Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	Further simplification (and in many cases: elimination) of non-adding-value reporting is needed.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	Further simplification is needed. It should not be required for SMEs (who deliver data to the big corporations, even though we are below all "official" thresholds) to hire expensive "ESG"-consultants" to be in compliance.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I disagree	No. Many of the remaining points are still not adding any value to companies and shareholders (and the environment), only to "ESG consultants".			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I disagree	No. Further simplification and elimination is needed.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I disagree	No. Further simplification and elimination is needed.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	No. Further simplification and elimination is needed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	No. Further simplification and elimination is needed.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	For both options, further simplification and elimination is needed.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Further simplification and elimination is needed.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	I disagree. Further simplification and elimination is needed.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	Further simplification and elimination is needed.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	22.E1.	Comments on deleted datapoints in ESRS E1	I disagree	Further simplification and elimination is needed.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	22.E2.	Comments on deleted datapoints in ESRS E2	I disagree	Further simplification and elimination is needed.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	22.E3.	Comments on deleted datapoints in ESRS E3	I disagree	Further simplification and elimination is needed.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	22.E4.	Comments on deleted datapoints in ESRS E4	I disagree	Further simplification and elimination is needed.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	22.E5.	Comments on deleted datapoints in ESRS E5	I disagree	Further simplification and elimination is needed.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	22.S1	Comments on deleted datapoints in ESRS S1	I disagree	Further simplification and elimination is needed.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	22.S2	Comments on deleted datapoints in ESRS S2	I disagree	Further simplification and elimination is needed.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	22.S3	Comments on deleted datapoints in ESRS S3	I disagree	Further simplification and elimination is needed.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	22.S4	Comments on deleted datapoints in ESRS S4	I disagree	Further simplification and elimination is needed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	22.G1	Comments on deleted datapoints in ESRS G1	I disagree	Further simplification and elimination is needed.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	Keep "may". In general, non-mandatory recommendations should be removed - including these.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	Keep "may". In general, non-mandatory recommendations should be removed - including these.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	The word "fair" is undefined makes no sense at all. Remove everything and all references related to a "fair representation".			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Most investors don't care. The benefits have to be larger than the cost.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	Does not make sense. There is only one planet.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The area is way to complex for anyone to create anything. Eliminate it.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	Simply eliminate Appendix B.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	The phrase "ecological integrity" makes no sense. Eliminate everything related to that.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	It's unclear how many genders there are. Just remove this.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	In the practical world, this has no effect. Simply remove it.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Simplify or eliminate.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Simplify or eliminate.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Simplify or eliminate.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Simplify or eliminate.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Simplify or eliminate.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Simplify or eliminate.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Simplify or eliminate.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Simplify or eliminate.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Simplify or eliminate.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Simplify or eliminate.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Simplify or eliminate.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Simplify or eliminate.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Simplify or eliminate.			
Survey	Net Zero Game ApS	Preparer (non-financial preparing a sustainability report)	Denmark	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		It's worrying how the Green Transition was hurried through the European Parliament just before the election. We blame the European Commission, the Eurocrats and the Members of the European Parliament.			
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	S4				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	I believe that the mandatory data point need to stay for all of the ESRS. Companies need to take actions.			
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Again companies need to take action. The transition plan is important.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Lisam Systems SA	Consultant (including software vendor)	Belgium	35.E1-1.	Do you agree with the amendments of this chapter?	I agree		E1	Disclosure Requirement E1-1 - Transition plan for climate change mitigation	
Survey	Independent	Other - please specify (required)	Netherlands	35.S1-15.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Gender Pay | To create actual insight in the glass ceiling/ sticky floor concept; use a split + a count as per DR S1-9 definition "Top management" and "Other staff". E.g. - 82% (6F, 123M) and +2% (253F, 286M) - state that undefined (X) is added to the smallest group (as per EBA guidelines).	S1	Disclosure Requirement S1-15 - Remuneration metrics	
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We still see a high amount of effort when it comes to tagging the report.			
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Option 2 is more feasable for companies			
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	22.S1	Comments on deleted datapoints in ESRS S1	I agree	I hope the description of the remaining data points is getting more detailled and easier to calculate for companies (f.ex. gender pay gap)			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	23.	Six datapoints exceptionally moved from “may” to “shall” In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, “may disclose” datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	25.	Emphasis on ESRS being a “fair presentation” reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	26.	Exception for Financial Institutions’ Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 (“when only setting intensity targets”), to disclose also the associated absolute values” (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking’s progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking’s employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	The amout of cases would increase for us			
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG’s approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-54) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a “human rights policy” in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary (“may”) datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	The gender pay gap is really hard to measure for many companies			
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	3S.ES-5.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	information on the expected durability is for machines really hard to measure	ES	Disclosure Requirement ES-5 - Resource outflows	
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	3S.S1-8.	Do you agree with the amendments of this chapter?	I agree		S1	Disclosure Requirement S1-8 - Diversity metrics	
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	3S.S1-11.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	In small companies the metrics about people with disabilities could disclose who of the employees has a disability - data security	S1	Disclosure Requirement S1-11 - Persons with disabilities	
Survey	Max Automation	Preparer (non-financial preparing a sustainability report)	Germany	3S.S1-14.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The familiy-related leave is a right for every employee in germany.	S1	Disclosure Requirement S1-14 - Work-life balance metrics	
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	It has been clarified and shortened (good). However, value-chain consideration is still too strong (e.g., small-med-sized companies w/ complex supply chains, or with very large suppliers ("Broadcom") will still have problems. Also, it should be further simplified such that the required AUDIT (validation) becomes simpler and CHEAPER.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	Still too complex and time-consuming. Also, adds unnecessarily to AUDIT cost! (These exploded in the last 2 years, meaning that less money may be spent on "real" ESG actions.) Also, mitigation and any forward-looking plan or assessment always bears the risk of being partially wrong. This leads to an endless debate of why things went the way they did though assessed / planned differently. Waste of time and money.			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Readability got somewhat better (which was drastically necessary). In total, the requirements on the statement are still too many / too complex. From that perspective, the use of appendices does not help much. A full ESRS report is not "elegantly" to read.			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	ESRS 2 indeed seems to having been revised massively. It got much shorter and more readable. However, its accumulated requirements are still too complex, given stakeholder and value-chain consideration and IRO-SBM interaction.			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Readability improved. However, complexity is still too high IN PARTICULAR since reporting-obligation threshold, BIGGER companies are not discriminated from VERY BIG companies. For the former, the accumulated necessary effort is still too high, too time-consuming and too costly.			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS2; E5	This refers to ESRS 2 GDR-A and ESRS E5, inflow / outflow. Together, they are completely unpractical for manufacturers of complex (B2) electronic products, specially very complex products sold in small numbers. Such products can easily contain 10,000s of complex electronic components that in turn can easily contain 1,000s of substances. And detailed analysis for the report is either close to impossibly or meaningless. The letter results from aggregation w/w. Then, risk is that total weight, e.g., of secondary material is vastly dominated by metal shelves, and not of more prcious components, HOWEVER, according to LCA, the latter components have a FOR HIGHER environmental impact (and often are not allowed to contain secondary material). That is, the answer can be misleading since it does not reflect any important components details. Suggest a massive revision here for complex electronic goods.			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	The simplifications make sense.			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	The simplification makes sense.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Option 2! That is very clear. Quantitative (financial) risk is ALWAYS an estimate, and in many cases a guesstimate. The value of option 1 is very doubtful. It can also be doubted that this leads to a "loss of information important to investors" at all.			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	It may have to be further simplified since for relevant industries, sector-specific requirements are not available, hence whatever expectations may never be fully met (or the expectations are wrong).			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	It seems appropriate. So far, we did not report on IFRS S1/2, hence this answer may be weighted less.			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	Deletions are ok - do not reverse (4th option above)! However, very high number and associated effort of datapoints. Effort still too high, with the associated risk that smaller companies cannot report w/o consulting firms ("if you need consulting, it is WRONG"). GDR-T IMO is still too complex.			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	About ok given that climate change is (still) the most relevant topic.			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	22.E2.	Comments on deleted datapoints in ESRS E2	I partially agree and partially disagree	Seems feasible. However, this has never been material for us.			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	22.E3.	Comments on deleted datapoints in ESRS E3	I partially agree and partially disagree	Seems ok-ish. Never been material for us, and I doubt that companies where this is material will have all the required data.			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	22.E4.	Comments on deleted datapoints in ESRS E4	I partially agree and partially disagree	Same as above			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	22.E5.	Comments on deleted datapoints in ESRS E5	I partially agree and partially disagree	See my earlier comment on inflow/outflow. This needs revision!			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	22.S1	Comments on deleted datapoints in ESRS S1	I partially agree and partially disagree	About ok. We have all this data…			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	22.S2	Comments on deleted datapoints in ESRS S2	I partially agree and partially disagree	Seems good!			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	22.S3	Comments on deleted datapoints in ESRS S3	I partially agree and partially disagree	Seems ok.			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	22.S4	Comments on deleted datapoints in ESRS S4	I partially agree and partially disagree	Seems ok.			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	22.G1	Comments on deleted datapoints in ESRS G1	I partially agree and partially disagree	Seems ok as well.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	23.	Six datapoints exceptionally moved from “may” to “shall” In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, “may disclose” datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Water - ok Biodiversity - I strongly doubt Business conduct - ok (good)			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	Only ESRS 2 makes sense. I doubt tat E2-4 makes sense since many companies will not have this information. Same E5-4 (see my earlier comments). E5-5 is ok (good).			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	25.	Emphasis on ESRS being a “fair presentation” reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	I agree with the "increased audit cost" argument stated above			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	26.	Exception for Financial Institutions’ Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 (“when only setting intensity targets”), to disclose also the associated absolute values” (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking’s progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	I agree w/ the opposers. Intensity targets always have the risk of shielding zero improvements. Also, I don't agree with the financing argument of the promoters. I also agree that ALL OTHERS also have to use/make complex assumptions/estimates, etc.			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking’s employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	Makes sense, and reliefs companies with small "sales" offices in many countries.			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	It makes sense. More relevant, even stricter reporting requirements will NEVER completely avoid that (too) low salaries are paid…			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG’s approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a “human rights policy” in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	It seems duplications and other less-relevant / irrelevant DRs have been removed which is good. IMO, the stongest area for SFDR-ESRS alignment is S1/S2, and a reasonable level of alignment seems to be achieved. No further comments here.			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	Where this topic may become more relevant (material) in the future, this shall be kept as simple as possible. IMO, most companies would not survive the same required effort for E2-E4 (E5), plus S2-S4, that they have to spend for E5.			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary (“may”) datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	This wil lbe problematic for several companies, and will not make the world a better place.			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	Deletion is ok, no severe risks re. SMEs seen			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	see above			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	see above			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	For us, E1 has outstanding relevance. As such, it is ok.			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	see above			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	see above			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	see above			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	see above			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	given relevance, this seems ok			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	see above			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	see above			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	see above			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	ok, and should not be too problematic for companies			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	ok			
Survey	Adtran Networks SE	Preparer (non-financial preparing a sustainability report)	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Maintain keeping it simple. The challenge is to give complex topics a seemingly simple framework. Reporting shall not necessitate consulting!			
Survey	Reclaim Finance	NGO	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The proposed amendments significantly simplify the DMA process, providing further flexibility to companies on their double materiality assessment while clarifying certain dimensions (including regarding the interactions between impacts, risk and opportunities and the integration of remediation measures). However, uncertainty remains on how materiality will be assessed, notably in the case of potential impact. Indeed, in the draft, the materiality of potential impacts would be considered depending on the scale and likelihood of this impact. In the case of negative impact, this means that highly negative consequences could be ignored if they are deemed unlikely. The Efrag somewhat acknowledges the risks this situation creates by stating that for potential human rights impact their scale take precedent over their likelihood. Yet, such a precautionary approach is also needed for other potential negative impacts, including when it comes to climate mitigation, pollution prevention and biodiversity preservation. We therefore call on the Efrag to extend the approach proposed for human rights to other impacts and adjust the draft to ensure all potential negative impacts are immediately considered material if they reach a certain scale.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Reclaim Finance	NGO	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	The new guidance could contribute to more relevant and comparable reporting. We also believe it could contribute to simplify implementation, as it settles some important question practitioners face while assessing materiality. We agree with the SRB members that supported the inclusion of this provision. We stress prevention and mitigation actions are taken into account in the proposed guidance, resulting in various disclosure requirements levels. On the contrary, we stress that enabling companies to consider topics as non-material as soon as they deploy significant mitigation or prevention actions simply hides risks and increase the chances of unaccounted negative impacts that would emerge due to mitigation failures.			
Survey	Reclaim Finance	NGO	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	Overall, these changes improved the readability of the ESRS and made them more user-friendly. They do not have significant consequences for the content and relevance of the ESRS.			
Survey	Reclaim Finance	NGO	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	If the proposed changes contributed to simplify the standard and make it more user-friendly, we note the removal details from topical standards give less visibility to these elements and therefore could result in lower quality reporting.			
Survey	Reclaim Finance	NGO	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	If the changes somewhat contribute to clarity - notably through relocating "shall" datapoints in the main body and adjusting application requirements - we stress that the complete removal of voluntary ("may") datapoints could on the contrary bring confusion, desincentivize ambitious reporting and reduce disclosure usefulness. Indeed, while the NIMG picks up some of the removed voluntary disclosure elements, its role is not the same as the voluntary data points and it does not seem to include all of these elements. We therefore suggest that the Efrag at least (i) fully reflects the former voluntary disclosures in the NIMG or an additional documents and (ii) makes clear that companies can go beyond the mandatory standard and build on these elements.			
Survey	Reclaim Finance	NGO	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Providing the changes made, NIMG are highly relevant to ESRS usability. NIMG should also play a role in fostering best practices, giving companies more information on how best to report on key datapoints. Yet, so far, NIMG are not sufficient to do so and largely serve as additional non-binding supplement to ARs. If time constraints may not enable to do this in the first version, updates could be planned to integrate best practices and guide companies further in applying the ESRS. Furthermore, NIMG could feature more prominently former voluntary datapoints.			
Survey	Reclaim Finance	NGO	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	We warn about the cumulative impact of the many proposed reliefs that will increase the differences between disclosures and reduce overall quality. They add new filters in the reporting process that are largely incoherent with the goal of the ESRS and could even add to complexity. We especially note that: - The relief "undue cost or effort" is an important change that implicitly adds a new layer to how companies determine which information to report. While materiality is tied to impact/risk, this new filter is solely tied to the burden of reporting for the company. Therefore, this is clearly incoherent with the spirit of the ESRS and a potential source of misreporting. We also stress it does not simply the process, but rather adds some complexity. - The relief that enables indefinite and unconditional exclusion of data from joint operations where the entity lacks "operational control" is not relevant and could significantly impact the quality and extent of reporting. Indeed, companies can most often obtain data through financial control or influence over the operator, even when they do not have operational control. Additionally, this could breach the "risk-based" approach integrated to the ESRS, whereby companies are to identify potential negative sources of impact/risk along their activities. Here again, the change could add to complexity. - The possibility to increasingly rely on estimates instead of direct data should be assessed carefully. This is likely to contribute to reduce data gathering by companies and related demands along their supply chains. If this could reduce the work necessary to carry out ESRS compliant reporting, it therefore also reduce its potential positive impact and the accuracy of reported data. The gathering of direct data should remain the preferred option, even when the use of proxies is authorized.			
Survey	Reclaim Finance	NGO	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	Providing the potential significant impact of this relief, we support the use of a time limit as proposed by Efrag SRB. Furthermore, we warn about the cumulative effect of other relief as highlighted in our response to question 17.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Reclaim Finance	NGO	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	The anticipated financial effects are essential to understand how/if a company is prepared. Sustainability risks are not considered in traditional risk management, and the proposed relief would contribute to maintain this situation and therefore to increase systemic risks. It will always be challenging to quantify the financial effects and many uncertainties will always remain, but this does mean that this data is not useful or relevant. If the Efrag can clarify that quantification enable for some degree of inaccuracy, companies should not be granted a full relief.			
Survey	Reclaim Finance	NGO	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	Paragraph 40-42 establish require disclosure of the minimum elements needed to understand potential financial effects of physical and transition risks. Further reductions would significantly impair the relevance of this information, especially for financial institutions. In fact, additional elements - for example, when relevant, the value of the infrastructure at risk - would be relevant and help financial institutions fulfill to their own prudential requirements.			
Survey	Reclaim Finance	NGO	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Interoperability should not come at the expense of the relevance and usefulness of the standard. Yet, several of the reliefs introduced to align with the IFRS on undue cost or effort and quantitative financial effects could have this effect. We especially note that the relief "undue cost or effort" is an important change that implicitly adds a new layer to how companies determine which information to report. While materiality is tied to impact/risk, this new filter is solely tied to the burden of reporting for the company. Therefore, this is clearly incoherent with the spirit of the ESRS and a potential source of misreporting. We also stress it does not simply the process, but rather adds some complexity.			
Survey	Reclaim Finance	NGO	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Reclaim Finance	NGO	France	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	Overall, we stress the Efrag proposal represents the maximum reduction in data point possible without abandoning the EU Green Deal objectives. The proposed reduction will significantly limit comparability between disclosures, through much lower granularity and less comparable reporting practices. It will also likely reduce data quality, as companies have much less guidance on what exactly to report and how. Yet, we acknowledge that it largely preserves the key datapoints related to EU objectives and necessary to understand impact and risk at company level. Any further reduction would no longer solely affect the granularity and quality of reporting, but would instead directly affect the scope of the ESRS and the information essential for EU objectives.			
Survey	Reclaim Finance	NGO	France	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	We stress the Efrag proposal represents the maximum reduction in data point possible without abandoning the EU Green Deal objectives. For E1, much like for the other topical ESRS, the proposed reduction will significantly limit comparability between disclosures, through much lower granularity and less comparable reporting practices. It will likely reduce data quality, as companies have much less guidance on what exactly to report and how. For example, there are much less data points detailing the design of decarbonization targets. Yet, many factors are crucial to understand their potential impact. In this situation, some companies will provide sufficient data but others simply won't. Similarly, datapoints on transition plans are critically insufficient to cover all of the needed aspects of transition planning and to enable a robust assessment of published plans. In this context, we stress that any further reduction would be detrimental to EU climate goals. We also note Efrag could provide additional guidance on specific points, notably decarbonization targets and transition plans, through NIMG and/or specific documents.			
Survey	Reclaim Finance	NGO	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We strongly agree with these exceptions. In the context of the removal of voluntary datapoints, the identified datapoints that are highly relevant to their respective topical standards should be preserved and become mandatory.			
Survey	Reclaim Finance	NGO	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Added mandatory datapoints usefully supplement preexisting ones and either contribute to consistency or are related to EU policy priorities.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Reclaim Finance	NGO	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	I interpret the CSRD as requiring fair presentation and see this change as a clarification rather than anything else. I believe it supports the various goals of the review.			
Survey	Reclaim Finance	NGO	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Reclaim Finance has conducted a detailed study of the decarbonisation targets of banks (see: https://reclaimfinance.org/site/en/the-need-to-redesign-bank-decarbonization-targets/) and is now studying investor targets. The NGO also contributed to work around target setting on insurers. This work notably showed that current methodologies - mostly based on PCAF - for financed emissions are largely inadequate, insofar as they are not related to real emission and not likely to induce change in the real economy. One of the key problem with the PCAF methodology for financed emissions is the use of an attribution factor that leads to change in financed emissions due to changes in the value of companies and not of their emissions. This problem is somewhat acknowledged by PCAF itself and by its users. Yet, solutions exist and other metrics used do not reproduce this mistake and are more directly linked to real-economy practices and emissions: 1) For all sectors except the fossil fuel sector, financial institutions can notably rely on physical intensity targets (or so-called "weighted average physical intensity" WAPI). This metric type is already used by many financial institutions. 2) For the fossil fuel sector, that must in time be phased-out, financial institutions can rely on targets to reduce the volume of financing. If emission targets are to be used, absolute targets should be used but they should not rely on attribution factors, and thus simply reflect the absolute emission of all companies financed in the sector. We therefore highlight that the question does not tackle the most pressing issue with financial institution target setting and emission reporting. We urge the Efrag to integrate in the ESRS requirement to: - Report on WAPI sectoral targets for all sector except fossil fuels; - Report on absolute emissions without attribution for fossil fuels.			
Survey	Reclaim Finance	NGO	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	Reductions are mainly made on data that can be relatively easily derived, and therefore disclosures still cover PAIs. The Efrag should abstain from further changes, notably considering the upcoming SFDR review.			
Survey	Reclaim Finance	NGO	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	The review creates a gap in term of metrics. The new AR should at least include references to key sources including the Science-Based Target Network (SBTN), Nature Positive initiative and the Taskforce on Nature-related Financial Disclosures (TNFD). Additional references could be made to initiatives and methodologies that can help fulfill The Kunming-Montreal Global Biodiversity Framework, for example the Forest500.			
Survey	Reclaim Finance	NGO	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We stress the Efrag proposal represents the maximum reduction in data point possible without abandoning the EU Green Deal objectives.			
Survey	Reclaim Finance	NGO	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We stress the Efrag proposal represents the maximum reduction in data point possible without abandoning the EU Green Deal objectives.			
Survey	Reclaim Finance	NGO	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We stress the Efrag proposal represents the maximum reduction in data point possible without abandoning the EU Green Deal objectives. Specific comments on E1 will be provided in section 3 of the consultation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Reclaim Finance	NGO	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		1) The proposal represent the maximum reduction in data points Overall, we stress the Efrag proposal represents the maximum reduction in data point possible without abandoning the EU Green Deal objectives. The proposed reduction will significantly limit comparability between disclosures, through much lower granularity and less comparable reporting practices. It will also likely reduce data quality, as companies have much less guidance on what exactly to report and how. Yet, we acknowledge that it largely preserves the key datapoints related to EU objectives and necessary to understand impact and risk at company level. Any further reduction would no longer solely affect the granularity and quality of reporting, but would instead directly affect the scope of the ESRS and the information essential for EU objectives. 2) Several of the reliefs introduced are concerning and could significantly reduce the usefulness of the standard If the overall proposal strikes a balance between simplification and data needs, the proposed reliefs introduce additional stages and filters that are likely to significantly reduce its usefulness. This is especially the case of the reliefs on "undue cost or effort" and operational control. 3) The standard remains inadequate for financial institutions and proposed specific references are not relevant The standard should be significantly adapted to be easily implementable by financial institutions and reflect the specificities of their activities. Yet, in the current standard the only adjustment proposed are: 1) Potential difference in requirements on target disclosures; 2) Reference to PCAF methodology on financed emissions. As explained in our response to question 26, this is largely inadequate.			
Survey	Reclaim Finance	NGO	France	35.E1-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree		E1	Disclosure Requirement E1-1 - Transition plan for climate change mitigation	
Survey	Quantis	Consultant (including software vendor)	Switzerland	35.S4-3.	Do you agree with the amendments of this chapter?	I disagree	In the version downloaded through the EFRAG's website, there is an error as §15 is noted as §14 (so §14 is present twice).	S4	Disclosure Requirement S4-3 - Actions and resources related to consumers and end-users	
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	More simplification would have been more appropriate, esp. in the S standards and G1			
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Infraserv GmbH und Co. Höchst KG	Preparer (non-financial preparing a sustainability report)	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Exponential Roadmap Initiative	Other - please specify (required)	Sweden	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Exponential Roadmap Initiative	Other - please specify (required)	Sweden	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Exponential Roadmap Initiative	Other - please specify (required)	Sweden	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E1	The exposure draft of ESRS E1 proposed removals of one or two illustrative table formats (eg in AR 60 and AR 64). We think these can usefully be retained in the NMIG. Such tables can be helpful for companies unsure about how to report information publicly, and promotion of these tables will support standardisation of reporting, which is helpful for stakeholders.			
Survey	Exponential Roadmap Initiative	Other - please specify (required)	Sweden	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	Exponential Roadmap Initiative	Other - please specify (required)	Sweden	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Exponential Roadmap Initiative	Other - please specify (required)	Sweden	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See comments in third section of this survey, on specific paragraphs. Specifically we advocate for retaining parts of E1-4 para 34. (c) and (d), E1-6 AR 46. (i), E1-7 AR 62 (d) and (e) and E1-7 AR 63 (e) and (f) (all references to the current version of ESRS E1 (rather than to the Exposure Draft).			
Survey	Exponential Roadmap Initiative	Other - please specify (required)	Sweden	35.E1-8.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	See comments in Excel template.	E1	Disclosure Requirement E1-8 - Gross Scopes 1, 2, 3 emissions	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Diskussion with auditors suspected			
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E1; E2; E5				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	pretty good, but still too much datapoints included			
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	absolutely !			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to ii)) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	Personally no experiences in such calcultion			
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	More info than 'unadjusted ratio' would be appreciated			
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Freudenberg FST GmbH	Preparer (non-financial preparing a sustainability report)	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		My biggest concern is still, that auditors (even at limited assurance) will come up with insignificant issues. Very little on experiences but a high interest on being received as important, becomes rapidly a dangerous mixture. Auditing should be opened for technicaly oriented service providers. (like ISO-certifiers).			
Survey	Kurtz Ersa	Preparer (non-financial preparing a sustainability report)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	Positive: Elimination of most detailed topics, merged topics are easier to report on, non-mandatory status leaves a certain amount of freedom			
Survey	Kurtz Ersa	Preparer (non-financial preparing a sustainability report)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Not sure which effect it will has, maybe excessive reporting on potential impacts.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Kurtz Ersa	Preparer (non-financial preparing a sustainability report)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	Approaches seem to support the avoidance of repetition across sections (we noticed) and a focus on the most relevant information within the sustainability statement. It makes it possible to incorporate additional information we classify as useful for our expected readers (e. g. topics from older reports) and to make use of a readerfriendly structure.			
Survey	Kurtz Ersa	Preparer (non-financial preparing a sustainability report)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	Elimination of topical specifications to GOV, SBM and IRO seems to make sense in order to avoid double reporting within the statement and fragmentation of topics in the report.			
Survey	Kurtz Ersa	Preparer (non-financial preparing a sustainability report)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	Mandatory application requirements below the respective Disclosure Requirement makes it more understandable and the information within the ESRS less fragmented.			
Survey	Kurtz Ersa	Preparer (non-financial preparing a sustainability report)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The relief regarding the reporting of partial scopes and the possibility to use estimates is very helpful. It should be mentioned that companies shall disclosure where these estimates come from/how they are calculated, for example in the statements appendix.			
Survey	Kurtz Ersa	Preparer (non-financial preparing a sustainability report)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	It makes it possible to disclosure the data we have at the moment and to show how we improve data quality step by step.			
Survey	Kurtz Ersa	Preparer (non-financial preparing a sustainability report)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	The current quality of data could be a bottleneck to measure financial effects. Too much uncertainties could result in useless information and burning of capacities. If improvements are made to address these problems companies might start reporting on a voluntary basis to stand out from the crowd.			
Survey	Kurtz Ersa	Preparer (non-financial preparing a sustainability report)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	It seems meaningful to provide the data that is still required in ESRS E1 but it might be difficult to provide meaningful data for all sites of a Group. Data on these data points might not be available at the moment and the calculation might take time.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Kurtz Ersa	Preparer (non-financial preparing a sustainability report)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	Not assessment possible			
Survey	Kurtz Ersa	Preparer (non-financial preparing a sustainability report)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Kurtz Ersa	Preparer (non-financial preparing a sustainability report)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	No additional burden			
Survey	Kurtz Ersa	Preparer (non-financial preparing a sustainability report)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree				
Survey	Kurtz Ersa	Preparer (non-financial preparing a sustainability report)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	At the moment the risk to report excessive information seems to be very high. And Stakeholders have limited time to filter for relevant information.			
Survey	Kurtz Ersa	Preparer (non-financial preparing a sustainability report)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Not assessment possible			
Survey	Kurtz Ersa	Preparer (non-financial preparing a sustainability report)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	No assessment possible, outcome/improvement unclear			
Survey	Kurtz Ersa	Preparer (non-financial preparing a sustainability report)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	No assessment possible			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Kurtz Ersa	Preparer (non-financial preparing a sustainability report)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	No assessment possible			
Survey	Kurtz Ersa	Preparer (non-financial preparing a sustainability report)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	Not sure but an alignment with SBTN and latest trends might help. Furthermore guidance for biodiversity and ecosystems-related targets would be welcomed.			
Survey	Kurtz Ersa	Preparer (non-financial preparing a sustainability report)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	No assessment possible			
Survey	Kurtz Ersa	Preparer (non-financial preparing a sustainability report)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	No assessment possible			
Survey	Kurtz Ersa	Preparer (non-financial preparing a sustainability report)	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Very long survey, hard to check and assess everything in detail.			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	This year, although non mandatory, we found that some of the points, repeated them selves. We thought that during our filling in of the points, there were repeated answers and they were a bit confusing, rendering the report a bit boring.			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	I agree with the comments from other members. Some of the point description was a bit confusing and for some smaller companies not easy to assess and see exactly what was required to be transcribed. It needs to be simplified and adequate for smaller companies to be motivated to fill in, even if non mandatory			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	I think it is quite important to simplify the requisites, mainly the way the reporting should be done. If it gets simpler, more people will be willing to present sustainability reports			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	Its very important to be able top link certain disclosures with requirements. In the begining the ESRS E1 could be confused when we read the other topical requirements and we would have repeated information			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	When eliminating the may disclose requirements, it simplifies the requirements that are mandatory and the simplifies the reading of the stantard. The previous document had a mixture of may and shall and sometimes that would be more confusing.			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E1	Regarding this quite big requirement, i think it seems more clarified and simpler to read. Must still read it more attentively, but seems easier to comprehend.			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	It is quite important to simplify metrics for the investments, etc. Sometimes it is difficult for a company like our (pastrey and bakery) to relate to some info mixing sustainable investments and all that data. Sometimes it is also difficult to be able to include some equipments that improve energy production, but cannont be included when relating to finantial investments, because there is no relation to NACE in some industries.			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	I think it is quite important to permit the exporsure of information if the company only considers certain scopes. When a company is begining to report its progress, most data is not available and when available, it is still being adapted to the more adequate assumptions. It is always a work in progress and sometimes the feedback it gets from its upstream chain is not always complete. Mainly when working with smaller companies and suppliers.			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Like i refered to before. Sometimes the information regarding sustainable improvements is not imediately and directly relatable to finances. Sometimes they are "only" improvements like adapting taps to reduce water usage etc and the real results are not immediately measurable. Does not mean that the company is not making a big effort to improve. Sometimes ii is also important to include some improvements that are not possible to be done, because they will interfere to a certain quality standard of a product, which would make the customer reject it.			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	One issue that sometimes makes it hard to disclose is certain aspects of business secrecy. Dependening on the markets, it the company reveals lots of information, when it is compared with other companies that do not need to disclose, that can be used for non correct business activities. Its important to consider that the info shall be disclosed, but with more care			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	There are businesses that do not have sectorial standards adapted to them. Frozen bakery and pastry. Its quite hard to relate to them when speaking of ESRS standards.			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	Very important to focus on important points and sometimes join very similar points into one point			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	22.E1.	Comments on deleted datapoints in ESRS E1	I agree	Very important to focus on important points and sometimes join very similar points into one point			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	22.E2.	Comments on deleted datapoints in ESRS E2	I agree	Very important to focus on important points and sometimes join very similar points into one point			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	22.E3.	Comments on deleted datapoints in ESRS E3	I agree	Very important to focus on important points and sometimes join very similar points into one point			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	22.E4.	Comments on deleted datapoints in ESRS E4	I agree	Very important to focus on important points and sometimes join very similar points into one point			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	22.E5.	Comments on deleted datapoints in ESRS E5	I agree	Very important to focus on important points and sometimes join very similar points into one point			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	22.S1	Comments on deleted datapoints in ESRS S1	I agree	Very important to focus on important points and sometimes join very similar points into one point			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	22.S2	Comments on deleted datapoints in ESRS S2	I agree	Very important to focus on important points and sometimes join very similar points into one point			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	22.S3	Comments on deleted datapoints in ESRS S3	I agree	Very important to focus on important points and sometimes join very similar points into one point			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	22.S4	Comments on deleted datapoints in ESRS S4	I agree	Very important to focus on important points and sometimes join very similar points into one point			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	22.G1	Comments on deleted datapoints in ESRS G1	I agree	Very important to focus on important points and sometimes join very similar points into one point			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Although all the topics are very important, the main issue sometimes, when speaking of the protection of biodiversity, is the importance that the customer gives to certain issues. When using sustainable raw materials, like cocoa, palm, etc, there is a natural increase in the price of the material and most customers want to use sustainable raw materials, but not pay the price. And a company must have some profits to be able to thrive and improve			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	good change			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	I think with these changes and with the companies that are pbligated to report this year, we will have more feedback on the difficulties and improvements necessary			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	It is still a very new subject and probably there are certaisn aspects that have not been correctly considered and evaluated. Only with some time we will be able to have a correct judgement			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	I agree as disclosure per country could give a more detailed idea of issues that are more or less relevant			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	yes, because sometimes there is a very big difference in wages and the is not considered an honest comparing between companies			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Apendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	na			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	Its not an easy topic to discuss			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	its still a work in progress			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	I agree that it is a start, but like with most standards, there will be more amendements as people start working with them			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	I agree that it is a start, but like with most standards, there will be more amendements as people start working with them			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	I agree that it is a start, but like with most standards, there will be more amendements as people start working with them			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	I agree that it is a start, but like with most standards, there will be more amendements as people start working with them			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	I agree that it is a start, but like with most standards, there will be more amendements as people start working with them			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	I agree that it is a start, but like with most standards, there will be more amendements as people start working with them			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	I agree that it is a start, but like with most standards, there will be more amendements as people start working with them			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	I agree that it is a start, but like with most standards, there will be more amendements as people start working with them			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	I agree that it is a start, but like with most standards, there will be more amendements as people start working with them			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	I agree that it is a start, but like with most standards, there will be more amendements as people start working with them			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	I agree that it is a start, but like with most standards, there will be more amendements as people start working with them			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	I agree that it is a start, but like with most standards, there will be more amendements as people start working with them			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	I agree that it is a start, but like with most standards, there will be more amendements as people start working with them			
Survey	PANIKE SA	Preparer (non-financial preparing a sustainability report)	Portugal	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		I agree that it is a start, but like with most standards, there will be more amendements as people start working with them			
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	While the proposed amendments to ESRS 1 aim to simplify the Double Materiality Assessment, I do not consider this objective sufficiently achieved. In my view, the intended balance between simplification and robustness has not been met. The explicit allowance for both bottom-up and top-down approaches is positive in principle, yet the absence of clearer methodological guidance leaves too much room for divergent interpretations and inconsistent practices. Key uncertainties are not resolved structurally but shifted to preparers under the new principle-based approach. This places even greater weight on ESRS 2, which I believe is likely to harm, rather than improve, auditability and comparability. Instead of clarifying the missing logical links between impacts, risks and opportunities (IROs), topics, and Minimum Disclosure Requirements (MDRs), the amendments merely rename "matters" as "topics" and allow reporting at either topic or subtopic level. This "do-it-yourself" logic may increase flexibility, but it reduces comparability and makes auditability more difficult. From my perspective, the better path would have been to strengthen the topical standards. That would have created greater precision and thereby improved auditability and comparability across undertakings. I welcome the stronger role of materiality as a general filter and the emphasis on fair presentation. However, these changes alone do not sufficiently reduce the documentation burden. The streamlining of the topic list is helpful, but aggregation and disaggregation rules remain unclear and risk leading to either overly abstract or excessively detailed disclosures. In conclusion, I do not believe that the amendments adequately simplify the DMA process. From my perspective, the ESRS remain deeply flawed at their foundation, and the current amendments represent little more than cosmetic adjustments rather than the structural improvements that would be required.			
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	I appreciate the intention behind the new guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in the assessment of materiality of negative impacts. However, I do not believe that these provisions actually contribute to simplification, relevance, or comparability. On the contrary, they introduce an additional layer of complexity that runs counter to the stated mandate of simplification. Instead of reducing divergence in practice, the new rules may create more uncertainty for preparers and reviewers. This is because the guidance effectively shifts the burden of interpretation onto companies, who must navigate subtle distinctions between gross and net views over multiple periods. While I recognize the effort to clarify an important implementation question, I do not believe the new guidance fulfils its purpose. It risks making the DMA more complicated rather than simpler, and therefore does not align with the simplification mandate set out for the ESRS revisions.			
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I disagree	While I acknowledge the intention to simplify the interaction between ESRS 2 and the topical standards, in my view the amendments do not achieve this goal. Instead of reducing complexity, they shift key structural uncertainties onto the preparers through a principles-based "do-it-yourself logic." By eliminating many topical specifications and relying more heavily on ESRS 2, the architecture places disproportionate weight on the General Disclosure Requirements. This approach increases discretion for preparers, but at the expense of auditability and comparability across undertakings. What was intended as simplification risks creating greater divergence in practice. In my opinion, a more effective and proportionate path would have been to strengthen the topical standards. This would have introduced greater precision, provided clearer guidance for preparers, and ensured that disclosures remain both consistent and comparable.			
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree				
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2				
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	In my view, the disclosure requirements on Anticipated Financial Effects (E1-11, formerly E1-9) should be removed entirely. First, the datapoints rely on a very high degree of estimation, forward-looking assumptions, and prognostic modelling. This inevitably introduces excessive uncertainty into reporting, and the results are neither robust nor auditable. Instead of improving decision-usefulness, the disclosures risk producing figures that are speculative and potentially misleading for users. Second, there is currently no widely accepted scientific methodology or internationally recognized standard for calculating such anticipated financial effects in a consistent way. Without a sound and harmonized methodological foundation, comparability across undertakings cannot be ensured. This undermines the objective of creating reliable and decision-useful sustainability reporting. For these reasons, I do not believe the requirements strike the right balance between reporting effort and users' needs. On the contrary, they add complexity and costs without generating reliable or comparable insights. I therefore recommend that this disclosure requirement be deleted in its entirety until a scientifically recognized and standardized methodology has been established.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	I strongly disagree. In my view, the decision to move six datapoints from "may disclose" to "shall disclose" is not compatible with the simplification mandate given to EFRAG. 1. Violation of the simplification mandate The political mandate was clear: to simplify and reduce reporting obligations. By upgrading optional datapoints into mandatory ones, this change runs directly counter to that objective and contradicts the political will behind the revision process. 2. Introduction of new obligations Even if EFRAG argues otherwise, these datapoints do create new obligations. Previously, they were not clearly required. By explicitly defining them as mandatory datapoints, they now impose additional reporting burdens that did not exist in practice before. 3. Unsound comparison of datapoints It is methodologically flawed to justify the addition of quantitative datapoints by comparing them to the removal of narrative datapoints. Narrative disclosures often build on existing texts, while quantitative datapoints require extensive manual effort, system changes, and significantly higher costs. The workload is therefore not comparable. 4. Insufficient and unconvincing rationale The reasoning provided is not sufficiently substantiated. In some cases, it is objectively questionable—for instance, the assumption that most companies already have a biodiversity strategy is not supported by evidence. 5. Impact on competitiveness By adding new mandatory datapoints without robust justification, the approach risks weakening the competitiveness of EU companies compared to non-EU peers who do not face equivalent obligations. For these reasons, I do not consider this approach acceptable. It undermines the simplification mandate, creates new burdens, and is not supported by sufficiently sound reasoning.			
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	I strongly disagree. In my view, the addition of four new datapoints is not compatible with the simplification mandate that EFRAG has received. 1.Violation of the simplification mandate The mandate was clear: not to increase reporting obligations. Adding new mandatory datapoints directly contradicts this objective and the political will for simplification. 2.Introduction of new obligations EFRAG argues that these datapoints do not add new requirements because they relate to existing disclosure objectives. I cannot agree. Datapoints such as percentage of total weight of raw material or microplastics were not previously required in this form. They clearly represent new, specific obligations. 3.Data availability and reliability The required information, such as the percentage of total weight of raw material, is in most cases simply not available. Companies do not collect data at this level of granularity, nor do recognized methodologies exist. This places undertakings before hurdles that are practically insurmountable. Where companies attempt to fill the gaps with estimates, such estimates cannot be considered reliable or robust due to the lack of underlying data. The resulting figures risk being speculative rather than decision-useful. 4.Unsound justification by comparison It is not a sound argument to offset new quantitative datapoints by reducing narrative datapoints. Narrative disclosures often build on existing information, while quantitative datapoints require new processes, significant manual work, and higher costs. The workload is therefore not comparable. 5.Competitiveness concerns Adding new highly demanding datapoints without a sound methodological foundation risks undermining the competitiveness of EU companies compared to peers elsewhere. For these reasons, I do not believe the inclusion of these datapoints is justified.			
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	As above			
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	As above			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The disclosure requirements on Anticipated Financial Effects (E1-11, formerly E1-9) should be removed entirely (as explained above).			
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Adding new mandatory datapoints directly contradicts the simplification mandate and the political will.			
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Adding new mandatory datapoints directly contradicts the simplification mandate and the political will.			
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Adding new mandatory datapoints directly contradicts the simplification mandate and the political will.			
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Adding new mandatory datapoints directly contradicts the simplification mandate and the political will.			
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	In my view, the disclosure requirements on non-employees should be deleted entirely, as they add disproportionate complexity without providing decision-useful information.			
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	I believe that value chain reporting should be limited to tier 1 in alignment with the CSDDD, as this ensures consistency while keeping the reporting scope manageable.			
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The disclosure requirements on payment practices should be deleted entirely, as they create an extremely high administrative burden without a proportionate benefit.			
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	NEW AG	Preparer (non-financial preparing a sustainability report)	Germany	35.ES-4.	Do you agree with the amendments of this chapter?	I disagree	The mandate was clear: not to increase reporting obligations. Adding new mandatory datapoints directly contradicts this objective and the political will for simplification. The required information, such as the percentage of total weight of raw material, is in most cases simply not available. Companies do not collect data at this level of granularity, nor do recognized methodologies exist. This places undertakings before hurdles that are practically insurmountable. Where companies attempt to fill the gaps with estimates, such estimates cannot be considered reliable or robust due to the lack of underlying data. The resulting figures risk being speculative rather than decision-useful.	ES	Disclosure Requirement ES-4 - Resource Inflows	
Survey	Q-Park BV	Preparer (non-financial preparing a sustainability report)	Netherlands	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	Q-Park BV	Preparer (non-financial preparing a sustainability report)	Netherlands	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	Q-Park BV	Preparer (non-financial preparing a sustainability report)	Netherlands	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				

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Survey	Q-Park BV	Preparer (non-financial preparing a sustainability report)	Netherlands	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Q-Park BV	Preparer (non-financial preparing a sustainability report)	Netherlands	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Q-Park BV	Preparer (non-financial preparing a sustainability report)	Netherlands	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	Q-Park BV	Preparer (non-financial preparing a sustainability report)	Netherlands	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I would like to skip this question and provide my feedback in Part 3				
Survey	Q-Park BV	Preparer (non-financial preparing a sustainability report)	Netherlands	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I would like to skip this question and provide my feedback in Part 3				
Survey	Q-Park BV	Preparer (non-financial preparing a sustainability report)	Netherlands	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				
Survey	Q-Park BV	Preparer (non-financial preparing a sustainability report)	Netherlands	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Q-Park BV	Preparer (non-financial preparing a sustainability report)	Netherlands	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I would like to skip this question and provide my feedback in Part 3				
Survey	Q-Park BV	Preparer (non-financial preparing a sustainability report)	Netherlands	35.E1-8.	Do you agree with the amendments of this chapter?	I disagree	We find the Scope 3 a senseless exercise as it is based on estimations, assumptions and other non-sensical data. In addition there is practically no level of influence possible to decrease the number. Second, being a full EU company, everything is regulated and organised, i.e. strengthening the climate impact goals on so many levels already. Third, most of the parties we work with are too small - we cannot ask them for any information et cetera. Why not loos the whole Scope 3 and focus on Scope 1 and Scope 2. Data that makes sense, is not build on assumptions nor benchmarks and actually influences our decision-making processes. When aiming to make things simple - Scope 3 gives me the most headache, the least support and makes no sense on an impact level.	E1	Disclosure Requirement E1-8 - Gross Scopes 1, 2, 3 emissions	
Survey	Transparentem	NGO	United States	35.S2-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The draft S2-1 addresses forced labor and trafficking in human beings only through generic policy statements (paragraphs 11-12), missing the specific recruitment practices that often create forced labor conditions. This creates a critical policy gap. Specific addition needed: Add new paragraph to S2-1: "The undertaking shall state whether its policies explicitly require that workers do not pay recruitment fees or related costs for their employment, in line with ILO guidance, and establish procedures for full and timely reimbursement when such payments are identified." Rationale: 1.ILO Authority: The International Labour Organization has established clear guidance that workers should not pay recruitment fees, providing authoritative international standards for policy requirements. 2.Materiality: Recruitment fee practices create significant business risks. Workers paying for jobs indicates fraudulent recruitment—a primary forced labor pathway generating legal, reputational, and reputational risk, including having companies being impacted by forced labor import bans, having to pay back millions of dollars in recruitment fee reimbursements, and drops in share prices and revenue 3.Implementation practicality: This is a policy-level requirement (not metrics), addressing EFRAG's simplification objectives while covering material risk. Companies can reasonably establish and communicate such policies. 4.Global alignment: GRI is developing labor standards (finalizing 2025-2026) specifically including "fair recruitment" requirements. EFRAG's omission creates unnecessary framework divergence. 5.Internal consistency: Other severe labor violations receive policy attention in S2-1. Recruitment practices—as a forced labor pathway—warrant equivalent treatment. This addition maintains the simplified policy approach while ensuring coverage of concrete practices that indicate forced labor risk, supporting both stakeholder information needs and EFRAG's objective of relevant, decision-useful reporting.	S2	Disclosure Requirement S2-1 - Policies related to value chain workers	
Survey	Transparentem	NGO	United States	35.S2-3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	S2-3 creates a critical implementation gap by requiring disclosure of actions to "prevent, mitigate and remediate material negative impacts on value chain workers" without specifically addressing forced labor, despite forced labor being explicitly mentioned in the policy requirements (S2-1, paragraph 11). The inconsistency problem: Companies must state whether they have forced labor policies (S2-1) but aren't required to describe concrete actions to address this severe violation (S2-3). This makes the policy requirement meaningless in practice, as companies can claim forced labor policies but do not have to demonstrate implementation. Internal framework contradiction: S2-3 requires specific action disclosures for other worker rights issues, but one of the most severe labor violations (forced labor) receives only generic treatment. This undermines the standard's logical structure and effectiveness. Comparison within S2: Other disclosure requirements demonstrate EFRAG expects substantive action reporting: •Grievance mechanisms require effectiveness assessments •Human rights incidents must be disclosed •Worker engagement processes require detailed description •Remediation approaches need explanation Yet forced labor gets no specific action guidance. Recommended fix: Add application requirement or specific paragraph requiring disclosure of actions taken to prevent, identify, and remediate forced labor in value chains, consistent with the policy requirements already established in S2-1. This addresses an obvious gap where EFRAG determined forced labor warranted policy disclosure but not action disclosure.	S2	Disclosure Requirement S2-3 - Actions and resources related to value chain workers	
Survey	United Media Services	Preparer (non-financial preparing a sustainability report)	Romania	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	Simplification of the Double Materiality Assessment is welcome. For smaller companies and value-chain actors, clear and practical guidance is essential. At the same time, maintaining comparability between companies is important so that DMA does not become too subjective.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	United Media Services	Preparer (non-financial preparing a sustainability report)	Romania	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	Improved readability and use of summaries will help stakeholders who are not technical experts to access sustainability information. This is especially relevant for SMEs and service providers, who need ESG information in a concise format.			
Survey	United Media Services	Preparer (non-financial preparing a sustainability report)	Romania	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	The reliefs, especially undue cost/effort and flexibility on data quality, are critical for companies indirectly impacted by CSRD, such as suppliers. They make the reporting more realistic without undermining transparency.			
Survey	United Media Services	Preparer (non-financial preparing a sustainability report)	Romania	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Alignment with IFRS S1/S2 is essential for global companies and their supply chains. Enhancing interoperability reduces duplication of effort and supports international comparability.			
Survey	United Media Services	Preparer (non-financial preparing a sustainability report)	Romania	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	United Media Services	Preparer (non-financial preparing a sustainability report)	Romania	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	The reduction of datapoints (-57% mandatory, -100% voluntary) is very positive. It reduces the burden for companies indirectly impacted by CSRD, while keeping the focus on material and useful information. This makes reporting more practical for SMEs and value-chain actors.			
Survey	United Media Services	Preparer (non-financial preparing a sustainability report)	Romania	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	The amended ESRS strike a good balance between simplification and retaining the core objectives of the Green Deal. The substantial reduction of datapoints, improved clarity and readability, and elimination of voluntary disclosures make the standards more practical for companies indirectly impacted by CSRD, such as SMEs and value-chain partners. These changes will help reduce administrative burden while keeping reporting relevant and comparable for stakeholders.			
Survey	United Media Services	Preparer (non-financial preparing a sustainability report)	Romania	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	United Media Services	Preparer (non-financial preparing a sustainability report)	Romania	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	United Media Services	Preparer (non-financial preparing a sustainability report)	Romania	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	United Media Services	Preparer (non-financial preparing a sustainability report)	Romania	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	United Media Services	Preparer (non-financial preparing a sustainability report)	Romania	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	United Media Services	Preparer (non-financial preparing a sustainability report)	Romania	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	United Media Services	Preparer (non-financial preparing a sustainability report)	Romania	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	United Media Services	Preparer (non-financial preparing a sustainability report)	Romania	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	United Media Services	Preparer (non-financial preparing a sustainability report)	Romania	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

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Survey	United Media Services	Preparer (non-financial preparing a sustainability report)	Romania	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	United Media Services	Preparer (non-financial preparing a sustainability report)	Romania	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	United Media Services	Preparer (non-financial preparing a sustainability report)	Romania	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	United Media Services	Preparer (non-financial preparing a sustainability report)	Romania	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		As a company indirectly impacted by CSRD, we value the simplification process which makes sustainability reporting more achievable for SMEs and value-chain partners.			
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree					
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree					
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	how to report' guidelines (methodology) and examples of possible items in structured way is very useful.			
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree					
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	Allowing an undertaking to report metrics with a partial scope of calculation is very helpful in reducing the administrative burden and effort.			
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2					
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree					

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	SBM-3			
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	22.E1.	Comments on deleted datapoints in ESRS E1	I agree	E1-9			
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	22.E2.	Comments on deleted datapoints in ESRS E2	I agree	E2-6			
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	22.E3.	Comments on deleted datapoints in ESRS E3	I agree	E3-5			
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	22.E4.	Comments on deleted datapoints in ESRS E4	I agree	E4-6			
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	22.E5.	Comments on deleted datapoints in ESRS E5	I agree	E5-6			
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CEZ	Preparer (non-financial preparing a sustainability report)	Czechia	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Cleerit	Consultant (including software vendor)	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The rational to promot a reporting more close to the management view does not ensure progress on CSRD (29): "The fitness check on corporate reporting shows that those two perspectives are often not well understood or applied. It is therefore necessary to clarify that undertakings should consider each materiality perspective in its own right". By merging and presenting information regarding IROs on topical level - and thereby mixing negative and positive impacts, risks and opportunities - the presentation of information specificially related to one of the two perspectives can be aggregated, netted and obscured. The suggested wording is intended to emphasize that aggregation is only allowed by type of IRO family, to avoid netted outcomes. Also, the rationale for para. 66 is "Clarify that materiality is assessed at IRO level". It is then logical that all IROs cannot be merged into reporting on topic level only. And in para. 113 it is stated that "the undertaking shall make explicit which policies, actions and targets relate to which material impacts, risks, or opportunities, in accordance with paragraph 22". It's not possible to map PATs to "which material" IROs, if they are all aggregated and presented only at topic level. Suggested wording: "Information shall be presented either for groups of negative impacts, positive impacts, risks or opportunities levels, or at individual negative impact, positive impact, risk or opportunity level, depending on"			
Survey	Cleerit	Consultant (including software vendor)	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Cleerit	Consultant (including software vendor)	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Cleerit	Consultant (including software vendor)	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The rationale to merged all provisions if the undertaking has not adopted PAT, will complicate reporting for companies managing on IRO or groups of IROs level. Very often there are actions but not articulated policies and targets for example. So the option to separate policies, actions and targets is needed.			
Survey	Cleerit	Consultant (including software vendor)	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Cleerit	Consultant (including software vendor)	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	Cleerit	Consultant (including software vendor)	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	Cleerit	Consultant (including software vendor)	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The obvious choice is Option 1 since this is a key information for investors, a key component of the Green Deal (to redirect capital) and a key prerequisite to help companies to increase awareness and resilience. Given the phase-in provisions, the option to report either single amounts or ranges (AR 18 for para. 23), and the possibility to explain why the information has not been provided, the burden is proportionate. In addition, there is now AR 15 for para. 23. In preparing disclosures about its anticipated financial effects, an undertaking shall use reasonable and supportable information available to it at the reporting date without undue cost or effort (see paragraphs 88, 89 and 90 of ESRS 1). I disagree with the choice not to provide the option to state the "lack of skills" as a reason to omit quantitative information. It would be better to let the preparer be transparent and provide the real reason. The explanation "when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects" could potentially be used too broadly and also disguise a lack of skills as a reason to omit quantitative information. Transparency would be enhanced if the two choices were provided and accounted for.			
Survey	Cleerit	Consultant (including software vendor)	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Cleerit	Consultant (including software vendor)	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Cleerit	Consultant (including software vendor)	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Cleerit	Consultant (including software vendor)	France	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	The rationale to merged all provisions if the undertaking has not adopted PAT, will complicate reporting for companies managing on IRO or groups of IROs level. Very often there are actions but not articulated policies and targets for example. So the option to separate policies, actions and targets is needed. 34f, "if relevant, whether and how the undertaking makes the policy available to potentially affected stakeholders, and stakeholders who need to help implement it" should not be deleted. If an affected stakeholder is not able to understand if the policy is effectively communication, how can it consider that the policy can be respected? CSRD explicitly spells out that an accountability deficit could lead to lower levels of citizen trust in businesses, which in turn could have negative impacts on the efficient functioning of the social market economy (14), and that (18) disclosing on sustainability matters is justified by concerns about the impacts and accountability of the undertaking (18). This information should not be deleted: "(e) information regarding the progress of key actions underway and disclosed in prior periods and, if relevant, key actions taken in the reporting year ". Not disclosing on progress, especially for policy goals and key actions without metrics (which is a very common scenario), would result in descreased accountability and increased risk of greenwashing. Just reporting action information, without referens to qualitative progress and/or success, does not give enough information. You can take action, but if the intended outcome is not there, information on the action is much less meaningful. The rationale to reduce granularity is not a priority for this information.			
Survey	Cleerit	Consultant (including software vendor)	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Cleerit	Consultant (including software vendor)	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Cleerit	Consultant (including software vendor)	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	It would be useful to add an explanation detailing the differences between a faire presentation and compliance reporting framework.			
Survey	Cleerit	Consultant (including software vendor)	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Communique	Consultant (including software vendor)	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	DMA should enable an explanation of where a topic is material to only 1 part of a company/market/subsidiary and then allow that topic to be 'limited' for disclosure and assurance purposes. This is particularly important for 'social IROs' in S1 and S2. Example is retail employees being harassed by members of the public is a specific UK-only issue. UK subsidiary is outside EU-owned parent and therefore while the reporting company can recognize the issue as material, it does not need to disclose as part of parent company report.			
Survey	Communique	Consultant (including software vendor)	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	the explanation of the changes and the changes make the process more complex, not less! if there is prior regulation/reporting requirements like for H&S, this should be excluded from CSRD not layered on top.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Communique	Consultant (including software vendor)	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	these changes will not help to streamline the audit process. it is not apparent that the proposal will simplify the disclosure structure. in E1 for example, there is no 'flow' for the narrative DPs - the DP numbering jumps from one aspect to another and back again. It would be very helpful to show a structure for an ESRS statement which would clarify what the reporting company should state and what the auditor can expect to see. We are interating this at present and it is very time intensive.			
Survey	Communique	Consultant (including software vendor)	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Please create a checklist and flow chart to accompany the words - words are too open to interpretation			
Survey	Communique	Consultant (including software vendor)	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	S1 has proved particularly problematic for HR teams to respond to. The language used does not align with their current reporting requirements and other standards. A lot could be done to address this.			
Survey	Communique	Consultant (including software vendor)	United Kingdom	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E1; S1; S2	ensure reference and language alignment to existing standards and regulations such as H&S, packaging disclosures, GRI, TCFD etc			
Survey	Communique	Consultant (including software vendor)	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	These are very welcome, but still leave open some questions: on point 7 (acquisitions/disposals relief) - how does that align with GHG protocol for carbon accounting and rebaselining?			
Survey	Communique	Consultant (including software vendor)	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	a time limit will encourage continuous improvement, but it must be realistic for preparers to achieve			
Survey	Communique	Consultant (including software vendor)	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	if investors are particularly concerned about the risk to their investment in a company, they can ask for private clarification			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Communique	Consultant (including software vendor)	United Kingdom	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Communique	Consultant (including software vendor)	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Communique	Consultant (including software vendor)	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Communique	Consultant (including software vendor)	United Kingdom	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Communique	Consultant (including software vendor)	United Kingdom	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	still many terms that need careful definition or reference to other standards and regulations ie critical and strategic raw materials			
Survey	Communique	Consultant (including software vendor)	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	remains open to interpretation between the preparer and auditor			
Survey	Communique	Consultant (including software vendor)	United Kingdom	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	Communique	Consultant (including software vendor)	United Kingdom	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	although more disclosure, the clarification is simpler			
Survey	Communique	Consultant (including software vendor)	United Kingdom	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Communique	Consultant (including software vendor)	United Kingdom	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	still way too complex!			
Survey	Communique	Consultant (including software vendor)	United Kingdom	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Communique	Consultant (including software vendor)	United Kingdom	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Communique	Consultant (including software vendor)	United Kingdom	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Communique	Consultant (including software vendor)	United Kingdom	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Communique	Consultant (including software vendor)	United Kingdom	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I disagree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I would like to skip this question and provide my feedback in Part 3				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

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Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Techko, spol. s r.o.	User (analyst, data provider, rating agency, etc.)	Czechia	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	Will need a time limit imposed for good practice .			
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	A lot of companys were not doing the voluntary declarations anyway			
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Water usage of key climate importance			
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Micro plastics will be tricky to calculate putting a big burden on business			
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Need full transparency			
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	Don't fully understand what you are saying			
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

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Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Salutary Ltd	Preparer (non-financial preparing a sustainability report)	Ireland	3S.E3-3.	Do you agree with the amendments of this chapter?	I disagree	Big burden on business	E3	Disclosure Requirement E3-3 - Targets related to water	
Survey	University of Gdańsk	Academia	Poland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree				
Survey	University of Gdańsk	Academia	Poland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	University of Gdańsk	Academia	Poland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	University of Gdańsk	Academia	Poland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	University of Gdańsk	Academia	Poland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	University of Gdańsk	Academia	Poland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1				
Survey	University of Gdańsk	Academia	Poland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	University of Gdańsk	Academia	Poland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	University of Gdańsk	Academia	Poland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	University of Gdańsk	Academia	Poland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	University of Gdańsk	Academia	Poland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	University of Gdańsk	Academia	Poland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	University of Gdańsk	Academia	Poland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	University of Gdańsk	Academia	Poland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	University of Gdańsk	Academia	Poland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	University of Gdańsk	Academia	Poland	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	University of Gdańsk	Academia	Poland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	University of Gdańsk	Academia	Poland	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	University of Gdańsk	Academia	Poland	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	University of Gdańsk	Academia	Poland	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	University of Gdańsk	Academia	Poland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree				
Survey	University of Gdańsk	Academia	Poland	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	University of Gdańsk	Academia	Poland	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	University of Gdańsk	Academia	Poland	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	University of Gdańsk	Academia	Poland	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	University of Gdańsk	Academia	Poland	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	University of Gdańsk	Academia	Poland	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	University of Gdańsk	Academia	Poland	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	University of Gdańsk	Academia	Poland	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	University of Gdańsk	Academia	Poland	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	University of Gdańsk	Academia	Poland	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	University of Gdańsk	Academia	Poland	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	University of Gdańsk	Academia	Poland	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	University of Gdańsk	Academia	Poland	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	University of Gdańsk	Academia	Poland	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	improvements: information materiality, granularity;			
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	gross net not sufficiently clarified			
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	positive that all AR are now part of the main body. but what is the purpose of the NMIG? And the relation to other Implementation Guidance? If there are important aspects, they should be part of the main document or be moved to specific IGs.			
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Readiness of companies will be limited to provide quantification of financial effects, therefore option 2 to be preferred			
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree				
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Weight is not a meaningful metric especially for non-manufacturing companies			
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	We would prefer the adjusted pay gap to be mandatory as it is more meaningful			
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	gross/net still not fully clear			
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	unclear what is meant with resilience analysis - better instruction needed			
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	sector-specific guidance would be helpful			
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	A1 Telekom Austria Group	Preparer (non-financial preparing a sustainability report)	Austria	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Augusto Cocchioni – Independent Strategic Advisor on Participatory Governance and Integrated Sustainability	Other - please specify (required)	Hungary	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		This contribution refers in particular to ESRS S1 – Own Workforce and ESRS 2 – GOV-1 (Governance), where indicators on workers' participation could be introduced. I welcome EFRAG's effort to simplify the ESRS while preserving decision-useful information. However, a material imbalance remains between the environmental pillar (E) — rich in comparable KPIs — and the social pillar (S), where disclosures are largely process-oriented and narrative. In particular, the quality and effectiveness of workers' participation in governance and decision-making are not measured. The CSRD already requires companies to inform and discuss sustainability information with workers' representatives, and to communicate their opinion to the relevant bodies (Article 19a(5) and Article 29a(6)). Italy's Legislative Decree 125/2024 mirrors this obligation (Article 3(7); Article 4(9)). It is therefore consistent to reflect this legal basis in the ESRS through proportionate, "light" indicators that do not increase burden but enhance the credibility of the social dimension. I recommend adding to S1 and GOV-1 a minimal set of indicators, applicable "if material" and proportionate for SMEs (L-SME and VSME): 1. Participation in governance: presence of workers' representatives on administrative/supervisory bodies; % of seats held (where provided by national law). 2. Consultation on strategic decisions: % of strategic decisions (e.g., transition plans, ESG investments, restructurings) subject to prior consultation/information. 3. Social dialogue functioning: number of annual meetings with workers' representatives on ESG topics; existence of joint committees or agreements on sustainability governance. 4. Outcomes (voluntary for SMEs): changes in turnover, accidents, absenteeism, or disputes following participatory practices. These indicators would keep simplification intact while ensuring a balanced S vs. E approach and better alignment with the CSRD's participatory spirit.			
Survey	Augusto Cocchioni – Independent Strategic Advisor on Participatory Governance and Integrated Sustainability	Other - please specify (required)	Hungary	35.ESRS2_GOV-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	I recommend adding proportionate KPIs on workers' representation in boards or supervisory bodies, to align with CSRD Articles 19a(5) and 29a(6).	ESRS2	GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	
Survey	Augusto Cocchioni – Independent Strategic Advisor on Participatory Governance and Integrated Sustainability	Other - please specify (required)	Hungary	35.S1-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	S1-2 should go beyond describing engagement processes and also capture the effectiveness of workers' participation. I recommend introducing proportionate KPIs such as % of strategic decisions subject to consultation and number of annual ESG-related meetings with workers' representatives. S1-7 covers bargaining coverage and social dialogue, but does not measure outcomes. I suggest adding light indicators (e.g. existence of joint committees on sustainability, outcomes in turnover, safety or absenteeism linked to participatory practices).	S1	Disclosure Requirement S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.ESRS2_BP-1.	Do you agree with the amendments of this chapter?	I agree		ESRS2	BP-1 - Basis for the preparation of the sustainability statement	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.ESRS2_BP-2.	Do you agree with the amendments of this chapter?	I agree		ESRS2	BP-2 - Specific information if the undertaking uses phasing-in options	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.ESRS2_GOV-1.	Do you agree with the amendments of this chapter?	I agree		ESRS2	GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.ESRS2_GOV-2.	Do you agree with the amendments of this chapter?	I agree		ESRS2	GOV-2 - Integration of sustainability-related performance in incentive schemes	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.ESRS2_GOV-3.	Do you agree with the amendments of this chapter?	I agree		ESRS2	GOV-3 - Statement on due diligence	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.ESRS2_GOV-4.	Do you agree with the amendments of this chapter?	I agree		ESRS2	GOV-4 - Risk management and internal controls over sustainability reporting	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.ESRS2_SBM-1.	Do you agree with the amendments of this chapter?	I agree		ESRS2	SBM-1 - Strategy, business model and value chain	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.ESRS2_SBM-2.	Do you agree with the amendments of this chapter?	I agree		ESRS2	SBM-2 - Interests and views of stakeholders	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.ESRS2_SBM-3.	Do you agree with the amendments of this chapter?	I agree		ESRS2	SBM-3 - Interaction of material impacts risks and opportunities with strategy and business model, and financial effects	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.ESRS2_IRO-1.	Do you agree with the amendments of this chapter?	I agree		ESRS2	IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.ESRS2_IRO-2.	Do you agree with the amendments of this chapter?	I agree		ESRS2	IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.ESRS2_GDR-PAMT.	Do you agree with the amendments of this chapter?	I agree		ESRS2	General Disclosure Requirements for Policies, Actions, Metrics and Targets	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.ESRS2_GDR-P.	Do you agree with the amendments of this chapter?	I agree		ESRS2	General Disclosure Requirement for policies - GDR-P	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.ESRS2_GDR-A.	Do you agree with the amendments of this chapter?	I agree		ESRS2	General Disclosure Requirement for actions and resources - GDR-A	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.ESRS2_GDR-M.	Do you agree with the amendments of this chapter?	I agree		ESRS2	General Disclosure Requirement for metrics - GDR-M	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.ESRS2_GDR-T.	Do you agree with the amendments of this chapter?	I agree		ESRS2	General Disclosure Requirement for targets - GDR-T	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.E1-4.	Do you agree with the amendments of this chapter?	I agree		E1	Disclosure Requirement E1-4 - Policies related to climate change	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.E1-5.	Do you agree with the amendments of this chapter?	I agree		E1	Disclosure Requirement E1-5 - Actions and resources in relation to climate change	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.E1-6.	Do you agree with the amendments of this chapter?	I agree		E1	Disclosure Requirement E1-6 - Targets related to climate change	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.E1-7.	Do you agree with the amendments of this chapter?	I agree		E1	Disclosure Requirement E1-7 - Energy consumption and mix	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.E3-1.	Do you agree with the amendments of this chapter?	I agree		E3	Disclosure Requirement E3-1 - Policies related to water	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.E3-2.	Do you agree with the amendments of this chapter?	I agree		E3	Disclosure Requirement E3-2 - Actions and resources related to water	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.E5-1.	Do you agree with the amendments of this chapter?	I agree		E5	Disclosure Requirement E5-1 - Policies related to resource use and circular economy	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.ES-2.	Do you agree with the amendments of this chapter?	I agree		ES	Disclosure Requirement ES-2 - Actions and resources related to resource use and circular economy	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.ES-3.	Do you agree with the amendments of this chapter?	I agree		ES	Disclosure Requirement ES-3 - Targets related to resource use and circular economy	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.S1-1.	Do you agree with the amendments of this chapter?	I agree		S1	Disclosure Requirement S1-1 - Policies related to Own workforce	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.S1-3.	Do you agree with the amendments of this chapter?	I agree		S1	Disclosure Requirement S1-3 - Actions and Resources related to Own workforce	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.S1-4.	Do you agree with the amendments of this chapter?	I agree		S1	Disclosure Requirement S1-4 - Targets related to Own Workforce	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.S3-1.	Do you agree with the amendments of this chapter?	I agree		S3	Disclosure Requirement S3-1 - Policies related to affected communities	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.S3-2.	Do you agree with the amendments of this chapter?	I agree		S3	Disclosure Requirement S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.S3-3.	Do you agree with the amendments of this chapter?	I agree		S3	Disclosure Requirement S3-3 - Actions and resources related to affected communities	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.S3-4.	Do you agree with the amendments of this chapter?	I agree		S3	Disclosure Requirement S3-4 - Targets related to affected communities	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.S4-1.	Do you agree with the amendments of this chapter?	I agree		S4	Disclosure Requirement S4-1 - Policies related to consumers and end-users	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.S4-2.	Do you agree with the amendments of this chapter?	I agree		S4	Disclosure Requirement S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.S4-3.	Do you agree with the amendments of this chapter?	I agree		S4	Disclosure Requirement S4-3 - Actions and resources related to consumers and end-users	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.S4-4.	Do you agree with the amendments of this chapter?	I agree		S4	Disclosure Requirement S4-4 - Targets related to consumers and end-users	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.G1-1.	Do you agree with the amendments of this chapter?	I agree		G1	Disclosure Requirement G1-1 - Policies related to business conduct	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.G1-3.	Do you agree with the amendments of this chapter?	I agree		G1	Disclosure Requirement G1-3 - Targets related to business conduct	
Survey	emeis	Preparer (non-financial preparing a sustainability report)	France	3S.G1-4.	Do you agree with the amendments of this chapter?	I agree		G1	Disclosure Requirement G1-4 - Metrics related to Incidents of corruption or bribery	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Upright	User (analyst, data provider, rating agency, etc.)	Finland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The majority of the changes in Chapter 3 related to DMA are very welcome. One potentially problematic point is the option to choose between bottom-up or top-down approaches: While the bottom-up approach can be labor-intensive, it is fully feasible with modern technology. As one example, Upright's DMA data engine goes through all topics (prev. sust.matters) and identifies IROs using scientific articles without manual work. However, without such technology, the bottom-up approach may indeed be demanding. On the other hand, the top-down approach carries risks. Companies may rely on quick, subjective judgments. For example, if value chain data is lacking and costly to obtain, a company might conclude that "value chain topics probably do not result in material IROs." Such decisions reduce transparency and accuracy. Auditors may also struggle to challenge companies, since the top-down approach is allowed under current guidance. This risk is further heightened when combined with the 'undue cost or effort' clause. Balancing pros and cons (reduced workload vs. risk of poor quality DMAs) and considering practical viewpoints, Upright suggests: ESRS should require that, when using a top-down approach, companies need to gather sufficient evidence before deeming a topic non-material. Practical examples of what "sufficient evidence" could look like, without compromising too much on efficiency gains and reverting to the rebuttable presumption rule of the original ESRS draft: 1.Using available data, tools, technology, and proxies for a quick overview before excluding topics. 2.If there are any indications that a topic could be material, performing light spot checks before confirming non-materiality. 3.Explicitly stating that the 'undue cost or effort' clause cannot justify omitting IROs very likely to be material (e.g., by industry or geography). I.e., cannot serve as a means to conceal material IROs the company prefers not to disclose. 4.Longer-term: introduce sector-specific recommendations (see answer in "Any other comments").			
Survey	Upright	User (analyst, data provider, rating agency, etc.)	Finland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	From Upright's point of view, the new gross/net rule creates a reporting paradox that could mislead investors and other end-users of sustainability statements. Identified problems: - Flawed comparability - Misleading risk perception - Skewed incentives - Lack of transparency A straightforward "gross basis for all" approach would be far clearer and more useful for all stakeholders. More details, please see: https://www.uprightproject.com/blog/upright-stance-on-esrs-draft/ GROSS VS. NET: ASSESSMENT OF COST-SAVINGS The gross vs. net issue has been unclear, creating extra work for reporters. Greater clarity would definitely bring cost savings. In addition to the cost savings gained from increased clarity, some have argued that the latest recommendations in ESRS draft (gross/net approach) would also deliver significant cost reductions compared to Upright's proposed "gross basis for all" approach. Upright's perspective differs: In practice, only a limited number of impacts would fall under the "net" category, where mitigation actions make them permanently non-material. - Some environmental impacts might qualify, but for example potential human rights and governance impacts are unlikely to do so. This is partly because the "severity takes precedence" rule applies to negative human rights impacts. - In addition, negative human rights impacts are often complex and occur deep in value chains, making permanent mitigation very difficult. Overall, Upright believes there are very few cases where mitigation activities would make an issue non-material. In other words, the number of reporters who could significantly reduce their reporting workload because of this rule is small. This should, of course, be validated as part of EFRAG's ongoing gross vs. net discussions with reporters. By contrast, clear and consistent rules would make reporting more straightforward and lead to cost savings — without the aforementioned downsides of the gross/net approach, which risks reducing overall reporting quality.			
Survey	Upright	User (analyst, data provider, rating agency, etc.)	Finland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Upright	User (analyst, data provider, rating agency, etc.)	Finland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The inclusion of the 'undue cost or effort' relief is, in principle, a positive step, as it may help reduce overly demanding requirements such as some auditing expectations currently pushed onto companies. Alignment with IFRS principles is also welcome. However, Upright is concerned that this relief could lower the quality of sustainability information if companies use it to justify subjective judgments, rather than evidence-based analysis. This risk grows when combined with the top-down approach: companies could declare top-down that a topic is not material without proper analysis and invoke 'undue cost or effort' to avoid scrutiny. To prevent misuse of the clause—especially alongside the top-down approach—the amended ESRS could require sufficient evidence before concluding a topic is not material. Examples include: 1.Expanding the list of information always considered 'available without undue cost or effort': Unlike IFRS S1 (paragraph B9), ESRS does not include external sources. IFRS explicitly refers to 'generally available external sources such as peer benchmarks, ratings, or public statistics', but this is missing from ESRS. The framework could encourage use of such sources by stating that 'generally available sustainability data, tools, technology, and proxies' are considered available without undue cost or effort. 2.Explicitly prohibiting use of the clause to omit IROs very likely material given industry, geography, or stakeholder relevance. The clause must not be used to conceal material IROs a company prefers not to disclose. 3.Longer term: developing sector-specific guidance on likely material IROs (especially in value chains), reducing duplicate work and discouraging purely subjective judgments (see Upright's answer in "Any other comments"). In summary, these clarifications would preserve the efficiency benefits of the 'undue cost or effort' principle while ensuring it does not become a loophole that undermines the reliability and comparability of ESRS disclosures.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Upright	User (analyst, data provider, rating agency, etc.)	Finland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Upright strongly supports Option 1: it is the only approach that maintains comparability between companies, secures alignment with global standards, and preserves credibility and decision-usefulness of CSRD for capital markets. Option 1 is substantially aligned with IFRS S1 and S2, which establish the global baseline for sustainability-related financial disclosures, and with similar requirements adopted in California's SB-261 and Australia's new climate disclosure law. While we understand that purely qualitative disclosures under Option 2 may ease some short-term challenges for companies, this temporary convenience comes at significant long-term cost to the credibility and utility of the CSRD: 1.Lack of efficiency for investors: Purely qualitative disclosures signal that management has not, or cannot, assess the financial consequences of sustainability-related financial risks and opportunities. This would critically diminish the usefulness of CSRD disclosures. 2.Loss of interoperability: Option 2 would create misalignment with IFRS and other global disclosure standards. This would force multinational companies to produce inconsistent reports for different jurisdictions - quantitative disclosures elsewhere and qualitative-only reporting under ESRS - thereby undermining the usefulness and credibility of the ESRS compared to other standards. 3.No incentives for progress: The main argument for Option 2 ignores the fact that this also removes the critical incentive to build more mature methodologies and reporting practices. 4.Mitigation plans require quantification: ESRS already requires companies to disclose their mitigation and adaptation strategies. Yet without quantitative financial effects, such disclosures risk being aspirational narratives rather than decision-useful information. Investors need to see whether actions materially reduce financial risks. Many major jurisdictions (UK, Australia, Canada, Japan, China, Brazil, Mexico, Singapore, California) are adopting ISSB standards (IFRS S1 and S2), which require both qualitative and quantitative disclosure of anticipated financial effects. If the EU adopts Option 2 instead, it risks disconnecting from global developments and weakening its credibility in sustainable finance.			
Survey	Upright	User (analyst, data provider, rating agency, etc.)	Finland	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		SUGGESTIONS RELATED TO SECTOR-SPECIFIC IROs: Upright recognizes that developing sector-specific standards is not currently on the agenda. However, Upright wishes to comment on longer-term plans, as the absence of sector standards creates challenges for both information quality and reporting efficiency: 1.Reporting quality: If companies define their own methodologies and thresholds, material IROs will vary widely among similar companies, undermining comparability and credibility. 2.Reporting efficiency: Companies with similar IROs conduct overlapping assessments in isolation, wasting time and resources. Upright's suggestion is not to introduce sector-specific standards as originally planned, but rather a lighter version: sector-specific topic recommendations. Providing sector-specific recommendations for topics, which can likely include material IROs (especially those related to value chains) could lead to efficiency improvements in the DMA process and ensure more comparable reports. When DMA is done properly for one company and its value chains, this information is often also very useful for other companies operating in the same industry and can significantly reduce their DMA workload. Sector-specific recommendations would also reduce the risk of companies making subjective, sloppy decisions when deciding on material topics – a problem that arises with the 'top-down approach' and the 'undue cost or effort' clause. -Companies can more efficiently set aside topics that sector recommendations indicate are typically not material, avoiding unnecessary analysis and effort, since the likelihood of material IROs in these topics is low. -Conversely, companies cannot dismiss topics flagged by sector recommendations as likely material—they must still conduct an assessment before deciding otherwise. For further details, see Upright's feedback on the 'top-down approach' and 'undue cost or effort' clause. DMA data providers can support sector-specific recommendations. For example, Upright's data on 50,000+ companies can generate sector-specific heatmaps, which Upright is willing to share free of charge to support regulatory development and supervision.			
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Overall, I find the section to be much clearer compared to the earlier drafts, with several important improvements. The simplified list of topics and subtopics, as well as the clarification between bottom-up and top-down approaches, are very useful. The annex explaining how to treat impacts when mitigation or remediation measures are applied is also a strong addition. This resolves a frequent doubt among companies that questioned whether implementing such measures should reduce severity scores. However, I see some remaining gaps. In my view, it is problematic that the text suggests companies do not need to investigate further if they lack immediate information about impacts across time horizons. This is risky, as an impact that may appear irrelevant in the short term could become highly material in the medium or long term. Companies should be and educated to consider these dynamics rather than being given the impression they can skip deeper analysis. Another issue is that, while the overall text is clearer, the main challenge was never just ambiguity. The real problem is that many companies, including some of the largest in the Romanian market, do not understand concepts like forecasts or scenario analysis. While the standards have added examples in several places, it would be very helpful if the double materiality module also included simple, practical examples of these concepts. This would improve accessibility and reduce dependence on consultants or auditors, who often apply inconsistent methodologies. From my perspective, the standards themselves were not the main obstacle, even in the first drafts. The issue was the lack of a general methodology and a lack of references to practical resources (for instance, pointing companies towards UN Compass or similar tools).			

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Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	I fully agree that the additional clarifications were needed. While the text may seem overwhelming at first glance, the accompanying table is a very important and useful addition. I would also like to emphasize that companies should not refrain from reporting an impact simply because they are very careful in managing it. From my experience working with companies in heavy industries such as petroleum and coal, I have seen that many invest heavily in renewables, seek to transform their business models, or maintain very high safety standards (for example, ensuring pipelines are well maintained to avoid spills, which are among the main risks in the sector). However, even with strong prevention or mitigation measures, a potential impact still exists. This is inherent to the activity of the industry. For this reason, impacts should be reported transparently, alongside the measures undertaken to remediate or prevent them. Otherwise, there is a risk that companies may conclude that their prevention efforts are so effective that the underlying topic is no longer worth reporting. In my view, this would be a mistake and should be avoided through clearer guidance.			
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The only point I do not agree with is the removal of the requirement for a designated person or authority within the company to be responsible for implementing policies and driving change. In my view, this diminishes the sense of accountability within companies. I do understand that, for companies with no existing plans or interest, it would have been very difficult to map a clear timeline for future actions. However, eliminating the requirement for undertakings to plan and implement pathways for material topics and timelines is not a good development. Impacts are always linked to broader topics, and without this responsibility and forward-looking planning, the connection between identified impacts and the company's strategic response becomes much weaker. That said, I agree with the clarifications on aggregation level. Regarding the connections with GOV, SBM, and IRO, I cannot comment, as my work focused exclusively on the environmental side.			
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E1; E2; E3; E4; E5	I believe the standards should include as many practical examples and references as possible. This is crucial in markets where sustainability is still emerging and companies often lack even a dedicated sustainability department. From my experience, many large companies simply do not understand what is being asked of them. Without guidance, they see requirements but cannot translate them into action. References to existing frameworks and tools would make the standards more usable. For example, the European Pollutant Release and Transfer Register, Natura 2000 maps, biodiversity-sensitive zones, and air quality maps could help companies assess whether their activities add pressure to already vulnerable environments. Linking to relevant legislation on pollution or international biodiversity conventions would also provide clear direction. This should not be seen as additional effort for companies but as guidance. For instance, when asked to describe eco-design or circular initiatives, many companies do not even understand the concept. If presented with examples, case studies, or graphical tables, they would have a concrete starting point. Clearer definitions are also needed. For example, "biological materials" should be explicitly defined in ESRS E5. In practice, I have seen debates where companies and auditors applied different interpretations, leading to unnecessary conflicts. Consistency in definitions would greatly reduce such issues. Finally, the standards should link more strongly with systems and obligations that companies already have in place. In my work, I often extracted actions and targets directly from environmental permits when dealing with air pollution as a material topic. Referencing such sources grounds reporting in the real world and reduces reliance on consultants. In short, the problem was never the depth of the standards, but the lack of practical connections. Stronger references, definitions, and examples would make them both clearer and more impactful.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree				
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	From my perspective, it is not acceptable to suggest that no reliable or direct estimated data can be used in calculations. There are always methods available—geographical proxies, industrial proxies, peer proxies—that can provide reasonable estimates. It is far better to work with estimated data than to have no data at all. Expanding this flexibility to the value chain creates an even bigger problem. If companies are allowed to claim that data is not available, it gives them a window of opportunity to reduce their efforts further. This undermines comparability and diminishes the purpose of the directive itself. At least with estimated data, results can be benchmarked and compared across undertakings. But if companies report partial data from different sources, without consistent estimation, the reliability and usefulness of the disclosures is severely weakened. I also believe that removing time limits on data collection makes this situation worse. If sustainability declarations are to have real value, beyond narratives about investments and initiatives, they must be grounded in robust data. Numbers are the cornerstone of these reports. They provide the evidence base for assessing progress and ensuring accountability. For this reason, data collection should be treated as the highest priority. Instead of allowing companies to bypass this responsibility, they should be better instructed and equipped with clear sources from which to obtain the necessary data. Practical guidance, examples of proxies, and references to databases would all support companies in fulfilling this requirement without excessive burden.			
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	I do not agree with the idea that companies should be allowed to omit quantitative projections of anticipated financial effects simply because they lack resources, nor that such projections should be reported only on a voluntary basis. While I acknowledge that there is very high uncertainty in these estimates, and that no unified methodology currently exists, I fully support Opinion 1: quantitative information, even when estimated, is better than relying only on qualitative disclosures. Uncertainty is an inherent part of projections, but this does not make them less valuable. Even imperfect estimates provide a basis for comparison across companies and sectors, and allow investors to assess exposure to risks and opportunities in a structured way. By contrast, qualitative information alone does not enable standardization or comparability. Narrative disclosures may describe risks or impacts, but without numbers, investors cannot evaluate their magnitude or determine whether to continue investing. Permitting companies to omit quantitative projections on the grounds of limited resources creates perverse incentives. It could encourage undertakings, especially in more complex value chains, to avoid making the effort to provide meaningful financial insights. At least with estimates—whether based on geographical, industrial, or peer proxies—there is some level of comparability and benchmarking. Without them, reporting risks becoming fragmented and inconsistent, undermining the purpose of the directive. The credibility of sustainability declarations relies on more than stories of initiatives or commitments. The real value lies in the numbers—financial data and projections that demonstrate the scale of impacts and risks. Companies should be supported with clear methodologies, proxy examples, and references to data sources, but not given the option to bypass quantitative reporting altogether.			
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	In my view, the current approach places less emphasis on resilience and instead focuses primarily on risks—the negative side of the equation. While this may appear unbalanced, I believe the provision is clear enough and provides investors with a safe buffer zone. Ultimately, the priority is to ensure that investors can adequately assess potential vulnerabilities and exposures, and this framing achieves that objective.			
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	I fully support the efforts to harmonize standards and set uniform boundaries, particularly with respect to the financial control approach. This type of alignment is important for comparability and consistency across companies and sectors. However, there are two key points on which I strongly disagree. First, companies should not be allowed to omit Scope 3 emissions from their reporting. In many sectors, Scope 3 emissions represent the overwhelming majority of the footprint—often 85–90%. Excluding them would mean ignoring the most material part of a company's impact, which undermines both the credibility and the purpose of the directive. These are not small or under-resourced undertakings; we are speaking about some of the largest companies in Europe and globally, with the capacity and resources to measure and report these emissions. For them, Scope 3 should not be optional. Second, I strongly disagree with the idea that companies may omit quantification of potential financial effects when they claim to lack the necessary skills. Who decides whether they have the required skills or not? It is not realistic to assume that any company within the scope of this directive truly lacks the resources to either build this capacity internally or obtain it externally. Allowing such exemptions creates a dangerous precedent and weakens accountability.			

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Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Nothing to add.			
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Fair, especially the unknown waste trajectory one.			
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Exactly the point of masking rising emissions, both relative and absolute emissions should be considered.			
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I would like to skip this question and provide my feedback in Part 3	My expertise only spans E.			
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	My expertise only spans E.			
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	My expertise only spans E.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	My expertise only spans E.			
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

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Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
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Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Dublamaterialitate.ro/ Sustainability lens	Consultant (including software vendor)	Romania	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	Simplification is enough to allow more easily allow entities to meet requirements without further watering down.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Irish Trees	Other - please specify (required)	Ireland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Irish Trees	Other - please specify (required)	Ireland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	Irish Trees	Other - please specify (required)	Ireland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	May is ridiculous- shall is intent			
Survey	Irish Trees	Other - please specify (required)	Ireland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Financial institutions have a significant responsibility to both lead and understand their role so that they are in a position to model strategies that will have positive levers for other stakeholders and set a standard across all industries and investments			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Irish Trees	Other - please specify (required)	Ireland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the five affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree				
Survey	Irish Trees	Other - please specify (required)	Ireland	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree				
Survey	Irish Trees	Other - please specify (required)	Ireland	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Irish Trees	Other - please specify (required)	Ireland	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Irish Trees	Other - please specify (required)	Ireland	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	with proposed changes achieving the objectives of the EU Green Deal will not be possible			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Subtopics "Drivers of biodiversity and ecosystem change" and "The extent and condition of terrestrial and marine ecosystems" still seem to overlap, or further clarification on what each of the sub-topics comprises would be necessary			
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Combination of S1 and S2 is questionable			
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Combination of S1 and S2 is questionable			
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Alpiq AG	Preparer (non-financial preparing a sustainability report)	Switzerland	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

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Survey	CEWEP	Business association (other than association of financial institution)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The recovery definition proposed in Annex II p. 27 and its application to ESRS E5, paragraph 18 on waste, do not align with existing EU legislation. The Waste Framework Directive (2008/98/EC, Article 3(15) and Annex II), which is the cornerstone of EU waste management legislation, defines recovery as: "any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy. Annex II sets out a non-exhaustive list of recovery operations." As currently drafted, the reporting framework would lead to inaccurate reporting, as it would be unclear where to report incineration with energy recovery (R1): it is explicitly excluded from the ESRS definition of "recovery", but is not a disposal operation and therefore should not be reported under "waste directed to disposal". This would misrepresent actual waste treatment performance, create inconsistencies in EU statistics and compliance reporting, and result in incorrect financial disclosures by companies, since waste treatment pathways directly affect cost allocations, liabilities, and sustainability performance indicators. The stated goal of the Amended ESRS consultation is simplification and greater usability without compromising EU objectives. Introducing a definition that conflicts with existing law instead increases reporting complexity, as companies would face two contradictory classifications. To ensure alignment with existing EU legislation and avoid unnecessary burdens, we propose that: · The definition of "recovery" in Annex II should be amended to replicate or explicitly reference the definition provided in Article 3(15) of the Waste Framework Directive. · ESRS E5 §18 should clearly reflect that incineration with energy recovery (R1) is a recovery operation, consistent with EU law. For example, "iii. other recovery operation, including incineration with energy recovery"			
Survey	CEWEP	Business association (other than association of financial institution)	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The recovery definition proposed in Annex II p. 27 and its application to ESRS E5, paragraph 18 on waste, do not align with existing EU legislation. The Waste Framework Directive (2008/98/EC, Article 3(15) and Annex II), which is the cornerstone of EU waste management legislation, defines recovery as: "any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy. Annex II sets out a non-exhaustive list of recovery operations." As currently drafted, the reporting framework would lead to inaccurate reporting, as it would be unclear where to report incineration with energy recovery (R1): it is explicitly excluded from the ESRS definition of "recovery", but is not a disposal operation and therefore should not be reported under "waste directed to disposal". This would misrepresent actual waste treatment performance, create inconsistencies in EU statistics and compliance reporting, and result in incorrect financial disclosures by companies, since waste treatment pathways directly affect cost allocations, liabilities, and sustainability performance indicators. The stated goal of the Amended ESRS consultation is simplification and greater usability without compromising EU objectives. Introducing a definition that conflicts with existing law instead increases reporting complexity, as companies would face two contradictory classifications. To ensure alignment with existing EU legislation and avoid unnecessary burdens, we propose that: · The definition of "recovery" in Annex II should be amended to replicate or explicitly reference the definition provided in Article 3(15) of the Waste Framework Directive.			
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Concerning Appendix C, "If the potential impact was material within the reporting year, but prevention or mitigation action has been taken before the reporting date such that the impact no longer exists", The user does not benefit from the information, if the impact no longer exists, the mitigation action was taken beforehand. Therefore, it is not necessary to report the potential impact. It also raises the question, whether the statement contradicts Paragraph 34, which states that "the severity of the impact shall be evaluated considering the outcomes of any mitigation or prevention measures implemented before the impact occurred".			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Explicitly mentioning the option of including an 'executive summary' putting detailed information in the appendices increases audit reliability. However, we have already assumed that this flexibility is given according to the former version. Therefore, there is now a risk that only explicitly stated presentation options are permissible.			
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The level of simplification of the minimum disclosure requirements is not significant and continues to limit the reporting options. Since the PATs form the core of the CSRD, a large portion of the report remains almost unchanged. Further simplification could be achieved by reclassification some of the minimum disclosure requirements as application requirements.			
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The NMIGS's explanations are generally very helpful for understanding the disclosure requirements and the idea behind. However, there is a risk that these guidelines will be interpreted by auditors as a kind of checklist which could even limit the adjustability to company specific content.			
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	Relief for lack of data quality on metrics (ESRS 1 paragraph 92)			
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	All material sustainability risks can and must be reported in the risk report of the financial statements. Separate reporting in the non-financial section is redundant.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	40d: It is more logical and beneficial to evaluate the monetary amount and percentage of revenue at material physical risk after considering climate change adaptation actions. Evaluating risks before adaptation actions creates unnecessary alarm, misrepresents the company's actual vulnerability, and undermines the value of proactive climate resilience strategies. 41d: All reporting should follow accounting recognition criteria, across financial and non-financial reporting. 42: Users don't benefit from this information.			
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Setting absolute targets for financial institutions can lead to wrong incentives, as every investment leads to additional emissions, even and especially when financing green technologies. This contradicts the Green Deal's primary goal of redirecting financial flows. By reporting the mandatory absolute Green house emissions as a simple metric, which is not a target, the required transparency is given.			
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	We cannot assess the complexity of this topic and rely on the results of the proposed field test.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	Investors can and in practice already do address their individual requirements to their investees bilaterally. There is no need for covering the SFDR requirements in a general regulatory approach.			
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	Companies with significant environmental impacts should inform themselves about the current state of scientific knowledge. This is not a regulatory task.			
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree				
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

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Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Stadtwerke München GmbH	Preparer (non-financial preparing a sustainability report)	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

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Survey	SANOK RUBBER COMPANY S.A.	Preparer (non-financial preparing a sustainability report)	Poland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	We believe that the new guidelines in ESRS 1 provide much-needed clarification on the treatment of remedial, mitigating, and preventive actions in the DMA process. The clear distinction between "actual" and "potential" impacts and the guidance on how to report measures already implemented facilitate assessment and make reports more comparable. We also appreciate the distinction between the current period and future reporting periods. This makes it easier to avoid duplication of information on previous impacts while maintaining consistency with policies and actions that are still in force. An important simplification is the indication that impacts are assessed before mitigation measures are taken, and only then are the implemented measures reported. This approach increases transparency, especially in regulated areas (e.g., health and safety). We agree that a "gross" approach (not taking actions into account) could lead to excessive reporting. The current solution seems to strike a good balance between transparency and the practical usefulness of reports. We also believe that it would be a good idea to link the list of material topics to the relevant disclosure points, which would further simplify the process and improve the consistency of reporting. Translated with DeepL.com (free version)			
Survey	SANOK RUBBER COMPANY S.A.	Preparer (non-financial preparing a sustainability report)	Poland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	We agree that the new guidelines in ESRS 1 clearly show how to take corrective, mitigating, and preventive measures into account when assessing the materiality of negative impacts. This makes reporting more transparent—it shows both the actual impacts before the measures were taken and the measures taken to mitigate or remedy them.			
Survey	SANOK RUBBER COMPANY S.A.	Preparer (non-financial preparing a sustainability report)	Poland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We agree that the changes improve the readability and consistency of sustainability statements, and that the option to use summaries and appendices—which we consider a good solution—helps separate key messages from detailed information, eliminating fragmentation and repetition of data.			
Survey	SANOK RUBBER COMPANY S.A.	Preparer (non-financial preparing a sustainability report)	Poland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	The changes in ESRS 2 are positive because they have simplified reporting, reduced the number of mandatory data points ("shall") and introduced greater flexibility in disclosure. We also like the ability to aggregate data and better link disclosures to relevant topics, which makes reporting easier and the information more readable and practical			
Survey	SANOK RUBBER COMPANY S.A.	Preparer (non-financial preparing a sustainability report)	Poland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We agree that the changes improve the clarity and readability of the standards. We like that all mandatory data points are clearly highlighted in the main body of the standard, and optional "may disclose" items have been removed. This makes it easier to understand exactly what needs to be reported.			
Survey	SANOK RUBBER COMPANY S.A.	Preparer (non-financial preparing a sustainability report)	Poland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We believe that NMIG is a useful supporting tool because it contains guidelines and examples that can facilitate reporting and reduce the number of questions regarding implementation. We appreciate that the content of NMIG is clearly marked as non-mandatory, which allows for flexibility and does not impose additional requirements on reporting entities. In our view, NMIG can support the practical application of standards, provided that it remains a supporting tool and not a mandatory requirement.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	SANOK RUBBER COMPANY S.A.	Preparer (non-financial preparing a sustainability report)	Poland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	We like the possibility of using estimates instead of direct data, limiting disclosure in the absence of quality data, and relief in calculating indicators. Such solutions reduce the workload and facilitate ESG reporting. We would like to ask for clarification of the relief in the form of "unreasonable costs or effort" – what exactly does this mean? For example, it could be specified that this refers to the additional working time needed for detailed analyses, the need to use consulting services, or other activities that cause a disproportionate burden in relation to the value of the information obtained. It would be worth considering clarifying in which specific cases the exemption can be used in order to facilitate practical application and reduce the risk of disputes during audits.			
Survey	SANOK RUBBER COMPANY S.A.	Preparer (non-financial preparing a sustainability report)	Poland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We believe that the relief for poor data quality is practical and necessary, as it allows metrics to be reported even with partial data coverage, thereby reducing the reporting burden. We like the fact that companies must simultaneously disclose measures to improve data quality in future periods, which encourages systematic improvement in data coverage. One drawback may be the need to justify the use of the relief to an auditor, so it would be useful to clarify in which situations it can be used.			
Survey	SANOK RUBBER COMPANY S.A.	Preparer (non-financial preparing a sustainability report)	Poland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	We favor option 2 because it makes reporting qualitative information mandatory, while leaving quantitative information voluntary for companies. We believe that this approach reduces the reporting burden and provides flexibility for topics where mature methodologies or reliable data are lacking. At the same time, option 2 allows companies to gradually develop their own methodologies and report quantitative data where available, without imposing rigid and difficult-to-meet requirements.			
Survey	SANOK RUBBER COMPANY S.A.	Preparer (non-financial preparing a sustainability report)	Poland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	We believe that the revised paragraphs 40, 41, and 42 of ESRS E1 have been sufficiently simplified. The remaining data points cover only information that is relevant to investors and lenders, striking a balance between reporting effort and user needs. We consider this approach to be practical and feasible for day-to-day ESG reporting			
Survey	SANOK RUBBER COMPANY S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	SANOK RUBBER COMPANY S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	We view the changes to the PAT positively. The removal of less relevant, narrative data points and the transfer of mandatory requirements to the main part of the standard significantly simplifies reporting, while retaining the information that is key to assessing ESG materiality and impacts. A flexible, principles-based approach facilitates report preparation and reduces duplication of information, which is practical for companies.			
Survey	SANOK RUBBER COMPANY S.A.	Preparer (non-financial preparing a sustainability report)	Poland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	Even if the number of exceptions is small, changing the status from "may" to "must" introduces additional obligations and the risk of divergent interpretations. The principle of simplification should be applied consistently—each exception weakens its transparency and increases the burden on companies. In practice, this means more work in analyzing materiality and verification by auditors, which is contrary to the goal of reducing obligations.			
Survey	SANOK RUBBER COMPANY S.A.	Preparer (non-financial preparing a sustainability report)	Poland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	Adding new data points runs counter to the principle of simplification, even if there are only a few of them. Each exception means an additional obligation and increases the risk of ambiguous interpretation. Instead of improving transparency, this leads to greater burdens and undermines confidence in the very idea of simplification.			
Survey	SANOK RUBBER COMPANY S.A.	Preparer (non-financial preparing a sustainability report)	Poland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	The requirement for fair presentation in the ESRS is reasonable and may contribute to more relevant and transparent reporting by focusing on key information and reducing excessive disclosures. This ensures better use of the materiality filter and consistency of information for report recipients. At the same time, it is worth noting that the implementation of this requirement may increase audit requirements, as auditors will need to verify that the omitted data points are indeed not material, which may increase costs and legal risks. Overall, however, the change promotes the quality of reporting with an acceptable level of additional burden.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	SANOK RUBBER COMPANY S.A.	Preparer (non-financial preparing a sustainability report)	Poland	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	I disagree – Disclosing both intensity targets and absolute emissions allows for a more complete understanding of the actual climate impact of financial institutions. Although absolute calculations may require additional assumptions and be more complex, they provide key information about total emissions that is not apparent from intensity targets alone. Exempting financial institutions could lead to unequal treatment of sectors and make it difficult to assess their actual role in the climate transition.			
Survey	SANOK RUBBER COMPANY S.A.	Preparer (non-financial preparing a sustainability report)	Poland	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	I agree – The way SFDR PAI has been incorporated into the revised ESRS is clear and logical. Removing data points that overlapped with others or were practically irrelevant improves the clarity of reporting without losing important information. The consolidation of social standards indicators increases consistency and facilitates data interpretation, while not adversely affecting the scope of disclosures. These changes make reporting more understandable and focused on key ESG issues, with minimal risk of losing information that is relevant to investors and stakeholders.			
Survey	SANOK RUBBER COMPANY S.A.	Preparer (non-financial preparing a sustainability report)	Poland	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	"I partly agree and partly disagree" – because AR 26 provides a solid foundation, but it is worth updating it to better reflect current scientific trends and requirements for evidence-based targets.			
Survey	SANOK RUBBER COMPANY S.A.	Preparer (non-financial preparing a sustainability report)	Poland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	I agree with the removal of the voluntary data point on the adjusted gender pay gap, as this simplifies the reporting process and reduces the workload for the departments reporting this data			
Survey	SANOK RUBBER COMPANY S.A.	Preparer (non-financial preparing a sustainability report)	Poland	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	I agree – Removing the detailed indicator of the average invoice payment period is justified, as this data is often difficult to capture unambiguously and can lead to misleading interpretations. Retaining information on standard payment terms, the percentage of payments made on time, and any legal proceedings provides sufficient transparency and better reflects the company's payment practices towards SMEs.			
Survey	SANOK RUBBER COMPANY S.A.	Preparer (non-financial preparing a sustainability report)	Poland	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		I agree – The revised ESRS strike the right balance between reducing reporting burdens and preserving the content necessary to achieve the objectives of the European Green Deal. The simplifications improve the clarity and consistency of the standards, while reducing the number of data points that were difficult to implement in practice or duplicated other requirements. These changes will make it easier for companies to report effectively, while maintaining a high level of transparency and reliability of disclosures.			
Survey	Cadeler	Preparer (non-financial preparing a sustainability report)	Denmark	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	Cadeler	Preparer (non-financial preparing a sustainability report)	Denmark	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				

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Survey	Cadeler	Preparer (non-financial preparing a sustainability report)	Denmark	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Cadeler	Preparer (non-financial preparing a sustainability report)	Denmark	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Cadeler	Preparer (non-financial preparing a sustainability report)	Denmark	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Cadeler	Preparer (non-financial preparing a sustainability report)	Denmark	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Do we really preserve the transparency needed to achieve objectives of the Green Deal? Worried about that.			
Survey	Cadeler	Preparer (non-financial preparing a sustainability report)	Denmark	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	Cadeler	Preparer (non-financial preparing a sustainability report)	Denmark	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	Cadeler	Preparer (non-financial preparing a sustainability report)	Denmark	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				

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Survey	Cadeler	Preparer (non-financial preparing a sustainability report)	Denmark	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Cadeler	Preparer (non-financial preparing a sustainability report)	Denmark	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Cadeler	Preparer (non-financial preparing a sustainability report)	Denmark	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree about the 5 above mentioned modifications.			
Survey	Cadeler	Preparer (non-financial preparing a sustainability report)	Denmark	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Cadeler	Preparer (non-financial preparing a sustainability report)	Denmark	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	Fully agree			
Survey	Cadeler	Preparer (non-financial preparing a sustainability report)	Denmark	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Cadeler	Preparer (non-financial preparing a sustainability report)	Denmark	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Cadeler	Preparer (non-financial preparing a sustainability report)	Denmark	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Cadeler	Preparer (non-financial preparing a sustainability report)	Denmark	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	There is some value on adjusted gender pay gap as well to reflect some business specifities.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The DMA should remain a principles-led process, enabling the application of contextual judgment and supporting a meaningful connection between an undertaking's strategy and its sustainability reporting. The simplifications of the DMA process mainly reduce the effort for wave 2 companies but will not significantly reduce the effort for companies that are already reporting according to ESRS. Positive aspects: • Materiality filter: Stronger focus on materiality significantly reduces the reporting burden, adds more clarity. • DMA flexibility: Both bottom-up and top-down approaches allow practical implementation. • Fair presentation: Emphasis on fair presentation rather than a checklist helps avoid excessive documentation. • Streamlined topic list lowers complexity and risk of overreporting. • Clarity on sub-topics: AR 21 / para. 50 provides decisive clarification that only material sub-topics need to be reported. • Documentation relief: Excluding DMAs for obviously (non-)material topics and consolidating sub-sub-topics further reduces effort. • Link to IROs: Clearer connection between IROs (Impacts, Risks, Opportunities) and topics improves usability. Remaining concerns: • Materiality thresholds: Allowing thresholds is positive, but inconsistent approaches across companies are likely; the practical application of bottom-up vs. top-down remains unclear. • Appendix A: o AR 16 should be clearly communicated as "Appendix A." o Adding topics (e.g. "water storage") contradicts simplification. o Merging S1 and S2 is problematic, as S1 is far more often material than S2. o Sub-topics remain overly detailed in places; further simplification would be desirable. • Risk analysis linkage: In some cases, results of risk analysis cannot be clearly reconciled with reporting requirements, as sub-topics do not always map neatly. • There still seems to be room for interpretation which will result in discussions with auditors. • Clearer information of when an information is "necessary".			
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We acknowledge that new Paragraphs provide helpful clarifications, but significant concerns remain about complexity and feasibility in practice. We recommend greater flexibility, clearer alignment with existing standards, and stronger recognition of regulatory compliance as a key driver of sustainability. Positive aspects: • The guidance on distinguishing actual vs. potential impacts is useful and welcomed. • The clarification that remediation measures may be considered when assessing risks is a positive step, as it may reduce material risks and the related reporting effort. • Allowing consideration of actions that reduce the severity or likelihood of potential negative impacts reflects company practice and is in line with established risk management approaches. Concerns and challenges: • The gross approach for potential impacts with ongoing mitigation may lead to overreporting. • The guidance adds significant complexity to the DMA process, especially for smaller or less mature reporters. Current software tools cannot meaningfully map these requirements, creating practical difficulties for companies and auditors. • Appendix C attempts to address the gross vs. net issue, but in practice it requires companies to assess each negative impact in detail. This is unlikely to simplify reporting and may not be feasible beyond manual solutions. • We suggest greater flexibility by allowing net risk approaches, similar to ISO norms (e.g. ISO 9001/14001), where the effectiveness of actions and controls is integrated directly into risk assessments. Further considerations: • Excluding compliance with legal and regulatory requirements as a "positive impact" risks undervaluing the strategic role of regulation. • It is unclear whether globally valid guidelines remain acceptable as a mitigating factor under ESRS 1.36. • Unclear, when a mitigation or prevention action is considered "significant" and when would such action not be considered as significant? • Companies would have to report a high number of potential negative impacts (although non-material)			
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We agree that the proposed Amendments, in combination with other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting and enhance connectivity with corporate reporting. Positive aspects: • Executive summary & appendices: The explicit option to provide an executive summary and use appendices (e.g. for taxonomy data) improves clarity, structure, and readability of reports. • Flexibility: The amendments reduce unnecessary detail in the main report and allow companies to focus on key messages, avoiding duplication and fragmentation. • Connected information: Clearer guidance strengthens connectivity with other elements of corporate reporting and avoids repetitive disclosures. • GDRs: The adapted logic for presenting GDRs (general disclosures) is seen as very positive. It allows GDRs at topic level, summarized for certain IROs or for individual IROs, with flexibility to adjust the level of detail to company-specific circumstances. This should be maintained. • Governance standard (ESRS-G): The restructuring and summarization of data points (e.g. G1-2 qualitative vs. G1-4 quantitative) provides for more concise and practical reporting. Remaining concerns / open questions: • However, we understand these changes primarily as clarifications of existing options rather than substantial simplifications. From our perspective, they do not result in significant relief in terms of implementation effort or reporting complexity. • PAT duplication: The need to avoid duplication in the Performance and Target (PAT) section must be consistently recognized in the design of disclosure requirements. • Climate methodology (ESRS E1 AR 5, para. 18): It is unclear whether companies are expected to conduct a climate scenario analysis when disclosing the methodology used to assess the impact of hazards and transition risks. Greater clarity is needed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We consider the proposed amendments under Level 3 to be a significant improvement. The restructuring of the architecture and the clarified interaction between ESRS 2 and the topical standards enhance the overall readability and usability of the standards. The reduction in prescriptive elements is seen as a major improvement. Positive aspects: • Simplification. • Clear reduction of "shall" requirements in PAT lowers complexity and workload. • Deletion of topical specifications in GOV, SBM, and IRO simplifies the structure without major content loss; there should be no exceptions to this deletion. • Shortened standards and avoidance of duplication are highly welcomed. • Listing ARs directly after DRs improves readability and structure. Flexibility & pragmatism: • The new "undue cost or effort" clause is very positive, allowing companies to gradually expand databases without disproportionate burden. • Aggregation options reflect real management practice and increase efficiency. • Improved linkage between PAT and IROs enhances consistency and usability. • Absence of timeline explanations avoids unnecessary rigidity. Remaining concerns: • Sub-topic clarity: o Risk analysis results cannot always be clearly reconciled with reportable content; sub-topics should be reflected more explicitly in the topical standards or in a clear mapping table of DRs to sub-topics. o Some combinations (e.g. anti-corruption & bribery with animal welfare and complaints procedures) appear inconsistent and should be corrected (notably in G1). • Scenario/resilience analyses (ESRS E1): It must remain permissible to report that such analyses are not conducted; companies should not be indirectly obliged. • Phase-ins and NMiGs: Data points with planned phase-ins should be omitted or voluntary. NMiGs must remain voluntary in practice, with no indirect obligation created. • Formulation of PAT: Reformulating PAT as ARs risks confusion rather than simplification. • the treatment of net versus gross risk complicating implementation rather than easing it.			
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We generally agree that the proposed amendments significantly improve clarity and accessibility of the ESRS. The changes make it easier for companies to identify mandatory content and apply the standards consistently. The revised layout—particularly the relocation of mandatory Application Requirements directly under the relevant Disclosure Requirements—makes the legal text easier to follow and reduces the need to navigate back and forth within the document. However, while the structure and readability have improved, the overall reporting requirements remain largely unchanged. As such, the simplification primarily supports better orientation within the standards rather than reducing the reporting burden itself. Positive aspects: • Removal of "may disclose" provisions: Eliminating these optional elements improves clarity, avoids confusion, and ensures a clearer distinction between mandatory and voluntary disclosures. • Structure and usability: Relocating mandatory ARs under their related DRs enhances readability and transparency. • Language improvements: Revised wording supports better understanding and fosters consistent application across companies. • Transparency: The clearer separation of mandatory and voluntary requirements increases accessibility for both preparers and users of sustainability reports. • Simplification: The removal of duplicate data requirements, the shortening of standards, and the exclusion of non-mandatory data points from the NMiG make it easier to determine reporting obligations. Remaining concerns: • E2-19 vs. AR7 scope: There is still a lack of clarity regarding whether disclosures should cover only Substances of Very High Concern (SVHCs) or also Substances of Concern (SoCs). Alignment is needed to avoid inconsistent interpretations and reporting burdens. • It is still unclear what is meant by "policies" - a definition would be helpful. Is it really just "policy" in the narrower sense or also a strategy that may only be documented internally? • Clarification needed: how to comply with 1.5°C goal of Paris Agreement • The texts are still very complex.			
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Eliminate the Non-Mandatory Implementation Guidance (NMIG) to avoid implicit obligations under a non-mandatory status. If retained, it must remain outside the Delegated Act. The separation of mandatory and non-mandatory content improves the structure and readability of the standards. To ensure legal certainty and practical usability, the NMIG should remain outside the delegated act and its non-mandatory nature must be consistently emphasized. NMIG can serve as an orientation tool—especially for preparers in the early stages of implementation. However, it is important that the non-binding nature of NMIG remains clearly communicated and consistently understood by both preparers and auditors. There should be no implicit expectation that the examples provided must be followed or justified if not applied. Positive aspects: • We support that non-mandatory data points have been moved to NMIG, ensuring that the ESRS itself focuses strictly on mandatory content. • The NMIG can provide helpful illustrative examples that support understanding and application without creating additional obligations. Key conditions: • Legal status: The NMIG's non-binding nature must be clarified as soon as possible. It must not become a de facto "state of the art" that auditors, regulators, or stakeholders expect companies to follow. • Separation from ESRS: To avoid confusion, NMIG should remain clearly separate from the mandatory ESRS. Companies must be able to fulfill all reporting obligations by following ESRS alone. • No negative consequences: Non-compliance with NMIG must not result in disadvantages or be interpreted as a lack of compliance with ESRS. Practical considerations: • While some members note that aligning NMIG references directly next to the related ESRS paragraphs could improve usability, this is not essential as long as the distinction between binding and non-binding content is preserved.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The interoperability with the ISSB framework should be more focused. It is not clear, why there are 23 continued differences, 30 new differences, and only 3 new areas of alignment identified by the ISSB. This would support a more proportionate and pragmatic implementation of the ESRS, without compromising transparency or alignment with the objectives of the EU Green Deal. Positive aspects: • Undue cost or effort: The introduction of this principle, together with data quality reliefs, is strongly welcomed. It is especially critical for first-time reporters and offers pragmatic flexibility to address initial data gaps. • Value chain metrics: Allowing the use of estimates as well as direct data is a practical measure that reduces reporting burdens while maintaining relevance. • Scope reliefs: Exclusion of non-significant IRO activities and joint operations improves both feasibility and focus. • Resilience and financial effects disclosures: Limiting these to announced plans and qualitative information avoids speculative reporting and concentrates efforts on meaningful content. • Overall balance: The amendments are seen as a key simplification that will significantly reduce the reporting burden without undermining transparency. Remaining concerns: • Interpretation issues: The definition of what constitutes "reasonable" effort may lead to differing interpretations and potential disagreements with auditors. Clearer guidance would be beneficial. • Supply chain reporting: Further simplification is necessary. Companies should report on their own targets, actions, policies, and metrics. Supply chain data should only be required insofar as it directly relates to the company's own commitments (e.g. sustainable procurement). Companies should not be obliged to collect detailed data from suppliers or customers. • Subsidiary thresholds: Relief measures should also apply to smaller subsidiaries (e.g. under 50 or 20 employees), which face similar challenges as SMEs in gathering sustainability data.			
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between flexibility for preparers and preserving transparency. Additional clarification on the interpretation of "reasonable" effort would help ensure consistent and practical application across companies and sectors. Positive aspects: • Pragmatic reporting: The relief allows companies to report despite data limitations, which is especially valuable in complex value chains. • Continuous improvement: Requiring disclosure of actions to improve data quality ensures accountability and gradual enhancement over time. • No fixed time limit: Not setting a rigid deadline is reasonable, as data availability and maturity differ widely across sectors and supply chains. The requirement to disclose improvement measures already creates implicit pressure to strengthen data quality. • Alignment: The approach supports consistency with IFRS S1/S2 and significantly reduces the implementation burden without undermining credibility. • Undue cost or effort: The principle provides important flexibility for dealing with initial data gaps and enables gradual database expansion without disproportionate costs. Remaining concerns: • Interpretation risks: There is still potential for disagreement with auditors on what constitutes a "reasonable" effort to improve data quality. Clearer guidance could reduce uncertainty and ensure consistent application. • Realistic expectations: ESG data, particularly from extended value chains, will never reach the same level of precision as financial data. Standards should recognize these inherent limitations to avoid undue burden.			
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Remove the obligation to report on financial anticipated effects, since these disclosures are neither feasible nor reliable in reflecting a company's financial situation. If retained, we support Option 2: • Feasibility & proportionality: A qualitative-only requirement keeps reporting practical, especially for companies with limited methodologies or resources. • Avoids undue burden: Quantitative disclosures of long-term financial effects would often be speculative, uncertain, and resource-intensive, especially for family-owned or privately held companies. • Transparency with flexibility: Option 2 preserves flexibility by allowing companies to voluntarily provide quantitative information where available and relevant, without creating a mandatory obligation. • Focus on clarity: Encourages companies to provide clear narratives of expected financial implications instead of uncertain projections, which may not be comparable across firms. • Alignment with practice: Mid- and long-term financial effects are rarely available in reliable, comparable form; focusing on qualitative assessment supplemented by quantitative information only where meaningful is the more pragmatic approach. • Comparability: Quantitative projections would be highly subjective and could reduce comparability rather than improve it. Critical observations: • Some members noted that the discussion reflects broader uncertainty about the purpose of these disclosures. In their view, financial reporting in annual reports already provides sufficient quantitative information, and sustainability reporting should not duplicate speculative forecasts. • Also with option 2 we see no necessity to disclose this information for family businesses. • While Option 2 is preferred, a few stakeholders argue that complete deletion of the requirement would also be acceptable, as this information has limited relevance for many non-listed companies. • Also with option 2 the underlying data is often unclear, and the risks cannot be reliably isolated, making any form of disclosure—whether narrative or numeric—legally risky and prone to misinterpretation. Such information lacks comparability and does not offer decision-useful insights for stakeholders.			
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				

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Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Discrepancies between European Union accounting standards and international accounting standards result in significant costs for internationally active companies and lead to a lack of comparable information for capital markets. Companies should be allowed to use the ISSB standards as a starting point and supplement them with specific disclosures on impacts in order to achieve compliance with the CSRD/ESRS. Although the proposals contain some positive aspects for further efficiency gains (e.g. the proposals on industry-specific disclosures), there are some proposals that pose a significant risk to interoperability (e.g. with regard to expected financial impacts). Especially new differences between the ISSB Standards and ESRS Exposure Drafts must be prevented. Positive aspects: • Interoperability with IFRS S1/S2: Alignment of materiality and fair presentation principles with ISSB standards is a strong step toward global comparability. • Consolidation boundary: Adopting the financial consolidation boundary while allowing optional disclosure on an operational control basis reflects the logic of both the GHG Protocol and IFRS, improving consistency. • Reliefs and flexibility: Incorporation of IFRS-style reliefs, particularly the "undue cost or effort" clause, balances alignment with practicality for preparers. • Sector guidance: Reference to IFRS/SASB guidance as an optional source for sector-specific information is useful without creating prescriptive requirements. • Simplification maintained: ESRS-specific simplifications, such as shorter standards and removal of duplications, are preserved without undermining international alignment. Remaining concerns: • Clarity of "undue cost or effort": While welcomed in principle, this concept remains vague and risks disagreements with auditors. Clearer definitions or guidance are needed to avoid inconsistent application and potential disputes. • Stability of the standards should therefore be prioritized. • Comparability risks: Without clear boundaries for reliefs, comparability of financial reporting elements within CSRD reports may be weakened.			
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	We welcome the proposed reduction in "shall disclose" datapoints under materiality, as it represents a meaningful simplification and reduces the reporting burden, while maintaining the core information needed to fulfil the EU Green Deal objectives. But there is a lot of more potential to delete datapoints which are either not needed by financial users or not possible to collect for the companies. Also reducing the length of the sustainability report is very important, not just the number of data points removed, as there are significant differences in the complexity of the data points. Unfortunately, we do not expect a significantly reduced reporting volume under the amended ESRS. While the number of datapoints has decreased, the underlying disclosure obligations remain intact. Positive aspects: • The 57% reduction in mandatory datapoints significantly lowers complexity and is particularly valuable for companies with limited resources or less ambitious reporting scopes. • Removal of less critical narrative PAT disclosures streamlines reporting and improves clarity. • Prioritization of quantitative over narrative information strengthens comparability and efficiency. • The core content of the reporting requirements has been retained, and the summary presentation makes the standards easier to understand and apply in practice. Remaining concerns: • Environmental datapoints: While simplifications were introduced for certain areas (e.g. financial effects, own workforce), the environmental datapoints have only been partially streamlined. Some "deleted" requirements were merely merged or shifted, and new requirements were added. • Substances of Concern (SoCs): We strongly question the effectiveness of including SoCs in ESRS. These substances overlap with existing categories such as SVHC, leading to double counting and incomparable data. --> Focus on the most burdensome metrics and disclosures which represent the biggest efforts. While the reduction in quantitative disclosure points represents progress, quantitative disclosures have been reduced by just 35%, leaving room for further reductions.			
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The purpose of the simplification mandate is to reduce the number of data points to reduce the length of the report and to finally strengthen the meaningfulness of the report (and definitely not to increase the number of mandatory data points. Therefore, this is a step in the wrong direction. We therefore recommend to stick to the rule of no additional reporting obligations. • We particularly disagree with the disclosure of nature of corruption and bribery incidents since this information can be sensitive. We thus invoke ESRS 1 7.8 number 98: "The undertaking is not required to disclose classified information or sensitive information even if such information is considered material." • ESRS E3: It should be made explicitly clear that these metrics are only to be reported if the corresponding sub-topics ("water discharges" and "water withdrawal") have been assessed as material as part of the DMA. Otherwise, these requirements could entail effort without creating added value for the reader. • ESRS E4: In any case, it should be maintained that reporting on the transition plan is only required once the transition plan has been implemented and published. The introduction of such a transition plan should remain voluntary. • ESRS G1 10 (c): In our view, this data point does not necessarily create significant added value, as the focus on the procurement team does not necessarily appear relevant. How responsibilities are assigned within the company can be individual. Therefore, the focus should continue to be on the important key positions in terms of compliance training. • ESRS G1 14: The metrics relating to anti-corruption and anti-bribery are comprehensible and ok. However, it should be made clearer that only those metrics are to be reported for sub-topics that have been assessed as essential in the context of the DMA.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	In general, we do not support the introduction of new data points, as they typically result in significant additional effort for reporting entities without a corresponding increase in decision-useful information. The cost-benefit ratio of expanding disclosure requirements must be carefully considered, and in our view, the current framework already places substantial demands on preparers. Positive aspects: • Relevance of new datapoints: The additional datapoints are useful as they address critical issues of sustainability, always under the condition that materiality applies (except for ESRS 2 General Disclosures – BP 1, which is always mandatory). • Critical raw materials (ES-4): Treatment of critical raw materials as a separate disclosure is reasonable if – and only if – they are assessed as material. This preserves proportionality. • Waste reporting (ES-5): The newly added "destination unknown" category is welcome as a pragmatic exception. Where companies are able to define all waste destinations, this datapoint will simply be "0," which is both feasible and transparent. Remaining concerns: • Data availability challenges: Obtaining reliable data on microplastics and critical raw materials remains very difficult for companies at the end of the value chain. Without clearer guidance, the exception may not provide sufficient relief in practice. • Waste reporting clarity: It is unclear how "destination unknown" differs in practice from "waste directed to disposal" under paragraph 18(d). Further clarification is needed to avoid inconsistent reporting.			
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	The goal of fair presentation should be to ensure that only information deemed material is reported. In our view, the key criterion for both fair presentation and materiality assessment should be the usefulness of the information for the intended users of the report. This clarification helps reinforce the intended purpose of the standards: to support relevant, decision-useful sustainability reporting rather than checklist-driven compliance. By emphasizing fair presentation, the ESRS framework encourages preparers to exercise professional judgment and focus on disclosures that genuinely contribute to transparency and accountability to reduce unnecessary reporting and documentation efforts, particularly when justifying the omission of non-material datapoints. The concept of fair presentation requires clearer definitions and practical guidance to avoid disputes, ensure consistent application, and safeguard auditability. Without these clarifications, the risk remains that simplification could lead to inconsistent reporting rather than improved relevance. Positive aspects: • The simplification and stronger risk-based approach are welcome and will reduce reporting burden by focusing on genuinely material topics. • Internal costs and efforts can be reduced, while the amendments provide clearer guidance for companies subject to ESRS. • The principle of fair presentation is positive in theory and helps avoid excessive reported information. Concerns and limitations: • Financial adequacy: Without clearer definitions, there is a risk of oversimplified or even misleading reporting, as well as disputes with auditors. • Auditor diligence: Applying fair presentation consistently will be challenging, and it may become more difficult for auditors to demonstrate due diligence. • Interpretation risks: Non-finance employees are often less familiar with this principle, which could lead to uncertainty and inconsistent application. • Added value: In practice, the principle may not provide significant additional benefit, as disclosures are already strongly determined by the outcomes of the materiality analysis itself.			
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	Our members recognize both advantages and drawbacks of the proposed change to the threshold for country-by-country disclosure. Overall, the revised threshold is a pragmatic step that can improve clarity and comparability, but it may increase effort for certain companies. Clearer guidance on definitions (especially regarding ESRS S1-6) is necessary to ensure consistent application and to avoid undermining the simplification objective. Positive aspects: • The new approach of reporting for the top 10 largest countries (with >50 employees) is more practical and easier to handle for many companies. • Using a percentage-based approach supplemented with a breakdown of the top 10 countries provides meaningful detail without requiring a disproportionate reporting effort. • Much of this information is usually available in existing HR systems, so for many companies the change will not create additional data collection challenges. Concerns and limitations: • For some companies, the new threshold will in fact require disclosure for a larger number of branches than before. This may increase workload and run counter to the simplification objective. • It remains unclear how to deal with ESRS S1-6 ("significant driver") and how to define significance transparently. The criteria for excluding or including datapoints on non-employee characteristics lack clarity and risk inconsistent application.			
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	We see the proposed changes as a step forward but highlight important areas where clarification is still required to ensure consistent application. While the proposed methodology is a reasonable starting point, clearer definitions, prioritization of data sources, and explicit guidance on subnational agreements and EU benchmarks are essential. This will ensure that reporting on adequate wages is both feasible for preparers and reliable for users. Positive aspects: • Referencing the EU Directive on Adequate Minimum Wages would provide a clear benchmark for calculations within the EU. • Establishing a hierarchy of sources for non-EU adequate wages would improve consistency. For example, widely recognized global databases such as the Global Living Wage Coalition or WageIndicator should be prioritized before relying on generic estimates. Concerns and remaining questions: • It remains unclear how to deal with subnational agreements outside the EU. Clearer examples or guidance are needed to ensure companies can apply the methodology consistently. • More detailed information is required on which benchmarks should be used for calculating adequate wages within the EU, especially in cases where national or sectoral agreements differ. • Without such clarifications, the comparability of wage disclosures across companies and regions will remain limited.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	If the disclosure specifications and application requirements for E4-4 (targets) have largely been removed from the application requirements for companies when setting biodiversity and ecosystem targets as part of the simplification process, then it is imperative that clear guidance be provided elsewhere. If ESRS Set 1, E4 AR 26 is truly outdated, then it urgently needs to be revised. This would empower companies to set targets that are relevant to their specific material impacts, if any exist, rather than forcing compliance with a one-size-fits-all standard. Primary goal must be simplification and reinforcing the materiality principle, not adding more complex target-setting rules. We identified two key risks with overly prescriptive guidance. First, biodiversity metrics are still methodologically immature. Unlike climate, there is no single, globally accepted framework. Mandating a specific approach, such as SBTN, would be premature and could lock companies into methodologies that may become outdated or are dictated by a single organization. We argue that flexible target setting options are essential. Second, detailed guidance undermines the Double Materiality Assessment (DMA) by creating a "checklist" effect. This pressures companies to report on a topic even if their own assessment deems it non-material.			
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	We do not have a single perspective on the deletion of the voluntary datapoint on the adjusted gender pay gap. Overall, while some simplification is achieved by deleting the voluntary adjusted datapoint, this comes at the expense of comparability and meaningful interpretation. Concerns about deletion: • An adjusted gender pay gap provides more meaningful and fair insights, as it takes into account the function, role, or qualification of employees. Without such adjustment, unadjusted figures may promote misleading conclusions or reinforce structural discrimination. • Deleting the voluntary adjusted datapoint risks reducing comparability and nuance, especially in industries with specific role- or qualification-based differences. Arguments for deletion: • Reporting only the unadjusted pay gap is consistent with other EU directives and avoids creating parallel or conflicting reporting obligations. • While the unadjusted figure can be open to misinterpretation, aligning with existing legislation ensures coherence and limits additional reporting burdens.			
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	We acknowledge that the revised formulation continues to provide some level of transparency on payment practices, but important concerns remain regarding the protection of SMEs. Positive aspects: • Even without clause 33(a), companies are still required to disclose standard payment terms and the percentage of invoices aligned with these terms. This ensures a degree of visibility on payment practices that affect SMEs. • This disclosure helps identify whether companies have consistent policies in place regarding payment periods. • It did not offer meaningful insights and was difficult to interpret in a decision-useful way. Concerns: • The omission of clause 33(a) is problematic, as it removes explicit transparency on how long suppliers actually wait to be paid. SMEs, in particular, are vulnerable to late payments and often lack the bargaining power to enforce fair practices. • The deleted requirement would have provided a more detailed and concrete picture of payment behavior by disclosing the average payment time. Its absence risks weakening protections for SMEs. • While average payment time is influenced by company-specific cycles (e.g. weekly or bi-weekly runs), it nevertheless offers valuable information on whether small suppliers face structural disadvantages. • We also question the relevance and practicality of the remaining datapoint on "standard payment terms". • Also disclosures on standard payment terms are already partially covered by existing financial reporting requirements, in particular IAS 7.44. • Furthermore, the categorization of suppliers (e.g., SMEs) remains problematic.			
Survey	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		On page 27 of Annex II, under 'Recovery', energy recovery and biological circular waste that is not returned to the cycle (i.e. mainly fermentation) are expressly excluded from the definition of "recovery" and would therefore be classified as 'disposal'. This contradicts the waste hierarchy within the meaning of the Waste Framework Directive (WFD), according to which energy recovery is explicitly defined as 'recovery'. Recovery should be based on the WFD definition and therefore also include energy recovery: if the R1 criterion for energy efficiency is met. Composting and fermentation are recycling within the meaning of Article 3(17) of the WFD, provided that a nutrient cycle is created. Fermentation for energy recovery is also recovery according to Article 3(5) of the WFD.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AFNOR	Standard setting initiative	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	We acknowledge that the proposed amendments to Chapter 3 of ESRS 1 simplify the DMA process and reinforce the information materiality filter, reducing the risk of a checklist approach. The option for both top-down and bottom-up workflows, and the greater emphasis on outcome-focused disclosures, are welcome steps toward proportionality and usability. However, while the drafting is clearer, the amendments do not yet fully strike an acceptable balance between simplification and robustness because the DMA remains detached from recognised, consensus-based international standards. ESRS requirements should be anchored in harmonised European standards (hENs) developed under the Vienna Agreement between CEN and ISO, or equivalent ISO management systems (e.g., ISO 14001, 26000, 50001). These are built through a robust, democratic process that ensures legitimacy, protects the relevance of the EU standardisation system, and enables international scalability. In contrast, ESRS "common specification"-type provisions risk weakening the established standardisation framework and isolating Europe from the global playing field. By formally recognising such standards in the DMA process, ESRS would: Reduce the burden on companies, especially SMEs, by allowing re-use of existing evidence from certified management systems; Increase trust and acceptance among preparers, auditors, and users through the legitimacy of established norms; Demonstrate value to national stakeholders, showing that National Standards Bodies (NSB) and Committees (NC) are proactive in supporting the implementation of EU policy. We also recommend including practical tools such as a short decision tree, minimum documentation templates, and clear guidance on aggregation/disaggregation, to maintain robustness while further improving usability.			
Survey	AFNOR	Standard setting initiative	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	The updated guidance in Paragraphs 34–36 and Appendix C is a welcome step toward clarifying how implemented remediation, mitigation, and prevention measures should influence the double materiality assessment. The emphasis on differentiating gross from net impacts and recognising the effect of preventive actions supports more targeted and meaningful disclosures. That said, the methodology would benefit from a stronger foundation in formal, consensus-based standards — notably harmonised European standards (hENs) developed under the Vienna Agreement between CEN and ISO, or relevant ISO management systems (e.g., ISO 14001, ISO 26000, ISO 50001). These frameworks offer tried-and-tested approaches for evaluating residual risks and improvements after action is taken, developed through a transparent and internationally recognised process. Without this connection, ESRS risk evolving into stand-alone "common specifications" with limited legitimacy and weaker global interoperability. By embedding recognised standards into the DMA approach, EFRAG could: Safeguard the authority of the EU standardisation system and avoid undermining its established processes; Ease compliance for companies, particularly SMEs, through reuse of data, controls, and audits already performed under certified systems; Reinforce the role of National Standards Bodies and Committees as active partners in implementing EU sustainability policy. We further suggest allowing preparers to focus disclosures on the residual severity and likelihood of impacts once robust, standardised systems are in place, supported by proportionate evidence requirements. This would make reports both more comparable and less burdensome, while maintaining alignment with global practices.			
Survey	AFNOR	Standard setting initiative	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We support the proposed amendments under Lever 2 as they enhance flexibility, promote conciseness, and strengthen the integration of sustainability statements with overall corporate reporting. Allowing an executive summary, encouraging the use of appendices for detailed data, and clarifying "connected information" will make sustainability disclosures more accessible to a broader audience and reduce unnecessary duplication. To maximise the benefits, these improvements should be complemented by explicit recognition of harmonised European standards (hENs) developed under the Vienna Agreement between CEN and ISO. Referencing recognised, consensus-based standards for methodologies and terminology would: Protect the relevance of the EU standardisation system, avoiding parallel, non-standardised frameworks; Reduce the burden on preparers, particularly SMEs, by enabling them to reuse content from certified management systems (e.g., ISO 14001, ISO 26000, ISO 50001) in both narrative and data sections; Demonstrate to national stakeholders that National Standards Bodies and Committees are actively supporting CSRD implementation. We also encourage EFRAG to publish a cross-reference matrix between the sustainability statement structure and topical ESRS disclosure requirements, as well as with related financial reporting references. This would further improve connectivity, reduce fragmentation, and facilitate assurance processes. By embedding these readability measures in a framework aligned with robust, internationally recognised standards, the ESRS will remain both user-friendly and globally interoperable, ensuring that simplification does not come at the cost of legitimacy or comparability.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AFNOR	Standard setting initiative	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We welcome the restructuring of ESRS 2 and its improved interaction with topical standards. The streamlined "General Disclosure Requirements" and the more principles-based approach to policies, actions, and targets (PAT) enhance clarity and usability while maintaining the ability to deliver relevant and comparable information. Removing duplicative topical specifications and strengthening the link between PAT and IROs will reduce preparation effort without undermining robustness. To ensure that this simplification is durable and internationally scalable, ESRS should explicitly align with recognised, consensus-based international standards — for example, harmonised European standards (hENs) under the Vienna Agreement between CEN and ISO, as well as specific ISO and IEC management system and reporting frameworks such as ISO 9001 (quality management), ISO 14064 (GHG quantification), ISO 45001 (occupational health & safety), and ISO 37001 (anti-bribery). These standards are developed through rigorous, transparent processes and already provide tested structures for setting policies, defining actions, monitoring targets, and ensuring continual improvement. Integrating such references would: Protect the authority of the EU's standardisation system and avoid creating parallel, less legitimate "common specifications"; Reduce burden, especially for SMEs, by enabling reuse of documentation, controls, and KPIs already maintained under certified systems; Showcase to national stakeholders that National Standards Bodies and Committees are proactively enabling CSRD implementation. We recommend complementing the architectural simplification with a reference mapping tool that connects ESRS 2 requirements to equivalent clauses in recognised European and international standards. This would allow preparers to directly link sustainability reporting to their existing compliance and management frameworks, improving both efficiency and auditability. By pairing the structural clarity of Lever 3 with explicit ties to robust global standards, the ESRS will achieve genuine simplification without losing relevance, comparability, or international alignment.			
Survey	AFNOR	Standard setting initiative	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	While the removal of "may disclose" provisions and the relocation of mandatory application requirements directly beneath their corresponding disclosure requirements are steps toward a cleaner structure, these amendments alone do not fully achieve the desired level of clarity and accessibility. The language is more concise, but without explicit reference to recognised, consensus-based standards — such as harmonised European standards (hENs) under the Vienna Agreement between CEN and ISO, or relevant ISO and IEC frameworks (e.g., ISO 14064, ISO 50001, ISO 45001, ISO 37000) — the ESRS risk remaining self-contained "common specifications" with limited legitimacy and weaker international interoperability. The current drafting still leaves room for interpretation that could lead to inconsistent application across sectors and jurisdictions. For SMEs in particular, the absence of clear pathways to reuse existing data, processes, and audit trails from certified management systems may actually increase preparation effort despite the intention to simplify. To deliver genuine clarity and accessibility, the mandatory content should: Reference established standards for definitions, methodologies, and calculation rules, protecting the authority of the EU standardisation system; Incorporate a mapping tool linking ESRS requirements to equivalent provisions in CEN–ISO norms to guide preparers toward existing, verifiable sources of evidence; Explicitly recognise certified management systems as acceptable means of meeting certain disclosure requirements, reducing duplication. Without these linkages, the ESRS risk creating a parallel framework that isolates Europe from global reporting practice and misses an opportunity to demonstrate to national stakeholders that NSBs and NCs are proactively enabling EU policy implementation through proven, internationally recognised tools.			
Survey	AFNOR	Standard setting initiative	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The intention behind the NMIG — to provide optional, illustrative guidance and remove it from the Delegated Act — is understandable. However, in practice, its ambiguous status risks creating grey areas that undermine both simplification and legal certainty. Even if officially "non-mandatory," preparers, auditors, and regulators may treat NMIG content as a de facto checklist, especially where it reproduces elements formerly embedded in mandatory datapoints. This could reintroduce compliance pressure and increase workload, particularly for SMEs, contrary to the stated goal of datapoint reduction. If guidance is necessary, it should be firmly anchored in recognised, consensus-based international standards — such as harmonised European standards (hENs) developed under the Vienna Agreement between CEN and ISO, and relevant ISO/IEC frameworks (e.g., ISO 14064 for GHG accounting, ISO 50001 for energy management, ISO 26000 for social responsibility, ISO 37000 for governance). These established references provide clear, legitimate methodologies without creating an "ESRS-only" layer of pseudo-obligations. To avoid confusion and burden creep: NMIG should be formally separated from compliance assessments, with explicit safeguards preventing its use as an implicit requirement; Where possible, NMIG examples should be replaced or supplemented with references to existing CEN–ISO norms, allowing preparers to leverage certified management systems and avoid duplicate reporting structures; EFRAG and the Commission should make clear that auditors cannot request justification for non-use of NMIG elements. Without these safeguards, NMIG risks functioning as unofficial mandatory guidance — eroding the credibility of the simplification process, weakening the role of formal standardisation, and isolating the EU framework from globally recognised approaches.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AFNOR	Standard setting initiative	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	The additional reliefs — including "undue cost or effort," partial scope with improvement plans, and flexibility between direct data and estimates — are welcome in principle and respond to repeated stakeholder concerns about the reporting burden. These measures, if applied proportionately, can help align ESRS with the practical realities faced by preparers, especially SMEs. However, the amendments still fall short of providing a fully effective and coherent burden relief framework. The reliefs remain self-contained within the ESRS and are not sufficiently anchored in recognised, consensus-based standards such as harmonised European standards (hENs) developed under the Vienna Agreement between CEN and ISO, or relevant ISO/IEC frameworks (e.g., ISO 14064 for GHG accounting, ISO 50001 for energy management, ISO 45001 for occupational health and safety). These established standards already include tested mechanisms for scoping, data quality management, and materiality thresholds — mechanisms that could be directly referenced to reduce complexity and improve interoperability. Without this grounding, the reliefs risk being applied inconsistently, creating uncertainty for both preparers and auditors. In addition, the lack of explicit recognition of certified management systems as valid evidence of due process and continual improvement undermines the potential efficiency gains: companies may still face duplicative processes rather than leveraging existing compliance infrastructures. To better balance burden reduction with transparency and interoperability: Link ESRS relief conditions to the existence of recognised management systems, allowing reliance on ISO-certified processes as a "safe harbour"; Publish a clear mapping to equivalent IFRS S1/S2 relief provisions and to relevant CEN–ISO clauses; Ensure reliefs are accompanied by proportional documentation requirements to maintain trust without imposing hidden burdens. Only by integrating these reliefs with established standards can the ESRS truly deliver simplification while safeguarding transparency and legitimacy in the context of the EU Green Deal.			
Survey	AFNOR	Standard setting initiative	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	Providing flexibility to report metrics with a partial scope when no reliable direct or estimated data are available is a pragmatic step that recognises current data limitations, particularly in extended value chains. The requirement to disclose actions to improve coverage is also positive. However, the absence of any time limit on the use of this relief risks turning it into a permanent exemption rather than a temporary bridge toward full data coverage. This could undermine comparability and dilute incentives for systematic improvement. Without clear guardrails, the relief could also be applied inconsistently across sectors and jurisdictions. To ensure both flexibility and accountability, this provision should be explicitly linked to recognised, consensus-based standards for data quality management and continual improvement — for example, harmonised European standards (hENs) developed under the Vienna Agreement between CEN and ISO, or ISO/IEC frameworks such as ISO 14064 (GHG accounting), ISO 50001 (energy management), and ISO 9001 (quality management). These standards already provide well-defined processes for establishing baselines, improving data coverage, and auditing progress. We recommend: Setting a clear time limit or review period for the use of the relief, with the possibility of justified extensions; Allowing undertakings to rely on certified management systems as evidence of credible improvement plans, creating a "safe harbour" for compliance; Publishing a mapping between ESRS paragraph 92 and equivalent IFRS S1/S2 provisions, as well as relevant clauses in CEN–ISO standards, to strengthen interoperability and legal certainty. By grounding the relief in established international standards and ensuring it remains temporary and measurable, EFRAG can provide real flexibility for preparers without creating a loophole that weakens the quality and completeness of reported information.			
Survey	AFNOR	Standard setting initiative	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	Neither Option 1 nor Option 2 provides a satisfactory balance between transparency for users and practicability for preparers. Option 1 maintains a quantitative requirement but without sufficiently clear methodological anchors, which risks inconsistent application and high compliance costs without guaranteeing comparability. Option 2 removes the quantitative requirement altogether, which would result in a significant loss of decision-useful information for investors and reduce incentives for companies to improve their methodologies. A more effective approach would explicitly anchor any relief or requirement in recognised, consensus-based international standards — for example, harmonised European standards (hENs) under the Vienna Agreement between CEN and ISO, and relevant ISO frameworks such as ISO 14064 (GHG accounting), ISO 14008 (monetary valuation of environmental impacts), ISO 50001 (energy management), and ISO 31000 (risk management). These standards already provide robust methodologies for estimation, scenario analysis, uncertainty quantification, and valuation, which could serve as a "safe harbour" for ESRS compliance. In practice, this would mean: Retaining quantitative disclosure where feasible, but allowing omission only if the entity demonstrates the absence of reasonable and supportable data as defined in established standards; Requiring disclosure of the basis of estimation and uncertainty ranges, linked to recognised methodologies; Providing a crosswalk to IFRS S1/S2 relief provisions to ensure global interoperability. Without such alignment, Option 1 risks being burdensome without delivering consistent value, while Option 2 risks undermining the credibility and ambition of the ESRS framework. Both would leave Europe with a fragmented approach, disconnected from the international standardisation ecosystem and from the legitimate, consensus-driven processes that underpin durable and scalable reporting practices.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AFNOR	Standard setting initiative	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Retaining datapoints essential for assessing transition and physical risk is justified, but the absence of explicit reference to recognised, consensus-based standards leaves preparers without a clear technical anchor. Aligning these requirements with harmonised European standards (hENs) under the Vienna Agreement between CEN and ISO, and relevant ISO methodologies — such as ISO 14064 (GHG accounting), ISO 14090 (climate adaptation), ISO 14091 (climate risk assessment), and ISO 14008 (monetary valuation of environmental impacts) — would: Provide robust and internationally recognised approaches for scenario modelling, valuation, and uncertainty management; Reduce duplication by allowing reuse of outputs from certified management systems and regulatory climate-risk assessments; Strengthen global interoperability, benefiting both EU and non-EU stakeholders. We recommend: Embedding these standard references directly into the application requirements to create a "safe harbour" for compliance; Allowing range-based or scenario-based reporting where exact quantification is not feasible, provided the method is consistent with recognised standards; Publishing a mapping between DR E1-11 datapoints and equivalent IFRS S2 and sector-specific frameworks (e.g., NGFS scenarios, TCFD guidance) to facilitate alignment. Without such methodological integration, the amended provisions risk continuing to impose high effort for uncertain comparability, missing the opportunity to ground ESRS climate financial effect disclosures in legitimate, consensus-driven standards that enable both simplification and international scalability.			
Survey	AFNOR	Standard setting initiative	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We acknowledge EFRAG's efforts to improve interoperability with IFRS S1 and S2, such as aligning the GHG boundary with the financial consolidation approach and harmonising terminology. These changes make it easier for dual reporters to navigate both frameworks. However, the current approach remains focused on alignment with ISSB standards alone and does not sufficiently integrate recognised, consensus-based technical standards from the European and international standardisation system — for example, harmonised European standards (hENs) developed under the Vienna Agreement between CEN and ISO, or ISO/IEC methodologies like ISO 14064 (GHG accounting), ISO 14090/14091 (climate adaptation and risk assessment), and ISO 50001 (energy management). Anchoring interoperability in these robust, global standards would: Reduce duplication with other reporting regimes, an issue already flagged by multiple stakeholders; Allow companies — especially those already subject to sectoral or regulatory reporting — to reuse existing processes and data, cutting administrative workload; Strengthen the legitimacy of ESRS by connecting them to the broader standardisation ecosystem rather than creating a parallel "ESRS-only" layer. Interoperability should also prevent the cascade effect down value chains, where CSRD/CS3D obligations are passed de facto to suppliers via direct data requests or mandatory platforms. Without safeguards, such knock-on effects could undermine the simplification objectives and disproportionately affect SMEs. To achieve a truly balanced outcome, we recommend: Publishing a triangular mapping between ESRS, IFRS S1/S2, and relevant CEN–ISO standards; Ensuring that reliefs beyond IFRS do not create new gaps or inconsistencies; Embedding a progressive approach and group-level reporting options to ease the transition without sacrificing transparency. This broader, standards-based interoperability would better serve both EU policy goals and the operational realities of preparers.			
Survey	AFNOR	Standard setting initiative	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	AFNOR	Standard setting initiative	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We acknowledge that moving six datapoints from "may" to "shall" represents a very limited change compared to the overall datapoint reduction, and that these items are linked to existing disclosure objectives rather than introducing new concepts. Making these elements explicit can indeed improve clarity for both preparers and users. However, even small increases in mandatory reporting should be carefully assessed against the structural objective of reducing complexity and duplication. Without anchoring these additional "shall" datapoints in recognised, consensus-based technical references — such as ISO/CEN standards — there is a risk of reintroducing fragmented requirements. If these datapoints are not cross-referenced to established methodologies, companies may still need to perform bespoke analyses to satisfy ESRS, even where equivalent data or processes already exist under other frameworks (e.g., SFDR, EU Taxonomy, CS3D, sector-specific standards). This undermines the stated goal of simplification and increases the likelihood of cascade effects in value chains, particularly affecting SMEs. To mitigate this, we recommend: Publishing a mapping between the six datapoints and equivalent clauses in IFRS S1/S2 and relevant CEN–ISO standards; Allowing preparers to rely on outputs from certified management systems to meet these requirements; Monitoring implementation to ensure these additions do not become a precedent for gradually re-expanding the datapoint set. Even a small shift from voluntary to mandatory status should be accompanied by strong interoperability measures, to maintain both the credibility of the simplification process and the legitimacy of the ESRS within the wider standardisation ecosystem.			
Survey	AFNOR	Standard setting initiative	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AFNOR	Standard setting initiative	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	Clarifying that ESRS is a "fair presentation" framework — in line with IFRS S1 and S2 — has the potential to move reporting away from a purely compliance-driven, checklist approach. In theory, this could allow the materiality filter to operate more effectively and reduce the volume of immaterial information disclosed. However, in practice, the fair presentation requirement may also introduce greater subjectivity and uncertainty, especially in areas like impact materiality where established methodologies and benchmarks are less mature. This could lead to inconsistent interpretations, heightened legal exposure, and increased audit costs, particularly for smaller preparers. We would recommend: Publishing clear examples and sector-based benchmarks, linked to established standards, to guide preparers' judgements; Allowing reliance on certified management systems as evidence of an adequate process for determining material disclosures; Ensuring alignment with other EU regulatory definitions to avoid conflicting interpretations of materiality. Without these safeguards, there is a risk that the fair presentation approach — while conceptually sound — could inadvertently increase complexity and liability rather than reduce it.			
Survey	AFNOR	Standard setting initiative	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	The disclosure of both GHG emissions intensity targets and associated absolute values can, in principle, provide a more complete picture of an undertaking's climate progress. While intensity metrics reflect efficiency gains, they can mask increases in overall emissions; absolute figures address this but ignore the effects of business growth. Having both is generally valuable for transparency. That said, for financial institutions, estimating absolute emissions linked to portfolio targets involves highly uncertain modelling and a large number of forward-looking assumptions (portfolio composition, sectoral shifts, production capacity, market shares, intensity trajectories). Without robust, standardised methodologies, such disclosures risk being unreliable and of limited decision-usefulness, while significantly increasing the reporting burden. To address this, ESRS should explicitly reference recognised, consensus-based methodologies — such as those embedded in harmonised European standards (hENs) under the Vienna Agreement between CEN and ISO, and sector-specific frameworks like ISO 14097 (climate finance and investment), the Partnership for Carbon Accounting Financials (PCAF) Standard, and relevant ISO 14064 provisions. These could serve as a "safe harbour" for calculating and disclosing absolute values, ensuring methodological consistency and comparability. We recommend: Allowing financial institutions to disclose absolute targets only where they can be derived from established, verifiable methodologies; Providing clear guidance and worked examples for the sector, aligned with ISO/CEN standards, to limit variability; Ensuring that any sector-specific relief maintains a level playing field by being based on objective feasibility criteria rather than sector exemptions alone. Without such methodological anchors and proportionality safeguards, this requirement risks generating opaque or misleading figures, adding complexity without materially improving the quality of climate disclosures.			
Survey	AFNOR	Standard setting initiative	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	Changing the disaggregation threshold from a proportional measure (≥50 employees representing at least 10% of the workforce) to a "top 10 largest countries" rule can improve comparability and ensure that disclosures capture a broader set of geographies. It also simplifies the trigger condition, which may be easier to apply in practice. However, for multinational groups with a wide geographic footprint, this approach could increase the number of countries to be reported, particularly in cases where operations are spread across many small or medium-sized jurisdictions. Even if the raw data is "usually accessible," additional segmentation, quality checks, and reconciliation for each country can create a meaningful administrative burden — especially for entities with decentralised HR systems or partially outsourced functions. To balance transparency and proportionality, we recommend: Allowing undertakings to aggregate smaller jurisdictions into a residual "other countries" category once the threshold of 80–90% total employee coverage is reached; Recognising the use of established HR and workforce reporting standards (e.g., ISO 30414 on human capital reporting) and certified HR information systems as a "safe harbour" for data accuracy and scope; Embedding a progressive approach for first-time reporters, especially SMEs or subsidiaries, to avoid disproportionate initial compliance costs; Providing explicit alignment with related EU frameworks (e.g., equal pay reporting under EU law) to prevent duplication of disclosures. Without these safeguards, the shift to a top-10-country requirement risks eroding some of the simplification gains by increasing country-level granularity beyond what is decision-useful for many stakeholders, while adding workload that could be avoided through proportional aggregation and reliance on recognised standards.			
Survey	AFNOR	Standard setting initiative	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	Aligning the ESRS S1 methodology for non-EU adequate wages with the 2024 ILO Governing Body agreement is a step toward greater consistency with international labour standards. However, several aspects of the amended approach raise concerns regarding clarity, comparability, and ambition. First, the current hierarchy risks accepting minimum wages far below an adequate wage as compliant disclosures, particularly in jurisdictions where statutory minima are not aligned with living wage benchmarks. Second, by placing the assessment of relevant living wage datasets as a "last resort," the methodology may unintentionally discourage the use of the most meaningful data source for assessing wage adequacy. Third, the absence of a requirement to disclose which prong of the methodology has been applied significantly reduces comparability across undertakings and geographies. To address these issues, we recommend: Embedding explicit references to recognised international standards — such as ILO conventions, ISO 26000 (social responsibility), and harmonised European standards (hENs) under the Vienna Agreement — as methodological anchors; Requiring disclosure of the methodological prong applied, along with justification, to enable comparability and assurance; Encouraging the use of living wage benchmarks (e.g., Global Living Wage Coalition methodology) as a primary rather than last-resort option; Aligning definitions and wage calculation principles with other EU frameworks (e.g., Equal Pay Directive) to prevent duplication and inconsistencies. Without these refinements, the revised AR 22 risks producing wage adequacy disclosures that are technically compliant but substantively weak, potentially undermining both stakeholder trust and the EU's stated social sustainability objectives. Anchoring the methodology in robust, consensus-based standards would ensure that the simplification effort does not come at the cost of meaningful transparency or comparability.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AFNOR	Standard setting initiative	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	The current integration of SFDR PAIs into the Amended ESRS still presents three structural challenges: Relevance filter – Investor feedback already indicates that some PAIs are of limited practical relevance. Without a robust materiality-based filter, companies may still have to produce data of marginal decision-usefulness, diluting focus and increasing cost. Standardisation gap – Many PAI-related datapoints are not explicitly tied to recognised, consensus-based technical standards, such as harmonised European standards (hENs) under the Vienna Agreement between CEN and ISO, or ISO/IEC frameworks like ISO 14064 (GHG accounting), ISO 30414 (human capital), and ISO 26000 (social responsibility). Anchoring in these norms would improve comparability and allow reuse of existing compliance data. Duplication risk – Even after consolidation, overlaps remain between ESRS and SFDR requirements. Without clear crosswalks and interoperability tools, preparers risk parallel data collection exercises for essentially the same indicators, increasing administrative burden — particularly for dual reporters and SMEs in value chains. To strengthen integration while maintaining simplification, we recommend: Publishing a mapping table between each SFDR PAI and its corresponding ESRS datapoint, along with references to relevant CEN–ISO clauses; Embedding a proportionality principle so that low-relevance PAIs are disclosed only when material; Recognising certified management systems and established reporting tools as "safe harbours" for meeting certain PAI requirements. Without these measures, the SFDR–ESRS link risks maintaining complexity under a different form, rather than delivering the intended streamlining.			
Survey	AFNOR	Standard setting initiative	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	Providing companies with methodological guidance for biodiversity- and ecosystems-related targets is essential, particularly as target-setting in this field is still evolving and highly context-dependent. The current AR 26 offers useful examples (e.g., hectares restored, natural surfaces recreated, number of sites with approved ecological integrity), but it does not yet reflect the state of the art in biodiversity target methodologies. To be credible and comparable, AR 26 should be updated to align with internationally recognised biodiversity frameworks such as the Science Based Targets Network (SBTN), the Global Biodiversity Framework (GBF) under the CBD, and the recommendations of the Taskforce on Nature-related Financial Disclosures (TNFD). These initiatives emphasise measurable outcomes linked to ecological integrity, species diversity, ecosystem services, and landscape connectivity — going beyond purely area-based metrics. Additionally, guidance should be anchored in consensus-based technical standards relevant to biodiversity, for example: ISO 14055 (land degradation neutrality) for restoration planning and monitoring; ISO 14007/14008 for valuing biodiversity-related environmental costs and benefits; ISO 37120+ series for ecosystem services indicators at site or community level. These standards provide structured, verifiable methodologies that could serve as a "safe harbour" for ESRS compliance, reduce the risk of inconsistent approaches, and support comparability across sectors and geographies. Without these updates, biodiversity targets may remain inconsistent, difficult to verify, and potentially misaligned with scientific priorities. This could undermine stakeholder trust and the effectiveness of the EU's contribution to global biodiversity goals. We recommend that AR 26: Integrate SBTN/GBF-aligned indicators; Link to relevant CEN–ISO standards; Provide sector-specific examples for high-impact industries (e.g., forestry, mining, agriculture, infrastructure). This would ensure biodiversity targets are scientifically grounded, standardised, and operationally feasible.			
Survey	AFNOR	Standard setting initiative	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	Maintaining the unadjusted global gender pay gap aligns with the Pay Transparency Directive (EU) 2023/970 and ensures consistency with an established EU legal requirement. However, deleting the adjusted gender pay gap by employee category removes an important datapoint that can significantly enhance the interpretability and relevance of pay equity disclosures. The unadjusted gap provides a high-level indicator but can be heavily influenced by workforce composition, job segregation, and structural factors unrelated to equal pay for equal work. Without the adjusted metric — especially when broken down by employee category or country — stakeholders risk drawing misleading conclusions about an organisation's actual pay equity performance. Rather than complete deletion, we recommend retaining the adjusted metric as a proportionate, materiality-based requirement and anchoring its calculation in recognised, consensus-based standards such as: ISO 30414 (human capital reporting) for pay equity metrics; CEN guidelines on gender equality plans (developed under the Vienna Agreement); This would allow companies to use established methodologies, reduce the risk of inconsistent approaches, and enable comparability across sectors and jurisdictions. We also note that maintaining the adjusted metric could help prevent cascade effects in value chains, where investors or large clients request this data outside the ESRS framework, reintroducing the burden the deletion sought to remove. By keeping it within ESRS under clear methodological guidance, preparers could control how it is calculated and communicated. In summary, while simplification is important, deleting the adjusted gender pay gap datapoint risks weakening the quality and usefulness of social disclosures. A balanced approach would be to retain it with clear methodological anchors and a proportionality principle.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AFNOR	Standard setting initiative	France	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	Replacing former G1-2 and G1-6 "payment practices" datapoints with generic PAT disclosures improves readability, but it risks reducing visibility on concrete behaviours that affect SMEs' liquidity. Narrative PAT alone is unlikely to provide the discipline and comparability needed to meet the CSRD's SME-protection objective. A proportionate fix would be to retain a minimal set of standardised, decision-useful KPIs, subject to materiality, while keeping PAT for context. For example: Median/weighted-average days to pay for SME suppliers (reported separately from non-SMEs). % of SME invoices paid beyond agreed terms (and % paid within 30/60 days). Disputed-invoice rate and median time to resolve disputes. Existence and uptake of early-payment/fast-track options for SMEs (e.g., dynamic discounting), and transparency on supplier finance/reverse-factoring programs and their terms. These indicators are simple to extract from AP systems, auditable, and directly tied to SME resilience. To avoid burden creep, provide safe harbours by allowing companies to rely on processes certified or assessed against recognised, consensus-based standards (e.g., ISO 20400 on sustainable procurement, ISO 44001 on collaborative business relationships, ISO 9001 for order-to-pay controls, ISO 37000 for governance). Where such systems are in place, PAT can reference them, and the KPIs above become a concise outcome check rather than a parallel framework. Additional safeguards to prevent unintended cascade effects down the value chain: Permit aggregation where SME coverage ≥80–90% of supplier spend is reached. Encourage country/segment breakdowns only where material (e.g., known late-payment hotspots). Provide a brief assurance-ready template (definition of "SME supplier", inclusion/exclusion of disputed invoices, and treatment of payment-term extensions). In short, keep PAT, but re-introduce a small, harmonised KPI core on payment timeliness and dispute handling. This preserves simplification while delivering the specific transparency needed to protect SMEs in practice.			
Survey	AFNOR	Standard setting initiative	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The simplifications achieved in the Amended ESRS are visible in reduced datapoints, improved structure, and clarified wording. These changes are welcome insofar as they address readability and some implementation issues. However, they do not sufficiently resolve structural causes of complexity, nor do they secure true interoperability with global frameworks or national standardisation systems. The core issue is that ESRS remains non-founded on recognised, consensus-based standards. Unlike harmonised European standards (hENs) developed under the Vienna Agreement between CEN and ISO, or widely adopted ISO/IEC frameworks (e.g., ISO 14064 for GHG accounting, ISO 26000 for social responsibility, ISO 45001 for OH&S), the ESRS lacks the robust legitimacy, scalability, and international alignment such standards confer. Without systematic alignment, undertakings risk duplication and conflicting requirements under other EU legislation (SFDR, EU Taxonomy, CS3D) or international initiatives (ISSB, SBTN, TNFD). This can reintroduce burden via parallel reporting channels, undermining the simplification goal. We recommend: Embedding explicit references to CEN–ISO standards as implementation "safe harbours"; Aligning terminology and data models with globally recognised frameworks to ensure interoperability; Providing proportionality measures tailored for SMEs while preserving decision-useful transparency; Clarifying the Glossary to incorporate precise definitions harmonised with technical standards. The simplification is a step forward, but without standardisation-based anchoring, it risks being cosmetic and leaves Europe isolated from the international reporting ecosystem.			
Survey	AFNOR	Standard setting initiative	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The simplifications achieved in the Amended ESRS are visible in reduced datapoints, improved structure, and clarified wording. These changes are welcome insofar as they address readability and some implementation issues. However, they do not sufficiently resolve structural causes of complexity, nor do they secure true interoperability with global frameworks or national standardisation systems. The core issue is that ESRS remains non-founded on recognised, consensus-based standards. Unlike harmonised European standards (hENs) developed under the Vienna Agreement between CEN and ISO, or widely adopted ISO/IEC frameworks (e.g., ISO 14064 for GHG accounting, ISO 26000 for social responsibility, ISO 45001 for OH&S), the ESRS lacks the robust legitimacy, scalability, and international alignment such standards confer. Without systematic alignment, undertakings risk duplication and conflicting requirements under other EU legislation (SFDR, EU Taxonomy, CS3D) or international initiatives (ISSB, SBTN, TNFD). This can reintroduce burden via parallel reporting channels, undermining the simplification goal. We recommend: Embedding explicit references to CEN–ISO standards as implementation "safe harbours"; Aligning terminology and data models with globally recognised frameworks to ensure interoperability; Providing proportionality measures tailored for SMEs while preserving decision-useful transparency; Clarifying the Glossary to incorporate precise definitions harmonised with technical standards. The simplification is a step forward, but without standardisation-based anchoring, it risks being cosmetic and leaves Europe isolated from the international reporting ecosystem.			
Survey	AFNOR	Standard setting initiative	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The simplifications achieved in the Amended ESRS are visible in reduced datapoints, improved structure, and clarified wording. These changes are welcome insofar as they address readability and some implementation issues. However, they do not sufficiently resolve structural causes of complexity, nor do they secure true interoperability with global frameworks or national standardisation systems. The core issue is that ESRS remains non-founded on recognised, consensus-based standards. Unlike harmonised European standards (hENs) developed under the Vienna Agreement between CEN and ISO, or widely adopted ISO/IEC frameworks (e.g., ISO 14064 for GHG accounting, ISO 26000 for social responsibility, ISO 45001 for OH&S), the ESRS lacks the robust legitimacy, scalability, and international alignment such standards confer. Without systematic alignment, undertakings risk duplication and conflicting requirements under other EU legislation (SFDR, EU Taxonomy, CS3D) or international initiatives (ISSB, SBTN, TNFD). This can reintroduce burden via parallel reporting channels, undermining the simplification goal. We recommend: Embedding explicit references to CEN–ISO standards as implementation "safe harbours"; Aligning terminology and data models with globally recognised frameworks to ensure interoperability; Providing proportionality measures tailored for SMEs while preserving decision-useful transparency; Clarifying the Glossary to incorporate precise definitions harmonised with technical standards. The simplification is a step forward, but without standardisation-based anchoring, it risks being cosmetic and leaves Europe isolated from the international reporting ecosystem.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AFNOR	Standard setting initiative	France	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The simplifications achieved in the Amended ESRS are visible in reduced datapoints, improved structure, and clarified wording. These changes are welcome insofar as they address readability and some implementation issues. However, they do not sufficiently resolve structural causes of complexity, nor do they secure true interoperability with global frameworks or national standardisation systems. The core issue is that ESRS remains non-founded on recognised, consensus-based standards. Unlike harmonised European standards (hENs) developed under the Vienna Agreement between CEN and ISO, or widely adopted ISO/IEC frameworks (e.g., ISO 14064 for GHG accounting, ISO 26000 for social responsibility, ISO 45001 for OH&S), the ESRS lacks the robust legitimacy, scalability, and international alignment such standards confer. Without systematic alignment, undertakings risk duplication and conflicting requirements under other EU legislation (SFDR, EU Taxonomy, CS3D) or international initiatives (ISSB, SBTN, TNFD). This can reintroduce burden via parallel reporting channels, undermining the simplification goal. We recommend: Embedding explicit references to CEN–ISO standards as implementation "safe harbours"; Aligning terminology and data models with globally recognised frameworks to ensure interoperability; Providing proportionality measures tailored for SMEs while preserving decision-useful transparency; Clarifying the Glossary to incorporate precise definitions harmonised with technical standards. The simplification is a step forward, but without standardisation-based anchoring, it risks being cosmetic and leaves Europe isolated from the international reporting ecosystem.			
Survey	AFNOR	Standard setting initiative	France	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The simplifications achieved in the Amended ESRS are visible in reduced datapoints, improved structure, and clarified wording. These changes are welcome insofar as they address readability and some implementation issues. However, they do not sufficiently resolve structural causes of complexity, nor do they secure true interoperability with global frameworks or national standardisation systems. The core issue is that ESRS remains non-founded on recognised, consensus-based standards. Unlike harmonised European standards (hENs) developed under the Vienna Agreement between CEN and ISO, or widely adopted ISO/IEC frameworks (e.g., ISO 14064 for GHG accounting, ISO 26000 for social responsibility, ISO 45001 for OH&S), the ESRS lacks the robust legitimacy, scalability, and international alignment such standards confer. Without systematic alignment, undertakings risk duplication and conflicting requirements under other EU legislation (SFDR, EU Taxonomy, CS3D) or international initiatives (ISSB, SBTN, TNFD). This can reintroduce burden via parallel reporting channels, undermining the simplification goal. We recommend: Embedding explicit references to CEN–ISO standards as implementation "safe harbours"; Aligning terminology and data models with globally recognised frameworks to ensure interoperability; Providing proportionality measures tailored for SMEs while preserving decision-useful transparency; Clarifying the Glossary to incorporate precise definitions harmonised with technical standards. The simplification is a step forward, but without standardisation-based anchoring, it risks being cosmetic and leaves Europe isolated from the international reporting ecosystem.			
Survey	AFNOR	Standard setting initiative	France	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The simplifications achieved in the Amended ESRS are visible in reduced datapoints, improved structure, and clarified wording. These changes are welcome insofar as they address readability and some implementation issues. However, they do not sufficiently resolve structural causes of complexity, nor do they secure true interoperability with global frameworks or national standardisation systems. The core issue is that ESRS remains non-founded on recognised, consensus-based standards. Unlike harmonised European standards (hENs) developed under the Vienna Agreement between CEN and ISO, or widely adopted ISO/IEC frameworks (e.g., ISO 14064 for GHG accounting, ISO 26000 for social responsibility, ISO 45001 for OH&S), the ESRS lacks the robust legitimacy, scalability, and international alignment such standards confer. Without systematic alignment, undertakings risk duplication and conflicting requirements under other EU legislation (SFDR, EU Taxonomy, CS3D) or international initiatives (ISSB, SBTN, TNFD). This can reintroduce burden via parallel reporting channels, undermining the simplification goal. We recommend: Embedding explicit references to CEN–ISO standards as implementation "safe harbours"; Aligning terminology and data models with globally recognised frameworks to ensure interoperability; Providing proportionality measures tailored for SMEs while preserving decision-useful transparency; Clarifying the Glossary to incorporate precise definitions harmonised with technical standards. The simplification is a step forward, but without standardisation-based anchoring, it risks being cosmetic and leaves Europe isolated from the international reporting ecosystem.			
Survey	AFNOR	Standard setting initiative	France	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The simplifications achieved in the Amended ESRS are visible in reduced datapoints, improved structure, and clarified wording. These changes are welcome insofar as they address readability and some implementation issues. However, they do not sufficiently resolve structural causes of complexity, nor do they secure true interoperability with global frameworks or national standardisation systems. The core issue is that ESRS remains non-founded on recognised, consensus-based standards. Unlike harmonised European standards (hENs) developed under the Vienna Agreement between CEN and ISO, or widely adopted ISO/IEC frameworks (e.g., ISO 14064 for GHG accounting, ISO 26000 for social responsibility, ISO 45001 for OH&S), the ESRS lacks the robust legitimacy, scalability, and international alignment such standards confer. Without systematic alignment, undertakings risk duplication and conflicting requirements under other EU legislation (SFDR, EU Taxonomy, CS3D) or international initiatives (ISSB, SBTN, TNFD). This can reintroduce burden via parallel reporting channels, undermining the simplification goal. We recommend: Embedding explicit references to CEN–ISO standards as implementation "safe harbours"; Aligning terminology and data models with globally recognised frameworks to ensure interoperability; Providing proportionality measures tailored for SMEs while preserving decision-useful transparency; Clarifying the Glossary to incorporate precise definitions harmonised with technical standards. The simplification is a step forward, but without standardisation-based anchoring, it risks being cosmetic and leaves Europe isolated from the international reporting ecosystem.			

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Survey	AFNOR	Standard setting initiative	France	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The simplifications achieved in the Amended ESRS are visible in reduced datapoints, improved structure, and clarified wording. These changes are welcome insofar as they address readability and some implementation issues. However, they do not sufficiently resolve structural causes of complexity, nor do they secure true interoperability with global frameworks or national standardisation systems. The core issue is that ESRS remains non-founded on recognised, consensus-based standards. Unlike harmonised European standards (hENs) developed under the Vienna Agreement between CEN and ISO, or widely adopted ISO/IEC frameworks (e.g., ISO 14064 for GHG accounting, ISO 26000 for social responsibility, ISO 45001 for OH&S), the ESRS lacks the robust legitimacy, scalability, and international alignment such standards confer. Without systematic alignment, undertakings risk duplication and conflicting requirements under other EU legislation (SFDR, EU Taxonomy, CS3D) or international initiatives (ISSB, SBTN, TNFD). This can reintroduce burden via parallel reporting channels, undermining the simplification goal. We recommend: Embedding explicit references to CEN–ISO standards as implementation "safe harbours"; Aligning terminology and data models with globally recognised frameworks to ensure interoperability; Providing proportionality measures tailored for SMEs while preserving decision-useful transparency; Clarifying the Glossary to incorporate precise definitions harmonised with technical standards. The simplification is a step forward, but without standardisation-based anchoring, it risks being cosmetic and leaves Europe isolated from the international reporting ecosystem.			
Survey	AFNOR	Standard setting initiative	France	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The simplifications achieved in the Amended ESRS are visible in reduced datapoints, improved structure, and clarified wording. These changes are welcome insofar as they address readability and some implementation issues. However, they do not sufficiently resolve structural causes of complexity, nor do they secure true interoperability with global frameworks or national standardisation systems. The core issue is that ESRS remains non-founded on recognised, consensus-based standards. Unlike harmonised European standards (hENs) developed under the Vienna Agreement between CEN and ISO, or widely adopted ISO/IEC frameworks (e.g., ISO 14064 for GHG accounting, ISO 26000 for social responsibility, ISO 45001 for OH&S), the ESRS lacks the robust legitimacy, scalability, and international alignment such standards confer. Without systematic alignment, undertakings risk duplication and conflicting requirements under other EU legislation (SFDR, EU Taxonomy, CS3D) or international initiatives (ISSB, SBTN, TNFD). This can reintroduce burden via parallel reporting channels, undermining the simplification goal. We recommend: Embedding explicit references to CEN–ISO standards as implementation "safe harbours"; Aligning terminology and data models with globally recognised frameworks to ensure interoperability; Providing proportionality measures tailored for SMEs while preserving decision-useful transparency; Clarifying the Glossary to incorporate precise definitions harmonised with technical standards. The simplification is a step forward, but without standardisation-based anchoring, it risks being cosmetic and leaves Europe isolated from the international reporting ecosystem.			
Survey	AFNOR	Standard setting initiative	France	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The simplifications achieved in the Amended ESRS are visible in reduced datapoints, improved structure, and clarified wording. These changes are welcome insofar as they address readability and some implementation issues. However, they do not sufficiently resolve structural causes of complexity, nor do they secure true interoperability with global frameworks or national standardisation systems. The core issue is that ESRS remains non-founded on recognised, consensus-based standards. Unlike harmonised European standards (hENs) developed under the Vienna Agreement between CEN and ISO, or widely adopted ISO/IEC frameworks (e.g., ISO 14064 for GHG accounting, ISO 26000 for social responsibility, ISO 45001 for OH&S), the ESRS lacks the robust legitimacy, scalability, and international alignment such standards confer. Without systematic alignment, undertakings risk duplication and conflicting requirements under other EU legislation (SFDR, EU Taxonomy, CS3D) or international initiatives (ISSB, SBTN, TNFD). This can reintroduce burden via parallel reporting channels, undermining the simplification goal. We recommend: Embedding explicit references to CEN–ISO standards as implementation "safe harbours"; Aligning terminology and data models with globally recognised frameworks to ensure interoperability; Providing proportionality measures tailored for SMEs while preserving decision-useful transparency; Clarifying the Glossary to incorporate precise definitions harmonised with technical standards. The simplification is a step forward, but without standardisation-based anchoring, it risks being cosmetic and leaves Europe isolated from the international reporting ecosystem.			
Survey	AFNOR	Standard setting initiative	France	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The simplifications achieved in the Amended ESRS are visible in reduced datapoints, improved structure, and clarified wording. These changes are welcome insofar as they address readability and some implementation issues. However, they do not sufficiently resolve structural causes of complexity, nor do they secure true interoperability with global frameworks or national standardisation systems. The core issue is that ESRS remains non-founded on recognised, consensus-based standards. Unlike harmonised European standards (hENs) developed under the Vienna Agreement between CEN and ISO, or widely adopted ISO/IEC frameworks (e.g., ISO 14064 for GHG accounting, ISO 26000 for social responsibility, ISO 45001 for OH&S), the ESRS lacks the robust legitimacy, scalability, and international alignment such standards confer. Without systematic alignment, undertakings risk duplication and conflicting requirements under other EU legislation (SFDR, EU Taxonomy, CS3D) or international initiatives (ISSB, SBTN, TNFD). This can reintroduce burden via parallel reporting channels, undermining the simplification goal. We recommend: Embedding explicit references to CEN–ISO standards as implementation "safe harbours"; Aligning terminology and data models with globally recognised frameworks to ensure interoperability; Providing proportionality measures tailored for SMEs while preserving decision-useful transparency; Clarifying the Glossary to incorporate precise definitions harmonised with technical standards. The simplification is a step forward, but without standardisation-based anchoring, it risks being cosmetic and leaves Europe isolated from the international reporting ecosystem.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AFNOR	Standard setting initiative	France	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The simplifications achieved in the Amended ESRS are visible in reduced datapoints, improved structure, and clarified wording. These changes are welcome insofar as they address readability and some implementation issues. However, they do not sufficiently resolve structural causes of complexity, nor do they secure true interoperability with global frameworks or national standardisation systems. The core issue is that ESRS remains non-founded on recognised, consensus-based standards. Unlike harmonised European standards (hENs) developed under the Vienna Agreement between CEN and ISO, or widely adopted ISO/IEC frameworks (e.g., ISO 14064 for GHG accounting, ISO 26000 for social responsibility, ISO 45001 for OH&S), the ESRS lacks the robust legitimacy, scalability, and international alignment such standards confer. Without systematic alignment, undertakings risk duplication and conflicting requirements under other EU legislation (SFDR, EU Taxonomy, CS3D) or international initiatives (ISSB, SBTN, TNFD). This can reintroduce burden via parallel reporting channels, undermining the simplification goal. We recommend: Embedding explicit references to CEN–ISO standards as implementation "safe harbours"; Aligning terminology and data models with globally recognised frameworks to ensure interoperability; Providing proportionality measures tailored for SMEs while preserving decision-useful transparency; Clarifying the Glossary to incorporate precise definitions harmonised with technical standards. The simplification is a step forward, but without standardisation-based anchoring, it risks being cosmetic and leaves Europe isolated from the international reporting ecosystem.			
Survey	AFNOR	Standard setting initiative	France	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The simplifications achieved in the Amended ESRS are visible in reduced datapoints, improved structure, and clarified wording. These changes are welcome insofar as they address readability and some implementation issues. However, they do not sufficiently resolve structural causes of complexity, nor do they secure true interoperability with global frameworks or national standardisation systems. The core issue is that ESRS remains non-founded on recognised, consensus-based standards. Unlike harmonised European standards (hENs) developed under the Vienna Agreement between CEN and ISO, or widely adopted ISO/IEC frameworks (e.g., ISO 14064 for GHG accounting, ISO 26000 for social responsibility, ISO 45001 for OH&S), the ESRS lacks the robust legitimacy, scalability, and international alignment such standards confer. Without systematic alignment, undertakings risk duplication and conflicting requirements under other EU legislation (SFDR, EU Taxonomy, CS3D) or international initiatives (ISSB, SBTN, TNFD). This can reintroduce burden via parallel reporting channels, undermining the simplification goal. We recommend: Embedding explicit references to CEN–ISO standards as implementation "safe harbours"; Aligning terminology and data models with globally recognised frameworks to ensure interoperability; Providing proportionality measures tailored for SMEs while preserving decision-useful transparency; Clarifying the Glossary to incorporate precise definitions harmonised with technical standards. The simplification is a step forward, but without standardisation-based anchoring, it risks being cosmetic and leaves Europe isolated from the international reporting ecosystem.			
Survey	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				
Survey	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree				
Survey	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree				
Survey	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree				
Survey	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany	35.E5-5.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree		E5	Disclosure Requirement E5-5 - Resource outflows	
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	35.ESRS1_7.1.	Do you agree with the amendments of this chapter?	I agree		ESRS1	7.1 Presenting comparative	
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	35.ESRS1_7.5.	Do you agree with the amendments of this chapter?	I agree		ESRS1	7.5. Updating disclosures about events after the end of the reporting period	
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	35.ESRS1_8.	Do you agree with the amendments of this chapter?	I agree		ESRS1	8. Presentation requirements and structure of the sustainability statement	
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	35.ESRS1_8.1.	Do you agree with the amendments of this chapter?	I agree		ESRS1	8.1 General presentation requirement, structure and content of the	
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	35.ESRS1_8.2.	Do you agree with the amendments of this chapter?	I agree		ESRS1	8.2 Presentation of additional information included in the sustainability statement	
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	35.E1-3.	Do you agree with the amendments of this chapter?	I agree		E1	Disclosure Requirement E1-3 - Resilience in relation to climate change	
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	35.E1-5.	Do you agree with the amendments of this chapter?	I agree		E1	Disclosure Requirement E1-5 - Actions and resources in relation to climate change	
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	35.E1-7.	Do you agree with the amendments of this chapter?	I agree		E1	Disclosure Requirement E1-7 - Energy consumption and mix	
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	35.E1-8.	Do you agree with the amendments of this chapter?	I agree		E1	Disclosure Requirement E1-8 - Gross Scopes 1, 2, 3 emissions	
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	35.E5-1.	Do you agree with the amendments of this chapter?	I agree		E5	Disclosure Requirement E5-1 - Policies related to resource use and circular economy	
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	35.E5-2.	Do you agree with the amendments of this chapter?	I agree		E5	Disclosure Requirement E5-2 - Actions and resources related to resource use and circular economy	
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	35.E5-3.	Do you agree with the amendments of this chapter?	I agree		E5	Disclosure Requirement E5-3 - Targets related to resource use and circular economy	
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	35.E5-4.	Do you agree with the amendments of this chapter?	I agree		E5	Disclosure Requirement E5-4 - Resource Inflows	
Survey	Majesty Business Utvikling	Consultant (including software vendor)	Norway	35.E5-5.	Do you agree with the amendments of this chapter?	I agree		E5	Disclosure Requirement E5-5 - Resource outflows	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Dunya Analytics	User (analyst, data provider, rating agency, etc.)	United States	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The aggregation and streamlining of information and requirements simplifies the process. However, the DMA should not be done top-down. There are several aspects of DMA that cannot be completed top-down, such as assessing whether business locations are located near biodiversity sensitive areas, in proximity to affected communities, or within watersheds experiencing water stress. This is still a point that has not been clarified and that some companies may miss. Without clear guidance on the bottom-up approach, companies risk conducting superficial desktop assessments that fail to identify material nature-related impacts and dependencies, potentially leading to non-compliance and missed business risks.			
Survey	Dunya Analytics	User (analyst, data provider, rating agency, etc.)	United States	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	Comment: An Executive Summary makes it easier to understand the overall response, and potentially its connections with other corporate reporting. Clearly labeled Appendices can make it easier to find specific, detailed information.			
Survey	Dunya Analytics	User (analyst, data provider, rating agency, etc.)	United States	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	It is much easier to understand, as the "may" datapoints were confusing, and it was cumbersome to seek out and find the related AR and determine which were required and which were voluntary.			
Survey	Dunya Analytics	User (analyst, data provider, rating agency, etc.)	United States	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E3; E4	For ESRS E4, NMIG 13 for para. 20, it provides a list of data sources for biodiversity-sensitive areas, and refers to the Annex II definition. While many of the datasets in both descriptions are the same, some differ. E.g., NMIG 13 for para. 20 mentions the STAR metric, but Annex II does not. Annex II mentions Ramsar, but NMIG 13 does not. It would be better to have these consistent. Additionally, much of the data required for biodiversity sensitive areas is only available through IBAT, which can be prohibitively expensive for smaller companies. If there is a way to make these datasets more accessible, or not to mandate certain private datasets, that would help relieve an undue burden for these companies. NMIG 14 for para. 20. This is helpful to keep in, to help companies understand that they can use results from their already completed EIAs for determining if the site may have negative impacts on biodiversity sensitive sites. NMIG 15 for para. 20: The example table is a helpful template for companies to present their information. NMIG- ESRS E3 NMIG 6 for para. 17: this provides a helpful list of tools that can be used to identify areas at water risk and areas of high water stress.			
Survey	Dunya Analytics	User (analyst, data provider, rating agency, etc.)	United States	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	In terms of identifying material IROs, there are datasets available and accessible to all companies, even those with small teams and limited resources. The ESRS say that when actual data isn't available, estimates can be used. ENCORE provides industry-level data on nature risks that can help companies prioritize materiality. Rather than say companies don't need to report what they don't have data for, companies should be encouraged to use estimated or industry-level data, and then have a time period in which they need to update with actual data. I agree that it is essential to include a time limit, as we are only 5 years away from 2030 and the 30 by 30 global goal that was set as part of the Kunming-Montreal Global Biodiversity Framework. I agree that if companies don't have information on upstream or downstream, that can be delayed, although ENCORE can be used for value chain as a starting point. If upstream and downstream are not included, a time limit should be put on that as well.			
Survey	Dunya Analytics	User (analyst, data provider, rating agency, etc.)	United States	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Dunya Analytics	User (analyst, data provider, rating agency, etc.)	United States	22.E4.	Comments on deleted datapoints in ESRS E4	I agree	The related datapoints were merged and the focus of the disclosure was maintained. The voluntary datapoints had been confusing.			
Survey	Dunya Analytics	User (analyst, data provider, rating agency, etc.)	United States	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	These datapoints do not appear to add an additional burden, and improve the clarity of reporting requirements.			
Survey	Dunya Analytics	User (analyst, data provider, rating agency, etc.)	United States	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	These datapoints do not add an additional burden, and are added for better alignment with recent EU regulatory developments, or to consolidate other data points.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Dunya Analytics	User (analyst, data provider, rating agency, etc.)	United States	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	I agree that this is outdated. Leveraging the SBTN framework which describes how to set targets would provide better guidance to companies. In addition, the Nature Positive Initiative's pilot of their State of Nature metrics, once complete, may also have guidance on target setting.			
Survey	Dunya Analytics	User (analyst, data provider, rating agency, etc.)	United States	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Frontierra	Consultant (including software vendor)	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We welcome TNFD's proposal1 to consolidate the current nature-related standards (E2-E5) into a single, integrated nature standard and to (i) ensure a structured materiality assessment for nature-related issues; (ii) elevate reference to 'dependencies' on nature; and (iii) streamline and prioritize the number of quantitative nature-related data points. We call on EFRAG to make note of it and apply as possible.			
Survey	Frontierra	Consultant (including software vendor)	United Kingdom	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E4	We do not support the removal of the ESRS E4 biodiversity and ecosystems metrics metric specifications from the mandatory requirements. This is problematic because standardization is more limited at present than with other metrics. Specifying metrics (now in Non-Mandatory Illustrative Guidance (NMIG) 18-20) within the Standard would give companies the information they need to select and report practical, credible and comparable metrics and would support alignment with the TNFD disclosure metrics. If this does not occur, at the very least, it is important that (i) the NMIG stays attached to the Standard in some form and (i) a process is in place for ensuring updates are made on a timely basis, particularly for guidance on topics where data/tools for reporting are evolving rapidly.			
Survey	Frontierra	Consultant (including software vendor)	United Kingdom	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We welcome the ESRS being simplified in a way that maintains the double materiality approach of the Corporate Sustainability Reporting Directive (CSRD), covering environmental, social and governance topics. This principle of double materiality is vitally important for the reported information to be meaningful for users. It is also essential for the EU to respect its international engagement under the UN CBD Global Biodiversity Framework Target 15.			
Survey	Frontierra	Consultant (including software vendor)	United Kingdom	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We welcome the simplification effort mainly targeting unclear or duplicative requirements, maintaining essential disclosures on environmental metrics and ask EFRAG to maintain that approach in the simplification process. We also welcome alignment with the draft global consensus metrics on the state of nature, convened by the Nature Positive Initiative. This is important for ensuring metrics are credible, practical and aligned for companies. We support the simplified standards aligning with core elements of TNFD and encourage EFRAG to continue striving to maintain alignment with other international standards and frameworks, including ISSB and GRI. Improving the interoperability between the requirements in ESRS and the ISSB Standards, to enable companies to use the ISSB Standards as a starting point and 'top up' with specific impact disclosures to achieve compliance with the CSRD/ESRS, is important.			
Survey	Frontierra	Consultant (including software vendor)	United Kingdom	35.E4-5.	Do you agree with the amendments of this chapter?	I disagree	The option to report metrics only for locations relevant to existing sustainability targets should be removed or made additional. In order to align with the double materiality concept in ESRS 1 and throughout the standards, metrics should be reported for locations that are material for biodiversity and ecosystems.	E4	Disclosure Requirement E4-5 - Metrics related to biodiversity and ecosystems change	
Survey	Temasek International Pte. Ltd.	Asset manager/Investor	Singapore	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Temasek International Pte. Ltd.	Asset manager/Investor	Singapore	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	IFRS S1 does not specifically prescribe whether or how an entity is required to consider risk mitigation activities when identifying sustainability-related risks that could reasonably be expected to affect an entity's prospects and judgement must be applied. It was noted that this (appropriately) includes the need to apply judgement about how risk mitigation activities that are planned or that are already in place inform the identification of sustainability-related risks. Taking this approach, in some cases the assessment would be net (that is, considering the effects of mitigation) and sometimes gross (that is, before the effects of mitigation). The proposed approach in the ESRS ED prescribes how to consider mitigation, prevention and remediation actions in each situation. This prescriptive approach gives rise to a new risk to interoperability that could affect the scope of sustainability-related matters the respective standards would require information to be provided about.			
Survey	Temasek International Pte. Ltd.	Asset manager/Investor	Singapore	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Temasek International Pte. Ltd.	Asset manager/Investor	Singapore	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Temasek International Pte. Ltd.	Asset manager/Investor	Singapore	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Temasek International Pte. Ltd.	Asset manager/Investor	Singapore	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	Option 1 would enhance interoperability between ESRS and ISSB Standards and reduce the reporting burden for companies preparing information about anticipated financial effects applying ESRS. However, introducing the relief related to the skills, capabilities and resources available to the company and fully aligning the wordings of the other proportionality mechanisms with that in ISSB Standards (which is not the case in the current proposals) would benefit companies and significantly enhance interoperability between the two sets of standards. In addition, introducing a relief related to the commercial sensitivity of information about opportunities would further enhance interoperability and assist companies.			
Survey	Temasek International Pte. Ltd.	Asset manager/Investor	Singapore	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	While the content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced, we can enhance interoperability with the ISSB Standards and reduce the reporting burden for those applying ESRS by making the incremental quantitative information about a company's anticipated financial effects in paragraphs 40, 41 and 42 of the proposed changes to ESRS E1 (proposed Disclosure Requirement E1-11) optional.			
Survey	Temasek International Pte. Ltd.	Asset manager/Investor	Singapore	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	To further enhance interoperability with the ISSB Standards: (i) Allow measurement choices per the GHG Protocol and IFRS S2: The draft ESRS E1 has proposed the use of the financial control as the default organisational boundary in measuring GHG emissions. However, if such information fails to convey a fair presentation, ESRS E1 requires additional disclosure of Scope 1 and 2 GHG emissions based on operational control as defined in the GHG Protocol. This creates misalignment in classification and measurement approaches with current GHG Protocol and IFRS S2 (where companies are permitted to determine their organisation boundaries in accordance with options as prescribed by GHG Protocol – equity method, operational control and financial control). As such, we recommend EFRAG to align the measurement choices in ESRS E1 with GHG Protocol and IFRS S2, to reduce risks of differences between the frameworks / standards. (ii) Remove specific value chain information regarding leased assets: EFRAG has proposed to add a new section on the inclusion of value chain information regarding leased assets which adds a level of specificity that does not exist in the ISSB Standards. This proposal introduces the risk of new application differences between ESRS, ISSB Standards, and the GHG Protocol. (iii) Fully incorporate the IFRS reliefs: To allow omitting of commercially sensitive information about opportunities, Scope 3 GHG emissions when impracticable, and quantitative financial effects when the undertaking does not have the necessary skills or will be required to incur inordinate expenditure to acquire such skills or expertise.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Temasek International Pte. Ltd.	Asset manager/Investor	Singapore	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Temasek International Pte. Ltd.	Asset manager/Investor	Singapore	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Temasek International Pte. Ltd.	Asset manager/Investor	Singapore	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We are a global investor with portfolio spanning across geographies and industries. As a financial investor, we expect material decision useful information from our investees that is comparable. Many of our investees operate in jurisdictions that require the use of standards that are aligned with the ISSB Standards. The most effective way to ensure efficient reporting between the EU and international reporting regimes would be to enable companies to use the ISSB Standards as a starting point and 'top up' with specific impact disclosures to achieve compliance with the CSRD/ESRS. In the absence of equivalence or alternative compliance, a company will need to navigate between two sets of standards to comply with both the CSRD/ESRS and the ISSB Standards. To do so effectively the respective standards need to be interoperable. We believe closer alignment of ESRS with ISSB Standards will reduce duplicative reporting obligations for both EU and non-EU companies, and support the EU aims of high ESG standards while ensuring attractiveness of the EU as an investment destination. Furthermore, competing disclosure regimes will introduce difficulties to a global investor to compare information provided by investees that are subject to different regimes.			
Survey	Temasek International Pte. Ltd.	Asset manager/Investor	Singapore	35.ESRS1_1.	Do you agree with the amendments of this chapter?	I agree	Enabling companies reporting in compliance with ESRS to reference the IFRS Industry-based guidance facilitates efficiency for companies and provides decision-useful information for investors.	ESRS1	1. ESRS Standards, reporting areas and drafting conventions	
Survey	Temasek International Pte. Ltd.	Asset manager/Investor	Singapore	35.ESRS1_8.2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Paragraph 107 and 108 of draft ESRS 1 describes the technical material issued by the ISSB as additional disclosures that need to be clearly identified and presented in a way that do not obscure material information. This appears to contradict paragraph 11 of draft ESRS 1 that allows company to use reporting standards such as IFRS industry-based guidance to provide entity-specific disclosures. To enhance clarity, paragraph 107 and 108 of draft ESRS 1 can be re-drafted to enable companies to use the ISSB Standards as a starting point and 'top up' with specific disclosures to achieve compliance with CSRD/ESRS. We believe such closer alignment of ESRS with ISSB Standards will reduce duplicative reporting obligations and administrative burden for both EU and non-EU companies.	ESRS1	8.2 Presentation of additional information included in the sustainability statement	
Survey	Temasek International Pte. Ltd.	Asset manager/Investor	Singapore	35.E1-8.	Do you agree with the amendments of this chapter?	I disagree	To further enhance interoperability and reduce the differences between the requirements of the GHG Protocol, ESRS and IFRS S2, EFRAG should allow the measurement choices per the GHG Protocol and IFRS S2.	E1	Disclosure Requirement E1-8 - Gross Scopes 1, 2, 3 emissions	
Survey	Ryanair	Preparer (non-financial preparing a sustainability report)	Ireland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	ESRS para. 48(a) and AR 17 provide practical approach and AR 18 and AR 19 allows assessment of severity/magnitude and likelihood only for IROs whose materiality is not yet clear. This avoids unnecessary reassessment of elements already determined to be material or immaterial. However, necessary additional clarifications in the DMA updating process, where DMA should be proportionate to changes in circumstances, ensuring companies can leverage in previous assessment if conditions/IROs haven't changed. Also, need of illustrative examples of when AR 18–19 apply.			
Survey	Ryanair	Preparer (non-financial preparing a sustainability report)	Ireland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	Disregarding existing mitigation measures when assessing the materiality of potential impacts will lead to disproportionate reporting obligations if implemented actions to control severity are in place. This conflicts with the core purpose of using materiality as a reporting filter, which is to focus on issues that truly matter to the company and its stakeholders. Forcing to report extensively on such cases would dilute the relevance of disclosures and significant impacts. Guidance must include examples illustrating when mitigated potential impacts no longer meet the materiality threshold. Misleading guidance on how to consider remediation/mitigation/prevention actions in assessing materiality of negative impacts between ESRS 1 para. 34 and appendix C. As result of the above, in agreement with Appendix C (report potential impacts after prevention or mitigation actions if it remains material, and report the significant ongoing action for as long as it is necessary to manage the residual material impact.).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ryanair	Preparer (non-financial preparing a sustainability report)	Ireland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	In agreement with the changes to improve readability, conciseness and connectivity, specifically allowing disclosures at a higher level of aggregation than individual material IROs, where this reflects how IROs are actually managed.			
Survey	Ryanair	Preparer (non-financial preparing a sustainability report)	Ireland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	In disagreement with removing narrative disclosures while introducing new quantitative datapoints. Narrative disclosures generally build on existing management information, while quantitative datapoints often require entirely new systems, processes, and controls, creating significant additional costs and complexity.			
Survey	Ryanair	Preparer (non-financial preparing a sustainability report)	Ireland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	Further clarity regarding the "undue cost of effort relief" implications in terms of audit? How does this need to be evidenced?			
Survey	Ryanair	Preparer (non-financial preparing a sustainability report)	Ireland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	In disagreement with the absense of time limit for reliefs, as this could create uneven competitive position. The aim should be to enhance methodologies and improve data availability over time. This can be achieved by setting a time limit on reliefs, thereby encouraging actions towards this direction.			
Survey	Ryanair	Preparer (non-financial preparing a sustainability report)	Ireland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Option 2 allows companies to disclose the anticipated financial effects without compromising their financial position, particularly in cases where calculations rely on long-term assumptions that may be unreliable and involve high uncertainty. Moreover, option 2 gives companies confidence that commercially sensitive information will not be disclosed.			
Survey	Ryanair	Preparer (non-financial preparing a sustainability report)	Ireland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	Need for further guidance on the measurement of anticipated financial effects, particularly through specific examples illustrating the presentation of potential liabilities, such as those related to climate transition risks or stranded assets, in case quantification is required as methodologies are neither well-defined nor robust.			
Survey	Ryanair	Preparer (non-financial preparing a sustainability report)	Ireland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Ryanair	Preparer (non-financial preparing a sustainability report)	Ireland	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	Agree with the decrease of mandatory DPs that allow companies to reduce reporting burden.			
Survey	Ryanair	Preparer (non-financial preparing a sustainability report)	Ireland	22.E1.	Comments on deleted datapoints in ESRS E1	I agree	Agree with the decrease of mandatory DPs that allow companies to reduce reporting burden.			
Survey	Ryanair	Preparer (non-financial preparing a sustainability report)	Ireland	22.E2.	Comments on deleted datapoints in ESRS E2	I agree	Agree with the decrease of mandatory DPs that allow companies to reduce reporting burden.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ryanair	Preparer (non-financial preparing a sustainability report)	Ireland	22.ES.	Comments on deleted datapoints in ESRS ES	I agree	Agree with the decrease of mandatory DPs that allow companies to reduce reporting burden.			
Survey	Ryanair	Preparer (non-financial preparing a sustainability report)	Ireland	22.S1	Comments on deleted datapoints in ESRS S1	I agree	Agree with the decrease of mandatory DPs that allow companies to reduce reporting burden.			
Survey	Ryanair	Preparer (non-financial preparing a sustainability report)	Ireland	22.S4	Comments on deleted datapoints in ESRS S4	I agree	Agree with the decrease of mandatory DPs that allow companies to reduce reporting burden.			
Survey	Ryanair	Preparer (non-financial preparing a sustainability report)	Ireland	22.G1	Comments on deleted datapoints in ESRS G1	I agree	Agree with the decrease of mandatory DPs that allow companies to reduce reporting burden.			
Survey	Ryanair	Preparer (non-financial preparing a sustainability report)	Ireland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	Need for further clarification on the consequences of the fair presentation approach. What is the relationship between materiality principle and fair representation approach?			
Survey	Ryanair	Preparer (non-financial preparing a sustainability report)	Ireland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	This change is not supported.			
Survey	UAM	Academia	Spain	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	UAM	Academia	Spain	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	UAM	Academia	Spain	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	UAM	Academia	Spain	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UAM	Academia	Spain	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	UAM	Academia	Spain	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	UAM	Academia	Spain	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	UAM	Academia	Spain	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	UAM	Academia	Spain	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	UAM	Academia	Spain	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UAM	Academia	Spain	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	UAM	Academia	Spain	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	UAM	Academia	Spain	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	UAM	Academia	Spain	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	UAM	Academia	Spain	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	It seems financial institutions (including the Basel agreement) are key actors in the energetic transition needed to mitigate climate change			
Survey	UAM	Academia	Spain	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	I am unsure if country level is the right scope for reporting metrics. It is better than company level but can also be tricky if does not take into account planetary scope			
Survey	UAM	Academia	Spain	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	UAM	Academia	Spain	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	UAM	Academia	Spain	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	UAM	Academia	Spain	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UAM	Academia	Spain	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	UAM	Academia	Spain	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	UAM	Academia	Spain	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	UAM	Academia	Spain	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	UAM	Academia	Spain	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	UAM	Academia	Spain	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	UAM	Academia	Spain	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	UAM	Academia	Spain	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UAM	Academia	Spain	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	UAM	Academia	Spain	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	UAM	Academia	Spain	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	UAM	Academia	Spain	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	UAM	Academia	Spain	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	UAM	Academia	Spain	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We partially agree but see room for improvement in the following areas: Greater clarity on how to evaluate the criteria based on the proposed structure (e.g., severity). More flexibility to apply self-selected criteria, provided these are transparently communicated to readers. An alternative, more unconventional approach could be to make DMA reporting entirely voluntary. It could still serve as a tool for determining the reporting scope but without requiring the results to be reported.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	In its current form, the explanation does not provide sufficient clarity on how remediation actions are factored into the impact assessment, particularly when it comes to their placement on, for example, a 1-5 scale. Another challenge is the consideration of national regulations. For instance, E2 is subject to strict regulation in Germany, with clearly defined thresholds for aspects such as air pollutants. How is this to be incorporated into the impact assessment?			
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	In our opinion, it remains unclear whether an entity has the flexibility to report the standards within the ESG framework in an order of their choosing. This also applies to structuring the narrative along the order of the ESRS paragraphs/disclosure requirements. Furthermore, the option to link information to external documents could significantly enhance the conciseness and usability of the report. Lastly, a clarification on the use of graphs and the ability to tag information within graphs—particularly in the context of ESEF tagging—would be highly beneficial.			
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Fundamentally, the new structure presents us with the challenge of a significant one-time effort to re-tag existing reporting content and review it for its alignment with the new requirements. Therefore, it would be preferable to retain the current structure but convert many 'shall' data points into 'may' data points. If this is not feasible, we would welcome a transition phase during which entities could choose between the old and the new ESRS for a period of 1-2 years.			
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	There is a lack of clarification that the permanent use of estimates is allowed and that the extent of uncertainty in the estimation is not decisive for reporting or in the audit. Additionally, the current extensive requirement to individually document the data collection and calculation method for each metric is impractical. We wish it would be possible to shorten this.			
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	The new Paragraph 92 does not yet clearly specify whether a 'partial scope of calculation' can also apply to a shifted fiscal year. Due to other national and European regulations such as the IED or EPRTR, we are required to provide reports to local/national authorities on a calendar-year basis. It should be possible to use these calendar-year values even for a shifted fiscal year; otherwise, there would be significant conversion effort as well as confusion caused by contradictory reporting of the same datapoints for our stakeholders.			
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	Fundamentally, the new structure presents us with the challenge of a significant one-time effort to re-tag existing reporting content and review it for its alignment with the new requirements. Therefore, it would be preferable to retain the current structure but convert many 'shall' data points into 'may' data points. If this is not feasible, we would welcome a transition phase during which entities could choose between the old and the new ESRS for a period of 1-2 years.			
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	Fundamentally, the new structure presents us with the challenge of a significant one-time effort to re-tag existing reporting content and review it for its alignment with the new requirements. Therefore, it would be preferable to retain the current structure but convert many 'shall' data points into 'may' data points. If this is not feasible, we would welcome a transition phase during which entities could choose between the old and the new ESRS for a period of 1-2 years.			
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	22.E2.	Comments on deleted datapoints in ESRS E2	I partially agree and partially disagree	Fundamentally, the new structure presents us with the challenge of a significant one-time effort to re-tag existing reporting content and review it for its alignment with the new requirements. Therefore, it would be preferable to retain the current structure but convert many 'shall' data points into 'may' data points. If this is not feasible, we would welcome a transition phase during which entities could choose between the old and the new ESRS for a period of 1-2 years.			
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	22.E3.	Comments on deleted datapoints in ESRS E3	I partially agree and partially disagree	Fundamentally, the new structure presents us with the challenge of a significant one-time effort to re-tag existing reporting content and review it for its alignment with the new requirements. Therefore, it would be preferable to retain the current structure but convert many 'shall' data points into 'may' data points. If this is not feasible, we would welcome a transition phase during which entities could choose between the old and the new ESRS for a period of 1-2 years.			
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	22.E4.	Comments on deleted datapoints in ESRS E4	I partially agree and partially disagree	Fundamentally, the new structure presents us with the challenge of a significant one-time effort to re-tag existing reporting content and review it for its alignment with the new requirements. Therefore, it would be preferable to retain the current structure but convert many 'shall' data points into 'may' data points. If this is not feasible, we would welcome a transition phase during which entities could choose between the old and the new ESRS for a period of 1-2 years.			
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	22.E5.	Comments on deleted datapoints in ESRS E5	I partially agree and partially disagree	Fundamentally, the new structure presents us with the challenge of a significant one-time effort to re-tag existing reporting content and review it for its alignment with the new requirements. Therefore, it would be preferable to retain the current structure but convert many 'shall' data points into 'may' data points. If this is not feasible, we would welcome a transition phase during which entities could choose between the old and the new ESRS for a period of 1-2 years.			
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	22.S1	Comments on deleted datapoints in ESRS S1	I partially agree and partially disagree	Fundamentally, the new structure presents us with the challenge of a significant one-time effort to re-tag existing reporting content and review it for its alignment with the new requirements. Therefore, it would be preferable to retain the current structure but convert many 'shall' data points into 'may' data points. If this is not feasible, we would welcome a transition phase during which entities could choose between the old and the new ESRS for a period of 1-2 years.			
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	22.S2	Comments on deleted datapoints in ESRS S2	I partially agree and partially disagree	Fundamentally, the new structure presents us with the challenge of a significant one-time effort to re-tag existing reporting content and review it for its alignment with the new requirements. Therefore, it would be preferable to retain the current structure but convert many 'shall' data points into 'may' data points. If this is not feasible, we would welcome a transition phase during which entities could choose between the old and the new ESRS for a period of 1-2 years.			
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	22.S3	Comments on deleted datapoints in ESRS S3	I partially agree and partially disagree	Fundamentally, the new structure presents us with the challenge of a significant one-time effort to re-tag existing reporting content and review it for its alignment with the new requirements. Therefore, it would be preferable to retain the current structure but convert many 'shall' data points into 'may' data points. If this is not feasible, we would welcome a transition phase during which entities could choose between the old and the new ESRS for a period of 1-2 years.			
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	22.S4	Comments on deleted datapoints in ESRS S4	I partially agree and partially disagree	Fundamentally, the new structure presents us with the challenge of a significant one-time effort to re-tag existing reporting content and review it for its alignment with the new requirements. Therefore, it would be preferable to retain the current structure but convert many 'shall' data points into 'may' data points. If this is not feasible, we would welcome a transition phase during which entities could choose between the old and the new ESRS for a period of 1-2 years.			
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	22.G1	Comments on deleted datapoints in ESRS G1	I partially agree and partially disagree	Fundamentally, the new structure presents us with the challenge of a significant one-time effort to re-tag existing reporting content and review it for its alignment with the new requirements. Therefore, it would be preferable to retain the current structure but convert many 'shall' data points into 'may' data points. If this is not feasible, we would welcome a transition phase during which entities could choose between the old and the new ESRS for a period of 1-2 years.			
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	E5-5: In general, the final destination of waste is usually clear in Germany; however, this is not always the case at every stage of the process. When waste is managed by third-party waste operators, the entity often only receives an invoice indicating the quantity of waste handled, without any transparency regarding the final destination or the disposal method. Should waste falling into this category be included in this data point?			
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	MVV Energie AG	Preparer (non-financial preparing a sustainability report)	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We would welcome a clarification that the report can be reviewed not only by auditors but also by independent third-party reviewers. Furthermore, we would like to emphasize once again the importance of addressing the uncertainty related to calendar-year-based data for entities with a shifted fiscal year. It is essential to ensure alignment between regulations requiring reporting to authorities for monitoring purposes and external reporting for transparency.			
Survey	Ecopreneur.eu - The European Sustainable Business Federation	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	Ecopreneur.eu - The European Sustainable Business Federation	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Ecopreneur.eu - The European Sustainable Business Federation	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Ecopreneur.eu - The European Sustainable Business Federation	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ecopreneur.eu - The European Sustainable Business Federation	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Ecopreneur.eu - The European Sustainable Business Federation	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Ecopreneur.eu - The European Sustainable Business Federation	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Ecopreneur.eu - The European Sustainable Business Federation	Business association (other than association of financial institution)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Ecopreneur.eu - The European Sustainable Business Federation	Business association (other than association of financial institution)	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We welcome the ESRS being simplified in a way that maintains the double materiality approach of the Corporate Sustainability Reporting Directive (CSRD), covering environmental, social and governance topics. This principle of double materiality is vitally important for the reported information to be meaningful for users. It is also essential for the EU to respect its international engagement under the UN CBD Global Biodiversity Framework Target 15.			
Survey	Ecopreneur.eu - The European Sustainable Business Federation	Business association (other than association of financial institution)	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We welcome the simplification effort mainly targeting unclear or duplicative requirements, maintaining essential disclosures on environmental metrics and ask EFRAG to maintain that approach in the simplification process. We also welcome alignment with the draft global consensus metrics on the state of nature, convened by the Nature Positive Initiative. This is important for ensuring metrics are credible, practical and aligned for companies.			
Survey	Ecopreneur.eu - The European Sustainable Business Federation	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We support the simplified standards aligning with core elements of TNFD and encourage EFRAG to continue striving to maintain alignment with other international standards and frameworks, including ISSB and GRI. Improving the interoperability between the requirements in ESRS and the ISSB Standards, to enable companies to use the ISSB Standards as a starting point and 'top up' with specific impact disclosures to achieve compliance with the CSRD/ESRS, is important.			
Survey	Business for Nature	Business association (other than association of financial institution)	United States	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We welcome TNFD's proposal to consolidate the current nature-related standards (E2-E5) into a single, integrated nature standard and to (i) ensure a structured materiality assessment for nature-related issues; (ii) elevate reference to 'dependencies' on nature; and (iii) streamline and prioritize the number of quantitative nature-related data points. We call on EFRAG to make note of it and apply as possible.			
Survey	Business for Nature	Business association (other than association of financial institution)	United States	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E4	We do not support the removal of the ESRS E4 biodiversity and ecosystems metrics metric specifications from the mandatory requirements. This is problematic because standardization is more limited at present than with other metrics. Specifying metrics (now in Non-Mandatory Illustrative Guidance (NMIG) 18-20) within the Standard would give companies the information they need to select and report practical, credible and comparable metrics and would support alignment with the TNFD disclosure metrics. If this does not occur, at the very least, it is important that (i) the NMIG stays attached to the Standard in some form and (i) a process is in place for ensuring updates are made on a timely basis, particularly for guidance on topics where data/tools for reporting are evolving rapidly.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Business for Nature	Business association (other than association of financial institution)	United States	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We support the simplified standards aligning with core elements of TNFD and encourage EFRAG to continue striving to maintain alignment with other international standards and frameworks, including ISSB and GRI. Improving the interoperability between the requirements in ESRS and the ISSB Standards, to enable companies to use the ISSB Standards as a starting point and 'top up' with specific impact disclosures to achieve compliance with the CSRD/ESRS, is important.			
Survey	Business for Nature	Business association (other than association of financial institution)	United States	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We welcome the ESRS being simplified in a way that maintains the double materiality approach of the Corporate Sustainability Reporting Directive (CSRD), covering environmental, social and governance topics. This principle of double materiality is vitally important for the reported information to be meaningful for users. It is also essential for the EU to respect its international engagement under the UN CBD Global Biodiversity Framework Target 15.			
Survey	Business for Nature	Business association (other than association of financial institution)	United States	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We welcome the simplification effort mainly targeting unclear or duplicative requirements, maintaining essential disclosures on environmental metrics and ask EFRAG to maintain that approach in the simplification process. We also welcome alignment with the draft global consensus metrics on the state of nature, convened by the Nature Positive Initiative. This is important for ensuring metrics are credible, practical and aligned for companies.			
Survey	Business for Nature	Business association (other than association of financial institution)	United States	35.E4-5.	Do you agree with the amendments of this chapter?	I disagree	The option to report metrics only for locations relevant to existing sustainability targets should be removed or made additional. In order to align with the double materiality concept in ESRS 1 and throughout the standards, metrics should be reported for locations that are material for biodiversity and ecosystems.	E4	Disclosure Requirement E4-5 - Metrics related to biodiversity and ecosystems change	
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The amendments support more relevant reporting, but there remain some areas where reporting requirements remain onerous and lack relevance, in particular ESRS 1.10; 1.11; 5.2; ESRS E1 AR2 For Para 14(a); E1-7 (38 amended); AR17 for para 28 AR 32 amended; ESRS E2 AR 5 for para.16 (b); ESRS E5 !18; ESES S1 -13 40C; ESRS S2 8 (b) and (d). See section 3 of questionnaire for details			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Refer to detailed responses in Part 3 of this survey			
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Agee that NMIG should not be included in the delegated act to avoid triggering additional reporting burden			
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Given the nature of anticipated financial effects, it is very difficult to provide an accurate quantitative assessment of financial effects, especially as this is often very dependent on the specific scenario analysis used. Making this a requirement raises a high risk of qualitative assessments simply being turned into quantitative assessments, with the resulting information not being useful			
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	The items highlighted represent a very onerous burden to quantitatively estimate with any accuracy and are very dependent on the climate scenario used. Without specific requirement on which scenarios shall be used, reporters will produce data based on significantly varying assumptions, and the value of information will be limited as it will not be possible to compare different reporters on a like-for-like basis			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	ESRS E3 / E4 Whilst these items are generally applicable to onshore operations, the nature of marine operations means that the impact of direct water withdrawals from the ocean for potable water production and operational use is very limited, as is discharge. A note in the guidance should be made to explain this to data users, and the ESRS should allow operations that abstract and return water directly to the marine environment to explain the exact nature of this operation			
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Disagree with E2-4. The generation of secondary microplastics though equipment wear is extremely difficult to calculate, even qualitatively. Microplastic generation should be defined in terms of equipment manufacturer's plastic content and manufacturer's end of life treatment. Making this a general requirement for all organization's risks significant double counting, and the lack of a defined qualitative assessment standards or methodologies will cast doubt on the ability to compare results across companies. This requirement should be removed			
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	_Complex estimates are common to all sectors. Banks are no exception. Exception only for financial institutions would result in an unlevel playing field for other sectors. Intensity only targets should be permitted for all reporters following the same rationale given for this exemption by the finacial sector			
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	Collective bargaining agreements are country specific. Data should be readily available for enterprises working in multiple countries through core HR systems			
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	Agreement is contingent on the methodology, which must recognize the economic situation in LDCs outside the EEA, and not penalize companies providing adequate wages in the local context if they are not in line with minimum wages in the EU			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	Whilst alignment with SBTN is welcome, the standards and guidance must reflect that that the sector standards for SBT in the oil and gas industry are paused. Unless this standard is released, the AR must state that this only applies where recognised sector SBTs exist			
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Refer to response in part 3			
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Refer to response in part 3			
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Refer to response in part 3			
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Refer to response in part 3			
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Refer to response in part 3			
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Refer to response in part 3			
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Refer to response in part 3			
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Annika Eliasson Academic E-learning	User (analyst, data provider, rating agency, etc.)	Sweden	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	I welcome TNFD's proposal to consolidate the current nature-related standards (E2- E5) into a single, integrated nature standard and to (i) ensure a structured materiality assessment for nature-related issues; (ii) elevate reference to 'dependencies' on nature; and (iii) streamline and prioritize the number of quantitative nature-related data points. I call on EFRAG to make note of it and apply as possible.			
Survey	Annika Eliasson Academic E-learning	User (analyst, data provider, rating agency, etc.)	Sweden	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	I welcome TNFD's proposal to consolidate the current nature-related standards (E2- E5) into a single, integrated nature standard and to (i) ensure a structured materiality assessment for nature-related issues; (ii) elevate reference to 'dependencies' on nature; and (iii) streamline and prioritize the number of quantitative nature-related data points. I call on EFRAG to make note of it and apply as possible.			
Survey	Annika Eliasson Academic E-learning	User (analyst, data provider, rating agency, etc.)	Sweden	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E4	I do not support the removal of the ESRS E4 biodiversity and ecosystems metrics metric specifications from the mandatory requirements. This is problematic because standardization is more limited at present than with other metrics. Specifying metrics (now in Non-Mandatory Illustrative Guidance (NMIG) 18-20) within the Standard would give companies the information they need to select and report practical, credible and comparable metrics and would support alignment with the TNFD disclosure metrics. If this does not occur, at the very least, it is important that (i) the NMIG stays attached to the Standard in some form and (i) a process is in place for ensuring updates are made on a timely basis, particularly for guidance on topics where data/tools for reporting are evolving rapidly.			
Survey	Annika Eliasson Academic E-learning	User (analyst, data provider, rating agency, etc.)	Sweden	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	I welcome the ESRS being simplified in a way that maintains the double materiality approach of the Corporate Sustainability Reporting Directive (CSRD), covering environmental, social and governance topics. This principle of double materiality is vitally important for the reported information to be meaningful for users. It is also essential for the EU to respect its international engagement under the UN CBD Global Biodiversity Framework Target 15.			
Survey	Annika Eliasson Academic E-learning	User (analyst, data provider, rating agency, etc.)	Sweden	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	I welcome the simplification effort mainly targeting unclear or duplicative requirements, maintaining essential disclosures on environmental metrics and ask EFRAG to maintain that approach in the simplification process. I also welcome alignment with the draft global consensus metrics on the state of nature, convened by the Nature Positive Initiative. This is important for ensuring metrics are credible, practical and aligned for companies.			
Survey	Annika Eliasson Academic E-learning	User (analyst, data provider, rating agency, etc.)	Sweden	35.E4-5.	Do you agree with the amendments of this chapter?	I disagree	The option to report metrics only for locations relevant to existing sustainability targets should be removed or made additional. In order to align with the double materiality concept in ESRS 1 and throughout the standards, metrics should be reported for locations that are material for biodiversity and ecosystems.	E4	Disclosure Requirement E4-5 - Metrics related to biodiversity and ecosystems change	
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The simplified ESRS allow more conciseness but the AR 24 for para. 28(a) could be amended to avoid repetition of description of the material impacts, risks and opportunities. This mandatory datapoint should be suppressed: "If the undertaking exercises this option, it shall still present a concise description of its material impacts, risks and opportunities alongside its disclosures prepared in accordance with IRO-2."			
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1; S1	Some possibilities mentioned in the NMIG change the mandatory requirement mentioned in the draft ESRS. For example, NMIG 30 for paras.38 (a)(b) Calculation training hours and development data, the possibility to exclude inactive employees in the denominator should still be part of the ESRS. Indeed, this is not a voluntary additional datapoint but a possible change in a calculation that shall be done. If not included in the ESRS themselves, this might create issues with auditors if NMIG is not included in the CSRD.			
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2				
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	22.S1	Comments on deleted datapoints in ESRS S1	I partially agree and partially disagree	some "shall" datapoints should still be suppressed			
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	ESRS E4 Transition plan: this should remain a voluntary datapoint G1 business conduct: this shall datapoint recreates an additional burden and this is sensitive information that should not be mandatory. The existing mandatory disclosures were sufficient			
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	Though we understand the intent, this additional wording might create a lot of discussions with the auditors. The objective of "reducing the unnecessary reported information and the documentation needed to show that omitted datapoints are not material" can be achieved by completing the double materiality chapter in ESRS 1 (as this is already done in the draft).			
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	For all sectors this is an issue to disclose absolute GHG emissions target as it leads to disclose long term forecast business growth, which is often confidential information. Companies should have the possibility to choose between intensity and absolute targets in their reports, from financial or from other sectors as well.			
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I would like to skip this question and provide my feedback in Part 3				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	As it states, the datapoint will still trigger very different interpretations from one Company to the other. It would be more straightforward to have each year a list of adequat wages per country so that all companies have a common reference. If this is not possible to create a common reference, then the suppression of this datapoint seems more relevant.			
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree	Some more simplification should be brought to other datapoints that are part of the SFDR and this has blocked simplification - S1-15 unadjusted gender pay gap for example. SFDR reglementation should be also simplified / clarified if necessary.			
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	35.S1-5.	Do you agree with the amendments of this chapter?	I disagree	Same threshold should be maintained as previous disclosures: "countries in which the undertaking has 50 or more employees representing at least 10% of its total number of employees". Because the proposed change impose unnecessary administrative burden for many countries. If the fear is to miss some countries with a high number of employees, maybe there could be an additional requirement that all countries with more than 3000 headcounts should be reported for example.	S1	Disclosure Requirement S1-5 - Characteristics of the undertaking's employees	
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	35.S1-6.	Do you agree with the amendments of this chapter?	I disagree	This datapoint should be suppressed as this will create many discussions with definitions and auditors only to provide a number.	S1	Disclosure Requirement S1-6 - Characteristics of non-employees in the undertaking's own workforce	
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	35.S1-7.	Do you agree with the amendments of this chapter?	I disagree	This should be reported for countries with significant employment only as the burden of data gathering is huge for small countries. For a practical point of view, we should not have by country for EEA and by region for outside EEA as this makes things more complex. The reporting should be made for countries with significant employment for all geographies.	S1	Disclosure Requirement S1-7 - Collective bargaining coverage and social dialogue	
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	35.S1-10.	Do you agree with the amendments of this chapter?	I disagree	First, unemployment consideration should be excluded from this Disclosure Requirement as this is linked with public policies of each country and does not rely on the Company. Second, due to the reporting burden of this datapoint, the information should be gathered only for countries with significant employment. Third, the definitions should be clarified. Indeed, for sickness, what is the length that should be considered: starting from one day, is this a sufficient period? Same thing for maternity leave, some more precision should be brought to what could be considered as a protection.	S1	Disclosure Requirement S1-10 - Social protection	
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	35.S1-12.	Do you agree with the amendments of this chapter?	I disagree	For regular performance review, this is now specified that the denominator should be the number of employees reported in S1-5. This is not meaningful as employees hired recently are not eligible to performance review. This was better to let each group explain how they perform their calculation based on their internal standards / procedures.	S1	Disclosure Requirement S1-12 - Training and skills development metrics	
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	35.S1-14.	Do you agree with the amendments of this chapter?	I disagree	This Disclosure Requirement should remain mandatory only for countries with significant employment.	S1	Disclosure Requirement S1-14 - Work-life balance metrics	
Survey	Technip Energies	Preparer (non-financial preparing a sustainability report)	Netherlands	35.S1-15.	Do you agree with the amendments of this chapter?	I disagree	Even if required by SFDR, a worldwide calculated gender pay gap does not make any sense and does not provide useful information. Only a gender pay gap calculated and disclosed per country makes sense. So this should be requested per country for countries with significant employment.	S1	Disclosure Requirement S1-15 - Remuneration metrics	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Brancheforeningen Cirkulær	Business association (other than association of financial institution)	Denmark	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree				
Survey	Brancheforeningen Cirkulær	Business association (other than association of financial institution)	Denmark	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	The recovery definition proposed in Annex II p. 27 and its application to ESRS E5, paragraph 18 on waste, do not align with existing EU legislation. The Waste Framework Directive (2008/98/EC, Article 3(15) and Annex II), which is the cornerstone of EU waste management legislation, defines recovery as: "any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy. Annex II sets out a non-exhaustive list of recovery operations." As currently drafted, the reporting framework would lead to inaccurate reporting, as it would be unclear where to report incineration with energy recovery (R1): it is explicitly excluded from the ESRS definition of "recovery", but is not a disposal operation and therefore should not be reported under "waste directed to disposal". This would misrepresent actual waste treatment performance, create inconsistencies in EU statistics and compliance reporting, and result in incorrect financial disclosures by companies, since waste treatment pathways directly affect cost allocations, liabilities, and sustainability performance indicators. The stated goal of the Amended ESRS consultation is simplification and greater usability without compromising EU objectives. Introducing a definition that conflicts with existing law instead increases reporting complexity, as companies would face two contradictory classifications. To ensure alignment with existing EU legislation and avoid unnecessary burdens, we propose that: •The definition of "recovery" in Annex II should be amended to replicate or explicitly reference the definition provided in Article 3(15) of the Waste Framework Directive. •ESRS E5 §18 should clearly reflect that incineration with energy recovery (R1) is a recovery operation, consistent with EU law. For example, "iii. other recovery operation, including incineration with energy recovery"			
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Still not 100% clear how to assess severity of actual negative impacts in light of prevention/mitigation measures (not remediation, for which is clear that gross approach should be used). Paragraph 34 says: "When assessing the materiality of actual negative impacts, the severity of the impact shall be evaluated considering the outcomes of any mitigation or prevention measures implemented before the impact occurred". So, if the impact is x and prevention/mitigation actions outcome is y, the severity should be assessed as z=x-y if I'm not mistaken. But this wasn't clear enough the first time I read it, it seemed confusing especially when reading appendix C tables. For my understanding this is a net assessment of the severity of actual negative impacts in light of prevention/mitigation measures, but this point is not included in the Appendix C table since the table for actual negative impacts take into consideration only remediation actions and not prevention/mitigation. This should be clarified somehow, possibly by outlining the difference between what a remediation, mitigation, and prevention measure entail or by providing some explanatory examples for each type of actions in the DMA section of the Non-Mandatory Illustrative Guidance or in the Application Requirements of the relevant section.			
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	It is mentioned in the application requirements of SBM-3 that the interaction between material IROs and strategy and business model is also prescribed by IRO-2 par 28(a). In this case SBM-3 seems redundant also given the fact that the description of strategy and business model is prescribed in SBM-1. The few SBM-3 datapoints could then be incorporated into SBM-1 or be incorporated as application requirements of IRO-2.			
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	Data lacking in quality is indeed in contrast with the "fair representation" principle. In particular with verifiability and comparability. Thus there would be no relevant loss of information if omitted.			
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	I agree with option 1: leaving the possibility to report quantitative information on a voluntary basis would undermine the objective of the Green Deal considering that the CSRD proposed new scope would exclude from reporting the vast majority of EU businesses. Disclosing quantitative metrics on anticipated financial effects is crucial in allowing the most efficient capital allocation towards streams that are more sustainable instead on businesses that have a high environmental risk profile due to their lack of ambitions and actions against environmental issues (or that just present qualitative claims that are not substantiated with quantitative data, a case for which option 1 is better since it prescribes specific conditions under which quant. data can be omitted). In essence, giving companies too much room for deciding whether or not providing quantitative data by limiting the mandatory reporting of such information to qualitative assumptions on anticipated financial effects only would result not only in loss of information but also in loss of quality information, since there would be no hard data to back up qualitative claims (no consistent verifiability of data). Qualitative information that is not backed up by quantitative data can be misleading.			
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	Some data points might be indeed burdensome but if option 1 from the previous question will be followed then it allows the right amount of flexibility in disclosing this type of information which is quite relevant for financial actors.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets: both metrics are needed to have a more comprehensive outlook on financial institutions emissions profile since GHG intensity metric can change depending on whether the numerator or denominator changes. Absolute emission values might serve as a validation of actual ghg reduction.			
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	For E1-5 par. 40 to 43 I understand the information can be found elsewhere or derived from other indicators but allowing an easier identification of the metric might be better especially for users of the sustainability statement. Same logic for E1-6 para 53 to 55: info can be derived from other metrics but having gross GHG emissions intensity might be a good validation of the metrics from which it can be derived. I agree with the rest of the reasoning especially for moving certain topical paragraphs to ESRS 2 to avoid repetitions or the deletion of certain paragraphs that indeed would have been redundant (especially for the PAT related paragraphs).			
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	AR 26 b) may be worded as: size and site of newly created habitats that didn't originally exist; AR26 c) may be worded as: number or percentage of projects / sites where the undertaking has contributed to improve an ecosystem's capacity in maintaining its essential functions, diversity, and environmental processes (known as "ecological integrity")			
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree				
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	How payment practices towards SMEs are handled should be included at least in the "G1-1 – policies related to business conduct". Otherwise, this issue would be easily overlooked since "payment practices" are only mentioned at the beginning of the amended G1 as being a sub-topic. Reiteration in this case can be helpful to pinpoint the relevance of the sub-topic. Especially since SMEs constitute the largest share of businesses in the EU.			
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	One Click ESG	Consultant (including software vendor)	Netherlands	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	It should include a simple methodology for classifying impacts, risks and opportunities and defining a scale so that double materiality assessments carried out by different companies can be compared. There is a need to create a more practical tool.			
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	Significant improvement			
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E4	It would be interesting if NMIG 2 for. 15 were described in Amendments to ESRS E4.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Quantitative information is often too important to omit and, as it is generally more engaging and visually effective in a report, it should be given priority.			
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	There should be more content and support for the probability of occurrence, as in certain cases it is difficult to identify.			
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	Some voluntary data points should be retained to provide companies with guidance on how to go the extra mile in their reporting.			
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	Some voluntary data points should be retained to provide companies with guidance on how to go the extra mile in their reporting.			
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	22.E2.	Comments on deleted datapoints in ESRS E2	I partially agree and partially disagree	Some voluntary data points should be retained to provide companies with guidance on how to go the extra mile in their reporting.			
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	22.E3.	Comments on deleted datapoints in ESRS E3	I partially agree and partially disagree	Some voluntary data points should be retained to provide companies with guidance on how to go the extra mile in their reporting.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	22.E4.	Comments on deleted datapoints in ESRS E4	I partially agree and partially disagree	Some voluntary data points should be retained to provide companies with guidance on how to go the extra mile in their reporting.			
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	22.E5.	Comments on deleted datapoints in ESRS E5	I partially agree and partially disagree	Some voluntary data points should be retained to provide companies with guidance on how to go the extra mile in their reporting.			
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	22.S1	Comments on deleted datapoints in ESRS S1	I partially agree and partially disagree	Some voluntary data points should be retained to provide companies with guidance on how to go the extra mile in their reporting.			
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	22.S2	Comments on deleted datapoints in ESRS S2	I partially agree and partially disagree	Some voluntary data points should be retained to provide companies with guidance on how to go the extra mile in their reporting.			
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	22.S3	Comments on deleted datapoints in ESRS S3	I partially agree and partially disagree	Some voluntary data points should be retained to provide companies with guidance on how to go the extra mile in their reporting.			
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	22.S4	Comments on deleted datapoints in ESRS S4	I partially agree and partially disagree	Some voluntary data points should be retained to provide companies with guidance on how to go the extra mile in their reporting.			
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	22.G1	Comments on deleted datapoints in ESRS G1	I partially agree and partially disagree	Some voluntary data points should be retained to provide companies with guidance on how to go the extra mile in their reporting.			
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Financial institutions can provide transparency and foresight to investors by disclosing detailed intensity-based targets, explaining the methodologies and assumptions underpinning them, aligning their pathways with recognised climate scenarios, and reporting regularly on sectoral exposures and transition strategies.			
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The increase in the number of countries reporting for these two disclosures will encourage other countries outside the EU to also start collecting this type of information and looking at sustainability reporting.			
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	I do not agree with the removal of fatalities from the scope of SFDR PAI Indicator 3. Excluding such a critical measure undermines transparency and weakens the ability to assess the full impact of undertakings on workers' rights and wellbeing.			
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	Could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN.			
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	I do not agree with the deletion of the voluntary datapoint on the adjusted gender pay gap. While the unadjusted ratio provides a broad picture, the adjusted metric by employee category offers more meaningful insights into structural inequalities within organisations and should remain available to enhance transparency and comparability.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	The deletion of explicit datapoints on payment practices reduces transparency on how undertakings treat their suppliers, particularly SMEs, and weakens the ability to assess whether companies are supporting fair and sustainable business relationships in line with the CSRD's objectives.			
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	35.E1-1.	Do you agree with the amendments of this chapter?	I agree		E1	Disclosure Requirement E1-1 - Transition plan for climate change mitigation	
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	35.E1-5.	Do you agree with the amendments of this chapter?	I agree	Mention the connection with CDP and SBTI.	E1	Disclosure Requirement E1-5 - Actions and resources in relation to climate change	
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	35.E1-8.	Do you agree with the amendments of this chapter?	I agree		E1	Disclosure Requirement E1-8 - Gross Scopes 1, 2, 3 emissions	
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	35.E4-1.	Do you agree with the amendments of this chapter?	I agree		E4	Disclosure Requirement E4-1 - Transition plan for biodiversity and ecosystems	
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	35.E4-2.	Do you agree with the amendments of this chapter?	I agree		E4	Disclosure Requirement E4-2 - Policies related to biodiversity and ecosystems	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	35.E4-3.	Do you agree with the amendments of this chapter?	I agree		E4	Disclosure Requirement E4-3 - Actions and resources related to biodiversity and ecosystems	
Survey	Aliados Consulting	Consultant (including software vendor)	Portugal	35.E4-5.	Do you agree with the amendments of this chapter?	I agree		E4	Disclosure Requirement E4-5 - Metrics related to biodiversity and ecosystems change	
Survey	BeeOdiversity	Consultant (including software vendor)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	BeeOdiversity	Consultant (including software vendor)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	BeeOdiversity	Consultant (including software vendor)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	BeeOdiversity	Consultant (including software vendor)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	BeeOdiversity	Consultant (including software vendor)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We welcome TNFD's proposal1 to consolidate the current nature-related standards (E2-E5) into a single, integrated nature standard and to (i) ensure a structured materiality assessment for nature-related issues; (ii) elevate reference to 'dependencies' on nature; and (iii) streamline and prioritize the number of quantitative nature-related data points. We call on EFRAG to make note of it and apply as possible.			
Survey	BeeOdiversity	Consultant (including software vendor)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E4	We do not support the removal of the ESRS E4 biodiversity and ecosystems metrics metric specifications from the mandatory requirements. This is problematic because standardization is more limited at present than with other metrics. Specifying metrics (now in Non-Mandatory Illustrative Guidance (NMIG) 18-20) within the Standard would give companies the information they need to select and report practical, credible and comparable metrics and would support alignment with the TNFD disclosure metrics. If this does not occur, at the very least, it is important that (i) the NMIG stays attached to the Standard in some form and (i) a process is in place for ensuring updates are made on a timely basis, particularly for guidance on topics where data/tools for reporting are evolving rapidly.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BeeOdiversity	Consultant (including software vendor)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	BeeOdiversity	Consultant (including software vendor)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	BeeOdiversity	Consultant (including software vendor)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2				
Survey	BeeOdiversity	Consultant (including software vendor)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	BeeOdiversity	Consultant (including software vendor)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	BeeOdiversity	Consultant (including software vendor)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	BeeOdiversity	Consultant (including software vendor)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BeeOdiversity	Consultant (including software vendor)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	BeeOdiversity	Consultant (including software vendor)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	BeeOdiversity	Consultant (including software vendor)	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	BeeOdiversity	Consultant (including software vendor)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	BeeOdiversity	Consultant (including software vendor)	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We welcome the ESRS being simplified in a way that maintains the double materiality approach of the Corporate Sustainability Reporting Directive (CSRD), covering environmental, social and governance topics. This principle of double materiality is vitally important for the reported information to be meaningful for users. It is also essential for the EU to respect its international engagement under the UN CBD Global Biodiversity Framework Target 15.			
Survey	BeeOdiversity	Consultant (including software vendor)	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We welcome the simplification effort mainly targeting unclear or duplicative requirements, maintaining essential disclosures on environmental metrics and ask EFRAG to maintain that approach in the simplification process. We also welcome alignment with the draft global consensus metrics on the state of nature, convened by the Nature Positive Initiative. This is important for ensuring metrics are credible, practical and aligned for companies.			
Survey	MATERIALITY	Consultant (including software vendor)	Poland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The overall simplification of Chapter 3 is welcome. We find the new chapter 3.5. with practical considerations particularly helpful, as it has a potential to relieve large portion of the burden undertakings faced performing their materiality assessments. However we have several comments to changes we don't agree with: (1) The materiality of information principle should not be applicable to ESRS 2, as it may result in omitting fundamental information required in sustainability statements, such as on the DMA process and its results, or the governance over sustainability matters, and details on the undertaking's business model and strategy. The principle of materiality of information is highly judgmental and should be applied with caution. (2) Undertaking should not be allowed to include non-material information in sustainability statements, as this will obscure material information. Companies have many other means to communicate to their stakeholders non-material sustainability related information and there is no need to include these information in official, regulated annual statements. (3) Summarizing the list of topics in current Appendix A to only two-level structure is not very helpful, it was more useful as a three-level structure. Maintaining a three-level structure would not add any burden, as the list illustrative only. We also propose to add for clarity some changes in the list: (a) In "Climate change": add "Loss and damage" (b) In "Circular economy and resource use": add "Product and service design related to circular economy principles" (c) In "Climate change" replace "Energy" with "Energy, including use of fuels and energy efficiency" (4) The wording in par. 46 should be amended to reduce the risk of some companies declaring certain topics immaterial without due assessment. We propose the following wording: "The undertaking (...) and opportunity, however any exclusions must be clearly justified with reasoning and may be documented."			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	MATERIALITY	Consultant (including software vendor)	Poland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Adding Annex C may provide much needed clarity for undertakings performing their DMAs. However, several elements of the Annex need to be amended. If the intention is to streamline reporting by allowing mitigated impacts to be excluded, the standard should state that such exclusion is only permitted if the impacts and the related mitigation actions were disclosed in a previous report – and that these impacts may be referenced rather than repeated. Under no circumstances should the standard include statements such as 'in principle, no need to report on impact.' Such wording would create major gaps and undermine the reliability and comparability of the materiality assessment. "If an impact occurred in the reporting period and no remediation action has been taken" The wording "If an impact occurred" suggests that to identify a topic as actual negative, "something" would need to happen. E.g. an accident. In practice, for a manufacturing company it is commonly understood that "employee health and safety" is an actual material topic regardless of whether any accidents occur. In reference to par. 36 If successfully remediated negative impacts e.g. On employee health and safety do not become positive impacts, then does the topic become non-material? The sentence in the table of the Appendix C suggests that the topic becomes immaterial: "If the potential impact was material within the reporting year, but prevention or mitigation action has been taken before the reporting date such that the impact no longer exists (...) in principle no need to report the impact, as it is not material." In practice, a manufacturing company that manages employee health and safety effectively, with no incidents or accidents occurring, might classify this topic as immaterial, despite the substantial resources required to maintain it. In a logical approach, this does not make sense.			
Survey	MATERIALITY	Consultant (including software vendor)	Poland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	MATERIALITY	Consultant (including software vendor)	Poland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We agree with most of the changes introduced in relation to interactions between ESRS 2 and topical standards. However the requirement to disclose whether the undertaking plans to implement policies, actions and targets for a material topic, and in which timeframe, should remain as a "shall". Sustainability statements don't only document the past, but are also future-oriented. Allowing laggards in sustainable transition to remain silent on their material topics that have not been managed gives them an unjustified competitive advantage in relation to companies that are more advanced in managing sustainability matters. It should be the other way round. Requiring companies to disclose this information (on plans regarding adoption of PATs) is not burdensome, as all the information is readily available in-house.			
Survey	MATERIALITY	Consultant (including software vendor)	Poland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	MATERIALITY	Consultant (including software vendor)	Poland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We don't have comments regarding the contents of particular elements of the NMIG, only comments regarding its status. We propose (at the Commission's discretion) choosing only one of the following two options: (A)Inclusion of the contents of the NMIG into the Delegated Act. In this case each element of the NMIG should be included in the main body of each standard, in a clearly separable way, right after the applicable DR and AR. In this way, the report preparer would read in one place the disclosure requirement, the corresponding application requirement (in case it exists) and the corresponding non-mandatory illustrative guidance (in case it exists) (B)Leaving the contents of the draft NMIG for EFRAG to implement it in a series of Implementation Guidance documents to be issued in the future. Both options result in an understandable structure of the standards and their accompanying documents. Development of NMIG as another layer of documents, besides the mandatory standards and the non-mandatory EFRAG IGs may lead to further confusion among report preparers, users and auditors.			
Survey	MATERIALITY	Consultant (including software vendor)	Poland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	Simplification of ESRS, restructuring of the standards, elimination of two thirds of datapoints, including all "may" datapoints that created confusion is the main relief report preparers receive with the set of revised ESRS. Unfortunately, the inclusion of many additional "reliefs" will have a detrimental effect on the competitive position of many companies well advanced in sustainability transition, on comparability and reliability of the reports and on the transparency needed to achieve the objectives of the EU Green Deal. Any additional reliefs, if introduced, should be only temporary, i.e. for the first year, two years or three years of application of ESRS in a particular company. Introduction of permanent reliefs contradicts the very nature of mandatory reporting standards. If a provision is too difficult for undertakings to comply with at all times, it should be deleted from the standards. If a provision may be difficult for first time adopters, a temporary relief should be introduced. The relief "undue cost or effort" should be applicable only for the DMA process. The rationale is presented in our answer to the following question. Regarding difficulties related to collecting data from the value chain, the general 3-year relief for presenting information on metrics related to value chain is sufficient.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	MATERIALITY	Consultant (including software vendor)	Poland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	This relief should not be applicable at all for metrics related to own operations. The current draft ESRS 1 provision allows companies to hide inconvenient information, for example on their gender pay gap or high number of accidents, only due to the reason that it was difficult to collect all information from own operations. That provision will not be used by the majority of companies that fairly present their situation, it will only be abused by a small portion of companies. As a result, the provision profits only companies that are trying to hide some information. Additionally, introduction of the undue cost or effort in relation to metrics related to own operations will have a detrimental effect on comparability of information disclosed in reports by all companies and by companies in particular sectors. Lack of comparability of reports will be detrimental to the goals of the EU Savings and Investments Union.			
Survey	MATERIALITY	Consultant (including software vendor)	Poland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We prefer Option 1, as it is more closely aligned with IFRS. We strongly oppose Option 2. If it was to be adopted, European undertakings would be in a disadvantaged position in relation to companies from other jurisdictions that adopt IFRS standards. Financial institutions will anyway need quantitative information on anticipated financial effects from non-financial companies to assess risk related to credits and investments. Even if these information is not mandated by ESRS, companies will have to provide them. At the same time we acknowledge that less experienced companies and first time adopters may face difficulties in quantifying anticipated financial effects. This should be addressed with two solutions: (1) A three-year transition period should be granted for mandatory disclosure of quantitative anticipated financial effects (according to SBM-3 and E1-11); in the transition period undertakings shall report qualitative anticipated financial effects. (2) EFRAG should develop, on it's own or as a response to a mandate from the European Commission, a uniform methodology to quantify anticipated financial effects. Development of this methodology should be prepared and field-tested in no more of 1.5-2 years, leaving companies another 1-1.5 years to apply it before the end of the transition period. The methodology should be accompanied by appropriate tools facilitating it's application.			
Survey	MATERIALITY	Consultant (including software vendor)	Poland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				
Survey	MATERIALITY	Consultant (including software vendor)	Poland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	MATERIALITY	Consultant (including software vendor)	Poland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	MATERIALITY	Consultant (including software vendor)	Poland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	MATERIALITY	Consultant (including software vendor)	Poland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	MATERIALITY	Consultant (including software vendor)	Poland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	MATERIALITY	Consultant (including software vendor)	Poland	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We see no rationale reason why financial institutions should be exempted from disclosing climate absolute GHG emission reduction targets. It is a purely sectoral issue and it should not be addressed in sector-agnostic standards. We are of the opinion that sector standards should be maintained in the ESRS infrastructure, as they would be helpful for undertakings preparing their sustainability statements. In case sector standards are not developed, sector guidance should be developed and it should address any difficulties financial institutions may face disclosing their absolute GHG emission reduction targets.			
Survey	MATERIALITY	Consultant (including software vendor)	Poland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	MATERIALITY	Consultant (including software vendor)	Poland	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	The reference to the ILO Minimum Wage Fixing Convention No.131. is a great starting point and a leap forward in comparison to the original ESRS, however the market expectation is to be provided with the precise methodology. The convention incorporates the basic elements that should be included in the calculation. The regulator should further reference the methodology built upon the convention such as the Anker Methodology of the Global Living Wage Coalition. This would improve the comparability of the data published.			
Survey	MATERIALITY	Consultant (including software vendor)	Poland	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	The proposed changes may further align numerous disclosures on the due diligence process which would significantly declutter the reports. Furthermore closer alignment with SDR PAI and the OECD MNE Guidelines would improve structure of the disclosures which in turn would improve comparability of the published data.			
Survey	MATERIALITY	Consultant (including software vendor)	Poland	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	We disagree with deletion of the guidance related to setting targets on biodiversity and ecosystems. The guidance should be brought back to the AR and aligned with SBTN.			
Survey	MATERIALITY	Consultant (including software vendor)	Poland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	Unadjusted gender pay gap is a metric that very rarely presents the actual situation in an undertaking in a fair way. The employment structure and the sector of the company often drive high level of unadjusted gender pay gap. We propose that the company is required to disclose, on a mandatory basis, unadjusted or adjusted gender pay gap; in case the company chooses adjusted gender pay gap, it should be required to disclose the methodology applied. This construction of the disclosure requirement would add no additional datapoints while allowing companies to explain the actual structure and reasons for differences in remuneration for men and women.			
Survey	MATERIALITY	Consultant (including software vendor)	Poland	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	MATERIALITY	Consultant (including software vendor)	Poland	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	There are several inconsistencies in the Glossary regarding definitions of Circular Economy terms. Definition of "resource inflows" mentions "virgin and secondary raw materials", whereas "virgin materials" are not defined. Definition of "Key materials" states that they "can be sourced 'as is'", whereas it should be consistent with definition of "resource inflows". Therefore phrase "sourced 'as is'" should be replaced with phrase "raw materials". Definition of "Raw materials" should include "virgin and secondary raw materials", as this term is mentioned in "resource inflows" definition. It should be also explained whether "virgin materials" is the same as "primary materials". Definition of "Secondary resources" does not mention "recycling" neither explain directly, that "recycling materials" belong to that group of materials, whereas ESRS E5-5 par.17 d) requires to disclose the rate of "recycled materials used". Definition of "biological materials" does not explain whether materials of that kind are limited to virgin/primary resources/materials only, or does this group include processed materials (e.g. plywood or chipboard) Although "technical materials" are mentioned in ESRS E5-4 AR 2 for par. 15 a), they are not defined. Glossary defines "Circular material use rate" whereas this term does not exist in ESRS E5. Glossary defines "dismantling" whereas this term does not exist in ESRS E5.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	MATERIALITY	Consultant (including software vendor)	Poland	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We support the overall simplification of ESRS, especially with regards to language, structure of the standards and reduction of the number of datapoints. Further facilitation of the use of standards is possible. We propose EFRAG develops an XBRL tagging tool for revised ESRS, similar to the one that was developed for the VSME. This tool would provide a significant cost reduction for report preparers. We also advise EFRAG to be very cautious in relation to any additional reliefs added to the standards. As a general rule, all reliefs should be temporary only. Permanent reliefs are systemically incorrect, as they undermine coherence of the standards. We would also kindly ask EFRAG to communicate to the Commission that the European system of sustainability reporting is missing one final element: an EU-wide, uniform sustainability reporting assurance standard. It is urgently needed, and it should be developed and issued at the same time as the revised ESRS in the Delegated Act. Lack of an assurance standard issued by the Commission contributes to increase in costs for companies and non-consistent assurance practice across Member States.			
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E3	there needs to be more recognition of ESRS E1 and interaction with ESRS E3			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	I do not think that this should apply to ESRS E4			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	GWF Ltd	Consultant (including software vendor)	Switzerland	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We welcome the new structure without redundancies and the alignment with ISSB, which enhances comparability. In our view, these amendments, together with the other changes in the amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting and to promote better connectivity with corporate reporting as a whole."			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	22.S1	Comments on deleted datapoints in ESRS S1	I agree	We do not agree with the significant reduction of S1 and S2 data points, as we believe insufficient importance is given to social matters.			
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	22.S2	Comments on deleted datapoints in ESRS S2	I agree	We do not agree with the significant reduction of S1 and S2 data points, as we believe insufficient importance is given to social matters.			
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We do not support an exception for financial institutions regarding the disclosure of absolute GHG emissions targets. While we acknowledge that estimating absolute emissions for banks, insurers, and asset managers involves complexity, such challenges are common across all sectors. Both intensity and absolute targets are necessary to provide a complete understanding of an undertaking's climate impact. Intensity targets capture efficiency but may mask rising total emissions, whereas absolute targets show the overall impact. Granting an exception only for financial institutions would also create an unlevel playing field compared to other sectors.			
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We welcome the proposal that climate-related risks, scenario analysis, and climate resilience are addressed through two separate disclosure requirements, as this approach enhances clarity and ensures more comprehensive reporting on climate change transition and adaptation.			
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We support the proposal to include biodiversity transition plans. Biodiversity deserves greater emphasis, as it is closely interconnected with climate change, and addressing it in this way represents the correct and integrated approach.			
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fokus Zukunft GmbH & Co KG	Consultant (including software vendor)	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	- Overall, we welcome and support the simplifications contained in the drafts, in particular the fact that materiality is used as a filter, the "undue cost or effort" approach, that the ESRS 1 App. A is a "non-binding guidance" and the clarification that sustainability reporting is based on the consolidated financial statements (financial control approach) - ESRS 1 para. 16 et seq. (fair presentation): It should be clarified here that the sustainability report is part of the management report and that the same principles apply as in the management report - ESRS 1 para. 21 b): The reporting should be geared exclusively to the decision-making usefulness of the "primary users". However, the current proposal in no. 21 b) will foreseeably lead to an expansion of the information provided, as this user group must also be pleased. Point 21 b) is therefore to be deleted (see also Bullet above). - ESRS 1 para. 59: last half-sentence is to be deleted in order to preserve equality of financial and non-financial statements, consequently only the first sub-sentence in para. 4a in ESRS 2 must be retained - ESRS 1 para. 118: requirements for the possibility of referencing are to be examined, as they are currently impracticable - ESRS 2 para. 7: para. is to be deleted			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	- We welcome the concept of "big vs. net" in principle, this in the form of guidelines. However, industry-specific regulations must always take precedence (e.g. CRR and EBA-GL for banks or national regulations for smaller banks).			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	- Executive summary is superfluous, unauditable, only causes more costs and is a foreign body in the annual financial statements and management report			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	- In principle, the revision is to be welcomed. However, GOV, SBM and IRO should be simplified even further. - In addition, companies that have already reported under ESRS should be able to transition from the "old" disclosure requirements to the new ones.			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	- see also Commentary on the "Value Chain" - ESRS 1 AR 6 at no. 30 b): this requirement is to be deleted, otherwise materiality will always be triggered			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We support EFRAG's view that NMIG will not become part of the delegated act. However, the ESRS should once again explicitly clarify that the document is only an exemplary procedure and that preparers can also choose other approaches. It is not a requirement that a company or an auditor has to take into account or fear consequences if it is not observed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We understand EFRAG's entry into account that the requirements of the SFDR must be taken into account in the ESRS. However, the SFDR is also in urgent need of revision in this context. Relying on requirements there cannot be the solution. The EU Commission should therefore be informed that the SFDR should also be critically examined and revised within the framework of Omnibus.			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	The principle is to be welcomed. However, this must not lead to companies having to purchase data (see ESRS 1 para. 62), but this principle must be observed. There must be no obligation to buy data!			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	The expected financial effects are likely to be difficult to quantify for many companies at this point in time. Therefore, companies should be given the freedom to start with a qualitative assessment. ESRS 1 AR 15 b) is to be adapted accordingly.			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	In principle, it makes sense to provide information on the expected financial effects, but one should not make detailed requirements here, but could, for example, provide examples of topics to be reported via NMIG. The required information should therefore be made available in a stakeholder-oriented manner (e.g. according to the needs of the value chain partners, esp. banks and insurance companies, in the case of capital market-oriented companies in addition to the capital market).			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	National commercial law must be treated on an equal footing with IFRS!			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	We very much welcome the deletion of voluntary information and the reduction of the "shall disclose" datapoints. However, the conversion of previously voluntary data points into now mandatory data points must be rejected. It should not go beyond the "shall" information enshrined in the current ESRS. These should be the upper limit.			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	see ESRS 2 comment			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	22.E2.	Comments on deleted datapoints in ESRS E2	I partially agree and partially disagree	see ESRS 2 comment			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	22.E3.	Comments on deleted datapoints in ESRS E3	I partially agree and partially disagree	see ESRS 2 comment			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	22.E4.	Comments on deleted datapoints in ESRS E4	I partially agree and partially disagree	see ESRS 2 comment			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	22.E5.	Comments on deleted datapoints in ESRS E5	I partially agree and partially disagree	see ESRS 2 comment			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	22.S1	Comments on deleted datapoints in ESRS S1	I partially agree and partially disagree	see ESRS 2 comment			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	22.S2	Comments on deleted datapoints in ESRS S2	I partially agree and partially disagree	see ESRS 2 comment			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	22.S3	Comments on deleted datapoints in ESRS S3	I partially agree and partially disagree	see ESRS 2 comment			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	22.S4	Comments on deleted datapoints in ESRS S4	I partially agree and partially disagree	see ESRS 2 comment			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	22.G1	Comments on deleted datapoints in ESRS G1	I partially agree and partially disagree	see ESRS 2 comment			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	see comment under no. 22)			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	- ESRS 1 Appendix A should definitely be simplified. The resolution of the 3rd level (sub-subtopics) is to be welcomed. However, it does not help if the former sub-subtopics (in brackets) are then moved to the 2nd level (e.g. S1). There is still a need for further deletion here. - on "fair presentation" see comment under no. 11)			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree	See comment under no. 17.) In addition, not all companies subject to reporting obligations are covered by the SFDR.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	A binding obligation must be rejected. Developments should be monitored further before a commitment is required.			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	Point 33 a) in G 1-6 should be reinserted, as this is also explicitly required in the CSRD. This point is intended in particular to protect SMEs.			
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	DGRV – Deutscher Genossenschafts- und Raiffeisenverband e. V.	Business association (other than association of financial institution)	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		- explicit negative statements, e.g. if no strategies or measures have been taken, could be deleted, as this is already clear from the context - clarification that "entity specific topics" can only affect outstanding IROs - ESRS 1 para. 64: the value chain should be limited to Tier 1 for banks.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The abovementioned 8 points have not really simplified things, save point 7 which removes a few sub-topics. The rest just seems clarifications on topics which weren't too vague in the first place. All in all, these amendments don't really make a difference.			
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	Yes, this makes it more clear. There have been many arguments how to deal with mitigating actions and these additions clear this up.			
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Might give some clarity/new possibilities but not a whole lot.			
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	There are probably simplifications made but it still seems fairly complex when trying to read it.			
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Seems to be an improvement given the changes listed. However, the division in DR and AR created a need to consider instructions from different sections in the standard for the same disclosure. Splitting AR in a "may" and a "shall" part below the DR run the risk of creating three sections to consider for the same disclosure. The most pragmatic and practical structure for preparers, would be to merge DR and AR completely so everything relevant for one disclosure was available in the same place with clear information on whether it is "shall", "should" or may".			
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	It is nice that this information is supplied separately. Makes the EFRAG itself clearer.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	The problematic special reporting around joint operations/ventures for E1 is made voluntary and moved to NMIG. This is a decision we welcome.			
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	This gives us some flexibility in reporting when data is limited. With that relief we could still report using only the data we have, even if we don't have reliable data for some parts of the business or suppliers/customers. But we would need to explain what steps we take to get better data for the future.			
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Regarding climate risks, it is challenging to provide quantitative figures on anticipated financial effects due to significant uncertainties, complexities, and data limitations. These risks may materialize in the future, and the analysis is based on various scenarios, each carrying substantial uncertainty. Moreover, methodologies for calculating anticipated financial effects vary between companies, depending on the approaches and assumptions applied. This variability makes disclosures difficult to compare and may result in misleading conclusions, limiting their usefulness to stakeholders. Option 2 offers a more balanced approach. It reduces the administrative burden while enhancing reporting quality. Companies would still have the flexibility to provide quantitative information where it is feasible and relevant, while also minimizing the risk of investors or stakeholders relying on non-robust data for decision-making			
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	Actions in the future for physical climate risks are hard to quantify and scope will depend on scenarios and developments. Given the longer timeframe compared to other IROs this becomes particularity problematic.			
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Vattenfall is positive to alignment between key frameworks on definitions, requirements methodologies and language. The alignment of GHG boundaries, especially with the management of joint ventures under operational control, with GHG-protocol is positive and will improve comparability across markets			
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	We support the proposed reduction in mandatory and voluntary datapoints, as it meaningfully eases the reporting burden without compromising the quality of sustainability information. By removing less relevant and mainly narrative disclosures, the amendments ensure that only essential datapoints remain, striking a practical balance between efficiency and the objectives of the EU Green Deal.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	23.	Six datapoints exceptionally moved from “may” to “shall” In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, “may disclose” datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Regarding amendement 10c "whether the procurement team is involved in training related to its engagement with suppliers for the improvement of their sustainability performance" is a bit unclear on which trainings should be reported, it is awide definition. Regarding questions 23 and para 14, the threshold for reporting is to unclear (when is case of bribery "confirmed"? etc)?, what is considered "anti-corruption" here, etc. I think reporting on convictions is enough and much clearer.			
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	25.	Emphasis on ESRS being a “fair presentation” reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	To ensure transparency, accountability, and stakeholder trust, we encourage the inclusion of a fair representation clause in reporting practices, as it promotes balanced disclosure of both positive achievements and areas for improvement, ensures that material topics are addressed proportionally to their impact, and supports consistency, comparability, and credibility in data reporting—ultimately strengthening the integrity and usefulness of the information shared.			
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	26.	Exception for Financial Institutions’ Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 (“when only setting intensity targets”), to disclose also the associated absolute values” (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking’s progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	No clear opinion as we are not a financial institution.			
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking’s employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	For reporting on pure volume of FTE & headcount it is more transparent to share all data. As long as the metrics used are aligned with the other metrics used for reporting this could be an improvement.			
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree				
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary (“may”) datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	It is unclear how this will align with requirements in the EU Pay transparency directive. Maybe that is why a simpler overall unadjusted pay gap is proposed. This will primarily indicate structural inequalities (e.g., underrepresentation of women in higher-paying roles), while a reporting per employee category and/or the adjusted pay gap would be more indicating any actual pay differences. But as the EU Pay transparency directive addresses more the latter, this could be a reasonable proposal.			
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of “compatibility with 1.5 degrees” for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Only filled in what is applicable to us. Regarding G1: The threshold for reporting is to unclear (when is case of bribery "confirmed"? etc)?, what is considered "anti-corruption" here, etc. I think reporting on convictions is enough and much clearer.			
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of “compatibility with 1.5 degrees” for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	35.E1-7.	Do you agree with the amendments of this chapter?	I disagree	Disclosure Requirement E1-7 - Energy consumption and mix : There should be an alignment between proposed paragraph 28 and 30, energy consumption and energy production. Important is to distinguish between fossil energy sources and fossil free energy sources. Therefore the bundling of nuclear and fossil into the category non-renewable linked to production should be broken up into "Nuclear" and "Fossil" e.g. following datapoints for consumption. We suggest that the disclosure requirement on energy production be disaggregated in the same manner as energy consumption—into renewable, fossil, and nuclear categories—to ensure consistency, enhance comparability, and provide a clearer picture of an organization's energy profile. This alignment would support more transparent reporting and better reflect the diversity of energy sources contributing to overall production.	E1	Disclosure Requirement E1-7 - Energy consumption and mix	
Survey	Vattenfall	Preparer (non-financial preparing a sustainability report)	Sweden	35.E1-8.	Do you agree with the amendments of this chapter?	I disagree	Disclosure Requirement E1-8 - Gross Scopes 1, 2, 3 emissions: On the new paragraph 33 (amended from AR 43 c, 45 e and 46 j : Due to the inherent complexity and limited availability of reliable data across the value chain, the disclosure of biogenic emissions under Scope 2 and Scope 3 should be voluntary. Mandating such reporting could lead to inconsistencies and undermine the comparability and credibility of climate disclosures.	E1	Disclosure Requirement E1-8 - Gross Scopes 1, 2, 3 emissions	
Survey	AKI	Asset manager/Investor	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	The chapter is better organised and understanable now. For further improvement it is recommended to differentiate clearer between IRO and topics in chapter 3.			
Survey	AKI	Asset manager/Investor	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	We support the idea that incident which have occured during the reportin period should be reported as well as remediation efforts.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AKI	Asset manager/Investor	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	AKI	Asset manager/Investor	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	I agree, however we would wellcome site specific information on biodiversity as well as mentioning metrics in ESRS 2 for social topoics. Companies alrady report usefull social metrics and these should be included here.			
Survey	AKI	Asset manager/Investor	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	Requireing examples in disclosures would be helpfull and illustrative			
Survey	AKI	Asset manager/Investor	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The combination of allowing to omit reporting because of "undue cost and effort and lack of data quality" is problematic and might lead to the a lack of crucial data for investors. We are also highly concerned about the reduction of data points for non employees. This is the most vulnerable group of workers and at the same time related to social risks which the investor needs to know. In particular we need to know about H&S risks of this group and about their contracts and wages. This group is also at risk of forced labour. So ommitting reporting on them might be in conflict with the foced labour disclosure requirement f. ex in the UK.			
Survey	AKI	Asset manager/Investor	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	These combined reliefs are going to far and endanger a level playing field for companies.			
Survey	AKI	Asset manager/Investor	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	It is important to estimate financial effects. This data is needed to integrate sustainability into the business strategy.			
Survey	AKI	Asset manager/Investor	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AKI	Asset manager/Investor	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	It must made sure that the coherence with IFRS is given. Reporting below IFRS should nt happen			
Survey	AKI	Asset manager/Investor	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	AKI	Asset manager/Investor	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	AKI	Asset manager/Investor	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	AKI	Asset manager/Investor	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The change seems reasonable			
Survey	AKI	Asset manager/Investor	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The new rule treats workeres in the EU differnt from workers outside of the EU as a wage below the living wage would become acceptabel for them. The ILO requirements for wage setting are not an adequate safeguards to prevent this.			
Survey	AKI	Asset manager/Investor	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	I very much wellcome this change. It makes it much easier for investors to understand PAI 10 and 11. I very much hope that present inconsistencies in the reporting on these PAI are solved by this change.			
Survey	AKI	Asset manager/Investor	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	It reamins to be seen how data on biodiversity evolves. This ist a good staring point.			
Survey	AKI	Asset manager/Investor	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AKI	Asset manager/Investor	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Danish 92 Group	NGO	Denmark	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Positively, the Exposure Draft maintains key elements of the ESRS that are critical to ensure alignment with the international standards on responsible business conduct. Importantly, the draft maintains: 1. The double materiality approach and a definition of impact materiality and scope of reporting that covers impacts across own operations and the full value chain - as far as consumers are concerned. This is in alignment with international standards on responsible business conduct (UN and OECD). 2. Emphasis and synergy with the concept of sustainability due diligence by highlighting how such efforts should inform companies' double materiality assessments whilst drawing on its main features in cross-cutting and topical disclosure requirements around companies' sustainability policies, actions, metrics and targets. 3. Emphasis on engaging with stakeholders, including affected rightsholders and their representatives, to inform the double materiality assessment and in companies' sustainability impact management and related disclosures. 4. The sustainability structure of the affected stakeholder groups: workers, workers in the value chain, affected communities, indigenous peoples, and consumers/end-users underpinned by sustainability sub-topics that substantially capture topics commonly at risk for these groups. It is of utmost importance that these positive elements of the Draft exposure are maintained! Negatively, however, we are concerned that the simplification will jeopardize the robustness and original purpose of the DMA. The lack of detail, concrete information and comparable and usefull data that can be obtained is a problem for both NGOs and investors.			
Survey	Danish 92 Group	NGO	Denmark	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	It is usefull that chapter 3 addresses the question of how prevention, mitigation and remedy of impacts shall be considered in materiality assesment, but if the DMA lacks specificity, the result will also be insufficient.			
Survey	Danish 92 Group	NGO	Denmark	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	While acknowledging the need for flexibility, we are concerned that reporting will lack clarity, sufficient detail and deliver comparable data.			
Survey	Danish 92 Group	NGO	Denmark	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	While understanding the need for simplification, we are concerned that the (so far) 68% reduction of data points is problematic for the purpose of generating relevant and comparable information. It is of the utmost importance that the number of data points is not reduced further. Any further reduction of the standards or dilution of its key concepts would be highly problematic. In achieving this big a reduction many of the previous explanations, examples and guidance elements have been lost. We therefore highlight the importance of ensuring that guidance around implementation is given utmost priority in the next phases to avoid under-implementation and support companies in implementing the standard in its new form. In the follwing two specific points of critical concern, we agree with the response from Frank Bold, in: 1. The original Disclosure Requirement in environmental standards concerning screening of sites in materiality assessment were replaced by an application requirement to ESRS 2 IRO-1. This in effect makes transparency on this aspect optional. Consideration of local context is a key element of an appropriate materiality assessment. This should be both recognised in Chapter 3 of ESRS 1, and in ESRS 2 IRO-1, which should include an explicit datapoint on how the undertaking screened its locations and value chains. We welcome that E standards provide a clearer reference on the importance of disaggregation of disclosures, but this can only be done well if locations are properly screened. 2. We strongly recommend adding an explicit reference to the disclosure of relevant, entity-specific metrics directly in S standards. The fact that S2, S3 and S4 do not include any metrics and the anticipated sectoral standards which would have provided such metrics will not be adopted, shift the expectations for disclosure of metrics for S topics to entity-specific disclosures.			
Survey	Danish 92 Group	NGO	Denmark	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	In agreement with Frank Bold, we support the proposed changes. We agree with the removal of the confusing 'may disclose' elements. However, where they provide useful examples of disclosures, they could be included directly in the standards as "examples". This is particularly the case for the topics for which the reporting practice is evolving, such as Biodiversity and Ecosystems.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Danish 92 Group	NGO	Denmark	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The ESRS are not clear concerning the combined effects of the reliefs and how the reliefs should interact. Interpreting and applying these reliefs independently of each other makes it possible to abuse and omit important information, resulting in significant differences in reporting practice.			
Survey	Danish 92 Group	NGO	Denmark	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	We do not agree that the combined reliefs give an acceptable balance. They should clearly require the undertaking to improve the coverage and quality of the data needed to meet ESRS requirements.			
Survey	Danish 92 Group	NGO	Denmark	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	In general, we find it to be essential to focus on the integration of all elements of sustainability into companies' business strategy, considerations and risk management. Resigning on this ambition is counterproductive to the objective of putting sustainability reporting on the same level as financial reporting.			
Survey	Danish 92 Group	NGO	Denmark	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	While acknowledging the need for simplification, we remain concerned about the right balance between reporting effort and users' needs.			
Survey	Danish 92 Group	NGO	Denmark	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Reliefs must be IFRS compliant. Any further rekiels will undermine the objective of setting a global baseline for ESG reporting..			
Survey	Danish 92 Group	NGO	Denmark	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Danish 92 Group	NGO	Denmark	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We generally agree with these changes.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Danish 92 Group	NGO	Denmark	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We generally agree with these changes.			
Survey	Danish 92 Group	NGO	Denmark	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	The global carbon budget is defined in absolute terms. For this reason, it remains essential and the financial institutions should definately not be exempted.			
Survey	Danish 92 Group	NGO	Denmark	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	In alignment with Shift and the DIHR, we find that it is critically important to maintain S1-9 on Adequate Wages. Workers have a human right to a living wage, meaning sufficient remuneration to support themselves and their families in a life of basic dignity. The methodology requires companies to compare actual wages to an "adequate wage" standard for their employees in the EU while directing them to compare with legal minimum wages for their employees outside the EU if those minimum wages are agreed in line with the ILO's wage-setting principles. 1. It undermines the objective: the methodology for reporting on whether all employees earn an adequate wage should not include an option that is tied to the generally much lower standard of the legal minimum wage 2. It is discriminatory. The legal minimum wage nearly everywhere remains substantially below a living wage threshold. The disclosure would have companies apply a lower standard to their employees outside of the EU than they apply to those inside the EU. 3. It undermines comparability of reports: Companies have very different proportions of their workforce inside and outside the EU. If they apply these different standards for reporting on adequate wages depending on the location of employees, the data is not comparable. This undermines the disclosure's utility for investors and other stakeholders that use sustainability reports.			
Survey	Danish 92 Group	NGO	Denmark	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	In line with Frank Bold, we agree that measurable targets related to biodiversity and ecosystems shall be set and disclosed according to the guidance and examples given by relevant global frameworks, such as SBTN (Step 3 - Measure, Set & Disclose Targets), TNFD (component P1 and P2 & Annex 5, sector guidance and guidance on Target Setting) & resources by World Economic Forum Nature-Positive Transitions.			
Survey	Danish 92 Group	NGO	Denmark	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	Gender pay gap should be seen as a general concern for all companies across sectors and should be addressed as such.			
Survey	Danish 92 Group	NGO	Denmark	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		In alignment with WWF, we emphasize that the 1.5°C alignment shall remain the central and non-negotiable reference for corporate climate targets. Allowing companies to refer alternatively to the EU Climate Law risks undermining scientific robustness and integrity, as it could open the door to selective interpretations and policy developments.			
Survey	NBIM	Asset manager/Investor	Norway	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We note that EFRAG has made progress in this area. The amended ESRS now apply a materiality filter to all reported information, aligning with ISSB's approach. The fair presentation framework advances this alignment further, particularly for the financial materiality component of ESRS double materiality assessment. We welcome these changes as they shift focus from strict compliance to disclosure of more decision-useful information for investors. We particularly value EFRAG's permanent reference to IFRS Industry Based Guidance (including IFRS S2 and SASB Standards) for entity-specific disclosures. To enhance interoperability further, we recommend explicitly incorporating SASB standards into the ESRS Double Materiality Assessment process. SASB standards are specifically designed to identify financially material sustainability topics by industry, which would provide structured guidance for companies as they determine which sustainability issues affect their financial performance.			
Survey	NBIM	Asset manager/Investor	Norway	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	NBIM	Asset manager/Investor	Norway	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	In our previous feedback, we identified how the original ESRS structure created reporting inefficiencies. EFRAG has now streamlined this approach by allowing companies to report core information once rather than repeating similar details across multiple sections. We welcome this change, as it improves clarity, reduces repetition, and results in more effective application of the standards by companies.			
Survey	NBIM	Asset manager/Investor	Norway	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We note that EFRAG has made progress in this area. We support the reorganization that clearly separates mandatory from non-mandatory requirements, and eliminates "may disclose" provisions, as it makes the application of the standards more effective. However, we do believe terminology, metrics and reliefs of ESRS can be further aligned with ISSB which will make it easier for companies to comply with multiple reporting frameworks. For example, further terminology alignment opportunities include scenario analysis disclosures in ESRS E1 (Climate Change) and resilience assessment disclosures in ESRS 2 Strategy, Business Model and Management (SBM-3). Additionally, with the removal of specific biodiversity metrics from the mandatory text of ESRS E4 (Biodiversity and Ecosystems), we recommend incorporating an explicit reference to the TNFD core global disclosure metrics in the mandatory text itself. While the Non-Mandatory Implementation Guidance mentions TNFD as a framework companies "might consider", reference in the mandatory text would establish a clear measurement standard, ensure comparable reporting, and align with emerging global standards.			
Survey	NBIM	Asset manager/Investor	Norway	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	EFRAG has proposed several new relief provisions that diverge from ISSB standards. These create interoperability challenges. When combined with the enhanced materiality filter introduced in the amended ESRS, these reliefs also increase the risk of material information gaps in sustainability reporting. For example, the extension of "undue cost or effort" relief to all metrics, even those for a company's own operations, is concerning. Companies can use this relief to omit important sustainability metrics. Similarly, the "relief for acquisitions and disposals" creates differences in reporting boundaries compared to financial statements, undermining the connectivity between sustainability and financial reporting. What requires careful consideration is the lack of clarity on how these reliefs can be used or how they might interact with each other. This can potentially create a patchwork of inconsistent disclosures across companies and sectors. They further increase the complexity of the application of standards. We recommend aligning relief provisions with ISSB standards to ensure consistent application regardless of reporting framework. Furthermore, EFRAG should review which relief provisions should be transitional and which should be permanent, based on the final scope of Corporate Sustainability Reporting Directive (CSRD) and as sustainability reporting practices mature.			
Survey	NBIM	Asset manager/Investor	Norway	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	As investors, we require financial effects disclosures to evaluate how sustainability factors impact financial position and performance. Quantitative data enables precise assessment of financial implications and facilitates meaningful comparison across companies. While qualitative explanations provide valuable context, they simply cannot replace the numerical information that forms the foundation of valuation methodologies and investment decisions. However, we recommend adopting this option with all ISSB relief mechanisms to achieve full interoperability. This would include incorporating ISSB's skills and capabilities limitation provision, which would help companies during the implementation phase. Furthermore, mandating Option 1 aligns with the global direction of sustainability reporting, as ISSB standards are now being implemented worldwide. Making quantitative disclosure optional would not only create gaps in the reporting landscape but would also hamper our ability to conduct consistent cross-border portfolio analysis. We acknowledge the methodological challenges companies face when calculating these financial effects. However, reporting capabilities and methodologies will mature as ISSB and ESRS standards become more widely adopted. Rather than reducing requirements, we recommend that EFRAG references ISSB's educational guidance to support companies through this transition. For these reasons, we have reservations about Option 2, which would make quantitative disclosure permanently voluntary. If adopted, it would substantially diminish the transparency, comparability, and overall usefulness of sustainability reporting for investment decision-making.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	NBIM	Asset manager/Investor	Norway	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We welcome interoperability improvements with ISSB standards, but remain concerned about several amendments that reduce alignment between frameworks. These changes compromise comparability and diminish the quality of information available to investors. The proposal to make quantitative disclosure of anticipated financial effects optional diverges from ISSB's approach (as detailed in our response to question 19). Further, limiting financial effects disclosure to "already announced" investments and plans departs from ISSB's comprehensive framework and undermines the essential connectivity between sustainability impacts and financial statements. Investors require a complete picture of how sustainability issues affect business performance and prospects. It's notable that none of the 35+ jurisdictions adopting ISSB standards are moving away from this disclosure requirement. Instead of reducing requirements, implementing capacity building initiatives and adopting ISSB-aligned relief mechanisms would better address preparers' challenges. The hybrid approach to GHG emissions boundaries also introduces inconsistencies. By requiring financial control as default while mandating operational control reporting in certain circumstances, EFRAG creates a system where identical operations could show different emissions profiles under ESRS versus ISSB frameworks. This approach would require companies to maintain dual calculation methodologies and would invite inconsistent implementation as preparers make varying judgments about when financial control fails to provide "fair presentation." Additionally, the introduction of other relief provisions that diverge from ISSB standards (detailed in our response to question 17) further weakens interoperability. The European Commission explicitly mandates maximizing interoperability with global standards. In this context, EFRAG's threshold for creating further divergence should be high. We believe EFRAG can achieve simplification and burden reduction without compromising alignment with ISSB. Full alignment would ultimately reduce reporting complexity while advancing a unified global sustainability reporting infrastructure that benefits both preparers and users.			
Survey	NBIM	Asset manager/Investor	Norway	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	NBIM	Asset manager/Investor	Norway	22.ESRS2	Comments on deleted datapoints in ESRS 2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	We are concerned that EFRAG has proposed deletion of seven ISSB-aligned disclosure requirements. This contradicts the European Commission's direction to enhance interoperability with global standards. While datapoint reduction is important for simplification, the threshold for removing globally aligned datapoints should be high. Preserving these datapoints would better serve both European companies seeking reporting efficiency and international investors requiring consistent information. These include: •ESRS 2 General disclosures GOV-1: Information about management's role in governance processes for monitoring and overseeing impacts, risks and opportunities (aligned with IFRS S1, para. 8 (22 c)) •ESRS 2 General disclosures - MDR for actions and resources in relation to material topics: Disclosure on monitoring progress made against previously disclosed actions, including quantitative and qualitative information (aligned with IFRS S1 para 38) • •ESRS 2 General disclosures- IRO-1, paragraph 53(e): Disclosure on the extent to which and how the process to assess and manage material sustainability impacts, risks and opportunities is integrated into the undertaking's overall risk management process (aligned with IFRS S1 paragraph 25(b)) •ESRS E1 Climate change (53 amended): Disclosure of gross GHG emissions intensity per unit of products and/or services (aligned with IFRS S2 paragraph 33) •ESRS 2 General disclosures GOV-2: Description of whether and how climate-related considerations are factored into executive remuneration (aligned with IFRS S1 par. 10 (29 c)) •ESRS 2 General disclosures GOV-2: Disclosure of the percentage of executive management remuneration recognized in the current period that is linked to climate-related considerations (aligned with IFRS S1 par. 10 (29 c))			
Survey	NBIM	Asset manager/Investor	Norway	22.E1.	Comments on deleted datapoints in ESRS E1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	These deleted points also include: •ESRS E1 Climate change (53 amended): Disclosure of gross GHG emissions intensity per unit of products and/or services (aligned with IFRS S2 paragraph 33) •ESRS E1 Climate change AR 46(g) amended: Information on the extent to which Scope 3 greenhouse gas emissions are measured using inputs from specific activities within the entity's value chain (primary data), secondary data or a combination of both (aligned with IFRS S2 paragraph B32)			
Survey	NBIM	Asset manager/Investor	Norway	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The new requirement to disaggregate metrics for the top 10 largest countries by employee headcount (with more than 50 employees) provides better geographic visibility. This change should enhance transparency regarding workforce conditions across different jurisdictions, and support more effective assessment of risks and opportunities.			
Survey	NBIM	Asset manager/Investor	Norway	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We support the provision of guidance on what biodiversity and ecosystems-related targets can cover. This should refer to Taskforce on Nature-related Financial Disclosures (TNFD) where possible.			
Survey	NBIM	Asset manager/Investor	Norway	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	The deletion of the voluntary datapoint on adjusted gender pay gap by employee category removes important contextual information for investors. While the unadjusted global pay gap provides an overall indicator, it alone does not provide sufficient insight into whether pay differences stem from legitimate factors (such as role distribution, experience levels, and qualification differences) or from potential discrimination. The adjusted metric, which accounts for these factors, offers complementary information that helps us evaluate whether companies are addressing structural inequalities in addition to direct pay discrimination.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The Danish Government welcomes the simplified approach to the DMA especially regarding part 3,5 about practical considerations. It's important that the DMA remains dual. Yet the process itself has not been simplified or reduced in scope. We are therefore concerned that these changes may not achieve a sufficient alleviation of reporting burdens. The DMA should be more sector-oriented. Also, further improvements and clarifications are needed: It should be clarified, that although it's expected that the top-down and the bottom-up approaches have the same results, this should not be understood as a compliance tool to assess whether the DMA results are correct. ESRS-1 para-29 states that the undertaking shall update the conclusions of its DMA from previous years to exclude information that's no longer material or include information that has become material. It's unclear how an undertaking is expected to assess this without conducting the full DMA process again as described in Basis for Conclusion paragraph-172. Further clarification is needed. Although not part of the DMA chapter itself we find that, the amendment to Chapter 2 of ESRS-1 and Appendix B about the core principles underlying 'fair presentation', that the explicit application clarifies the use of this concept. It's however paramount that this concept and its correlation to similar concepts in other legislative frameworks and standards is explained in detail, especially considering the introduction of the possibility of including non-material information. We refer to our answer to question 25. We also encourage EFRAG to clarify how much entity-specific information to include in the context of the requirements related to the DMA and the concept of "fair presentation" Regarding ESRS-1, para-107, point (ii) allowing the inclusion of non-material information, we encourage EFRAG to further clarify and emphasize the conditions that needs to be met specified in para-107 a and b.			
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We welcome the additional guidance on how to consider remediation, mitigation and prevention which was much needed. However, we find that the right balance has not been reached completely. The examples in Appendix C to ESRS 1 are difficult to read and understand and we find that reading through the examples only in very few cases the net-approach are used. We acknowledge the point on health and safety impacts specifically but fear a general emphasis on gross risks that are not material in practice. We appreciate EFRAG's further consideration in this balance in a field test. In Appendix C, the example where an impact occurred in the reporting period and a remediation action has been taken, is fully completed and the impact is remediated seems to be in conflict with ESRS 1 para 36 that states that the undertakings positive impacts should be considered in their own right and shall not be netted off against its negative impacts. Also, sector guidance is especially called for in the market. Therefore, the Danish government believes that sector-specific guidance can support and limit the double materiality assessment in such a way, that the reporting is focused and useful, especially for the financial sector. In this way, it is possible both to reduce the burden on reporting companies, as their double materiality assessment becomes less extensive and more sector-oriented, and to make the reporting more decision-useful.			
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The added flexibility is welcomed, especially the possibility to use appendices. Clarification as to whether an appendix to the sustainability statement should be placed in conclusion of the sustainability statement or if it could be placed at the end of the annual report or elsewhere (e.g. with incorporation by reference) would be appreciated As we understand ESRS 2 para 31 it allows the undertaking to arrange its disclosures in a way that reflects its management priorities and business model. We support and recommend further flexibility by changing the requirement in ESRS 1 para 105 that states that the sustainability statement shall be structured in four parts in the order: general, environmental, social and governance-information. The order of the main chapters in the statement should be up to the reporting entity, so that they can structure the chapters in order of relevance. See also our answer to question 33.			
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We agree with the proposed amendments and welcome the simplification of the minimum disclosure requirements, which were both difficult to understand and to navigate. The reduction in 'shall'-datapoints for PAT's is appreciated and will lead to more relevant disclosures and be less prescriptive, which will enhance comparability. That said, The Danish Government would be supportive should further feasible reductions in data points be identified and taken into consideration. We find that moving description of IRO's to IRO-2 is an improvement on the previous setup. Several Danish "wave-1" companies have argued that the previous IRO-2 disclosure requirement had little to no value.			
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We welcome the amendments to achieve clarity and accessibility, especially the decision by EFRAG to completely remove the 'may disclose' datapoints and the positioning of ARs in immediate conjunction with relevant DRs which eases readability of the standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We welcome the proposed reliefs and the increased interoperability with ISSB especially regarding the introduction of the relief from undue cost and effort. However, we find that the terminology introduced in ESRS-1, para-45 a and para-47 regarding reasonable and supportable information vs. evidence needs clarification and we encourage EFRAG to explicitly point to the reasoning behind the terminology and connection with ISSB. Also, we find that ESRS-1 para-67 and AR 28 for para-67 are difficult to understand due to the fact that para-67 on the one hand states that it's not needed for undertakings to collect data from their value chain in relation to metrics, and explicitly gives scope-3 emissions as an example of this and on the other hand in AR 28 for para-67 states that - with the exception of scope-3 - metrics in topical ESRS do not require the inclusion of upstream and downstream data. To complicate it further, ESRS-1 para-91 states, that scope-3 emissions are excluded from the relief introduced in the paragraph to comply with disclosure requirements when only having reliable data for part of the scope or value chain. This can in our understanding imply, that if an undertaking only can collect reliable data for parts of the value chain for its scope-3 emissions, it's not allowed to disclose solely on this part of the value chain and disclose the actions taken to increase coverage and quality, but the undertaking is allowed to disclose its scope-3 emissions based on estimates alone. Please also refer to our answer to question 18 below. We therefore ask EFRAG to clarify these disclosure requirements and their interaction. Furthermore, we bring to the attention of EFRAG that the reference in ESRS-1 para-91 to ESRS E1-6 GHG-Emissions should be updated to ESRS E1-8 GHG-Emissions.			
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We welcome the intended relief in ESRS 1 para 91 that allows an undertaking to report metrics with a partial scope of calculation, however there are several aspects that we do not find sufficiently described and thus hard to interpret, for instance how ESRS 1 para 91 should be understood in conjunction with ESRS 1 para 67 and AR 28 for Para 67 – see our answer to question 17 above. In addition to the concerns described in question 17 above, we believe that it is not sufficiently clear if this relief for metrics is only applicable to impact-metrics or if this is also applicable to metrics for risks and opportunities. We would also like to raise a concern that when requiring the undertaking to disclose the actions taken to improve future quality and coverage and at subsequent reporting dates whether reliable data has become available, this could indicate that the relief is only temporary until the actions taken has resulted in the availability of data in high quality and coverage. The paragraph does not take into account the situation, where the undertaking does not have the ability to take any actions (e.g. because it does not have any buying power over its supplier) and where there is no prospect that reliable data will become available in the future.			
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We find that option 1 is the best solution as this allows for the highest level of interoperability to IFRS. Interoperability with IFRS is particularly important, as the reduced scope of the CSRD means that the majority of companies covered by the CSRD will also be subject to IFRS.			
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	The Danish Government supports the amendments to ESRS 1, requiring companies to apply key qualitative characteristics when preparing sustainability statements, making the concept of 'fair presentation' more explicit. This enhances consistency and understanding across different standards. However, differences in interpretation between preparers and auditors already exist. EFRAG must therefore clearly explain how 'fair presentation' in IFRS and similar concepts in the Accounting Directive relate, to ensure consistent understanding and reduce disagreements. We find that interoperability across various legislative frameworks and standards are essential, we therefore welcome EFRAGs work to further streamline the ESRS standards in this regard. The amendment to the disclosures in ESRS E1 GHG emissions and the implementation of IFRS reliefs on undue cost and effort is especially welcomed as well as the streamlining of the language used in ESRS and IFRS. Where differences in meaning or terminology remain, these should be explicitly explained in the ESRS.			
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	The Danish Government would be supportive should further feasible reductions in data points be identified and taken into consideration.			
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	The Danish Government would be supportive should further feasible reductions in data points be identified and taken into consideration.			
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	22.E2.	Comments on deleted datapoints in ESRS E2	I partially agree and partially disagree	The Danish Government would be supportive should further feasible reductions in data points be identified and taken into consideration.			
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	22.E3.	Comments on deleted datapoints in ESRS E3	I partially agree and partially disagree	The Danish Government would be supportive should further feasible reductions in data points be identified and taken into consideration.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	22.E4.	Comments on deleted datapoints in ESRS E4	I partially agree and partially disagree	The Danish Government would be supportive should further feasible reductions in data points be identified and taken into consideration.			
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	22.E5.	Comments on deleted datapoints in ESRS E5	I partially agree and partially disagree	The Danish Government would be supportive should further feasible reductions in data points be identified and taken into consideration.			
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	22.S1	Comments on deleted datapoints in ESRS S1	I partially agree and partially disagree	The Danish Government would be supportive should further feasible reductions in data points be identified and taken into consideration.			
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	22.S2	Comments on deleted datapoints in ESRS S2	I partially agree and partially disagree	The Danish Government would be supportive should further feasible reductions in data points be identified and taken into consideration.			
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	22.S3	Comments on deleted datapoints in ESRS S3	I partially agree and partially disagree	The Danish Government would be supportive should further feasible reductions in data points be identified and taken into consideration.			
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	22.S4	Comments on deleted datapoints in ESRS S4	I partially agree and partially disagree	The Danish Government would be supportive should further feasible reductions in data points be identified and taken into consideration.			
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	22.G1	Comments on deleted datapoints in ESRS G1	I partially agree and partially disagree	The Danish Government would be supportive should further feasible reductions in data points be identified and taken into consideration.			
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	The Danish Government welcomes the amendment to Chapter 2 of ESRS 1 and Appendix B, which require undertakings to apply the fundamental and enhancing qualitative characteristics of information when preparing their sustainability statements. These characteristics are the core principles underlying 'fair presentation', and their explicit application clarifies the use of this concept. Making the concept of 'fair presentation' more explicit within the ESRS is valuable, as re-using established principles across multiple legislative frameworks and standards enhances interoperability and better facilitate understanding. Clarifying its application helps address potential inconsistencies that may arise when similar concepts are defined or interpreted differently. 'Fair presentation' is a well-recognized and longstanding concept that preparers, auditors, and users have applied for years in financial reporting. However, we have already experienced differences in understanding between preparers and auditors regarding how these concepts should be interpreted. It is therefore essential that EFRAG clearly explains the coherence between 'fair presentation' in the IFRS Conceptual Framework for Financial Reporting, 'fair presentation' in IFRS S1, and the concepts of 'true and fair view' and 'fair review' as defined in the Accounting Directive. All these concepts are rooted in the same fundamental and enhancing qualitative characteristics. Ensuring clarity on these connections will foster better understanding among all parties, resulting in more relevant reporting and a shared interpretation of key concepts, ultimately reducing disagreements between preparers and auditors.			
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	The Danish Financial Supervisory Authority (DFSA) does not agree that financial institutions should be exempted from disclosing values for absolute GHG emissions. DFSA considers it important to disclose this value, as both intensity-based and absolute targets are necessary to provide a realistic and nuanced picture of an institution's progress in the area of climate action. Intensity targets alone may potentially obscure any increase in GHG emissions. Furthermore, information on an institution's total GHG emissions is one of the most central values to disclose in order to reach the objectives of the CSRD. Intensity-based and absolute targets, together with other descriptions of the institution's sustainability strategy, provide the best overall picture of the institution's climate impact as well as its efforts and contributions to the green transition. However, DFSA would like to add that it is important to establish a definition of the value chains of financial institutions in order to strengthen the application and user quality of the disclosed values for absolute GHG emissions. The values disclosed across financial institutions should be clearly delineated, well-defined, and comparable.			
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	We partially agree with the way the SFDR PAI have been incorporated. The datapoints removed are either rarely used, irrelevant, provided for in other reporting, and as such we see their removal as an efficient way to reduce burdens. We are, however, unsure of the reference to ESRS E4, AR 13 regarding PAI 12, as we have been unable to find this point. We assume that the reference was meant to be AR3 – if this is the case, we can also agree with this amendment. Concerning the datapoint on GHG intensity of a company E1-6, para 53-55 we still think that this datapoint is highly relevant for FMP when assessing whether an investee company can be perceived as a sustainable investment pursuant to article 2(17) and the requirement of doing no significant harm. In addition, we would like some clarity on whether a company is still obliged to report on GHG intensity but instead of being obliged to calculate this by use of the company's revenue, it is up to the company how to calculate the GHG intensity pursuant to the NMIG.			
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	In ESRS 2 para 28 (b), it is stipulated that if the undertaking concludes that climate change is not material and omits all disclosure requirements in ESRS E1 climate change, the undertaking shall disclose the basis for this conclusion. However, due to the fact that ESRS 2 is no longer mandatory, it is difficult to understand how this disclosure requirement should be understood. The same issue arises for ESRS 2 para 30 that states that if the undertaking has not adopted policies, actions and targets, it shall disclose this fact. Due to the fact that ESRS 2 is no longer mandatory, it is difficult to understand how this disclosure requirement should be understood. This also applies to ESRS 2 para 44. We therefore encourage EFRAG to clarify this. ESRS 2 para 22 requires undertakings to disclose, amongst other things, how the undertaking addresses or plans to address its IROs. In AR 14 for para 22 it is further clarified that this includes a clear reference to the specific policies, actions and targets implemented during the reporting period. It is unclear if this implies that policies implemented in previous years or targets set in previous years are not to be included? As we understand ESRS 2 para 31 it allows the undertaking to arrange its disclosures in a way that reflects its management priorities and business model. We support and recommend further flexibility by changing the requirement in ESRS 1 para 105 that states that the sustainability statement shall be structured in four parts in the order: general, environmental, social and governance-information. The order of the main chapters in the statement should be up to the reporting entity, so that they can structure the chapters in order of relevans.			
Survey	The Danish Ministry of Industry, Business and Financial Affairs	National supervisory authority & regulator	Denmark	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Interoperability: For improved understandability and interoperability with the voluntary standard for SME's (VSME) as well as with the proposed value chain cap, it is important that ESRS clearly explains how the disclosures are able to inform about aspects in the value chain in regard to: -GHG removals (E1-9) -Microplastics (E2-4) -Substances of very high concern (E2-5) -Waste (E5-5) This is on the one hand to give clear guidance to undertakings in-scope of the CSRD as to how this should be done in line with VSME and on the other hand to protect SMEs from data requests beyond the value chain cap. The reasoning for this is, that the VSME does not contain information about these topics and thus the undertaking in scope of CSRD could be required to request data from its value chain partners that goes beyond the value chain cap. The Danish Government would be supportive should further feasible reductions in data points be identified and taken into consideration.			
Survey	NABU	NGO	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	Chapter 3 is presented in a clearer and more structured way. Section 3.1 improves the definition of materiality of information by replacing the criterion of "significance" with the "understandability" of impacts, offering stronger guidance and ensuring consistency with the CSRD as well as international sustainability due diligence standards. The section also explains how materiality of information connects to the (fundamental) qualitative characteristics of information described in Chapter 2, and to the requirements for aggregation and disaggregation of information (for example, paragraph 52 on avoiding "obscuring"). Chapter 3.3.2, paragraph 37 overlooks the fact that financial materiality assessment is intended not only to identify material information but also to determine material risks and opportunities, as mandated by the CSRD. These risks and opportunities appear only midway through paragraph 38, which disrupts the coherence of the text.			
Survey	NABU	NGO	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	It is helpful that Chapter 3 discusses how prevention, mitigation, and remedy of impacts should be addressed in materiality assessment; however, the rules could be stated in a simpler and more accessible manner. Paragraph 34, for instance, uses unnecessarily complex language to convey the straightforward point that actual impacts must be considered as they occurred during the reporting period, and that any remediation after the fact is irrelevant. We particularly welcome the clarification that potential impacts requiring substantial and ongoing prevention or mitigation efforts should be assessed on a gross basis. This clarification is essential, since without it companies would, in theory, be unable to report on how they manage such issues. To strengthen this guidance, it would also be valuable to link it to the materiality of information filters, which could help companies differentiate between significant efforts and routine compliance measures or standard practices.			
Survey	NABU	NGO	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	NABU	NGO	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We welcome the elimination of duplications between the cross-cutting and topical standards and support the stronger focus on general disclosure requirements. Similarly, many PAT provisions within the topical standards functioned more as illustrative examples or guidance than as concrete datapoints, which we consider appropriate. That said, the original disclosure requirements in the environmental standards regarding site screening in materiality assessments have been replaced with an application requirement under ESRS 2 IRO-1. This change effectively makes transparency on this issue optional. Given that consideration of local context is a fundamental component of sound materiality assessment, it should be explicitly recognised in Chapter 3 of ESRS 1. Moreover, ESRS 2 IRO-1 should include a clear datapoint requiring undertakings to report how they screened their locations and value chains. We also appreciate the improved emphasis within the environmental standards on the importance of disaggregating disclosures. However, meaningful disaggregation can only be achieved if the screening of locations is carried out thoroughly.			
Survey	NABU	NGO	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We support the proposed changes and agree with the removal of the "may disclose" elements, as their status has often caused confusion. However, it is not necessary to remove all of them from NMIG. When these elements serve as useful examples of disclosures, they could be incorporated directly into the standards as illustrative "examples." This approach is particularly valuable for topics where reporting practices are still evolving, such as biodiversity and ecosystems. Including such examples within the standards would help first-time preparers understand the types of information likely to be relevant and provide a foundation for standardizing metrics. Requiring consultation of a separate document like NMIG creates an unnecessary hurdle.			
Survey	NABU	NGO	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The standards lack clarity regarding the combined effect of the reliefs and how they are intended to interact. Applying these reliefs independently risks abuse, omission of material information, and significant inconsistencies in reporting practices. The reporting of metrics is affected by the interplay of undue cost and effort, and lack of data quality reliefs. However, the standards do not properly contextualize these reliefs, nor do they set explicit requirements or timelines for companies to improve data coverage and quality. This issue is compounded by the relief that unconditionally allows the exclusion of joint operations. If environmental metrics related to these operations are material, the standards should encourage their eventual disclosure. The existing undue cost and effort, and lack of data quality reliefs already provide sufficient flexibility for this purpose. There is also a lack of coherence in reliefs related to financial effects, i.e., information essential for understanding risks and the company's capacity to address them. For example, the limitation tied to announced investment plans focuses disclosure on effects that are easier to assess and quantify, while other reliefs allow companies to omit quantitative disclosures altogether. We broadly support the relief in ESRS 1, paragraph 90, which permits exclusion of activities that are not significant drivers of the IROs when calculating metrics. However, the application of this option needs clarification for specific environmental and social metrics that are standardized in the ESRS.			
Survey	NABU	NGO	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	The combined reliefs should explicitly require undertakings to enhance both the coverage and quality of the data needed to comply with ESRS requirements. For metrics related to the company's own operations or those directly standardized in the ESRS, this obligation should include a clear time frame. For other metrics, gradual improvements over time should also be explicitly mandated, while still allowing flexibility under the undue cost and effort relief.			
Survey	NABU	NGO	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ability to estimate financial effects is essential for an undertaking to integrate sustainability into its business strategy, planning, and risk management. It is also crucial for determining financial materiality, including avoiding the overreporting of topics as financially material. Abandoning this objective would conflict with the goal of placing sustainability reporting on the same level as financial reporting, integrating both, and ultimately addressing the "tragedy of horizons." We consider Option 1 to be unnecessarily extensive and lacking a defined time frame, but broadly acceptable. We disagree with the statement that "[d]ifferent from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources." The proposed ESRS already include the undue cost and effort relief, which appears to cover such situations. Regarding Option 2, we do not find it justifiable to go beyond the IFRS relief. One of the strongest arguments from stakeholders advocating simplification of the ESRS was that, as a principle, the standards should align with IFRS unless the CSRD or other EU legislation explicitly require otherwise. Deviating from this principle risks undermining the development of a global baseline supported by both the EU and the ISSB, which is critical for establishing a level playing field for EU companies.			
Survey	NABU	NGO	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	NABU	NGO	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Reliefs should not exceed those provided under IFRS, as going beyond would undermine the goal of establishing a global baseline for ESG reporting—an essential element for ensuring a level playing field for EU companies in a global context. The undue cost and effort relief described in ESRS 1, paragraphs 87–89, is a comprehensive measure that addresses nearly all situations in which an undertaking might face practical challenges. The explicit emphasis on fair presentation, combined with the strengthened focus on applying the materiality of information filter, gives companies greater flexibility in determining the meaningful content of their sustainability statements. This represents a further shift from a compliance-based to a principle-based approach. However, these changes also entail increased responsibility for the undertaking. Introducing additional reliefs would weaken this responsibility and create opportunities for misuse.			
Survey	NABU	NGO	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	NABU	NGO	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	The number of datapoints in each standard represents the minimum necessary to ensure cohesive disclosure requirements, and, as a result, to maintain basic comparability and quality of disclosures. We have not found any instance in which the ESRS impose excessive requirements beyond what is considered common practice or what is set out in internationally recognized reporting standards and frameworks, such as IFRS, GRI, or TNFD. In fact, the ESRS are generally more concise and less demanding. Further reductions—while still covering all ESG factors as required by the CSRD—would risk creating significant gaps in quality between ESRS disclosures and those based on other recognized standards.			
Survey	NABU	NGO	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We support these changes, noting that they do not introduce any new burden. This is particularly relevant for water-related metrics. To report on water consumption, undertakings are already required to calculate withdrawals and discharges, with these calculations—and the underlying data—subject to assurance. By elevating these implicit datapoints to explicit ones, the disclosure requirements become clearer compared with the previous ESRS, where some of these datapoints were presented as "may disclosures." Whether these individual datapoints are ultimately disclosed remains appropriately subject to the undertaking's application of the materiality of information filter.			
Survey	NABU	NGO	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We support these changes, noting that they do not introduce any new burden. E2-4 on secondary microplastics is not a new datapoint, as correctly explained in the Rationale above. It is unclear why this item has been included in the question in its current form.			
Survey	NABU	NGO	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	The ESRS, grounded in the materiality principle, the CSRD requirement to disclose impacts, risks, and opportunities along with their management, and the general principles of the Accounting Directive, are already subject to a fair presentation regime. Making this explicit serves to clarify the expectation. It provides companies with clear guidance on the discretion and judgment they are expected to exercise when applying the standards, as well as the associated safeguards.			
Survey	NABU	NGO	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We acknowledge the challenges of recalculating absolute values and recognize that financial institutions often manage GHG performance using intensity-based approaches. However, the global carbon budget is defined in absolute terms. Therefore, it remains essential that financial institutions disclose absolute targets to demonstrate how their strategies align with the economy-wide transition to net zero. Absolute targets are critical for users of sustainability statements and for understanding the real-world climate impact of financed activities. While intensity measures provide insights into efficiency, they can obscure rising absolute emissions in expanding portfolios or sectors. In contrast, absolute values clearly indicate whether institutions are contributing to the necessary 90–95% global reduction in emissions by 2050, with steep cuts by 2030. Both intensity and absolute approaches rely on similar underlying data, and estimation challenges are not unique to the financial sector. Allowing an exemption would undermine fairness in a sector-agnostic standard. Other industries could similarly argue for exceptions based on their own challenges, which would reduce comparability across sectors. Moreover, absolute financed emissions are already recognized in existing standards and regulations, including the SBTi Financial Sector Net-Zero Standard, the UNEP FI/NZBA recommendations, and the EU SFDR, all of which require or encourage absolute emissions disclosure. Exempting banks would risk misalignment and diminish the usefulness of reported data for stakeholders, including asset owners who rely on it for their own disclosures.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	NABU	NGO	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	We welcome the removal of duplicated datapoints. The new, simplified framework allows companies to report on SFDR-related matters in a manner that aligns with the way their policies are structured. For users, this consolidation improves the ease of locating the relevant information.			
Survey	NABU	NGO	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Measurable targets for biodiversity and ecosystems should be established and disclosed following the guidance and examples provided by relevant global frameworks. These include SBTN (Step 3 – Measure, Set & Disclose Targets), TNFD (components P1 and P2, Annex 5, sector guidance, and Target Setting guidance), as well as resources from the World Economic Forum on the Nature-Positive Transition.			
Survey	NABU	NGO	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We note that the standard has been significantly streamlined, which improves readability and reduces the overwhelming level of detail. The shift of certain detailed questions to the ARs is generally understandable and beneficial. However, no further reductions are acceptable. As the standards develop and areapplied in practice, the level of ambition must increase to ensure meaningful disclosures. The results of the materiality analysis in the different EDs should mandatory to report. This "bare-bones" version, esp. with the reduced E standards, should now also be easily applicable to smaller companies, which means that raising the thresholds is no longer necessary. On a positive note, the accompanying guidance document is a valuable resource and could be further expanded to support implementation. Overall, while the standard is more readable, it currently lacks the "big picture" perspective necessary for comprehensive sustainability assessment.			
Survey	NABU	NGO	Germany	35.E4-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Transition Plan Incentive – The standard should include at least an incentive or ambition for companies to develop a transition plan, rather than only requiring disclosure if a plan already exists. This would encourage proactive planning and support meaningful progress.	E4	Disclosure Requirement E4-1 - Transition plan for biodiversity and ecosystems	
Survey	NABU	NGO	Germany	35.E4-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	- Dependencies and Planetary Boundaries – Dependencies are now mentioned only once, and the concept of Planetary Boundaries, which provides essential guidance, has been removed. Understanding dependencies is particularly important for assessing ecosystem services, as they are critical to evaluating the interconnections and impacts within ecological systems	E4	Disclosure Requirement E4-2 - Policies related to biodiversity and ecosystems	
Survey	NABU	NGO	Germany	35.E4-3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The definition of what biodiversity offsetts can be made clearer: Is the purchase / retiring of a voluntary biodiversity credit an offsett? Is giving NGOs money to do restoration work offsetting? Or is it meant in a strict mandartory offsetting scheme way?	E4	Disclosure Requirement E4-3 - Actions and resources related to biodiversity and ecosystems	
Survey	NABU	NGO	Germany	35.E4-5.	Do you agree with the amendments of this chapter?	I disagree	- Upstream and downstream supply chains are barely addressed, raising questions about how overall company performance can be adequately assessed. -The standard should clearly require disclosure of sites in or near biodiversity-sensitive areas, rather than limiting reporting only to sites determined to be connected to negative impacts. - The Land Use Metric based on an LCA, former ESRS E4 DR 36., which was a strong starting point, is no longer included. - ESRS E4 AR7 (amended): The use "and/or" could allow undertakings to interpret as para. 20 does not apply if a site does not meet all 3 criteria. Instead, any of the 3 criteria (and in particular (a) or (c)) and Ecosystems change should be enough to trigger the disclosure. Use "or" instead of "and/or".	E4	Disclosure Requirement E4-5 - Metrics related to biodiversity and ecosystems change	
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Double materiality is crucial and must remain at the center of the ESRS framework and European Union sustainability regime for corporate reporting to be credible and useful. The principle of "materiality of information" is concerning since it introduces a further filter for companies to not report information. For example, it represents a step backwards from ID-177, which says that most S1 metrics must be reported if S1 Own Workforce is material. It is essential to maintain the principle of fair presentation in the reporting standards. It is positive that the revision of the AR 16 list of topics has maintained all of the sub-subtopics for S1 + S2. These are based on the list of social topics in the CSRD and should all be maintained. The emphasis on aggregation (as opposed to disaggregation) is concerning, as disaggregated information (both site-specific and country-specific) is key to understanding the distribution of IROs.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	It is important that companies report not just their net impact but also the gross impact should be reported. The recommended text preserves this principle.			
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The proposed changes are helpful. However, para 113 is difficult to understand: "113. If the description of the material impacts, risks and opportunities prepared in accordance with [Draft] Amended ESRS 2 IRO-2 is not presented alongside the respective policies, actions and targets, the undertaking shall make explicit which policies, actions and targets relate to which material impacts, risks, or opportunities, in accordance with paragraph 22." Para 22 addresses the issue of appropriate aggregation or disaggregation of information on material impacts, risks and opportunities and their management, without setting any rules regarding the location of such disclosures depending (or not) on the level of aggregation.			
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The Exposure Draft removes duplications between the cross-cutting and topical standards. The preservation of the 4-part architecture in the social standards is important to respect the distinctiveness of different affected stakeholder groups. However, we have two critical concerns. Firstly, the original DR in environmental standards concerning screening of sites in materiality assessment were replaced by an application requirement to ESRS 2 IRO-1. This in effect makes transparency on this aspect optional. Consideration of local context is a key element of an appropriate materiality assessment. This should be both recognised in Chapter 3 of ESRS 1, and in ESRS 2 IRO-1, which should include an explicit datapoint on how the undertaking screened its locations and value chains. We welcome that E standards provide a clearer reference on the importance of disaggregation of disclosures, but this can only be done well if locations are properly screened. Secondly, we strongly recommend adding an explicit reference to the disclosure of relevant, entity-specific metrics directly in S standards. The fact that S2, S3 and S4 do not include any metrics should not imply that entity-specific metrics for S topics should not be disclosed.			
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The "may" (voluntary) data points should not be eliminated. In many cases they are "shall" in GRI standards, so it is important to keep them to align with GRI standards. Also, many of them were originally proposed as mandatory by EFRAG to the EC. The first wave of reports show that many companies have reported some "may" data points. Retaining them would help ensure standardization/comparability between company reports. Almost all of the datapoints for non-employee workers are voluntary, thus most datapoints for this vulnerable group of workers has been lost. Also, important datapoints on full time versus part time workers has been eliminated.			
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	It is worrying that mandatory guidance in the Set 1 ESRS has been downgraded to "non-mandatory". Mandatory guidance is key to ensuring comparability and completeness of sustainability reporting. At a minimum, Non-mandatory Implementation Guidance (NMIG) should be included in the Delegated Act, and ideally called Mandatory Implementation Guidance. A major point of concern is that ID-177, which provided guidance that most S1 metrics should be reported if S1 Own Workforce is material, has now been downgraded into NMIG. Instead, EFRAG should preserve and promote the guidance that most S1 metrics shall be reported.			
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	As a whole the reliefs go too far, overshooting the balance between cost/effort and transparency. There is a danger of enabling green/social washing. The relief for "undue cost or effort" is too vague thus leaving too much room for interpretation. The relief for direct data for value chain reporting is too extensive, as direct data is key for transparency. The relief for reporting on operations which are not "significant drivers of IROs" also opens up too much leeway for interpretation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	These combined reliefs overshoot the balance between transparency and cost/effort and risk enabling green/social washing. At a minimum, there should be a time limit introduced for these reliefs on value chain metrics.			
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ability to estimate financial effects is critical for the undertaking's ability to integrate sustainability into its business strategy considerations, planning and risk management. It is also key for the determination of financial materiality, including in terms of overreporting topics as financially material. Reporting on financial effects is crucial to achieving the objective of putting sustainability reporting on the same level as financial reporting and integrating both. The European Union has recognised the value of a double materiality approach to corporate reporting which requires disclosure of both material environmental and social impacts, risks and opportunities as well financially material data, It is important to keep the requirement on businesses to analyse and understand the financial effects of their business model. This will ensure investors have access to credible data as well as providing the underpinning for future business planning.			
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	ESRS reliefs should not go beyond those set in IFRS. The principle of fair presentation needs to be protected to provide transparency on all material IROs. As noted in the response to question 15, it is also important to consider interoperability with GRI when considering changes to the ESRS, rather than only considering ISSB's standards.			
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	22.S1	Comments on deleted datapoints in ESRS S1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The reduction in the number of mandatory and voluntary datapoints goes far beyond striking an acceptable balance. As mentioned above, the voluntary datapoints should be maintained to provide alignment with GRI, which is currently in the process of strengthening its labor standards, as well as guidance and standardization for companies reporting more than just the mandatory datapoints. An explicit quantitative goal of 50%+ reductions was never set by the European Commission for EFRAG. A number of S1 datapoint metrics have been eliminated which should be reinstated: •S1-5 Employees: gender breakdown for zero-hour employees •S1-8 Diversity: age distribution; •S1-10 Social protection: reinstatement of retirement •S1-12: Training and development: gender breakdowns, •S1-13 Health and safety: fatalities from ill-health for non-employees and other workers on site; •S1-14 Work-life balance: employees that took family related leave;			
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Adding a datapoint on training of the procurement team is needed to support the implementation of human rights in the supply chain. The addition of a datapoint on confirmed incidents of bribery is needed to improve transparency on the effectiveness of bribery/corruption policies and measures.			
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Agree that the following mandatory datapoint should be added: ESRS 2 General disclosures – BP 1 the undertaking shall state that the general requirements of ESRS 1 have been applied for the preparation of its sustainability statement.			
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	The "fair presentation" principle is essential to reduce the risk of green/social washing, as it emphasizes the full disclosure of all material impacts, risks and opportunities and their management. It is not understandable why this principle is under attack, as it is included as one of the general principles of the Accounting Directive.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	It is essential that financial institutions disclose absolute targets to assess how their strategies align with the economy-wide transition to net zero. Absolute targets are relevant for users of sustainability statements and for understanding the real-world climate impact of financed activities. While intensity measures provide insights into efficiency, they can mask rising absolute emissions in growing portfolios or sectors. Granting an exemption would also undermine fairness in a sector-agnostic standard. Other industries could equally argue for exceptions based on their own difficulties, reducing comparability across sectors. Moreover, absolute financed emissions are already recognised in existing standards and regulations: the SBTi financial sector net-zero standard, the UNEP FI/NZBA recommendations, and EU SFDR all require or encourage absolute emissions disclosure. Exempting banks would risk misalignment and reduce the usefulness of reported data for stakeholders, including asset owners who depend on it for their own disclosures.			
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The "top 10" threshold for reporting country-level data on employment, collective bargaining and social dialogue is a major improvement over the current 10% employment threshold. An analysis of the first sustainability statements from Wave 1 companies shows that the current 10% threshold results in country-level disclosures on as little as 21% of total employees. More country-level information is needed to understand the distribution of impacts across countries, as well as whether employment thresholds for specific labour rights have been exceeded. The new threshold does not require additional effort/cost by companies, since they must gather country-level data anyways to calculate the global figures. Furthermore, it does not result in extra datapoints, since the information currently is (and can be under the revised ESRS) reported as one table.			
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	An analysis of the first year ESRS reports shows that most companies are simply reporting that they pay minimum wages, whereas the intention (as outlined in the ESRS Basis for Conclusions) is that companies should be enabled to disclose commitments to paying a wage "sufficient to support themselves and their families in dignity" as well as the extent to which they do this. This shows that the methodology for non-EU countries needs to be changed. Furthermore, the new ILO agreement on a methodology for living wages needs to be taken into account. While the proposed new methodology takes a step forward in both regards, two key changes are needed: •The methodology for reporting on 'adequate wages' should measure actual wages against an adequate/living wage for all employees, not only those within the EU. In particular, for employees outside the EU, the methodology should allow employees' actual wages to be measured: oA) against the local legal minimum wage only when this is set in line with the ILO principles on estimating living wages; or oB) against living wage estimates that are set in line with ILO principles on estimating living wages. •Companies should be able to rely on local legal minimum wages or living wage estimates when the authorities or organisations that set them provide public evidence of their alignment with the ILO principles for estimating living wages. Furthermore, the transitional provision for the EU needs to be reinstated, as not all Member States have transposed the Adequate Minimum Wage Directive.			
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	The new, simplified framework makes it easier for companies to report on these SFDR-related matters in a way that corresponds to how their policies are set. For users, this consolidation makes it easier to locate the relevant information. However, the SFDR datapoints are very helpful and should only selectively be amended.			
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	The unadjusted gender pay gap should be kept as mandatory, since the methodology for calculating it is clear. The adjusted pay gap figure as voluntary. In practice many companies are reporting both figures, which is useful for improved transparency. However, since the methodology for calculating the adjusted figure is not standardized, the unadjusted should be kept mandatory.			
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	As detailed above, cumulative impact of the various reliefs is concerning.			
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The improved language on DMA is welcomed, including on the engagement with workers' representatives.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The proposed "top 10" threshold for the reporting of country-level information for employee headcount, collective bargaining and social dialogue is a significant improvement over the current 10% employment threshold. Country-level information needs to be reported in more detail, and on other metrics as well, in order to have more transparency on the distribution of impacts across countries. In the metrics, voluntary datapoints need to be reinstated as well as the datapoints on gender breakdowns, workforce age distribution, etc. detailed above need to be reinstated. The proposed new methodology for adequate wages outside of the EU also needs attention, and the transition language for EU member states needs to be reinstated, since the Adequate Minimum Wage Directive has not been implemented in some Member States. We would also like to reiterate our longstanding demand for including franchise workers in the S1 definition of own workers, as well as the need for sector-specific standards to supplement the Set 1 sector-agnostic standards.			
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We are concerned that the loss of many specific datapoints related to workers in the value chain will mean that disclosures about material impacts, risks and opportunities become more generic and have less information about the specific stakeholder groups because specifications about the level of granularity have been deleted. Many of the points that are being deleted from ESRS S2 had originally been included because they reflected effective practice in relation to improving supply chain labour rights, for example, AR 6 awareness of the impacts on value chain workers from an undertaking's strategy or business model, AR 20 illustrating how the perspectives of value chain workers have informed specific decisions or activities of the undertaking and AR 25 which looks at retaliation and whether workers can use grievance mechanisms confidentially.			
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	European Transport Workers' Federation (ETF)	Trade union	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The definition of own workforce should be expanded to include franchise workers. The term "non-employees" should be supplemented with the phrase "non-employee workers" or "non-employee workers in own workforce".			
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	The proposed amendment simplified the DMA process and keep an acceptable balance between simplification and robustness of the DMA. The elements that make the report relevant are still present. The very in-depth topics certainly force organizations to go further in the process, but the most important topics are still present. Do you believe the removal of "sub-sub-topic" granularity could lead to underreporting of relevant issues? The removal of "sub-sub-topic" granularity could lead to underreporting, but it is up to the undertaking. It has the responsibility to be transparent with their stakeholders. If the undertaking report with the will to be transparent, it should not lead to an underreporting. On the other hand, the report will be less detailed but more accessible for the stakeholders. Is the distinction between gross vs. net assessment of IROs sufficiently clear for practical implementation? The distinction is not enough clear. It should be more well explained in a paragraph dedicated to the subject. In the revised ESRS1 text, the term gross and net are only found in a few paragraphs without any real explanation. You have to do external research to get a real explanation of gross vs net. Would you support relocating static disclosures (e.g., EU Taxonomy tables) to appendices to improve readability? The static disclosures are a necessity to obtain a complete report. They should be kept on the main part, but the detailed information like tables could be in the appendix. Do you feel the guidance provides enough clarity for first-year reporting under the Omnibus? The guidance provides enough clarity for fist-year reporting under the omnibus. The guidance is well structured but could include some visualization of certain concepts like the DMA.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The Appendix C clarify well how to consider remediation, mitigation and prevention implemented. But it could be interesting to let the company create a part in the report where, they present their old material impacts and how they success to remediate/mitigate/prevent them. The CSRD have for main goal to enable the comparison between companies. With it, companies can compare themselves on their strategy to remediate/mitigate/prevent their material impacts. This also reassures other stakeholders that the company is implementing actions that really work, and this gives the company credibility. Do you consider the "gross vs. net" approach practical for assessing impacts across complex value chains? It is practical, it gives a good idea of the efficiency of the action the company implemented. And as said before it enables comparability and give credibility to the company in the front of stakeholders. Some issues can be met like the distinction can be difficult if actions are implemented since a longtime ago. It could be helpful to give some case studies to have a better understanding. How do you see this guidance affecting data collection efforts, especially where your company has limited control over upstream/downstream actors? The data collection should be difficult because some upstream/downstream actors are not in Europe and they do not feel concerned by European initiatives and consider, especially from the point of view of upstream actors, that the repercussions will be minimal compared to the investment they would have to put in place to meet European expectations. Unfortunately, this will not change unless European regulations are applied internationally and all countries commit to it, which is a utopia.			
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	In theory, it seems to be more user-friendly and more flexible. Include an executive summary and a more well-structured appendix to let only the main messages should be helpful to have a more accessible CSRD report. Yes, clearer guidance on how to structure appendices would be helpful, like an study case or practical examples. Do you find the concept of "connected information" sufficiently actionable in practice? The concept of "connected information" should be detailed in the ESRS 1. It is partially actionable in practice. In some case, in large organisations, to justify well, we should contextualise again so repeat some subject already explained before.			
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The PAT are a necessity to encourage the companies to implement solution to remediate/mitigate/prevent their impact. They should be mandatory but not the first years, the time for companies to find their bearings with the CSRD report. To resume I agree that the proposed amendments strike an appropriate balance but after few years the elements like PAT should not be a simple requirement but mandatory to encourage companies. If they are mandatory at a certain point, some companies will be "lazy" to implement solutions and will not progress.			
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	I agree, the "may disclose" brought a lot of confusion, it is a good thing to have them directly classified in the AR and located them directly under their related Disclosure Requirements. Would a side-by-side comparison tool of old vs. new datapoints (e.g., Excel format) help your team navigate the changes more effectively? Yes, it could be helpful because the documents "Log_of_Amendments_of_the_ESRS_Exposure_Draft_July_2025" are really confusing with too much information. It's really messy to read.			
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	I believe during the assurance procedures the NMIG should be kept separate to avoid confusion. NMIG should be just used if the person does not understand a concept. Would mapping tools between ESRS and IFRS/GHG Protocol improve the usefulness of NMIG for preparers and auditors? This could facilitate consistency between different types of reporting (financial, climate, etc.). But we must be careful that it does not become more confusing. Perhaps a separate file could be more accessible. Do you see NMIG as a practical tool for internal training and onboarding of sustainability teams? NMIG is not famous, many people working in sustainability teams don't know what it is. There is a big lack of communication about this tool. This tool is well structured, but not really user friendly. I don't see it at all as a practical tool for internal training. It is not enough visual and accessible. You really have to dive into it to understand what it's about.			
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Excluding activities that are not significant drivers of IROs and joint operations without operational control when calculating non-climate environmental metrics, is a relevant tool but how to measure if the company does not interpret it too large. The general "undue cost or effort", In which conditions we should consider than a requirement demands too many resources. Precise criteria are needed. Proposed Amendments provide sufficient relief and strike an acceptable balance, if some clear simple conditions are implemented. Do you believe the reliefs sufficiently address concerns around operational control and joint ventures? The activities from operational controls and joint ventures would be considered, in majority, as unsignificant drivers of IROs according to the reliefs. For the first years of CSRD reports, this simplification is interesting, but for the future it must be re-included in order to encourage companies to act up to operational controls and joint venture activities, such as in five years. Would clearer guidance on how to apply "undue cost or effort" across different metrics improve consistency? Yes please, company need more conditions to avoid risk interpretation of this concept. Do you see challenges in estimating value chain metrics where data access is limited or unreliable? Yes, this is the case for actors who are outside the European Union, such as suppliers or customers, but also parent companies. Very important internal data within the company is difficult to obtain because the parent company, not wanting European regulations as a priority, can limit access to certain fundamental data in order to be transparent.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	I agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance, if a frame is well defined, such as some conditions and clear justifications. Would a time-bound limitation on this relief improve comparability across reporting entities? Yes a time-bound limitation should be needed to improve comparability at condition it is staying flexible and feasible. If they are not limitation, companies can abuse this relief. This relief is relevant during the first years, giving time to companies to take ownership of the CSRD report and then to implement time limits. Do you foresee difficulties in explaining improvement actions where data gaps are persistent or systemic? Data gaps can be persistent or systemic, especially from external actors, but if these actors find themselves with all their European stakeholders, some of whom are major, with the same requests concerning data, they will have to accept to provide them. The time-bound limitation could be a good solution.			
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	For the first few years, let's imagine 5 years, option 2 is preferable. Companies have time to take ownership of the CSRD reports, as well as all the stakeholders who support them in the process. After this period, the conditions must be tightened. This is where option 1 should be implemented, and why not make quantitative information completely mandatory in 10 years. Clearer criteria are needed in this case to help reduce auditor interpretation risks such as clarify the acceptable level of uncertainty, what is meant by "no separable data", the minimum conditions for considering a business plan not reasonably available, etc.			
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	They have been sufficiently simplified. It is more relevant to disclose the financial effect of material topics. It keep the main topics and clarify the report to be more accessible for the stakeholders. Do you find the remaining datapoints feasible to report on given current data availability and internal processes? The amendments give more flexibility, the remaining datapoints are generally feasible, especially for companies with mature sustainability data systems. However, for smaller entities or those early in their sustainability journey, challenges may persist due to limited internal processes or data granularity. Would sector-specific guidance help improve consistency in reporting anticipated financial effects? Yes, sector-specific guidance would significantly improve consistency and comparability in reporting anticipated financial effects. Each sector has is own specificity, and risks.			
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	The proposed Amendments achieve an appropriate balance thanks to the relief adoption, the alignment and references of the frames SASB, IFRS and ISSB. Do you support the alignment of GHG boundaries with financial consolidation, or would operational control be more appropriate for your reporting structure? Aligning GHG boundaries with financial consolidation is consistent with IFRS S2 and the GHG Protocol, and supports integration with financial reporting. However, for organizations with complex ownership structures or joint ventures, operational control may offer a more accurate reflection of emissions responsibility. A dual approach should be considered. It means financial consolidation as the default, with optional operational control disclosure. It give more flexibility. Would additional guidance on Scope 3 treatment improve alignment with GHG Protocol and reduce ambiguity? Yes, additional guidance on Scope 3 treatments are needed. It is the most challenging scope to identify and measure. We need clear examples and guidance especially when a main actor is out of European Union.			
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	The proposed reduction strikes an acceptable balance, but over the years the "shall disclose" datapoints should increase progressively to still encourage companies to progress in a sustainable and transparent way. Do you believe the prioritisation of quantitative over narrative datapoints improves usability and comparability? Yes, quantitative data improves usability and comparability between companies. They are needed. Would a crosswalk between old and new datapoints help your team manage the transition more effectively? Yes, a crosswalk between the old and new datapoints would be extremely helpful for managing the transition, especially to identify which disclosures have been removed, merged, or reworded.			
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Yes, these exceptions are appropriate and justified. The selected datapoints reflect core sustainability concerns, such as water usage, biodiversity transition planning, and business conduct. In most of the case, there are material. Do you foresee any implementation challenges with the transition plan for biodiversity or procurement training disclosures? Biodiversity transition plans need a clear frame for each sector because, they don't have the same impacts like agriculture or a service company. I see less implementations challenge for the procurement training disclosures apart from a budget. Would sector-specific examples help clarify expectations for these newly mandatory datapoints? Yes because not all sectors have the same level of impact on these newly mandatory datapoints.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	They are justified but some of them are difficult to measure like E2-4 and E5-5. Companies need guidance and standard to understand how measure them and to be comparable. Do you foresee any challenges in collecting reliable data for E5-5, especially regarding unknown destinations? Yes many challenges are predictable from E5, like a clear definition to understand, what exactly is taken into account in this term, what are the expected measurement standards in order to be relevant and comparable and finally what to do if the information is not accessible, for example with an external actor who does not wish to communicate on this subject. Would further guidance on defining "critical and strategic raw materials" improve consistency across sectors? Yes			
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	25.	Emphasis on ESRS being a “fair presentation” reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 (“when only setting intensity targets”), to disclose also the associated absolute values” (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking’s progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking’s employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	Yes, the new threshold simplifies reporting while maintaining relevance by focusing on the top 10 countries. Do you believe the new threshold improves relevance or could exclude key geographies with material social risks? This could exclude material elements but would be rather rare. Material topics tend to come from companies' major geographic areas. However, after a few years, the top countries by headcount should expand to cover more and more areas. Or, conditions should be implemented to include areas that have a material impact even if they are not in the top 10. Would additional flexibility for regional aggregation help reduce reporting burden while maintaining transparency? Yes, allowing regional aggregation could reduce complexity while preserving transparency, especially for companies with fragmented operations.			
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	This methodology offers standardisation and comparability and encourage company with guidance on wage-setting and living wages Would clearer guidance on wage estimation methods improve comparability across jurisdictions? Yes please, to standardize wage estimation. Do you support alignment with ILO principles, even in countries with weak wage enforcement mechanisms? I support; companies must go beyond local obligations to ensure decent working conditions.			
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG’s approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a “human rights policy” in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	Yes, the incorporation of SFDR PAI into the amended ESRS is well-balanced. The removal of overlapping or non-relevant datapoints improves clarity and reduces reporting burden, while maintaining alignment with SFDR objectives. Do you believe the consolidation of social datapoints improves clarity or risks losing granularity? It improves clarity by avoiding redundancies. It could lost granularity, if we don't have sector-specific guidance where needed. Would clearer mapping between SFDR and ESRS disclosures help streamline dual reporting obligations? Yes please			
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	It is unfortunate that Disclosure specifications and guidance for biodiversity/ecosystem targets have mostly been removed and leaving only one suggestion (AR 26). For things to change, you have to be demanding. Perhaps we should add disclosures as we go along. Would referencing science-based frameworks like SBTN improve the relevance and credibility of biodiversity disclosures? Yes, this will strengthen the credibility of the objectives, improve comparability between companies, and align efforts with the latest scientific advances. Do you believe more detailed guidance is needed to support target-setting for ecosystem restoration? In the future yes			
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary (“may”) datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	The adjusted pay gap gives the opportunity to see where the women are underrepresented in certain positions such as management. It should be reintroduce for at least large organizations which have the resources to do it. Would country-level breakdowns of the unadjusted pay gap improve the usefulness of the disclosure? Yes, the country-level breakdowns of the unadjusted pay gap improve the usefulness of the disclosure. Do you believe adjusted pay gap data should be reintroduced as mandatory for large organizations? Yes			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	Partially. While the new provisions (PAT disclosures and SME-specific elements) offer some coverage, they lack the direct visibility previously provided. To fully meet CSRD objectives, more explicit disclosures on payment terms and practices toward SMEs would be beneficial. Do you believe the removal of direct payment practice disclosures weakens transparency on supplier relationships? Yes, removing direct disclosures reduces transparency on how companies treat their suppliers, especially SMEs. Payment practices are a key indicator of responsible business conduct, and their absence may obscure unfair treatment. Would clearer guidance on SME identification and engagement improve reporting consistency? Absolutely. Clearer guidance on how to identify SMEs and report engagement practices would enhance consistency across companies and sectors and strengthen the relevance of disclosures for stakeholders.			
Survey	FANUC	Preparer (non-financial preparing a sustainability report)	Japan	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Indeed, it was necessary to simplify certain CSRD disclosures, but it's important to keep in mind that companies are more likely to implement sustainable actions when they are strongly encouraged by regulations or influential stakeholders. That's why, after a few years of CSRD reporting, the level of ambition for disclosures should gradually increase. Of course, it's essential to listen to companies when they face challenges due to lack of data or resources, but we must also set progressively higher expectations. To support them, guidance should be simple and user-friendly, with clear visuals and practical tools.			
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	These changes should improve and standardise implementation of the materiality assessment by companies, while retaining key elements of the process – including those aligned with international frameworks like ISSB, GRI and the UNGPs. This should lead to more comparable and relevant reporting for investors. However, we do not support deleting the following disclosure requirements: a)How likelihood, magnitude, and nature of effects of risks and opportunities have been assessed. b)Extent to which and how process to identify, assess and manage risks, opportunities and impacts is integrated into overall management processes. c)How process to identify, assess and manage impacts, risks and opportunities has changed compared to prior reporting period. Investors need this information to understand how companies identify, assess and manage their sustainability matters – particularly for issues where processes and methodologies are still evolving. Further, such removals would compromise interoperability with international frameworks by removing requirements included within the ISSB standards (b-d) and GRI standards (a), risking comparability across investors' global portfolios. To support the effective implementation of the materiality assessment, it will be important to develop sector-specific guidance once the ESRS Set 1 revision is finalised. This should help preparers to identify the likely material indicators for their industries – enabling more relevant information for investors – and build on international sector standards to improve global comparability. Such guidance should also clarify how – and to what extent – financial institutions should consider their value chain (i.e. financial assets) in the materiality assessment, given data gaps from portfolio companies and current lack of guidance in this area. It should build on the UNGPs, OECD guidelines and other international reference points. For instance, clarification that financial institutions should focus on financial assets that are likely to give rise to material sustainability risks, opportunities and impacts would be helpful.			
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	The PRI supports this guidance, because it is likely to improve and standardise implementation of the impact materiality assessment by companies. This should lead to more comparable and relevant reporting for investors.			
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The PRI supports these changes, as they are likely to improve the understandability of disclosures for investors without compromising the relevance or quality of information – while preserving information quality requirements which are important to ensure decision-useful data for investors.			
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The PRI supports most of the above changes, as well as the removal of duplications between cross-cutting and topical standards. This should clarify the requirements for preparers and improve implementation, enhancing the quality and understandability of disclosures, while also preserving many of the disclosures investors need on policies, targets and action plans. However, we do not support the proposed deletion of requirements to disclose: •Whether and when an entity plans to implement policies, action plans and targets for material topics. •Information on the progress of actions or actions plans disclosed in previous periods. •Key actions taken (and the results) to provide for and cooperate in or support the provision of remedy for those harmed by actual material impacts. Investors need this information to assess how and when companies' risks, opportunities and impacts are likely to evolve over time, and to inform their engagement with investees.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The PRI supports the above structural changes, because they are likely to improve implementation by companies and lead to better-quality and more understandable disclosures for investors. However, we do not support the deletion of all "may disclose" datapoints and have made comments on specific datapoints in response to Part 3 of this consultation.			
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We recommend the NMIG is included within the Delegated Act. This would encourage preparers to consider it, thereby improving the relevance and quality of disclosures for investors, without increasing reporting burden given the voluntary nature of this guidance.			
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We support reliefs to facilitate implementation, provided that companies using these reliefs must still disclose efforts to meet relevant requirements (ESRS 1, Section 7.4), e.g. actions to address data availability concerns. This information can support investor engagement and would encourage improvements in reporting. Further, we support preserving requirements to disclose metric calculation methodologies, to improve verifiability of reporting for investors. We note that the reduced scope of the CSRD, as well as the Commission's proposed "value chain cap" limiting the information that companies subject to CSRD can request from value chain partners with fewer than 1,000 employees, will substantially reduce the availability and quality of sustainability reporting for larger companies and investors. For investors, this can complicate decision making, increase the risk they are accused of greenwashing and heighten their dependency on service provider data. While we recognise this is beyond EFRAG's remit, ensuring in the CSRD text that companies can ask suppliers for reasonable and proportionate information would reduce the need for companies to rely on this provision. To improve implementation by preparers (and by extension data availability and quality for investors), we recommend that EFRAG provides guidance on when and how companies should use these reliefs. For example, the proposed relief allowing companies to exclude activities that are not significant drivers of risks, opportunities and impacts when calculating metrics should be explicit about specific environmental and social metrics - such as GHG emissions under ESRS E1 and characteristics of employees and non-employees under ESRS S1 – that are relevant for all companies and whereby such exclusions are therefore not appropriate. Finally, we oppose the introduction of reliefs relating to acquisitions and disposals acquired during the reporting period, which will reduce alignment with ISSB standards and cause differences in the reporting boundary compared to the financial statements – risking connectivity.			
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We support this relief, provided that EFRAG maintains the requirement for companies to disclose actions undertaken to improve the coverage of calculations in subsequent reporting periods – given this can support investors' engagement with companies. Similar to our Question 17 response, to improve implementation by preparers (and by extension data availability and quality for investors), we recommend that EFRAG provides guidance on when and how companies should use this relief. However, we recommend the "undue cost and effort" relief related to the disclosure of all metrics associated with an entity's own operations (as opposed to a smaller subset under the ISSB standards) is removed. In addition to compromising alignment with ISSB standards, this increases the risk that investors receive fewer datapoints needed for decision-making and stewardship.			
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ESRS should only permit Option 1, and require companies to justify only providing qualitative information should they choose to do so. All investors, regardless of investment strategy, need disclosures on financial effects to understand the existing and future financial implications of exposure to sustainability-related risks and opportunities. These disclosures are especially useful to investors when quantitative information is disclosed – clearly illustrating the connections between sustainability risks and opportunities and specific financial statement line items – with qualitative information to provide additional context and explain methodological choices. Further, mandating Option 1 is needed to ensure interoperability with the ISSB standards, which nearly 40 countries have adopted or are in the process of adopting – and by extension to ensure comparability of reporting across investors' global portfolios. Not requiring quantitative information about anticipated financial effects would result in the omission of information included in the global baseline. We recognise that calculating financial effects of sustainability matters may present implementation challenges for preparers, particularly given methodological uncertainty. However, the availability and quality of such disclosures will continue to increase across industries as the ISSB standards are adopted, and there is a growing set of guidance (including from the ISSB) on how to report this information. By leveraging existing practice and providing clear guidance within the ESRS Non-Mandatory Implementation Guidance (NMIG), EFRAG can help to ensure effective implementation by preparers, thereby providing investors with the information they need.			
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	The PRI supports these requirements, as they will provide investors with the information they need on financial effects of climate-related risks and opportunities. We also welcome efforts to align them with equivalent requirements in the ISSB standards, as this will help to improve comparability for investors.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We welcome efforts to improve interoperability with the ISSB standards. Given nearly 40 jurisdictions have now adopted the ISSB standards or are taking steps to do so, better interoperability will improve comparability of reporting for investors. However, there are several amendments within the simplified ESRS that risk compromising the high level of interoperability achieved between the current ESRS and the ISSB standards. As set out in Part 3 and our response to Question 19, this includes several removed and amended datapoints, which we would recommend are added back in and harmonised with the ISSB standards. Further, we would suggest realigning the below structural features with the ISSB standards, to achieve further interoperability: •The proposed reliefs beyond those included within the ISSB standards risk creating data gaps This is because investors may not receive information that other companies reporting pursuant to ISSB standards provide. Therefore, these reliefs – relating to acquisitions and disposals acquired during the reporting period, and the "undue cost and effort" relief specifically related to the disclosure of metrics associated with an entity's own operations – should be removed. •The requirement on ensuring that relevant information is not obscured should be harmonised with that of the ISSB standards, to improve both comparability and understandability for investors. These changes would help to ensure that investors receive comparable reporting across their global portfolios.			
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	The PRI supports EFRAG's attempt to simplify the ESRS by reducing the number of datapoints, to ensure that requirements are both clear and manageable for businesses and sufficiently detailed and comparable for investors' decision-making. We welcome attempts to preserve datapoints across issue-agnostic and issue-specific ESRS that are aligned with international standards, or necessary for financial institutions to meet their own regulatory reporting obligations. Further, we acknowledge and commend that EFRAG was able to remove datapoints while preserving a significant amount of the information for investors, through editorial changes, merging requirements and consolidating certain indicators across standards. However, we do not support all of EFRAG's proposed deletions. Our recommendations on which specific datapoints should be retained – informed by the need for interoperability with international frameworks (including the ISSB standards, GRI standards and TNFD Framework) and datapoints prioritised in investor feedback we have received – can be found in Part 3 of our response. Of the datapoints EFRAG is proposing to delete, our response recommends that 53 of these are added back into the standards – approximately 5% of the 1,000+ datapoints that were in the ESRS prior to EFRAG's simplification proposal.			
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	The PRI supports these additions. The inclusion of total discharges from own operations strengthens alignment with the TNFD core disclosure metrics, which include total volume of water discharged. Disclosure of total water withdrawal is also valuable addition given that investors are particularly aware of water scarcity as a material risk. For instance, in 2022, 69% of listed equities reporting to CDP stated they had water-related risks, putting USD 225 billion of value at risk: https://planet-tracker.org/high-and-dry-how-water-issues-are-stranding-assets/. Water-related risks are also among the most recognised nature-related risks by financial institutions, with references to drought in annual reports and US mandatory financial statements increasing from 682 in 2019 to 1,739 in 2024 across Bloomberg World Large and Mid-Cap companies. Finally, we support the requirement to disclose nature-related transition plans. Feedback from signatories and organisations such as the Nature Positive Initiative (NPI) indicates this is relevant information, and that an integrated approach to transition planning that considers multiple systemic risks has the potential to maximise synergies, avoid unintended consequences and build resilience. We recommend that guidance is provided on such transition plans to promote effective implementation of this disclosure requirement by the market.			
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	The PRI supports these additions and EFRAG's rationale to include them. Reporting on whether the general requirements of ESRS 1 have been applied will provide investors with information about the quality of disclosures. We also welcome the improved alignment with recent EU regulatory developments mentioned for E5-4. Investors support policy consistency and coherence, and this would also improve reporting burden. Finally, waste for which the final destination is unknown is relevant information for investors, as this can indicate poor management (or mismanagement) of waste, and allow investors to track progress over time.			
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	The PRI supports this proposal. Explicitly requiring faithful representation by companies will help to ensure that disclosures are decision-useful for investors, by providing companies with clarity on the discretion and judgment they are expected to exercise when applying the standards. However, we note that companies should still be prepared to justify materiality judgments to investors if requested. We recommend that this is clearly stated in the requirements. In addition, we recommend that additional guidance is provided on application of the "fair presentation" principle, particularly as it relates to impact materiality given this is beyond the scope of the ISSB standards.			
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We acknowledge that transition-supporting activities may improve intensity performance but still lead to short-term increases in absolute emissions, making longer-term absolute metrics useful. On the other hand, emissions intensity metrics show decarbonisation progress independent of business volume changes, while medium and longer-term absolute figures remain essential for calculating financed emissions and portfolio-level climate risk assessment. Therefore, rather than a full exemption, we recommend financial institutions are required to disclose both metrics with relevant context, explaining how transition activities may impact each measure differently.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The PRI does not support this change, which would require companies to assess whether wages established by national law or collective agreements align with ILO wage-setting principles. As noted by the abovementioned Board members, a nominal compliance with these principles does not ensure that wages are adequate or fair. Further, the proposed disclosure directs companies to prioritise the use of local legal minimum wages when calculating the gap between lowest wages and (often much lower) "adequate" wages for employees outside the EU – allowing companies to report minimum wages without an adequate wage guarantee. Therefore, the ESRS should require "adequate wages" to be measured: (i) against the legal minimum wage only where this is set in line with the definition of an adequate minimum wage under EU law, or the ILO principles on estimating living wages; and (ii) against living wage estimates that are set in line with ILO principles on estimating living wages. They should also be clear that companies should apply only option (i) if the authorities that set the minimum wage provide public evidence that it is in line with the EU definition of an adequate minimum wage or the ILO principles on estimating living wages. Finally, companies reporting on adequate wages should be required to disclose calculation methodologies, to improve verifiability for investors.			
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	The PRI supports overall efforts to simplify the standards while maintaining datapoints investors need to calculate SFDR Principal Adverse Impact (PAI) indicators. While we support EFRAG's consolidation of disclosures on policies related to human rights and alignment with the UN Guiding Principles and OECD Guidelines for Multinational Enterprises, we recommend this datapoint is reworded to more closely align with investors' information needs under SFDR, focusing on processes and compliance mechanisms rather than whether a relevant policy is in place. In addition, looking ahead, it will be important to ensure alignment between the ESRS and the future SFDR, given this regulation is likely to be subject to revision.			
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We support the provision of guidance on what biodiversity and ecosystems-related targets can cover. This should reference industry-led guidance (including from TNFD, the Science Based Targets Network (SBTN) and the Food and Agriculture Organisation (FAO)) where possible. However, we do not support the deletion of the following disclosure requirement within ESRS E4, as it is needed for investors to understand the credibility of targets disclosed. •Whether the targets are informed by, and/or aligned with the Kunming-Montreal Global Biodiversity Framework, relevant aspects of the EU Biodiversity Strategy for 2030 and other biodiversity and ecosystem-related national policies and legislation.			
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	35.ESRS2_BP-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirements: •Description of planned actions to improve accuracy in future of metrics that include value chain data estimated using indirect sources •Explanation of changes in preparation and presentation of sustainability information and reasons for them. This information can help investors to understand past and future changes to sustainability reporting, and engage on this basis. Further, given it is included in the ISSB standards, removing it would compromise global interoperability, and by extension comparability of reporting for investors.	ESRS2	BP-2 - Specific information if the undertaking uses phasing-in options	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	35.ESRS2_GOV-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirements: •Number of executive members •Number of non-executive members •Description of management's role in governance processes, controls and procedures used to monitor, manage and oversee impacts, risks and opportunities •Description of how oversight is exercised over management-level position or committee to which management's role is delegated •Information about reporting lines to administrative, management and supervisory bodies. •Disclosure of how dedicated controls and procedures are integrated with other internal functions •Disclosure of how administrative, management and supervisory bodies and senior executive management oversee setting of targets related to material impacts, risks and opportunities and how progress towards them is monitored Investor input has indicated these datapoints are decision-useful. This information would help investors to understand the internal controls that are in place for management to monitor, manage and thereby react to sustainability matters. Further, given these datapoints are included in the ISSB and/or GRI standards, removing them would compromise global interoperability, and by extension comparability of reporting for investors. In addition, the PRI does not support the proposed removal of the following requirement: •Disclosure of whether, by whom and how frequently administrative, management and supervisory bodies are informed about material impacts, risks and opportunities, implementation of due diligence, and results and effectiveness of policies, actions, metrics and targets adopted to address them. This information would help investors to understand the internal controls that are in place for management to monitor, manage and thereby react to sustainability matters. Further, given it is included in the ISSB and GRI standards, removing this datapoint would compromise global interoperability, and by extension comparability of reporting for investors.	ESRS2	GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	35.ESRS2_GOV-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirement: •Whether and how and sustainability-related performance metrics are considered as performance benchmarks or included in remuneration policies. This information would help investors to understand management's incentives to address material sustainability matters, and by extension how well these are managed and how they are likely to change in the future. Further, given it is included in the ISSB standards, removing this datapoint would compromise global interoperability, and by extension comparability of reporting for investors.	ESRS2	GOV-2 - Integration of sustainability-related performance in incentive schemes	
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	35.ESRS2_SBM-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirements: •Description of key stakeholders. •Description of categories of stakeholders for which engagement occurs. •Description of how stakeholder engagement is organised. •Description of purpose of stakeholder engagement. This information would help investors to understand the materiality assessment process, upon which disclosures are based. Further, given it is included in the GRI standards and TNFD Framework, removing this datapoint would compromise global interoperability, and by extension comparability of reporting for investors.	ESRS2	SBM-2 - Interests and views of stakeholders	
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	35.ESRS2_SBM-3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirements: •Disclosure of reasonably expected time horizons of material impacts. This information is crucial to investors' understanding of a company's material impacts. Further, given it is included in the GRI standards, removing this datapoint would compromise global interoperability, and by extension comparability of reporting for investors.	ESRS2	SBM-3 - Interaction of material impacts risks and opportunities with strategy and business model, and financial effects	
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	35.ESRS2_IRO-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirements: •Description of how likelihood, magnitude, and nature of effects of identified risks and opportunities have been assessed. •Description of extent to which and how process to identify, assess and manage impacts and risks is integrated into overall risk management process and used to evaluate overall risk profile and risk management processes. •Description of extent to which and how process to identify, assess and manage opportunities is integrated into overall management process. •Description of how process to identify, assess and manage impacts, risks and opportunities has changed compared to prior reporting period. This information would help investors to understand the materiality assessment process, upon which disclosures are based, and the degree to which this is incorporated into companies' wider policies and procedures. Further, given these datapoints are included in the ISSB standards, removing them would compromise global interoperability, and by extension comparability of reporting for investors. Finally, we recommend clarification within paragraph AR22 that TNFD LEAP is relevant for the materiality assessment of environmental impacts. The current wording may falsely suggest it is only useful for the purpose of screening site locations.	ESRS2	IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	35.E1-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirements: •How targets are compatible with the limiting of global warming to 1.5°C in line with the Paris Agreement. •Taxonomy-aligned revenue and capital expenditure (CapEx) supporting transition plans and, if applicable, planned CapEx. •Information on whether the company is excluded from EU Paris-aligned Benchmarks. Information on compatibility with 1.5°C through aligned pathways and scenarios is relevant for investors assessing alignment of their overall portfolios with climate objectives. Without this information, investors will need to assess companies' alignment themselves or rely on third parties. Reporting on Taxonomy alignment is also relevant to investors, particularly as a key indicator of transition plan credibility and effective implementation. Finally, investors need disclosures on exclusion from EU Paris-aligned Benchmarks to fulfil their own reporting of Principle Adverse Impacts (PAIs) under SFDR and assess compliance with ESMA fund name guidance. On the other hand, we support the proposal to preserve qualitative reporting on carbon lock-in as part of companies' overall dependencies, given this information is helpful for investors to understand the nature and feasibility of transition plans. The more explicit reference to dependencies will also help to improve alignment with the Transition Plan Taskforce (TPT) Disclosure Framework (which is now ISSB guidance on transition planning). Further, we welcome the addition of reporting on the role of management in transition planning, given this indicates the importance placed on such plans and how likely they are to be achieved.	E1	Disclosure Requirement E1-1 - Transition plan for climate change mitigation	
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	35.E1-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We note that several changes have been made in this section which create further differentiation with ISSB requirements. We recommend that scenario analysis requirements are aligned with the ISSB standards, to ensure that investors receive adequate information about how this is conducted – to enable them to understand and assess the results – and to ensure comparability of reporting across portfolios.	E1	Disclosure Requirement E1-2 - Climate-related risks and scenario analysis	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	3S.E1-8.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirements: •Quantitative and qualitative information regarding the progress of actions or action plans disclosed in prior periods. •The extent to which the undertaking's Scope 3 greenhouse gas emissions are measured using inputs from specific activities within the entity's upstream and downstream value chain. This first requirement would help investors to understand how companies are addressing their materiality sustainability matters, and by extension how these are likely to change in the future. Further, given this datapoint is included in the ISSB standards, removing it would compromise global interoperability, and by extension comparability of reporting for investors. The second requirement, in turn, would help investors to understand how Scope 3 GHG emissions are calculated, compared to other portfolio companies, and improve verifiability of reporting.. And similarly, given this datapoint is included in the ISSB standards, removing it would compromise global interoperability, and by extension comparability of reporting for investors. Finally, under EFRAG's proposed requirements, entities may need to measure their emissions using both the financial control organisational boundary and operational control method, whereas the ISSB standards (in alignment with the GHG Protocol) require the use of a single approach to measure emissions. To ensure comparable emissions reporting for investors, the ESRS should adopt the same requirements as the ISSB standards.	E1	Disclosure Requirement E1-8 - Gross Scopes 1, 2, 3 emissions	
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	3S.E2-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirement: •Disclosure of whether and how policy addresses substituting and minimising use of substances of concern and phasing out substances of very high concern. Investor input has identified this datapoint as decision-useful. Further, we recommend that the reference to "dependencies when relevant" is amended to remove the words "when relevant", to encourage companies to report on these and align with the TNFD Framework.	E2	Disclosure Requirement E2-1 - Policies related to pollution	
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	3S.E2-4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirement: •Description of changes over time (pollution of air, water and soil). Given it is included in the TNFD Framework, removing it would compromise global interoperability, and by extension comparability of reporting for investors.	E2	Disclosure Requirement E2-4 - Pollution of air, water and soil	
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	3S.E4-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirement: •Explanation of whether and how biodiversity and ecosystems-related policy addresses social consequences of biodiversity and ecosystems-related impacts. This datapoint should be maintained to encourage consideration and disclosure of interconnected issues and their synergies and trade-offs. Further, given it is included in the TNFD Framework and GRI standards, removing this datapoint would compromise global interoperability, and by extension comparability of reporting for investors.	E4	Disclosure Requirement E4-2 - Policies related to biodiversity and ecosystems	
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	3S.E4-5.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	To mitigate risks to consistency and relevance of reporting from removing biodiversity metrics from ESRS E4, we recommend that the TNFD core global disclosure metrics are referenced (when related to topics relevant to biodiversity and ecosystems). This should include the following metrics: •Total spatial footprint (km2) •Extent of ecosystem use changed, restored, and sustainably managed •Quantity of high-risk natural commodities sourced, including under a sustainable management plan or certification programme (tonnes) •Proportion of high-risk activities operated under appropriate measures to prevent unintentional introduction of invasive alien species This approach would ensure relevant disclosures and international alignment – particularly given ISSB's commitment to leverage TNFD's work in its own nature work – and build on existing market practice. In addition, we do not support the option to report only metrics for locations relevant to existing sustainability objectives (AR7(b)). Such metrics should be reported in addition to (rather than instead of) those related to locations where the undertaking has identified material impacts, risks and opportunities arising from its direct operations – or locations that are significant drivers of material impacts, risks and opportunities. Otherwise, there is a risk that companies will significantly narrow the scope of locations disclosed, despite material risks to operations. We also recommend that this requirement is included within ESRS E2, 3 and 5, given this reporting is relevant for these issue areas. Finally, we do not support the proposed removal of the following requirement: •Disclosure of how pathways of introduction and spread of invasive alien species and risks posed by invasive alien species are managed This datapoint (also present in TNFD and GRI) should be maintained to encourage consideration and disclosure of information on invasive species, given this is a key driver of biodiversity loss and otherwise infrequently mentioned in ESRS E4.	E4	Disclosure Requirement E4-5 - Metrics related to biodiversity and ecosystems change	
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	3S.E5-4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirement: •Description of methodologies used to calculate data and key assumptions used. Transparency on calculation methodologies is critical for verifiability of the information. Further, given it is included in the TNFD Framework, removing this datapoint would compromise global interoperability, and by extension comparability of reporting for investors.	E5	Disclosure Requirement E5-4 - Resource Inflows	
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	3S.E5-5.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirements: •Non-recycled waste •Disclosure of materials that are present in waste. While non-recycled waste can be derived given the requirements to disclose total amount of waste and total amount recycled, this datapoint would support transparency and facilitate investor understanding and reporting – especially as this is a data point required under SFDR – with limited additional effort for preparers. The second datapoint should also be added back in, as the new requirement to simply disclose "key materials" leaves room for reporting entities to only report some types of waste materials, and obscure other materials with potential cumulative impacts. Further, given this requirement is included in the TNFD Framework and GRI standards, removing it would compromise global interoperability, and by extension comparability of reporting for investors.	E5	Disclosure Requirement E5-5 - Resource outflows	
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	3S.S1-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirement: •Disclosure of whether and how policies are implemented through specific procedures to ensure discrimination is prevented, mitigated and acted upon once detected, as well as to advance diversity and inclusion. This datapoint is needed to ensure that relevant information is disclosed. Investors recognise discrimination policies as key policies that companies should have in place, and that general anti-discrimination commitments are often not specific enough unless they are backed up by specific processes and actions. Further, given this datapoint is included in the GRI standards, removing them would compromise global interoperability, and by extension comparability of reporting for investors.	S1	Disclosure Requirement S1-1 - Policies related to Own workforce	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	35.S1-3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirement: •Description of additional initiatives or actions with primary purpose of delivering positive impacts for own workforce. Given it is included in the GRI standards, removing this datapoint would compromise global interoperability, and by extension comparability of reporting for investors.	S1	Disclosure Requirement S1-3 - Actions and Resources related to Own workforce	
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	35.S1-6.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirements: •Characteristics of undertaking's employees - information on employees by region [table] •Number of employee who have left undertaking •Percentage of employee turnover •Disclosure of contextual information necessary to understand data (employees) •Number of full-time employees by head count or full time equivalent •Number of part-time employees by head count or full time equivalent •Description of methodologies and assumptions used to compile data (non-employees) •Non-employees numbers are reported at end of reporting period/average/other methodology •Disclosure of contextual information necessary to understand data (non-employee workers) Investor input has identified these datapoints as decision-useful, for the following reasons: •Investors can use information on regional makeup of the workforce when conducting a human rights risk assessment. •Employee turnover is a key indicator of a company's general health, as well as its treatment of its employees. •Contextual information, together with information on the number of full-time and part-time employees, is key to understanding a company's approach to its workforce, given that part-time contracts may be used to circumvent legislative requirements. * Information on methodology and assumptions is important to ensure verifiability of data for investors, while contextual information is needed to enhance understandability of disclosures and ensure that all relevant information is provided. Further, given these datapoints are included in the GRI standards, removing them would compromise global interoperability, and by extension comparability of reporting for investors.	S1	Disclosure Requirement S1-6 - Characteristics of non-employees in the undertaking's own workforce	
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	35.S1-10.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirements: •Whether all employees in own workforce are covered by social protection, through public programs or through benefits offered, against loss of income due to retirement. This information is relevant to investors adopting wider and long-term horizons in an age of increasing demographic changes, and stress on public social security systems. Further, given this datapoint is included in the GRI standards, removing it would compromise global interoperability, and by extension comparability of reporting for investors.	S1	Disclosure Requirement S1-10 - Social protection	
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	35.S1-13.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirements: •Number of cases of recordable work-related ill health of non-employees •Number of days lost to work-related injuries and fatalities from work-related accidents, work-related ill health and fatalities from ill health related to non-employees •Percentage of own workforce who are covered by health and safety management system based on legal requirements and (or) recognised standards or guidelines and which has been internally audited and (or) audited or certified by external party. Investor input has identified these datapoints as decision-useful. This information is key to understand working conditions, including of the non-contracted workforce. Further, given they are included in the GRI standards, removing these datapoints would compromise global interoperability, and by extension comparability of reporting for investors.	S1	Disclosure Requirement S1-13 - Health and Safety metrics	
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	35.S1-16.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirement: •Disclosure of the status of incidents and/or complaints and actions taken. This datapoint is relevant as investors need this information to understand the time it takes for companies to respond to issues. Further, given this datapoint is included in the GRI standards, removing it would compromise global interoperability, and by extension comparability of reporting for investors.	S1	Disclosure Requirement S1-16 - Incidents of discrimination and other human rights incidents	
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	35.S2-3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirement: •Description of initiatives or processes whose primary aim is to deliver positive impacts for value chain workers and are designed also to support achievement of one or more of Sustainable Development Goals This datapoint is useful for investors assessing their contribution to (or alignment with) the SDGs. Further, given it is included in the GRI standards, removing this datapoint would compromise global interoperability, and by extension comparability of reporting for investors.	S2	Disclosure Requirement S2-3 - Actions and resources related to value chain workers	
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	35.S3-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirements: •Description of types of affected communities subject to material impacts •Type of communities subject to material impacts by own operations or through value chain •Description of activities that result in positive impacts and types of affected communities that are positively affected or could be positively affected Removing these datapoints would limit understanding of a company's impacts, and of whether proper stakeholder mapping (and therefore engagement) has been carried out. Further, given they are included in the GRI standards and TNFD Framework, removing these datapoints would compromise global interoperability, and by extension comparability of reporting for investors. In addition, we note the requirement to disclose the occurrence of material negative impacts on affected communities is phrased in a way that may prompt companies to limit disclosure to impacts from the green transition, and in particular the effects of mines. While this is relevant information, we recommend clarifying that these should not be the only types of impacts disclosed.	S3	Disclosure Requirement S3-1 - Policies related to affected communities	
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	35.S3-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirement: •Disclosure of how the undertaking assesses the effectiveness of its engagement with affected communities •If applicable, that a company has not adopted channels for raising concerns or does not support the availability of such a channel, and (if applicable) a timeframe in which they aim to have such channels or processes in place Regarding the first requirement, given that assessment of engagement can be carried out in a number of ways, investors would benefit from clarity about how this is achieved – so they can assess whether engagement has been carried out properly. The second requirement should be restored as investors would benefit from knowing whether this: (i) does not exist; or (ii) exists and is not being reported on – and whether this will be established in the future.	S3	Disclosure Requirement S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	3S.S3-3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirement: •Disclosure of whether and how it is ensured that own practices do not cause or contribute to material negative impacts on affected communities This datapoint is a key component of due diligence processes under the UNGPs and OECD Guidelines. Further, given this datapoints is included in the GRI standards, removing it would compromise global interoperability, and by extension comparability of reporting for investors.	S3	Disclosure Requirement S3-3 - Actions and resources related to affected communities	
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	3S.S4-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirement: •Disclosure of how effectiveness of engagement with consumers and end-users is assessed Assessment of engagement can be carried out in a number of ways. Therefore, investors would benefit from clarity about how this is achieved, so they can assess whether engagement has been carried out properly. Further, given it is included in the GRI standards, removing this datapoint would compromise global interoperability, and by extension comparability of reporting for investors.	S4	Disclosure Requirement S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	
Survey	Principles for Responsible Investment (PRI)	Association of financial institutions	United Kingdom	3S.S4-3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The PRI does not support the proposed removal of the following requirement: •Initiatives or processes whose primary aim is to deliver positive impacts for consumers and/or end-users are designed also to support achievement of one or more of Sustainable Development Goals This datapoint is useful for investors assessing their contribution to (or alignment with) the SDGs. Further, given these datapoints are included in the GRI standards, removing them would compromise global interoperability, and by extension comparability of reporting for investors.	S4	Disclosure Requirement S4-3 - Actions and resources related to consumers and end-users	
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	Materiality will still be difficult to assess and we suggest greater use of illustrative examples and Practical guidance. This is a whole new realm fro preparers and the more guidance afforded the easier the implementation			
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Actual negative impacts should be considered on an impact-consequence matrix and thus materiality determined			
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	Connected information, discouraging fragmentation and/or repetition of information has been largely achieved. Simplicity of report preparations and presentation of such reports in a concise understandable form is the balance that needs to be struck			
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	Only the relevant and applicable shall data points should be retained and proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other			
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	The 3 changes should achieve the intended objective			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	We agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2			
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	non			
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Both options are amenable.			
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	non			
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	non			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	non			
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	The compliance approach is generally a hybrid approach, that is check list and tailored.			
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Their rationale for seeking such exemptions are reasonable and could include other sectors			
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	Country by country disclosure should be replaced by uniform disclosure across countries. This is more so since the burden to prepare the information per the new requirement is estimated to be limited.			
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to ii)) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	A simple universal method of calculation of minimum wages across jurisdictions should be availed in line with ILO standards. The ILO standard is a minimum baseline expectation. cost of living standards differ across the world and also between and within different regions of the same country so this will in effect be a complex measure and may give results that may be construed wrongly.			
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	non			
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	non			
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	The maintenance of the global unadjusted pay gap and removal of the adjusted gender pay gap would ease application.			
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	Yes, the objectives of the CSRD in respect to the protection of SME's			
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Mo Chartered Accountants (Zimbabwe)	Auditor	Zimbabwe	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		These will be subject to continual change and amendment once practical implementations takes effect. Not all considerations could have been foreseen and changes will be necessary over time. Due to its infancy, there are rightly very many exemptions and reliefs and this may have an impact on comparability and consistency. These may be removed in future once the standards become more commonplace.			
Survey	AP2	Asset manager/Investor	Sweden	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	AP2 believes it is important to preserve the essential alignment of double materiality with risk-based due diligence (including steps for identifying, assessing, and prioritizing impacts based on their severity and likelihood) under the international standards of the UNGPs and OECD Guidelines. AP2 also welcomes the current specificity of the impact materiality assessment process. It provides much-needed clarity for companies that are new to risk-based due diligence or are undertaking an impact materiality assessment for the first time. This clarity helps ensure that expectations remain consistent with international standards already being followed by many companies. Removing them would lead to diverging and incompatible approaches to impact materiality, reduce comparability between companies' materiality assessment results, and reduce compatibility with international standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AP2	Asset manager/Investor	Sweden	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	AP2 support efforts to improve transparency and accountability regarding wage practices in corporate reporting. We welcome the progress in ESRS, particularly the inclusion of collective bargaining and periodic review of minimum wages, but further refinement is necessary to ensure fair remuneration for all workers. The current draft could be discriminating to non-EU workers. 1. Defining "adequate" wages The draft lacks a clear definition of "adequate wage". Since the ILO provides a globally recognized definition and methodology for living wage, we recommend aligning ESRS with this standard. To ensure meaningful assessment, companies must disclose which prong of the methodology is applied; otherwise, investors cannot evaluate the robustness or comparability of reported figures. 2. Non-EU workers and hierarchy The methodology discriminates against workers outside the EU, as their wages are measured against the statutory minimum wage, compared to the EU Adequate Minimum Wage Directive for EU employees. The standard for non-EU employees is with that significantly lower as minimum wages in these countries often are substantially below what is required to meet basic needs. This creates a misleading picture and undermines the objective of fair remuneration. Furthermore, the current hierarchy prioritizes the use of minimum wages over living wage estimates, which can lead to distorted reporting outcomes. To avoid such misrepresentation and address the issue of discrimination, the hierarchy for all employees should be as follows: • Use the legal minimum wage only where it is demonstrably aligned with the definition of an adequate minimum wage under EU law or with the ILO principles on estimating living wages; • Otherwise, apply living wage estimates that are aligned with the ILO principles on estimating living wages.			
Survey	AP2	Asset manager/Investor	Sweden	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Commentary to question 14: AP2 encourage EFRAG to preserve the core four-part architecture of the social standards (covering own workforce, value chain workers, affected communities, and consumers/end-users). This structure provides companies with a clear and practical framework for navigating, assessing, and reporting on social issues. It helps ensure that materiality assessments are comprehensive, avoids blind spots, and fosters a common language for internal communication across functions. Reducing the social standards to a single category would risk oversimplifying complex realities and undermine the effectiveness and comparability of social disclosures. Maintaining this architecture is essential for meaningful and consistent sustainability reporting.			
Survey	GKK Partners	Consultant (including software vendor)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	GKK Partners	Consultant (including software vendor)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	GKK Partners	Consultant (including software vendor)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The inclusion of the "executive summary" as a structural element is welcomed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	GKK Partners	Consultant (including software vendor)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Agreement: - Reduction of "shall" datapoints - Improvement/clarity of connectivity "PAT to-IROs" Disagreement: - Elimination of "plans to implement a PAT" (incl. timeline) delutes transparency and might lower incentives for undertakings			
Survey	GKK Partners	Consultant (including software vendor)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	300 words for all NMIGs too short. Therefore only most relevant here: Integration of some NMIGs as ARs for clarity and examples. "NMIG 11" should be an AR. Moreover, it should be added that: "Such restriction to metrics (activity/location/asset system boundaries) must be transparently disclo-sed, e.g. via footnotes, in the specific disclosure." Also connected to "NMIG 9": if this is applied high transparency needed to protect comparability of information. "Mapping of sub-topics" why is this not an Appendix - similar to ESRS 1 Appendix A - or even merged with Appendix A? "Flowchart": 1) Should be added as Appendix to ESRS 1. 2) Why is ESRS 2, 30 ("disclose fact not adopted") not added to the decision tree after the second "No"? "Example of structure" should be added to ESRS 1 as Appendix, similar to existing ESRS 1 Appendix D. "Example of incorporation" should be added to ESRS 1 as Appendix (cf. ESRS 1 Appendix F). ESRS2: "NMIG 1" proposed to delete or add (a) into relevant ESRS 2, GOV-1, 9 - preferably deleted. Need for (b) not directly obvious, value of explicitly stating "experience" for users not tangible - proposed deletion. "NMIG 3" since it can be perceived, that some uncertainty is around the "due diligence": add as AR to ESRS 1 chapter 4 as Core Elements (a to e). Maybe shorten subpoints by only referencing to specific DRs. "NMIG 4" (a) seen as not critically benefical to proposed amended ESRS 2 GOV-4. If (b) "findings" is seen as critical, add as AR in ESRS 2 GOV-4. "NMIG 3 for para. 22" if fact "or in the upstream and downstream value chain" is deemed to be essential, must be added to ESRS 2, GDR-P as AR. "NMIG 6 for para. 28" should be AR in corresponding E1.			
Survey	GKK Partners	Consultant (including software vendor)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	Partial scope for the underlying calculations might delute comparability and transparency. It should therefore be mandatory to transparently highlight if and where this has been applied. E.g. in form of footnote directly placed at the metric disclosure and within the explanations of ESRS 2.			
Survey	GKK Partners	Consultant (including software vendor)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Quantification is paramount for capturing, measuring and managing. Chasing the goal to improve contemplation and reporting on specific ESG-topics, it would be negligent to limit the ESRS only to qualitative information. The given conditions in "Option 1" (connection to topic/material IRO, level of uncertainty, derivation, skills/capabilities, resources) appear sufficient to expect reporting.			
Survey	GKK Partners	Consultant (including software vendor)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	Complete agreement of necessity to have this DR. Concerning 40. (e): unclear connection to "leverage" out of ANNEX II. Might be changed by removing bold. Concerning 41. (f): similar to 40.(e) unclear connection to "leverage" (ANNEX II), proposal to remove bold. Concerning 42: change "assets or revenue", proposal to change "or" in "and" to foster contemplation and reporting.			
Survey	GKK Partners	Consultant (including software vendor)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	Point 3 ("undue cost or effort") goes further than IFRS one. If generally applied it could lower standardisation and comparability of sustainability statements. If kept, clearer guidances and ARs on how untertakings should transparently disclosed are advised.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	GKK Partners	Consultant (including software vendor)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	GKK Partners	Consultant (including software vendor)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	GKK Partners	Consultant (including software vendor)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	GKK Partners	Consultant (including software vendor)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	GKK Partners	Consultant (including software vendor)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	Previous AR 26 states "may expressed as", it is therefore not exhaustive. Agreement that AR 26 should be kept. Need for further revision, of dynamic landscape/latest trends, not seen as compulsory.			
Survey	GKK Partners	Consultant (including software vendor)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	University of Gothenburg	Academia	Sweden	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Overall, there is a clear linguistic improvement in the ESRS. The text is shorter, more focused and easier to read. There is an attempt in the revised ESRS to simplify the process of determining impact materiality. However, this cannot get around the basic question that impact materiality is related to users that are not well defined and unspecific decisions to be taken by such users. To simplify the process, the revised ESRS appear to define impact materiality in terms of innate characteristics of phenomena. It is unclear how such a focus is logically consistent with the concept of materiality, which has to do with the interaction between information and users. A reason for the limited simplification in ESRS 1 is that the standard is still based on the unchanged CSRD. This relates to an additional question which the EFRAG cannot do much about at present but that could create difficulties for preparers. A simplified CSRD is likely to result in a new revision to ESRS. While this would potentially allow for a true simplification of, e.g., ESRS 1, it would mean that preparers must adopt a third version of ESRS, all issued within a limited timeframe.			
Survey	University of Gothenburg	Academia	Sweden	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	The introduction of "fair presentation" might be difficult to implement in a newly regulated field such as ESRS. The concept has a long history in financial accounting. There, however, the meaning of the concept has gradually developed in practice over time. It will take some time before practice defines the meaning of fair presentation based on ESRS. Therefore, the concept is unlikely to be helpful in the early implementation of ESRS.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	University of Gothenburg	Academia	Sweden	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	European Biogas Association	Other - please specify (required)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	In ESRS E1, under Disclosure Requirement E1-8 and Application Requirements 19 to 25: The proposed amendments to ESRS E1-8 and AR 19–25 reflect progress in simplifying GHG emissions reporting, in line with EFRAG's simplification objectives. Notably: •The alternative possibility to use ISO 14064-1:2018 (instead of only the GHG Protocol standard) is made more explicit for each Scope of emissions. •Removal of the confusing unspecified reference to "principles of the GHGP". However, the standard still lacks sufficient clarity and practical applicability. 1) Use of market instruments in Scopes 1 and 3. While AR 21 and 25 refers to the GHG Protocol Standard and to ISO 14064-1:2018, they fail to recognise regulated market-based instruments such as RED-compliant Proofs of Sustainability for biomethane purchases. These instruments are legally required under EU law and widely used to account for emissions performance. Consistent with the simplification rationale under Lever 2 , AR 21 should explicitly accept RED-compliant Proofs of Sustainability under Scopes 1, 2 and 3. 2) Related to "better connectivity with corporate reporting", EBA highlights the lack of consistency of Application Requirement 21 paragraph e) with existing climate reporting standards and practices. In AR 21, all "biogenic emissions from the combustion or biodegradation of biomass (in particular, CH4 and N2O)" should be reported under Scope 1, while climate reporting practices (including the GHG Protocol) report those biogenic emissions off-scope (with the possible exception of CH4 and N2O). To ensure interoperability and reduce inconsistencies, AR 21 e) should be aligned with this and with Disclosure Requirement E1-8 paragraph 33. Contrary to what Paragraph 264 of the Basis for Conclusions states, under GHG Protocol Scope 2 Guidance, "Companies should separately report the biogenic CO2 emissions from electricity use (e.g. from biomass combustion in the electricity value chain) separately from the scopes".			
Survey	European Biogas Association	Other - please specify (required)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	In ESRS E1, under Disclosure Requirement E1-8, Application Requirements 21 (all Scopes) and 25 (specifically for Scope 3) should be clarified as regards to consistency with other pieces of EU legislation, notably the Renewable Energy Directive (RED). Specifically, AR 21 and AR 25 should recognize explicitly the use of RED-compliant proofs of sustainability (PoS) as valid instruments for emissions accounting from renewable fuel purchase under Scopes 1 and 3. As highlighted in the European Commission's Explanatory Memorandum accompanying the Simplification Omnibus proposal (February 2025), the ESRS revision must aim to "clarify provisions that are deemed unclear" and "improve consistency with other pieces of EU legislation". In the European Union, PoS are legally rooted in the RED and are issued within regulated mass-balance systems. The certification framework is supported by national or voluntary schemes recognised by the European Commission, requiring third-party audits, standardised GHG emission accounting, and traceability from feedstock to end-use. Production plants are certified. On this basis, producers can issue PoS that accompany biomethane consignments through the gas infrastructure, where the EU gas grid is legally treated as a single logistical facility. This robust architecture enables companies purchasing certified biomethane (with PoS) to demonstrate measurable and verifiable emissions reductions—even if the physical gas is delivered via shared infrastructure. Explicitly recognising RED-compliant PoS in AR 21 and 25 would: •Enhance legal clarity for preparers and auditors; •Avoid duplication and conflicting requirements across EU instruments; •Uphold the EU's ambition to streamline rules and reduce administrative burden; •Support traceable, verifiable decarbonisation pathways for renewable gases.			
Survey	European Biogas Association	Other - please specify (required)	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The European Biogas Association (EBA) welcomes the simplification efforts undertaken by EFRAG in the revision of ESRS E1 and recognises progress made, particularly under Disclosure Requirement E1-8 and related Application Requirements (ARs). Further improvement is necessary under Lever 2 (clarification and consistency with other legislation). In particular, within ESRS E1 Climate Change, Application Requirements 21 and 25 should be revised to explicitly recognise RED-compliant Proofs of Sustainability (PoS) as valid instruments for GHG accounting of renewable gas purchases under Scopes 1 and 3. These instruments are central to the EU's legally binding sustainability framework under the Renewable Energy Directive (RED) and are widely used to demonstrate measurable, auditable GHG reductions within regulated mass-balance systems. Failure to explicitly recognise these instruments leads to unnecessary confusion. Aligning the ESRS with the RED would uphold the objective of reducing administrative burden, increase coherence within EU sustainable finance law. These targeted clarifications would support the practical application of the standard, reduce audit ambiguity, and promote interoperability, while aligning fully with the Commission's mandate to "clarify provisions that are deemed unclear" and "improve consistency with other pieces of EU legislation," as stated in the Explanatory Memorandum to the Simplification Omnibus.			
Survey	European Biogas Association	Other - please specify (required)	Belgium	35.E1-8.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	•AR 21 (Applicable to Scopes 1, 2, and 3): RED-compliant Proofs of Sustainability (PoS) should be explicitly recognised as valid instruments for emissions accounting of biomethane purchases across all scopes. This would ensure consistency with EU legislation, particularly the Renewable Energy Directive (Lever 2). Biogenic emissions: Paragraph (e) of AR 21 requires reporting all biogenic emissions, including CO2, under Scope 1. This is inconsistent with Disclosure Requirement E1-8, paragraph 33 and the GHG Protocol, which treat biogenic CO2 as outside the scopes. This provision should be revised to support interoperability and consistency (Lever 2). •AR 25 (Scope 3): Recommendation: Like AR 21, AR 25 should explicitly recognise RED-compliant PoS for Scope 3 emissions accounting. These instruments are legally grounded and based on EU-regulated certification schemes and mass-balance systems. Clear inclusion would reduce ambiguity (Levers 2 and 4).	E1	Disclosure Requirement E1-8 - Gross Scopes 1, 2, 3 emissions	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Global Reporting Initiative	Standard setting initiative	Netherlands	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Amended ESRS 1 lacks a clear definition of impact materiality, comparable to the one included for financial materiality in paragraph 39. To eliminate ambiguity for companies and stakeholders, the definition in the Glossary needs to be clearly incorporated into the body of ESRS 1. To avoid confusion, this definition should be aligned verbatim with the GRI Standards, which define material topics as those that represent an organization's 'most significant impacts'. This is crucial to ensure clear and consistent application of impact materiality globally. In addition, since the steps for assessing impact materiality are not elaborated on within the ESRS, pointing to GRI 3: Material Topics can provide additional valuable guidance for reporters. Amended ESRS 1 presumes that investors are the only users of the sustainability statements for decision-making. This is not the case. Other stakeholder groups – such as civil society and policy makers – need to be included, rather than being relegated to being considered as only using this data to achieve an "understanding". Otherwise, the principle of double materiality is undermined by the prioritization of financial materiality only. Paragraph 21 (b) must be revised so that information is material when it is necessary for users, including civil society actors, to make informed assessments and decisions about an undertaking's most significant impacts and how it identifies and manages them.			
Survey	Global Reporting Initiative	Standard setting initiative	Netherlands	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	The new guidance on how to consider remediation, mitigation, and prevention actions in assessing the materiality of negative impacts is now based on a net-impact assessment. This is overly complex, inconsistent with financial materiality (where risks are assessed on a gross basis) and, more importantly, risks excluding severe potential negative impacts from reporting. Net-impact assessments can also vary widely depending on how organizations account for mitigation measures, leading to inconsistent and less comparable reporting. Assessing impacts on a gross basis means organizations cannot obscure or minimize potential harm simply by pointing to mitigation efforts. Particularly in cases where an impact is highly significant in a specific industry or location, disclosing these impacts and the effective implementation of prevention and mitigation measures provides valuable information to stakeholders. GRI 3: Material Topics provides relevant guidance on how to assess and prioritize impacts for reporting.			
Survey	Global Reporting Initiative	Standard setting initiative	Netherlands	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	It is important that the NMIG is updated and made available again for public feedback once the Amended ESRS have been finalized. Please refer to pages 29-30 of this Annex for our feedback on the NMIG: https://www.globalreporting.org/media/uo5a3wg0/annex-gri-response-to-public-consultation-on-the-amended-esrs-exposure-drafts.pdf			
Survey	Global Reporting Initiative	Standard setting initiative	Netherlands	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	Global Reporting Initiative	Standard setting initiative	Netherlands	22.ESRS2	Comments on deleted datapoints in ESRS 2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	We have observed a considerable reduction of GRI-aligned data points, both in the cross cutting and in the topical standards. The proposed amendments should not diminish interoperability with global sustainability reporting standards but rather strengthen it. Considering interoperability with the GRI Standards when deciding which mandatory data points to retain would ensure that any reductions are based on decision-useful impact information, validated through extensive multi-stakeholder consultation. For example, ESRS 2 no longer includes standalone data points on how a company identifies impacts, the involvement with negative impacts, and the provision of remedy, which provided crucial and easily identifiable information about an organization's approach to impacts. Here, reference could be made to GRI 3: Material Topics where this critical information is covered. In the excel template provided we indicate which of the deleted content we believe should be maintained. In addition, while we acknowledge the need to simplify reporting by reducing mandatory data points, this cannot come at the expense of meaningful, standardized information on impacts for investors, civil society, and other stakeholders. Although mandatory data points have been significantly reduced, the ESRS continue to require undertakings to report material information on material impacts. However, given that less information under the ESRS will be standardized, there is a risk of reduced reporting quality and comparability. We recommend that paragraph 11 of ESRS 1 includes an explicit reference to the GRI Topic Standards (in addition to GRI Sector Standards), as a reliable source of entity-specific disclosures and likely material topics. This will help ensure that organizations can report standardized information on significant sector-agnostic impacts and topics not covered by the amended ESRS.			
Survey	Global Reporting Initiative	Standard setting initiative	Netherlands	22.E1.	Comments on deleted datapoints in ESRS E1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Please refer to the excel template where we indicate which of the deleted content we believe should be maintained.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Global Reporting Initiative	Standard setting initiative	Netherlands	22.E2.	Comments on deleted datapoints in ESRS E2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Please refer to the excel template where we indicate which of the deleted content we believe should be maintained.			
Survey	Global Reporting Initiative	Standard setting initiative	Netherlands	22.E3.	Comments on deleted datapoints in ESRS E3	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Please refer to the excel template where we indicate which of the deleted content we believe should be maintained.			
Survey	Global Reporting Initiative	Standard setting initiative	Netherlands	22.E4.	Comments on deleted datapoints in ESRS E4	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Please refer to the excel template where we indicate which of the deleted content we believe should be maintained.			
Survey	Global Reporting Initiative	Standard setting initiative	Netherlands	22.E5.	Comments on deleted datapoints in ESRS E5	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Please refer to the excel template where we indicate which of the deleted content we believe should be maintained.			
Survey	Global Reporting Initiative	Standard setting initiative	Netherlands	22.S1	Comments on deleted datapoints in ESRS S1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Please refer to the excel template where we indicate which of the deleted content we believe should be maintained.			
Survey	Global Reporting Initiative	Standard setting initiative	Netherlands	22.S2	Comments on deleted datapoints in ESRS S2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Please refer to the excel template where we indicate which of the deleted content we believe should be maintained.			
Survey	Global Reporting Initiative	Standard setting initiative	Netherlands	22.S3	Comments on deleted datapoints in ESRS S3	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Please refer to the excel template where we indicate which of the deleted content we believe should be maintained.			
Survey	Global Reporting Initiative	Standard setting initiative	Netherlands	22.S4	Comments on deleted datapoints in ESRS S4	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Please refer to the excel template where we indicate which of the deleted content we believe should be maintained.			
Survey	Global Reporting Initiative	Standard setting initiative	Netherlands	22.G1	Comments on deleted datapoints in ESRS G1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Please refer to the excel template where we indicate which of the deleted content we believe should be maintained.			
Survey	Global Reporting Initiative	Standard setting initiative	Netherlands	23.	Six datapoints exceptionally moved from “may” to “shall” In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, “may disclose” datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We welcome moving data points on total water withdrawals, total water discharges, and the number and nature of the confirmed incidents of corruption from 'may' to 'shall'. This is in line with GRI 303-3-a, GRI 303-4-a and GRI 205-3-a respectively.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Global Reporting Initiative	Standard setting initiative	Netherlands	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	We disagree with the new threshold to report the breakdown of the number of employees by country for the countries in which the undertaking has 50 or more employees and that are the ten largest countries in terms of employee numbers. Similar to the previous threshold, it can obscure material information on where a significant number of employees are located and for understanding the potential impacts of undertakings. We recommend aligning with GRI 2-7-a and require a breakdown of the number of employees by region. In GRI 2-7, a region can refer to a country or other geographic locations, such as a city or a world region. This can provide flexibility to undertakings to report information at country level or by world region or other appropriate level, according to the specific circumstances of each undertaking, but on a complete basis.			
Survey	Global Reporting Initiative	Standard setting initiative	Netherlands	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	Former E4 AR 26 has been deleted as it was considered potentially outdated. We support retaining guidance on what biodiversity and ecosystems-related targets can cover. However, AR 26 in its former form is narrow and focused primarily on quantitative measures of areas or sites. Drawing on the GRI Standards, including GRI 101: Biodiversity 2024 (Disclosure 101-1-c and its guidance), we recommend that the Application Requirements more clearly reflect that biodiversity-related targets should be measurable, time-bound, and linked to the most significant impacts of the undertaking; specify baselines used; indicate how the targets are informed by the Kunming-Montreal Global Biodiversity Framework and science-based approaches such as SBTN; and cover an organization's most significant impacts in direct operations and upstream and downstream the value chain.			
Survey	Global Reporting Initiative	Standard setting initiative	Netherlands	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	The gender pay gap should be reported by employee category and by significant location of operation, to assess whether there is equal remuneration for work of equal value. GRI recommends replacing S1 44(a) with the adjusted pay gap, disaggregated by employee category for each significant location of operation, in line with GRI 405-1.			
Survey	Chamber of Labour, Austria	Trade union	Austria	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	In principle, the BAK welcomes the newly introduced practical regulations for carrying out the materiality analysis. From the BAK's point of view, however, the planned reduction in the granularity of a number of reporting obligations via the materiality analysis will result in a significant loss of transparency and information for the relevant stakeholders. Furthermore, it is provided that the involvement of stakeholders is required, but no further steps are necessary (AR 10 for para 33). It must be ensured that stakeholders can articulate their demands and that management can derive goals, measures, etc. from them. Only then can the effects on employees, suppliers in the value chain, consumers and the environment be recorded in reporting. This process should be reflected in the report so that stakeholders can understand how the company developed its topics. It is also unclear whether the proposed guidance provides sufficient clarity and transparency as to what level of adequate and proportionate evidence is needed to support the conclusions of the materiality analysis.			
Survey	Chamber of Labour, Austria	Trade union	Austria	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	Chamber of Labour, Austria	Trade union	Austria	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The BAK welcomes the proposal for an "executive summary" at the beginning of the Sustainability Report. However, it must be ensured that it is indeed only "a summary" and not the actual report. The concept of connected information offers a good way to avoid repetition. This leads to better readability and comprehensibility of the report. However, it is essential to provide an overall overview of all references in the report so that stakeholders can look up or be informed. In addition, if there are too many references, there is a risk that the clarity, transparency and comprehensibility of the reporting will suffer or be restricted. The BAK is of the opinion that all relevant information should be provided directly in the sustainability report in the management report. If information or information is moved in annexes, the BAK believes that it is essential to ensure that all annexes must also be disclosed and that they can be found clearly and easily in the report. Furthermore, the question arises for the BAK as to whether these simplifications will not make connectivity to financial reporting more difficult. The BAK therefore requests that appropriate consideration be taken into account so that the sustainability and financial reporting remains coherent in itself. This has always been a goal of the EU Commission and should therefore continue to be observed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Chamber of Labour, Austria	Trade union	Austria	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I disagree	From the BAK's point of view, the following points are critically assessed or rejected: - Less mandatory disclosures: The BAK opposes the planned deterioration of the disclosure requirements for ESRS 1 and 2. - Planned changes to mandatory reporting content on voluntary disclosures or the general deletion of the "may" regulations: These reductions lead to a significant loss of information for stakeholders and cannot guarantee comprehensible, transparent and understandable reporting. Simplifications should only be carried out if this does not lead to a qualitative impairment of reporting. The BAK therefore advocates a revision of the ESRS 1 and 2 regulations in accordance with ESRS Set 1. - No metrics are specified in the ESRS S 2-4. Therefore, the BAK proposes that the regulation to disclose relevant, company-specific information should be included directly in these standards. Otherwise, there is the impression that no company-specific information is required for these social standards. - The BAK is against an extension of the "phasing-in" regulations.			
Survey	Chamber of Labour, Austria	Trade union	Austria	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Unfortunately, the present draft provides for the mandatory guidelines to be downgraded to "no longer mandatory". From the BAK's point of view, this is associated with a significant deterioration in sustainability reporting. In addition, it is questionable what effect EFRAG's interpretative guidelines, which are declared non-binding, will have in practice. It can be assumed that they will have a certain binding effect. However, in such important areas of the European economy, this is viewed critically. Direct publications by the European institutions, specifically by the Commission, would be preferable. These would also better support companies in reporting.			
Survey	Chamber of Labour, Austria	Trade union	Austria	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	In European sustainability reporting, the ESRS must always be in the foreground. A pure orientation towards the ISSB standards is not advocated. EFRAG has already taken the GRI standards into account very much during the development of ESRS Set 1. This should also be taken into account in the new revision. The newly introduced principle of "fair presentation" must ensure in all cases that sufficient transparency and reliability of all essential regulations in reporting is given.			
Survey	Chamber of Labour, Austria	Trade union	Austria	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	Chamber of Labour, Austria	Trade union	Austria	22.S1	Comments on deleted datapoints in ESRS S1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The exposure drafts (April 2022) and the EFRAG draft of Set 1 (November 2022) have already seen a significant reduction in disclosure requirements for companies. The BAK therefore considers it urgently necessary that the draft standards now available are not further shortened or watered down in the further legislative process. This would result in a significant deterioration in the new sustainability reporting. In its statement of January 2023 on EFRAG's Set 1 published in November 2022, the Federal Chamber of Labour has already critically stated that the scope of the disclosure requirements has been significantly reduced compared to the exposure drafts from the consultation in summer 2022. It is precisely through the standards that it must be ensured that the information needs of stakeholders who are significantly affected by the entrepreneurial activities and their effects are met. These include, in particular, the requirements of trade unions, works councils and employees for a transparent, comparable mapping of working conditions in the sustainability indicators to be reported and the associated sustainability goals and risks. From the BAK's point of view, the following points are critically assessed or rejected: - Less mandatory disclosures or shift from mandatory reporting content to voluntary disclosures: The BAK is clearly opposed to the planned deterioration of the mandatory disclosure requirements, especially for ESRS E1 and ESRS S 1. In the CSRD Article 29b, all social information is listed in detail. Therefore, these social aspects in particular should be reflected in the ESRS. - From the BAK's point of view, the planned reduction in the granularity of a number of reporting obligations (e.g. no age groups for S1-8 diversity, no breakdown by gender for S 1-12 training) will result in a significant loss of transparency and information for the relevant stakeholders. - The BAK therefore advocates a resumption of the regulations (for the topic standards) in accordance with the currently applicable Delegated Act on the ESRS.			
Survey	Chamber of Labour, Austria	Trade union	Austria	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The BAK welcomes the mandatory information: - on the Biodiversity Transition Plan E4, - for training of procurement teams (procurement teams are of great importance, especially in connection with the value chain) and - for incidents of corruption/bribery.			
Survey	Chamber of Labour, Austria	Trade union	Austria	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	These exceptions provide important information and are therefore justified and appropriate.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Chamber of Labour, Austria	Trade union	Austria	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	This new principle of "fair presentation" is generally welcomed. However, it must not lead to the omission of important topics that are necessary for complete, meaningful, comparable and auditable sustainability reporting under this guise.			
Survey	Chamber of Labour, Austria	Trade union	Austria	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The change in the thresholds for reporting the number of persons employed is welcomed, as it provides more information on the number of employees, especially from companies operating in several countries, and this data is also necessary for other social indicators. In addition, there are no additional data points associated with it for the companies obliged to report.			
Survey	Chamber of Labour, Austria	Trade union	Austria	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree				
Survey	Chamber of Labour, Austria	Trade union	Austria	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree	These proposed simplifications support companies in reporting on SFDR-related topics. For users, this consolidation makes it easier to find the relevant information. However, the SFDR data points are very helpful and should only be changed selectively.			
Survey	Chamber of Labour, Austria	Trade union	Austria	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?		-			
Survey	Chamber of Labour, Austria	Trade union	Austria	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree				
Survey	Chamber of Labour, Austria	Trade union	Austria	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Please refer to the Excel template for comments on the standards			
Survey	Chamber of Labour, Austria	Trade union	Austria	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	Chamber of Labour, Austria	Trade union	Austria	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Chamber of Labour, Austria	Trade union	Austria	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Chamber of Labour, Austria	Trade union	Austria	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Chamber of Labour, Austria	Trade union	Austria	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
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Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
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Survey	3A Advisory SARL-S	Consultant (including software vendor)	Luxembourg	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We welcome the proposed amendments to the ESRS which represent a positive step forward. However, we suggest to consider a more flexible approach as regards the double materiality assessment by clarifying that companies should only carry out a full DMA periodically or when there are significant changes in their strategy or business model, and not necessarily on a yearly basis. Companies could instead review internally their DMA every year to determine whether such a reassessment is necessary. The DMA should therefore only be audited when updated periodically. It would also be beneficial to clearly define what constitutes a reassessment to avoid divergent interpretations of this concept by preparers and auditors. We also support the use of reasonable and supportable information available without undue cost or effort (ESRS 2 paragraph 47 & chapter 7.3), as well as ESRS 1 paragraph 48 on materiality based on the business model and AR 17 on the top-down approach. It is important to grant undertakings discretion to define the appropriate level of disaggregation whether by topic, business or another relevant area. We recommend deleting references to sub-sub-topics such as in Appendix A E4 ("Drivers of biodiversity and ecosystem change (terrestrial and marine habitat change, invasive species)"). We would like to avoid unnecessary burden and audit pressure.			
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We agree with adopting a net approach to assessing potential negative impacts within the Double Materiality Assessment (DMA). This reflects real business practices, where impacts are evaluated after accounting for credible, systematic, and effective prevention and mitigation measures. Industrial companies already invest heavily in regulatory compliance, site-level controls, advanced monitoring systems, and global frameworks (e.g., ISO, OGMP 2.0). These measures are audited, budgeted and continuously improved to reduce risk exposure. A gross-only assessment would inflate disclosures with hypothetical risks that are already effectively managed, creating excessive burden and misrepresenting actual exposure. A net approach ensures disclosures remain decision-useful, rewarding companies for proactive and data-backed mitigation efforts. However, on the other hand, we caution against the rigidity introduced by the gross vs. net approach in Appendix C. Framing materiality around gross impacts risks turning the exercise into a theoretical checklist, disconnected from sustainability reporting's purpose of accountability, comparability, and faithful representation. Safety topics, for instance, would be reported regardless, as they are business priorities even without annual incidents. By treating all impacts as material, the gross approach risks over-reporting and obscuring meaningful disclosures.			
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We support the changes proposed since they provide more clarity on how to report the disclosure requirements related to Policies, Actions and Targets. However, we reiterate that EFRAG should explore the possibility of merging disclosure requirements on PATs in the topical standards as these are often implemented together.			
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We fully support the changes introduced as regards the distinction between mandatory from voluntary datapoints, as it was flagged as one of the main sources of confusion during the preparation of the sustainability statements, also presenting challenges with auditors. However, further simplification and precision are needed to improve usability and avoid confusion, particularly with auditors. - Unclear and contradictory terminology should be eliminated. For instance, terms such as "shall consider" create ambiguity: "shall" implies mandatory action, while "consider" suggests discretion. This phrasing leaves room for interpretation and could result in inconsistent application or auditor disputes. - Application requirements (ARs) that use "may" should be removed, as "may" implies voluntary action, which contradicts the stated objective of eliminating voluntary disclosures. Clear, mandatory language is essential to ensure consistency and enforceability across undertakings.			
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We strongly support excluding the NMIG from the Delegated Act to ensure it is clearly interpreted as non-mandatory, in order to prevent an unintended increase in reporting burden. The NMIG should remain a helpful reference tool for preparers, not a regulatory requirement. This connects with the need of moving all voluntary and non-mandatory data points into a separate document to improve the clarity of the standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We strongly support that disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). What is more, we fully support other relief measures introduced by EFRAG: - included in [DRAFT] ESRS 1 section 5.4 as regards acquisitions and disposal - included in [DRAFT] ESRS 1 paragraph 92 allowing reporting undertakings to exclude joint operations over which they don't have operational control for the calculation of certain environmental metrics. However, additional alignment with financial reporting (i.e. IFRS 11-Joint arrangements) could be achieved. Following the financial consolidation method would improve the consistency of the information reported by companies. We would also like to draw attention to confusions and unclarities when reporting confidential information, especially justifying its omission to auditors.			
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We fully support the relief measures as regards the use of reasonable and supportable information that is available without undue cost or effort as it will significantly reduce the administrative burden on reporting undertakings. We believe this provision should be permanent and not subject to a time limit as proposed by some EFRAG SRB members (as mentioned in paragraph 76 of the [DRAFT] Basis for Conclusions. In the case of large Capital Groups, some information may not be available for a long time, not just a year or two, because it requires a complete remodeling of the current method of data collection. We particularly support ESRS 1, paragraph 92, which acknowledges the practical limitations of data availability in joint operations where the undertaking lacks operational control. Allowing the exclusion of such operations from environmental metrics is a pragmatic solution that enhances reporting feasibility and avoids duplicative or misleading disclosures. Similarly, we endorse ESRS 1, paragraph 91, which permits the use of metrics based on a partial scope of calculation. This flexibility is vital in the early years of reporting, when data systems are still evolving. Importantly, the requirement for companies to disclose the scope limitations and outline plans to improve data coverage ensures transparency and demonstrates continuous progress.			
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	We would like to recommend the wording included in OPTION 2, since it better addresses our concerns on the sensitivity of the information disclosed and on the excessive burden in calculating quantitative disclosures. The issue of anticipated financial impacts is extremely difficult. Advisors themselves don't yet know how to approach the topic, and preparing for the disclosure of such data can take years for large capital groups. What is more, such flexibility is necessary given the significant legal risks which are particularly acute where disclosures include financial data not reported in official financial statements and not reliably estimable. Such disclosures should fall under the remit of financial boards to ensure consistency with financial reporting requirements. If disclosure requirements are maintained, they should focus on qualitative information only, providing general indications of the time horizon and type of effects (e.g., financial position, performance, cash flows). Anticipated effects must be consistent with those considered for current financial effects. Crucially, inherent effects should not be required, as these are theoretical, not grounded in reasonable and supportable information, and risk misleading external users.			
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	It is crucial not to require disclosure 'before considering adaptation/mitigation actions', as this does not reflect how business strategy is defined and adds little value for users. Mitigation measures are typically embedded within corporate strategy, structural in nature, and linked to multiple risks. Attempting to calculate hypothetical monetary amounts before mitigation is both overly complex and unreliable, producing figures that are neither estimable nor dependable. For less technical readers, such disclosures could be misleading, especially since they are not recognized in the financial statements. We therefore strongly recommend limiting anticipated financial effect disclosures to qualitative information only. As a suggestion, the IFRS S1 reliefs in § 38 and § 39 should be integrated in the ESRS: 38. An entity need not provide quantitative information about the current or anticipated financial effects of a sustainability-related risk or opportunity if the entity determines that: (a) those effects are not separately identifiable; or (b) the level of measurement uncertainty involved in estimating those effects is so high that the resulting quantitative information would not be useful (see paragraphs 77–82). 39. In addition, an entity need not provide quantitative information about the anticipated financial effects of a sustainability-related risk or opportunity if the entity does not have the skills, capabilities or resources to provide that quantitative information.			

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Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	We fully support the change that the datapoint reduction resulted in the elimination of 7 "shall" datapoints described in Basis for Conclusions (BfC) (Chapter 4, Lever 6). Also, we support the changes introduced to enhance interoperability with the ISSB standards, especially the harmonization of the reporting boundary for GHG emissions.			
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	We support the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.E1.	Comments on deleted datapoints in ESRS E1	I agree	We support the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.E2.	Comments on deleted datapoints in ESRS E2	I agree	We support the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.E3.	Comments on deleted datapoints in ESRS E3	I agree	We support the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.E4.	Comments on deleted datapoints in ESRS E4	I agree	We support the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.E5.	Comments on deleted datapoints in ESRS E5	I agree	We support the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.S1	Comments on deleted datapoints in ESRS S1	I agree	We support the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.S2	Comments on deleted datapoints in ESRS S2	I agree	We support the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.S3	Comments on deleted datapoints in ESRS S3	I agree	We support the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.S4	Comments on deleted datapoints in ESRS S4	I agree	We support the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.G1	Comments on deleted datapoints in ESRS G1	I agree	We support the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We do not agree on adding new datapoints, especially when these datapoints were assessed as voluntary after a thorough drafting process of the ESRS and should remain as such since their content, and therefore their relevance, have not changed.			
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	The introduction of new mandatory datapoints contradicts the stated objective of simplifying the standards. Organizations are already facing significant challenges in collecting and reporting the extensive information required under ESRS. Adding further datapoints - such as on microplastics, critical raw materials, or waste - will increase the complexity of the process and burden companies, many of which are still in the early stages of building robust reporting systems. This challenge is particularly acute in the downstream value chain, where companies have very limited visibility and control over how products are used after leaving their facilities. Obtaining reliable data from customers, distributors, or end-users is in practice extremely complex, and in many cases simply not feasible. Instead of introducing these requirements as mandatory at this stage, we strongly recommend that such topics are first developed and tested within non-mandatory guidance (NMIG). This would allow companies to experiment and progressively prepare their reporting systems. Imposing new obligations undermines the principle of burden relief and seriously threatens the feasibility of the entire reporting framework, especially for sectors with complex and fragmented value chains.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree				
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	We are concerned that the revised workforce disclosures introduce a level of detail that is not necessarily relevant or decision-useful, particularly for multinational companies. The requirement to disclose employee numbers per country with more than 50 employees may add little value, as in practice these employees may be concentrated in a single region (e.g., Europe) without enhancing the reader's understanding of global workforce distribution. A more representative and meaningful approach would be to return to the previous version of the disclosure, which required companies to report on countries where there are more than 50 employees representing at least 10% of the total workforce. This ensures focus on material geographies while avoiding unnecessary granularity. We also recommend removing the requirement to disaggregate employees by contract type (permanent, temporary, non-guaranteed). While well-intentioned, this requirement offers limited value to users and creates disproportionate complexity for preparers. Contract categories are defined differently across jurisdictions, leading to inconsistencies and undermining comparability. Moreover, workforce composition often fluctuates throughout the year, particularly in industries with seasonal demand or project-based work, which reduces the reliability of such disclosures.			
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree				
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	We agree with the deletion of that voluntary datapoint. However, [DRAFT] DR S1-15 still requires the undertaking to disclose the percentage gap in pay between its female and male employees and the ratio between the remuneration of its highest paid individual and the median remuneration for its employees. The undertaking must also disclose the annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees (excluding the highest-paid individual). It is still problematic because a significant amount of the top management's remuneration relies on variable income, which in turn relies on the financial results and statements; this indicator cannot therefore be calculated accurately before the certification of the financial statement, which puts its publication in jeopardy every year. Also, the preparation of these disclosures is significantly challenging for large capital groups with numerous subsidiaries. This would require having data on the annual salary of each employee of the group, which would have to be collected outside the HR and payroll system. Obtaining such data would be also difficult in the context of the EU data protection law, as it is only available to the employer at subsidiary level.			
Survey	ORLEN S.A.	Preparer (non-financial preparing a sustainability report)	Poland	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		On value chain reporting, we respectfully request that EFRAG consider limiting the scope of the impact materiality assessment to entities with which an undertaking has a direct contractual relationship. For large multinational organizations, value chains are highly complex and global in scope. Tracking and assessing impacts beyond direct contractual partners presents substantial practical, operational, and methodological challenges, particularly given the absence of consistent data availability and supplier transparency. In many cases, undertakings lack the leverage to influence or collect reliable information from actors further down the chain, resulting in disclosures that are burdensome to produce yet incomplete or inaccurate in practice. Also, it is important that the ESRS are properly translated into other languages by ESG experts in order to minimise errors and interpretational confusion.			
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	11. DMA simplification → Partially agree Good on clarity/top-down option; risk of under-reporting unless expectations for documentation and stakeholder input are explicit.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	12. "Gross vs net" guidance → Agree Assessing potential impacts gross prevents "we manage it well, so it's immaterial" logic; keep, but add examples by sector.			
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	13. Readability & connectivity → Agree Exec summary + appendices help users; insist cross-references to financials and capex pathways.			
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	14. ESRS2 & topical standards restructure (PAT) → Partially agree Less prescriptive is fine, but don't weaken Policies-Actions-Targets linkage to material IROs; require traceability from IRO → PAT → metrics.			
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	15. Clarity/accessibility → Agree Clear split mand./non-mand. reduces checklist behaviour.			
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	16. NMIG role → Agree Keep outside Delegated Act; warn auditors not to treat NMIG as de-facto mandatory.			
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	17. Burden reliefs overall → Partially agree Useful, but risk of data gaps; tie reliefs to improvement plans and auditable timelines.			
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	18. Data-quality relief (partial scope) → Partially agree Allow partials with a time-bound ramp-up (e.g., scope ↑ annually) and quantified coverage %; no open-ended use.			

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Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	19. Anticipated financial effects → Option 1 Keep quantitative info with guardrails; otherwise investors can't price transition/physical risks.			
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	20. E1 financial-effects paras 40–42 → Partially agree Simpler, but ensure scenario, time-horizon and balance-sheet/cash-flow channels remain explicit.			
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	21. Interoperability with IFRS S1/S2 → Agree Financial-control boundary is a big win; avoid extra reliefs that break alignment.			
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	22. Datapoint reduction → Partially agree OK if critical GHG, transition plan, and value-chain metrics remain intact; watch loss of decision-useful PAT details.			
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	23. Six "may" → "shall" → Agree Targeted upgrades improve clarity.			
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	24. Four new mandatory DPs → Agree If they close genuine decision-useful gaps.			
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	25. Fair-presentation emphasis → Agree Supports materiality and reduces boilerplate; provide examples to reduce litigation fear.			
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	26. FI absolute targets exception → Disagree Need intensity + absolute; intensity alone can mask rising financed emissions.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	27. S1 country thresholds → Agree Top-10 approach is more decision-useful; burden is manageable.			
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadequwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	28. Non-EU adequate wages → Partially agree Align with ILO is good; require which prong used and encourage reputable living-wage datasets earlier in the hierarchy.			
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	29. SFDR PAI incorporation → Partially agree Avoid duplication; ensure remaining PAIs are fully covered and traceable.			
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	30. E4 AR26 biodiversity targets → Partially agree Update with SBTN-aligned metrics (pressures, state, response) and area/condition quality.			
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	31. S1 adjusted gender pay gap deletion → Disagree Keep adjusted gap (by category/country) for management action; unadjusted % alone misleads.			
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	32. G1 payment practices → Partially agree PAT is fine, but add a simple KPI (e.g., % invoices paid ≤30/60 days) to protect SMEs.			
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Simplification helps; ensure guardrails on reliefs, time-bound data-quality improvements, and strong ISSB interoperability.			
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Simplification helps; ensure guardrails on reliefs, time-bound data-quality improvements, and strong ISSB interoperability.			
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Simplification helps; ensure guardrails on reliefs, time-bound data-quality improvements, and strong ISSB interoperability.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Simplification helps; ensure guardrails on reliefs, time-bound data-quality improvements, and strong ISSB interoperability.			
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Survey	Birkenstock Group B.V. & Co. KG	Preparer (non-financial preparing a sustainability report)	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Why this helps CO_2 in practice: Better interoperability (ESRS→ISSB) → lower cost to report once, freeing capacity for actual abatement. Clear IRO→PAT→Metrics chain → capital shifts to low-carbon options. Risks: unlimited reliefs or weaker PAT detail → less pressure to decarbonise. Hence the guardrails above.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	Chapter 3 is clearer and better organised. The improved definition of materiality of information in Section 3.1, namely the replacement of criterion of "significance" with "understandability" of impacts provides better guidance and is aligned with the CSRD and international sustainability due diligence instruments. It also clarifies how the materiality of information interacts with (fundamental) qualitative characteristics of information criteria from Chapter 2, and with the rules concerning aggregation and disaggregation of information (e.g. para 52 on "not obscuring"). Section 3.5. Practical considerations are particularly helpful to avoid unnecessary complexity in materiality assessment. However, Chapter 3 frequently conflates 'topics' with 'impacts, risks and opportunities' ('IROs'). Para 22 is confusing when it says that information may be presented "either at the topical level or at [IRO] level". Such a dichotomy is confusing and incorrect. While topics refer to broad thematic areas, IROs are entity specific. The CSRD, as well as IFRS, TCFD, and TNFD consistently focus on the latter. Overemphasising 'topics' risks leading to generic, boilerplate disclosures that lack relevance and specificity. Chapter 3 would be clearer if it keeps the focus on IROs and plainly explain that depending on their nature and context such IROs may be defined at a general level - often corresponding to topics - and/or that information on their management may be similarly aggregated. This should be clarified also in provisions on entity-specific disclosures in paragraph 23 (and in paragraph 10 in Chapter 1) In Chapter 3.3.2, para 37 fails to mention that the purpose of financial material assessment is to not just to identify materiality information but also determine the material risks and opportunities, as required by the CSRD. In this regard, the risks and opportunities are only mentioned in the middle of para 38, making the text incoherent.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	It is useful that Chapter 3 addresses the question of how prevention, mitigation and remedy of impacts shall be considered in materiality assessment, but the rules could be expressed in a more simple and understandable way. Para 34 uses a very complicated language to express a simple idea that actual impacts shall be considered as they occurred during the reporting period, and that their ex-post remediation is not relevant. We welcome and stress the importance of the clarification that the potential impacts which require significant ongoing preventative or mitigation efforts shall be considered gross. Without such clarification, it would be in theory be impossible for companies to report on how they manage such issues. In this regard, it would be helpful to refer to the materiality of information filters to provide companies with further guidance on how to distinguish such significant efforts from common practice and compliance measures. The table provided in Appendix C provides more detailed information, which it would be helpful to integrate directly into the main body to ensure clarity and consistency.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The proposed changes are meaningful. We would like to bring the attention to para 113, which we find hard to understand: "113. If the description of the material impacts, risks and opportunities prepared in accordance with [Draft] Amended ESRS 2 IRO-2 is not presented alongside the respective policies, actions and targets, the undertaking shall make explicit which policies, actions and targets relate to which material impacts, risks, or opportunities, in accordance with paragraph 22." It is not clear to us what the reference to para 22 is meant to imply. Para 22 addresses the issue of appropriate aggregation or disaggregation of information on material impacts, risks and opportunities and their management. But it doesn't set any rules regarding the location of such disclosures depending (or not) on the level of aggregation.			

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Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We welcome the removal of the duplications between the cross-cutting and topical standards. We support the emphasis on general disclosure requirements. Likewise, many PAT provisions in the topical standards had a character of examples or guidances rather than datapoints. Additionally, the preservation of the 5-part and 4-part architecture of the environmental and social standards respectively is welcome and important in providing a structure and language for preparers to navigate the issues, communicate internally with colleagues and organise their disclosures with regard to social issues. The environmental standards similarly provide an architecture that supports this kind of navigation, and which are retained, including with the specific metrics under each of standards E1 to E5. The architecture should be complete and equivalent across the standards However, we have two critical concerns. First, the original DR in environmental standards concerning screening of sites in materiality assessment were replaced by an application requirement to ESRS 2 IRO-1. This in effect makes transparency on this aspect optional. Consideration of local context is a key element of an appropriate materiality assessment. This should be both recognised in Chapter 3 of ESRS 1, and in ESRS 2 IRO-1, which should include an explicit datapoint on how the undertaking screened its locations and value chains. We welcome that E standards provide a clearer reference on the importance of disaggregation of disclosures, but this can only be done well if locations are properly screened. Second, we strongly recommend adding an explicit reference to the disclosure of relevant, entity specific metrics directly in S standards. The fact that S2, S3 and S4 do not include any metrics and the anticipated sectoral standards which would have provided such metrics will not be adopted, shift the expectations for disclosure of metrics for S topics to entity-specific disclosures.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We support the proposed changes. We agree with the removal of 'may disclose' elements, because their status has been causing confusion. However, they do not need to be all removed to NMIG. Where they provide useful examples of disclosures, they could be included directly in the standards as "examples". This is particularly the case for the topics for which the reporting practice is evolving, such as Biodiversity and ecosystems. This would make it easier for first-time preparers to understand what kind of information is likely to be relevant and provide a basis for the standardization of metrics. Having to consult another document, such as NMIG, is adding an unnecessary hurdle. The language and therefore understandability of the standards have been considerably improved, however in ESRS 1 especially there is still much to be done in this regard.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The standards are not clear in terms of what the combined effect of the reliefs is and how the reliefs are meant to interact. Interpreting and applying these reliefs independently of each other open doors to abuse and omitting material information, significant differences in reporting practice. Reporting of metrics is subject to a combination of undue cost and effort and lack of data quality reliefs. But the standards do not put these two reliefs in proper context and do not include any explicit requirement and timeframe for companies to improve the coverage and quality of data. This is exacerbated by the relief which unconditionally allows exclusion of joint operations. If the environmental metrics concerning such operations are material, then the standards should incentivise their eventual disclosure. The undue cost and effort and lack of data quality reliefs already provide sufficient flexibility in this regard. Similarly, there is a lack of coherence among the directions of the reliefs related to financial effects, i.e., information which is essential for understanding of the risks and company's ability to overcome them. The limitation related to the announced investment plans focuses the disclosures on effects which are easier to assess and therefore quantify, yet the standards also propose reliefs that enable omitting quantitative disclosures. We broadly agree with the relief provided in ESRS 1, para 90, which allows for calculation of metrics exclusion of activities that are not significant drivers of the IROs. However, the application of this option must be clarified for specific environmental and social metrics which are standardised in the ESRS. For instance, the GHG Protocol's completeness principle explicitly warns against misapplication of materiality criteria in this regard. Similarly, for S1 workforce metrics, such as characteristics of the employees and non-employees, such exclusions are not appropriate.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	These combined reliefs should clearly require the undertaking to improve the coverage and quality of the data needed to meet ESRS requirements. For the metrics concerning own operations and/or metrics standardised directly in the ESRS, this should be subject to clear time limitation. For other metrics, improvements over the years should be also explicitly required, subject to undue cost and effort relief.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ability to estimate financial effects is critical for the undertaking's ability to integrate sustainability into its business strategy considerations, planning and risk management. It is also key for the determination of financial materiality, including in terms of overreporting topics as financially material. Resigning on this ambition is at odds with the objective of putting sustainability reporting on the same level as financial reporting, the integration of both, and ultimately overcoming the tragedy of horizons. We find Option 1 unnecessarily extensive, and lacking time limitation, but broadly acceptable. We disagree with the assertion made in the question that it "[d]ifferent from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources ". In this regard, the new proposed ESRS include the undue cost and effort relief which seems to account for such a situation. With respect to Option 2, we don't find it justifiable to go beyond the IFRS relief. One of the most strongly voiced arguments from stakeholders who called for simplification of ESRS was that, as a matter of principle, ESRS must be aligned with the IFRS except where CSRD or other EU legislation require otherwise. Abandonment of this principle seriously undermines prospects of building a global baseline which both the EU and the ISSB support, and which is an important part of building a level playing field for the EU companies.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Reliefs should not go beyond those set in IFRS. Going further would undermine the objective of setting a global baseline for ESG reporting, which is important for achieving a level playing field for EU companies in a global context. The undue cost and effort relief outlined in ESRS 1, para 87-89, is a powerful relief, which addresses virtually all situations where the undertaking may encounter practical obstacles. Explicit emphasis on fair presentation, combined with the strengthened focus on the use of materiality of information filter, provide companies with an increased flexibility in determining meaningful content of their sustainability statements. It marks a further move away from compliance-based to principle-based approach. However, such changes imply increased responsibility for the undertaking. Implementing further reliefs would undermine this responsibility and open the doors to abuse.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	The number of datapoints in each standard represent the minimum necessary to ensure cohesive disclosure requirements, and consequently basic comparability and quality of the actual disclosures. We have not identified any instance where ESRS would include exorbitant requirements, considered common practice and internationally recognised reporting standards and frameworks such as IFRS, GRI, or TNFD. ESRS are generally more concise and less demanding. Introducing further reductions (while keeping the coverage of all ESG factors as required by the CSRD) would create serious quality gaps between the ESRS disclosures and those based on the standards.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree with these changes, noting that the suggested changes do not add a new burden. This is particularly the case for the water-related metrics. In order to disclose the water consumption, the undertaking already has to calculate withdrawals and discharges, and such calculation and therefore the underlying data is subject to the assurance. Moving these implicit datapoints to the forefront as explicit data points makes the disclosure requirement clearer, compared to the previous ESRS where some of these datapoints were framed as "may disclosures". Whether or not these individual datapoints are to be disclosed is correctly subject to materiality of the information filter applied by the undertaking.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree with these changes, noting that the suggested changes do not add a new burden. E2-4 on secondary microplastics is not a new datapoint, as correctly pointed out in the Rationale above. We do not understand why it is included in this question, as such.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	ESRS, being based on the materiality principle, the CSRD requirement to disclose impacts, risks and opportunities and their management, and the general principles of the Accounting Directive, has already been subject to a fair presentation regime. Making it explicit helps to clarify it. It provides companies with clarity on the discretion and judgement, as well as related safeguard, they are expected to exercise when applying the standards.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We recognise the complexity of recalculating absolute values and acknowledge that financial institutions often manage GHG performance using intensity-based approaches. However, the global carbon budget is defined in absolute terms. For this reason, it remains essential that even financial institutions disclose absolute targets to assess how their strategies align with the economy-wide transition to net zero. Absolute targets are relevant for users of sustainability statements and for understanding the real-world climate impact of financed activities. While intensity measures provide insights into efficiency, they can mask rising absolute emissions in growing portfolios or sectors. Absolute values, by contrast, give a clear signal of whether institutions are contributing to the necessary 90–95% global reduction in emissions by 2050, with steep cuts by 2030. Both approaches rely on similar underlying data, and estimation challenges are not unique to the financial sector. Granting an exemption would also undermine fairness in a sector-agnostic standard. Other industries could equally argue for exceptions based on their own difficulties, reducing comparability across sectors. Moreover, absolute financed emissions are already recognised in existing standards and regulations: the SBTi financial sector net-zero standard, the UNEP FI/NZBA recommendations, and EU SFDR all require or encourage absolute emissions disclosure. Exempting banks would risk misalignment and reduce the usefulness of reported data for stakeholders, including asset owners who depend on it for their own disclosures.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The new threshold is simpler and clearer, and therefore easier to apply. It also sets a clear cap. Any potential increase of breakdowns of the disclosed information is negligent in terms of added burden.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	This should be addressed through revisions to para AR 22. The methodology presents four key problems: 1.It undermines the objective: the methodology for reporting on whether all employees earn an adequate wage should not include an option that is tied to the generally much lower standard of the legal minimum wage 2.It is discriminatory. The disclosure would have companies apply a lower standard to their employees outside of the EU than they apply to those inside the EU. 3.It is complex for companies: The methodology would require companies themselves to assess whether minimum wages in each country align with the ILO's wage-setting principles, and whether living wage benchmarks align with the ILO's principles for estimating living wages. 4.It undermines comparability of reports: If they apply these different standards for reporting on adequate wages depending on the location of employees, the data is not comparable. Two key changes are therefore needed: •The methodology for reporting on adequate wages should measure actual wages against an adequate/living wage for all employees not only those within the EU. In particular, for employees outside the EU, the methodology should allow employees' actual wages to be measured: oagainst the local legal minimum wage only when this is set in line with the ILO principles on estimating living wages; or oagainst living wage estimates that are set in line with ILO principles on estimating living wages. •Companies should be able to rely on local legal minimum wages or living wage estimates when the authorities or organisations that set them provide public evidence of their alignment with the ILO principles for estimating living wages. This will avoid companies' having to make this assessment themselves.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	We welcome the fact that multiplication of datapoints was removed. The new, simplified framework makes it easier for companies to report on these SFDR-related matters in a way that corresponds to how their policies are set. For users, this consolidation makes it easier to locate the relevant information.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Measurable targets related to biodiversity and ecosystems shall be set and disclosed according to the guidance and examples given by relevant global frameworks, such as SBTN (Step 3 - Measure, Set & Disclose Targets), TNFD (component P1 and P2 & Annex 5, sector guidance and guidance on Target Setting) & resources by World Economic Forum Nature-Positive Transitions.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	Our proposal is to not include such datapoint, but instead provide a paragraph in the application requirements, explaining that the adjusted pay gap is an important entity-specific information, which is often necessary to contextualise and enable understanding of the information provided by the unadjusted pay gap. Further this AR could remind the undertakings that the unadjusted pay gap needs to be appropriately disaggregated. Unadjusted and adjusted perspectives on pay gap have different purposes. The unadjusted pay gap - appropriately broken down by countries or areas of operations in line with ESRS 1 - provides general context and the information on how the undertaking is affected by systemic drivers of gender inequality. The adjusted pay gap is primarily an entity-specific disclosure. It is particularly relevant for complex companies to better understand where and how the pay gap manifests, and what are the specific drivers of it. There is no one 'standardizable' way to adjust the pay gap calculation. Such adjustments must consider the undertaking's specific context and circumstances and avoid 'overadjusting'. If the calculation controls for every source of difference between males and females in the workforce, then it would obscure the pay gap and its causes. Therefore, including a datapoint - whether mandatory or voluntary - on adjusted pay gap in the standards is problematic, because it is impossible to provide a standardised methodology. On the other hand, for many companies' information on adjusted pay gap is likely to be material, and therefore such information should be provided.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	The removal of paragraph 14 can be easily compensated by adding a reference to SMEs in the description of the topics in ESRS 1, Appendix A, and in ESRS G1, paragraph 4. The removal of datapoint originally located in para 33(a) concerning average days it takes to pay an invoice, does not seem to be necessary for the reduction of burden. The undertaking would still need to collect this data to be able to meet the other requirements, in particular the calculation of the % of its payment aligned with its standard payment terms (in para 20(a)).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS 1: We are concerned about the concurrent effect of various reliefs. We are also concerned about the unintended confusion caused by a rather confusing explanation of the relationship between impacts, risks and opportunities on one hand, and sustainability topics on the other.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	ESRS 2: We disagree with the downgrading of the transparency on site/assets/activities screening from the level of datapoints in the E standards to an Application Requirement in ESRS 2.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	ESRS E1: We do not think that the streamlining of the E1-1 Transition Plan for Climate Change Mitigation added value. If anything, more rather than less details and clarifications are needed. The glossary could retain the definition of net zero targets and related criteria, as use and reporting of such targets is a common practice.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	ESRS E2, E3, E5: We welcome the changes made, including the clarification and minor additions to the datapoints in the metrics section. They provide for greater clarity and do not add further reporting burden.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	ESRS E2, E3, E5: We welcome the changes made, including the clarification and minor additions to the datapoints in the metrics section. They provide for greater clarity and do not add further reporting burden.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	ESRS E4: Given the current state of art in this area, it would be helpful to include more guidance on how to set metrics and how to utilise the other reporting frameworks and standards such as the TCFD. The standard should also clearly require the disclosure of sites in/near biodiversity sensitive areas, rather than limiting it to those determined to be connected to material impacts only.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	ESRS E2, E3, E5: We welcome the changes made, including the clarification and minor additions to the datapoints in the metrics section. They provide for greater clarity and do not add further reporting burden.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	ESRS S1, S2, S3, S4: We would recommend adding an explicit reference to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, that is the standards that lack any metrics. In S1, we have strong reservations about the newly suggested methodology for adequate wages outside of the EEA. It would lead to misleading disclosures and add burden for companies.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	ESRS S1, S2, S3, S4: We would recommend adding an explicit reference to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, that is the standards that lack any metrics. In S1, we have strong reservations about the newly suggested methodology for adequate wages outside of the EEA. It would lead to misleading disclosures and add burden for companies.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	ESRS S1, S2, S3, S4: We would recommend adding an explicit reference to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, that is the standards that lack any metrics. In S1, we have strong reservations about the newly suggested methodology for adequate wages outside of the EEA. It would lead to misleading disclosures and add burden for companies.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	ESRS S1, S2, S3, S4: We would recommend adding an explicit reference to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, that is the standards that lack any metrics. In S1, we have strong reservations about the newly suggested methodology for adequate wages outside of the EEA. It would lead to misleading disclosures and add burden for companies.			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	ESRS G1: We particularly welcome the streamlining and alignment of the structure of this standard with the remainder of the standards			
Survey	Jaekel Consulting	Consultant (including software vendor)	Sweden	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	NomoGaia	NGO	United States	35.S1-1.	Do you agree with the amendments of this chapter?	I agree		S1	Disclosure Requirement S1-1 - Policies related to Own workforce	
Survey	NomoGaia	NGO	United States	35.S1-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	See specific comment on Excel Spreadsheet.	S1	Disclosure Requirement S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	
Survey	NomoGaia	NGO	United States	35.S1-3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	This is one instance where lumping together material risks, implacts and opportunies is not helpful. Disclosure of impact key actions should be specific and detailed. Human rights risk reporting is universally general and vague.	S1	Disclosure Requirement S1-3 - Actions and Resources related to Own workforce	
Survey	NomoGaia	NGO	United States	35.S2-1.	Do you agree with the amendments of this chapter?	I agree		S2	Disclosure Requirement S2-1 - Policies related to value chain workers	
Survey	NomoGaia	NGO	United States	35.S2-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	There should be required disclosure on how the undertaking communicates the existance of, and access method to, its human rights grievance mechanisms. Many companies and institution have such mechanisms but they do not sufficiently publicize them to make them know and so used. Also, the UNGP 31 Effectiveness Criteria are good general principles but they do not state criteria that can be used to ensure that a grievance mechanism is effective or porvides effective remedy.	S2	Disclosure Requirement S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	
Survey	NomoGaia	NGO	United States	35.S2-3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	This is another instance where lumping together risk, impacts and opportunies is counter productive. Key actions taken in respose to negative human rights impacts need to be specifically disclosed as do remedies.	S2	Disclosure Requirement S2-3 - Actions and resources related to value chain workers	
Survey	NomoGaia	NGO	United States	35.S2-4.	Do you agree with the amendments of this chapter?	I agree		S2	Disclosure Requirement S2-4 - Targets related to value chain workers	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	NomoGaia	NGO	United States	35.S3-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	There should be a required disclosure on how the undertaking makes its human rigths grievance mechanisms know to potential claimants.	S3	Disclosure Requirement S3-1 - Policies related to affected communities	
Survey	NomoGaia	NGO	United States	35.S3-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	If an undertaking takes the position that it has recieved FPIC from an indigenous people it should disclosure that contention and describe the project or actions consented to. This is abolutely key to allow FPIC claims to be publicly addressed.	S3	Disclosure Requirement S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	
Survey	NomoGaia	NGO	United States	35.S3-3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Key actions for human rights impacts need to be specifically describd.	S3	Disclosure Requirement S3-3 - Actions and resources related to affected communities	
Survey	Institute for Human Rights and Business	NGO	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The proposals encompass the maximum level of possible simplification. Any further simplification would undermine the goals of the ESRS and the EU's wider goals. We welcome the move away from an approach that is too prescriptive and may result in companies focusing on disclosure compliance rather than risk prevention and mitigation. However, this draft places too much hope on good practice by business, which will result in incomparable data and an uneven playing field. We suggest that a middle ground be sought by providing additional guidance, such as (i) The examples included in the previous version (ii) Guidance for transition plans, which many companies still lack clarity on (iii) Sector-specific approaches with dedicated disclosures or guidance documents, allowing the identification of sector-wide risks and a level playing field between businesses, without overburdening them.			
Survey	Institute for Human Rights and Business	NGO	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree				
Survey	Institute for Human Rights and Business	NGO	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We welcome the move away from an approach that is too prescriptive and may result in companies focusing on disclosure compliance rather than risk prevention and mitigation. However, this draft places too much hope on good practice by business, which will result in incomparable data and an uneven playing field. We suggest that a middle ground be sought by providing additional guidance, such as (i) The examples included in the previous version (ii) Guidance for transition plans, which many companies still lack clarity on (iii) Sector-specific approaches with dedicated disclosures or guidance documents, allowing the identification of sector-wide risks and a level playing field between businesses, without overburdening them.			
Survey	Institute for Human Rights and Business	NGO	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree				
Survey	Institute for Human Rights and Business	NGO	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	While we understand the benefit of a shorter ESRS, we would welcome the retention of the "May disclose" reporting points as they can provide a helpful framework for frontrunners who want to go beyond simple compliance. If preferable, these reporting points may be included in an Appendix to the ESRS. We welcome the move away from an approach that is too prescriptive and may result in companies focusing on disclosure compliance rather than risk prevention and mitigation. However, this draft places too much hope on good practice by business, which will result in incomparable data and an uneven playing field. We suggest that a middle ground be sought by providing additional guidance, such as (i) The examples included in the previous version (ii) Guidance for transition plans, which many companies still lack clarity on (iii) Sector-specific approaches with dedicated disclosures or guidance documents, allowing the identification of sector-wide risks and a level playing field between businesses, without overburdening them.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Institute for Human Rights and Business	NGO	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	The relief on financial effects is concerning. Financial effects are a key principle of financial materiality and are also embedded in the IFRS. While we understand the difficulty in assessing anticipated financial effects, the ESRS is a key opportunity to drive methodological and technical innovation for these assessment. While initial disclosures will be limited, they will be crucial, and data will improve over time. We strongly recommend this relief be removed. The relief for "undo cost and effort" is too generic. It will allow companies to omit critical KPIs and create an uneven playing field. While it is important to reduce the burden, this is already achieved through (i) the materiality process (ii) the reduction in the number of "shall disclose" reporting indicators and (iii) the removal of the "may disclose" indicators, which are the ones that may be omitted if data collection is deemed too difficult. If further relief is required, we recommend qualifying statements.			
Survey	Institute for Human Rights and Business	NGO	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	The relief for "undo cost and effort" is too generic. It will allow companies to omit critical KPIs and create an uneven playing field. While it is important to reduce the burden, this is already achieved through (i) the materiality process (ii) the reduction in the number of "shall disclose" reporting indicators and (iii) the removal of the "may disclose" indicators, which are the ones that may be omitted if data collection is deemed too difficult. If further relief is required, we recommend qualifying statements.			
Survey	Institute for Human Rights and Business	NGO	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	The relief on financial effects is concerning. Financial effects are a key principle of financial materiality and are also embedded in the IFRS. While we understand the difficulty in assessing anticipated financial effects, the ESRS is a key opportunity to drive methodological and technical innovation for these assessment. While initial disclosures will be limited, they will be crucial, and data will improve over time. We strongly recommend this relief be removed. If the relief is to be retained, we recommend option 1 be prioritised over option 2.			
Survey	Institute for Human Rights and Business	NGO	United Kingdom	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree				
Survey	Institute for Human Rights and Business	NGO	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	We strongly support the closer alignment with the IFRS which will simplify reporting and allow greater interoperability			
Survey	Institute for Human Rights and Business	NGO	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Institute for Human Rights and Business	NGO	United Kingdom	22.S1	Comments on deleted datapoints in ESRS S1	I partially agree and partially disagree	The disclosure requirement for adequate wages is inadequate as it requires companies to determine whether wages in each context align with ILO wage-setting principles. This process will be burdensome for companies and will not allow fair comparisons. The disclosure should be amended to reference adequate, living or fair wages, benchmarked against available criteria by the ILO or - ideally - developed by the EU Commission. The percentage of workers who took family-related leave should be reintroduced as part of the work-life balance metric.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Institute for Human Rights and Business	NGO	United Kingdom	22.S3	Comments on deleted datapoints in ESRS S3	I partially agree and partially disagree	We strongly support the retention of sector-agnostic standards ESRS S3 (Affected communities) which requires "an explanation of the general approach the undertaking takes to identify and manage any material actual and potential impacts on affected communities in relation to communities' economic, social and cultural rights (for example, adequate housing…)". With the housing crisis getting increasingly worse across Europe, it's crucial that this reference be retained in the final ESRS.			
Survey	Institute for Human Rights and Business	NGO	United Kingdom	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Institute for Human Rights and Business	NGO	United Kingdom	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Institute for Human Rights and Business	NGO	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Institute for Human Rights and Business	NGO	United Kingdom	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	Institute for Human Rights and Business	NGO	United Kingdom	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadequwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The disclosure requirement for adequate wages is inadequate as it requires companies to determine whether wages in each context align with ILO wage-setting principles. This process will be burdensome for companies and will not allow fair comparisons. The disclosure should be amended to reference adequate, living or fair wages, benchmarked against available criteria by the ILO or - ideally - developed by the EU Commission.			
Survey	Institute for Human Rights and Business	NGO	United Kingdom	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	The previously drafted gender pay gap metric is more appropriate and should be included ahead of this revised version			
Survey	Save the Children	NGO	Sweden	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	Save the Children believes that it is important that the double materiality approach (DMA) has been maintained in the simplification efforts as well as its alignment with the due diligence steps and international standards. Save the Children also welcomes the definition of affected stakeholders that explicitly includes "persons in vulnerable situations" (now AR 10), as children are part of this group. This is in line with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines on Multinational Enterprises for Responsible Business Conduct. Specifically considering children in the DMA will allow companies to identify and assess specific impacts on children that are often severe, but many times remain invisible. Any further simplification would misalign the ESRS with international standards and companies' practice, thus creating different approaches to DMA that would make comparability among sustainability reports challenging.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Save the Children	NGO	Sweden	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Save the Children agrees that the maintenance of the 4-part structure of the social standards is welcome as impacts, risks and opportunities vary depending on the type of stakeholders. This allows preparers to better understand the issues and communicate them internally and externally. Conversely, in the social topical standards, requirements to further disclose the characteristics of the undertaking's stakeholders, including whether these are persons in vulnerable situations, such as children and young workers, have been deleted (ESRS S1 DR related to ESRS 2 SBM-3, AR 8; ESRS S2 DR related to ESRS 2 SBM-3, AR 8; ESRS S3 DR related to ESRS 2 SBM-3, 9(a); ESRS S4, DR related to ESRS 2 SBM-3, 10(a)). This amendment ignores that impacts on different stakeholders requires different action and that a company's strategy and business model might affect stakeholders differently, such as children. For example, as exemplified by the UN Committee on the Rights of the Child in its General Comment no 25 on "children's rights in the digital environment": "The digital environment includes businesses that rely financially on processing personal data to target revenue-generating or paid-for content, and such processes intentionally and unintentionally affect the digital experiences of children. Many of those processes involve multiple commercial partners, creating a supply chain of commercial activity and the processing of personal data that may result in violations or abuses of children's rights, including through advertising design features that anticipate and guide a child's actions towards more extreme content, automated notifications that can interrupt sleep or the use of a child's personal information or location to target potentially harmful commercially driven content". Absence of this information from sustainability reports would impede investors from assessing the undertaking's sustainability performance. Save the Children recommends re-instating these DR and AR in the social standards.			
Survey	Save the Children	NGO	Sweden	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	Save the Children	NGO	Sweden	22.ESRS2	Comments on deleted datapoints in ESRS 2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Save the Children suggests that in ESRS S1 new para 2: the UN Convention on the Rights of the Child should be added to align with the text of the CSRD (Recital 49). ESRS S1 14(b): information on whether child labour is widespread or systematic in the context where companies operates and the operations that are at significant risk of incidents of child labour is important information to help companies identify and manage their material impacts. Such information is necessary already at the DMA stage. This information is also relevant for investors and users to assess the performance of the undertaking. ESRS S1 new para 34(d): parental leave is an equally important datapoint to achieve both gender equality and children's rights. Evidence shows that longer periods of paid parental leave (for both mothers and fathers) improve child health and lower poverty. ESRS S1 old para. 93(b): the datapoint on the percentage of entitled employees that took family related leave with a gender breakdown is essential to understand the real effectiveness of companies' policies as it can indicate whether there are barriers to employees in taking advantage of existing work-life balance policies. ESRS S1-1 old AR13: the description of existing policies on child labour is essential information for both investors and other users. In addition, when it comes to children's rights this is something that most companies already disclose. ESRS S1 DR related to ESRS 2 SBM-3, AR 8; ESRS S2 DR related to ESRS 2 SBM-3, AR 8; ESRS S3 DR related to ESRS 2 SBM-3, 9(a); ESRS S4, DR related to ESRS 2 SBM-3, 10(a): see answer to question 14.			
Survey	Save the Children	NGO	Sweden	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Save the Children welcomes the fact that there is no change to the definition of child labour in the Glossary as it is aligns with the international child rights legal framework (UN Convention on the Rights of the Child and ILO Conventions).			
Survey	Stockholm Resilience Centre	Academia	Sweden	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	We note grave concerns with the amended text as double materiality has been weakened in both definition and operationalization. In consequence, clarity regarding definition and approach to DMA are compromised. For example, deletion of §28 ESRS 1 appears dubiously justified under the claim that this streamlines content and simplifies understandings of the DMA, when in fact proposed changes (reformulation under §22) reduce the clarity of the DMA process. The CSRD/ESRS rests on the DM principle. The amended text must therefore explicitly specify that prominence is given to the double materiality as a general filter, and that requirements are subject to it. However, the text now refers only to materiality, introducing ambiguity and room for misinterpretation. We see serval risks with this amendment: Ambiguity will likely mean that companies use financial materiality as a general filter, in which case many environmental impacts not deemed financially material will be excluded. Different undertakings will (or have the flexibility to) identify different material impacts, even if they operate in the same sectors. This necessarily undermines reliability and comparability of said information for investors. Underreporting will create potentially large gaps in impact information, undermining assessments of risks and opportunities. How large a gap in impact information will remain unknow as impact reporting is not guided by any scientific benchmark. This will create large uncertainties regarding the representativeness and usefulness of the information generated by ESRS. Above listed issues will undermine the decision-usefulness of the information for investors, as reliable risk estimates fundamentally depend on credible impact assessments. We argue for a DMA process underpinned by scientific guidance, and that the EC solicit the expertise of the scientific community to develop this. Our organization stands ready to accept.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Stockholm Resilience Centre	Academia	Sweden	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Guidance is valuable, but the complexity by which environmental impacts translate to risks introduces the probability of underreporting systemic risks because of a lack of understanding about the causal connections between the two. SRC recommends erring on the side of gross impact disclosure, especially for environmental impacts where systemic risks remain despite mitigation (e.g. biodiversity loss, climate tipping points). We recognize the tension/ debate in this regard and strongly recommend that EFRAG collaborate with scientific knowledge partners such as SRC and iDiv and others to ensure that streamlining does not come at the expense of relevance, reliability, and verifiability. This should be done in revision process and the aforementioned institutions express their willingness to help with field testing. Subjective materiality remains an issue for this ESRS 1 guidance (see Q11). We therefore emphasize that environmental impacts are inherently linked to human rights issues and must therefore be prioritized in a way that advances severity considerations first and foremost. For this, scientific knowledge and grounding for materiality assessments is crucial. Remediation impacts must be assessed in accordance with scientific knowledge and praxis, and valuation guidance will be needed to translate these impacts into disclosures. We believe such guidance should be informed in dialogue with scientific knowledge partners in the revision process.			
Survey	Stockholm Resilience Centre	Academia	Sweden	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	In line with our response to Q 11, we are concerned that the simplification and amendment of text has introduced an ambiguity in the materiality filter that is to guide all subsequent reporting requirements for a reporting organization. As noted under Q11, the effect of this ambiguity is likely to be a reduced usefulness of the information for all users of the disclosures, as it will undermine comparability, increase uncertainty surrounding the reliability and representativeness of the information, which in turn affects its reliability for further risk assessments.			
Survey	Stockholm Resilience Centre	Academia	Sweden	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	We recognize the tension between costs and preserving the transparency needed to achieve the objectives of the EU Green Deal. However, we have grave concerns that the current amendments and the introduced relief for "undue cost or effort", including for the calculation of metrics, will encourage perpetual underreporting. For some of the environmental impact data in the DR it is natural that the initial implementation and subsequent internal reorganization to gather such information may result in costs. As with any initial investment, this cost would be expected to abate over the subsequent years. Introducing this relief poses a high risk that companies who do not currently have appropriate data structures in place to gather the information will deem the cost too high and hence refrain from reporting, referring to this relief. This would be a highly negative outcome of the amendment. We also find the introduced relief for lack of data quality of metrics (ESRS 1 §91) to be problematic as this will undermine the relevance and usefulness of the disclosures. For both undue costs and data quality relief we recommend a structured and time limited approach, where a transition period can be granted for gradual implementation, but where after a given time period the relief shall be phased out. This would reduce the likelihood of perpetual underreporting or poor quality disclosures.			
Survey	Stockholm Resilience Centre	Academia	Sweden	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We strongly support these exceptions related to ESRS E 3 and 4.			
Survey	Stockholm Resilience Centre	Academia	Sweden	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	Faithful presentation requires that disclosed information be complete, neutral, and accurate. As noted under Q11, we see a real and tangible risk that unless the materiality filter to be used is clarified as being a double materiality filter, there is a high risk that fair presentation will be compromised as environmental and social impacts that are not deemed to be immediately financially material are likely to be excluded. This will be only a partial presentation of information and will negatively affect the usefulness of said information for both primary users and other users. We call for a clarification of fair presentation in relation to double materiality and for an involvement of the scientific community in anchoring the Qualitative Characteristics of Information for environmental impacts in science. This would ensure that the fundamental characteristics relating to relevance, completeness, neutrality, accuracy, verifiability and comparability would be satisfied. Furthermore, we suggest that guidance be developed together with scientists to support the DMA process as well as other critical decisions, such as 'appropriate level of aggregation' (e.g. ESRS 1 §51), which if left up to the discretion of individual reporting organizations will likely undermine the principle of fair presentation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Stockholm Resilience Centre	Academia	Sweden	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We strongly maintain that intensity targets, while capturing efficiency, are highly likely to mask rising emission levels. Allowing investors to continue without absolute targets de-emphasizes pressure on them to not just ensure their portfolio companies have targets but also timebound milestones for significant reductions. Cumulative assessments are needed to ensure alignment with EU targets and global climate goals, and for this we need absolute targets. We recognize that growth of companies with relatively low carbon intensity measures will result in a growing absolute carbon footprint of that asset. If this growth means that other more carbon intense companies are removed from the market this should not affect the overall carbon footprint of an investor's portfolio and would thus be a non-issue for investors with an absolute target. However, if the entire market grows and companies with a higher carbon intensity remain on the market, supported by investors and without any timebound targets to reduce absolute (and relative) emissions, this will result in failure to meet the net zero targets and transgression of critical environmental boundaries.			
Survey	Stockholm Resilience Centre	Academia	Sweden	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Biodiversity loss is driven by environmental pressures and IPBES has identified 5 key direct drivers/pressures. In corporate reporting it is therefore important to make a distinction between the drivers of biodiversity loss/change and biodiversity outcomes. We suggest that ESRS adopt an approach where targets for biodiversity are quantitative, location-specific, and anchored in key drivers of biodiversity change identified by IPBES. Targets should include: •GHG emissions •Land(/sea) use change •Freshwater use •Pollution •Invasive species All targets should specify a baseline year, a target year, and a geographical scope—preferably one target for each operational location. If quantitative targets are unavailable, undertakings should be required to provide a plan for developing such targets. This approach would ensure that biodiversity targets are linked to the underlying drivers of biodiversity loss and not to convoluted biodiversity metrics, such as biodiversity footprints. Such tools will not offer a consistent and comparable measure even for the same undertaking over time as the underlying models and characterization factors change as science evolves. Furthermore, to output an accurate biodiversity metric footprinting tools require location specific data on environmental pressure. Used with revenue data they return output measures that do not satisfy the qualitative characteristics of Information as stated in Appendix B or ESRS 1. An approach focused on targets for drivers of biodiversity loss would also further strengthen the alignment of ESRS with the Global Biodiversity Framework. However, we do note that the current structure of the topical standards makes these targets awkward, since the key pressures driving biodiversity loss are dispersed across different standards (see response to Q33). Despite this, these biodiversity-related targets would provide measurable and actionable information that is essential for businesses to mitigate biodiversity risk and improve their sustainability strategy.			
Survey	Stockholm Resilience Centre	Academia	Sweden	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	We feel compelled to comment on the overall structure of the ESRS in relation to biodiversity. Biodiversity loss is driven by environmental pressures. In corporate reporting it is therefore important to make a distinction between the drivers of biodiversity loss/change and biodiversity outcomes. We note a somewhat awkward structure of the ESRS, where E1-3 provide information on three key drivers of biodiversity change identified by IPBES (climate, water and pollutants), but E4 asks for information on biodiversity outcomes. The remaining two key drivers of biodiversity (land/sea use and invasive species) are 'hidden' as a DR under different topical standards. land/sea use change DR appear under E1 and E4 and invasive species appears as a sub-topic within E4 but is only a DR if biodiversity is deemed material. Combined with the issues identified in relation to DM (see response to Q11) this structure risks exclusion or underreporting of information about corporate pressures representing these two drivers of biodiversity loss which are essential for scientifically grounded assessments of biodiversity impacts. Such assessments are generally modelled since biodiversity outcomes most often cannot be measured directly without significant costs. Biodiversity impact models do, however, require information on the key environmental pressures and their location. In its current form, the essential information on environmental pressures driving biodiversity loss are scattered across 4 different topical sandards, and each must pass through the materiality filter before becoming a required datapoint.			
Survey	Stockholm Resilience Centre	Academia	Sweden	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	We believe the issues with the structure will result in many companies not disclosing information about some or all of their environmental pressures (and locations) in a way that makes reliable and science-based biodiversity impact assessments possible. We emphasize that collection/disclosure of environmentally material environmental pressures by companies could and should be combined with empirical measures of biodiversity impacts as these methods develop. ESRS should therefore encode this flexibility to report empirical measures of biodiversity (e.g. eDNA) but this should be complementary, and not replace mandated disclosures about environmental pressure. We note that definition of 'near' to Biodiversity Sensitive Areas is now included in the new ARs, but given the importance for this definition in guiding DR E4-2, we find the definition lacking in clarity. Who determines the capacity for negative impact and based on what? Who evaluates the quality and relevant characteristics of a buffer zone, and based on what? For the AR8 §20 to have meaningful effect we recommend that scientifically anchored guidance be developed to guide the determination of 'near' in the context of BSAs. We note that DPs that covered resilience and strategy have been removed from the topical standard and replaced with a new focus on Transition Plans, where this type information should be provided instead. However, Transition Plans shall only be disclosed if they are already publicly available from the organization, leading to there being no obligation or urgency to develop such a plan. In short, it becomes very easy to opt out of disclosing information on strategy even if it is highly material.			
Survey	Stockholm Resilience Centre	Academia	Sweden	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	We note and strongly support that the new DR E4-5 centralizes the obligation to report location for material biodiversity impacts. However, the disaggregation principle must be accompanied by science-based guidance regarding what can be considered an appropriate level of aggregation/disaggregation (see feedback on development of scientific guidance Q11). In DPs focusing on disclosure of materials or products, a new writing has been added that "key products/materials" should be disclosed. This new focus on 'key' introduces room for undertakings to themselves decide what constitutes a key material to report, leading to underreporting of environmentally harmful products or materials if they are not considered significant enough by the reporting organization.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Stockholm Resilience Centre	Academia	Sweden	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Guidance is valuable, but the complexity by which environmental impacts translate to risks introduces the probability of underreporting systemic risks because of a lack of understanding about the causal connections between the two. Simplification must not dilute the essential message: companies operate within ecological limits. ESRS should remain a tool to effectively connect and align corporate reporting with the broader EU and international framework of economic and environmental instruments, including the Green Deal, Paris Agreement, and CBD/GBF. The structured nature of this consultation questionnaire means we have not been able to provide detailed suggestions for changes but we strongly urge EFRAG to include scientific knowledge partners in the revision process.			
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We believe that the proposed changes to the double materiality assessment (DMA) represent a significant step forward in terms of clarity and simplification, but do not fully strike the right balance between simplification and robustness. On the positive side, the clarification of the limits to be considered in identifying impacts, risks, and opportunities (IROs), the elimination of redundancies, and the integration of inputs from risk management processes all represent progress. These measures increase consistency, reduce reporting costs, and enable a more effective link between financial and impact materiality. The option to report only sub-topics when they are materially relevant is also a practical improvement, as it avoids unnecessary obligations and may encourage companies outside the CSRD's scope to engage in this exercise as a useful tool. However, the revisions raise important risks. The generalized openness to the top-down approach, without clear criteria for its application, may lead large entities to adopt less in-depth methodologies, weakening comparability and limiting the usefulness of DMA as a strategic tool for sustainability management. Similarly, the possibility of conducting only qualitative assessments, without differentiating time horizons or breaking down severity into scale, scope, and irremediable nature, reduces objectivity and undermines credibility. This excessive simplification creates ambiguities that can be exploited to minimize transparency. The clarification that positive impacts cannot be confused with legal or regulatory obligations is a valuable development, as is the reinforcement of the need to disclose ongoing remediation actions and their results when a negative impact is material. These measures strengthen transparency and alignment with international best practices, reducing risks of greenwashing.In summary,we recognize important progress, but argue that simplification should not compromise the methodological integrity of DMA.Greater clarity is needed on when and for whom the top-down approach is justified, as well as minimum safeguards for rigor in qualitative analysis.			
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We acknowledge that the new guidance on how to consider remediation, mitigation, and prevention actions in assessing the materiality of negative impacts represents a valuable effort to address one of the most debated implementation issues — the so-called "gross vs. net" dilemma. In principle, clarification enhances transparency and comparability by establishing when to consider the effect of actions and by requiring disclosure of ongoing remediation efforts. It also prevents companies from disregarding highly relevant impacts simply because they operate in sectors with strong preventive measures already in place. However, we share some of the concerns raised within EFRAG and by practitioners. The provisions are complex and create risks of inconsistent application across entities. In particular, the rule that potential impacts must be assessed on a "gross" basis when significant ongoing actions are required can lead to excessive reporting and confusion. At the same time, allowing entities to take credit for actions implemented before the occurrence of an actual impact introduces subjectivity and may reduce comparability between entities. The balance between recognizing proactive risk management and avoiding under-reporting of material issues remains fragile. We agree with the clarification that remediation actions implemented in the same reporting period should not reduce the severity assessment of actual negative impacts. This reinforces accountability and ensures that companies remain transparent about incidents, regardless of the corrective measures taken afterward. Similarly, the clarification that positive impacts cannot be offset against negative ones is a relevant safeguard to ensure transparency and avoid misrepresentation. The guidance provided is a step forward in addressing a long-standing gap, but it still requires clarification and stronger safeguards to ensure consistent application. Clearer thresholds, illustrative examples, and minimum criteria for when gross versus net assessment applies would be essential to ensure that the process generates useful and comparable information across sectors.			
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The proposed amendments to improve readability, conciseness, and connectivity of ESRS sustainability statements represent a positive step forward. The introduction of clearer structures, harmonized reporting logic, and the option to include executive summaries all help to reduce complexity and make disclosures more user-friendly. These changes address legitimate concerns that reports under the original ESRS risked becoming excessively lengthy and difficult for stakeholders to navigate. However, the flexibility in structuring and the strong focus on conciseness may open the door for entities to exclude relevant information under the justification of simplification. The shift to more selective disclosures, while valuable to avoid immaterial detail, creates a risk of underreporting. Connectivity with financial reporting was enhanced through closer alignment with IFRS S1/S2, which is a positive development. But it should not come at the cost of reducing the richness of the information. For instance, anticipated financial effects (Option 2) limited to qualitative disclosures would severely weaken the link between sustainability and financial information. In summary, while we support the direction of improved usability and connectivity, the amendments need clearer safeguards to ensure that conciseness does not undermine transparency. The standards should ensure that the undertakings continue to provide a comprehensive and balanced picture of its actual impacts, risks and opportunities.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We recognize that the proposed restructuring of ESRS 2 and the topical standards addresses some of the key concerns raised in the first reporting cycle. By consolidating general disclosure requirements (policies, actions, targets, and metrics) into ESRS 2 and removing duplications from topical standards, the amendments simplify the architecture, reduce preparation effort, and improve usability, while contributing also to a less repetitive content. This creates clearer reporting logic and better connectivity across disclosures, which is consistent with feedback from preparers and advisory firms. That said, we do not consider that the amendments fully strike the right balance. Without clear safeguards, there is a real risk that entities will report selectively, omitting material information that is critical for stakeholders. The simplification effort should not undermine the ESRS ambition to provide comprehensive, decision-useful and comparable sustainability information. For instance, a company with suppliers in over 30 countries, including several with high risk of forced or child labor, might choose to disclose information only for the 'top 10' countries, being that this is now the criteria. As a result, serious human rights issues in smaller markets could be left unreported, even if they are critical for stakeholders to assess.			
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We acknowledge that the amendments significantly improve the clarity and accessibility of the ESRS. Simplified language, harmonized structures across standards, and the introduction of illustrative guidance contribute to making the standards more user-friendly, particularly for first-time reporters. These changes directly address concerns raised during the first reporting cycle about complexity and technical jargon.			
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The introduction of the Non-Mandatory Illustrative Guidance (NMIG) represents a positive step toward supporting companies, especially those with limited experience in sustainability reporting, in the implementation of the ESRS. However, its non-binding nature raises questions about its practical effectiveness, consistency of application, and alignment with the CSRD's objectives. The NMIG provides practical examples, templates, and interpretative support that can help companies understand how to apply complex disclosure requirements, particularly in areas such as double materiality, value chain boundaries, and environmental targets. It is especially helpful for undertakings who are reporting for the first-time, who may lack internal expertise or resources to interpret the standards on their own. It can also promote convergence in reporting practices across sectors and jurisdictions, improving comparability and auditability. Being non-mandatory, companies may choose to ignore or selectively apply the guidance, leading to inconsistencies in how disclosures are prepared and interpreted. The lack of formal status may also weaken its authority in regulatory or enforcement contexts, especially if national regulators interpret the ESRS differently. Additionally, there is a clear risk that auditors and assurance providers may not treat the NMIG as a reference point, being that it is non-biding, which could then create gaps between preparers and verifiers. To enhance the usefulness and clarity of the NMIG, we recommend that EFRAG: • Clarify the expected use of the NMIG in the context of assurance and supervisory review. • Consider elevating certain parts of the NMIG to mandatory application guidance, especially where consistent interpretation is critical (e.g., materiality assessment, value chain scope). • Ensure that the NMIG is regularly updated to reflect evolving best practices, sector-specific needs, and alignment with international frameworks (e.g., ISSB, GRI, TNFD).			
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The amendments introducing new burden reliefs respond to a legitimate concern raised by many preparers, especially first-time reporters and smaller entities: the cost and effort of gathering and validating data across complex value chains. Allowing the use of reasonable and supportable information without undue cost or effort and permitting estimates or partial coverage when data is not fully available are practical measures that will reduce pressure and make implementation more feasible. The transitional reliefs and the flexibility in scope adjustments following acquisitions and disposals are also pragmatic and welcome. On the other hand, we are concerned that the reliefs, as currently drafted, may create too much discretion and risk undermining transparency. While burden reduction is important, it must not compromise the credibility and comparability of disclosures. For instance, allowing entities to omit parts of their value chain due to data limitations could result in material blind spots, particularly in sectors with high upstream or downstream impacts. Without clear guidance and disclosure obligations about the scope of estimates, users may find it difficult to assess the reliability of the reported information. We also note that while the reliefs are designed to align with ISSB's IFRS S1 and S2, the balance is not fully achieved. In certain cases, the ESRS reliefs appear broader, which could reduce interoperability. Investors and other stakeholders expect consistency between the European and global frameworks, and any perception of "lowering the bar" in ESRS may weaken confidence in the comparability of sustainability reporting.			
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	The relief was necessary to make implementation feasible, but it must be framed as either a temporary option or be better explained. Companies should demonstrate progress year-on-year in improving data quality, ensuring that the relief does not become a permanent justification for incomplete reporting. In situations where data quality on metrics is limited this relief addresses a real challenge for many undertakings, particularly smaller entities or first-time reporters. The flexibility to use reasonable and supportable information available without undue cost or effort reflects practical realities of data collection across complex value chains. It also aligns ESRS more closely with ISSB's IFRS S1 and S2, which recognize the need for proportionality in early implementation. This should reduce reporting costs and provide a more realistic path to full compliance over time. However, if companies systematically claim data quality limitations, the credibility and comparability of sustainability disclosures may be undermined. Stakeholders expect transparency about how data gaps are handled, and relief cannot become an excuse for omitting material information.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We strongly support Option 1 as the most balanced approach to anticipated financial effects. It maintains the obligation to disclose quantitative information wherever possible, while providing relief in cases where measurement is impracticable or where uncertainty is so high that figures would not be meaningful. This is consistent with the treatment in IFRS S1 and S2, ensuring greater interoperability between ESRS and global standards. It also has the merit of clarifying conditions for relief, which in our view, provides sufficient flexibility to reduce burden while maintaining the credibility and comparability of reports. It acknowledges the challenges undertakings face, especially in early years, but still reinforces the principle that anticipated financial effects are fundamental to connectivity between sustainability and financial reporting. Option 2 would downgrade disclosures to a purely qualitative basis, leaving quantitative information entirely voluntary. This would represent a step backwards in sustainability reporting, especially in areas such as climate change, biodiversity, or pollution, where quantitative disclosures are on their way to became critical to investor decision-making.			
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	The amended paragraphs 40, 41, and 42 of ESRS E1 represent a clear effort to simplify disclosure requirements on anticipated financial effects of climate-related risks and opportunities. This simplification aligns with the broader goal of reducing the reporting burden, particularly for companies with limited resources or technical capacity. While the amendments improve clarity and alignment with IFRS S2, they may not fully meet the needs of users who require detailed and decision-useful information to assess climate-related financial risks and opportunities. The revised structure is more concise and readable, which facilitates implementation and may improve consistency across companies. The inclusion of a methodology disclosure requirement (paragraph 40(e)) enhances transparency and helps users understand how figures were calculated. Furthermore, alignment with IFRS S2 and the expectations of financial institutions supports interoperability and comparability in capital markets. However, the removal of detailed breakdowns, such as disaggregation by acute versus chronic risks, energy-efficiency classes, and expected liabilities, reduces the granularity of information available to users. The omission of scenario analysis references, previously linked to resilience assessments, also weakens the connection between strategic climate planning and financial disclosures. Moreover, the potential financial benefits from climate-related opportunities, previously addressed in paragraph 69, are no longer explicitly covered. This reduces visibility into how companies intend to capitalize on the transition to a low-carbon economy.While simplification may reduce reporting effort,it risks undermining the usefulness of disclosures for investors, analysts, and other stakeholders who need to understand the financial materiality of climate risks across time horizons, the strategic positioning of companies regarding climate opportunities, and the resilience of business models under different scenarios. To strike a better balance, we recommend that EFRAG reintroduce selected elements from the previous version, such as scenario analysis references and opportunity-related disclosures, and develop NMIG examples to guide companies in quantifying anticipated financial effects.			
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	There is a need for caution when considering whether the balance is fully achieved. While simplification has been delivered in the ESRS, some elements diverge from ISSB treatment and may cause confusion. For example, the option of purely qualitative disclosures for anticipated financial effects (Option 2) is not aligned with IFRS S1/S2, which expect quantitative information whenever possible. Allowing Option 2 would reduce comparability and undermine interoperability at precisely the point where convergence is most needed. Similarly, the broader reliefs introduced in ESRS risk creating a perception that European reporting is less rigorous than the ISSB baseline, which could damage the credibility of EU disclosures in global markets. However, one of the key strengths of the Amended ESRS is the clear effort to improve interoperability with the ISSB's IFRS S1 and S2. This alignment is critical for preparers operating internationally, who would otherwise face duplication and inconsistencies when reporting under both frameworks. The closer convergence on materiality (decision-useful information for users), the reinforcement of anticipated financial effects disclosures, and the harmonized structure around governance, strategy, risk management, and metrics/targets are positive steps.			
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	The deletion of voluntary "may disclose" datapoints improve usability and are likely to reduce costs. This simplification also increases focus, avoiding long reports filled with immaterial or redundant information, which stakeholders often found difficult to navigate. However, we are fully aware that there are risks of weakening the comprehensiveness of sustainability reporting in the EU, simplification should not come at the expense of transparency. In particular, steps must be taken to ensure that the remaining datapoints continue to capture the information that is necessary to fulfil the objectives of the EU Green Deal, especially in relation to climate, biodiversity, and social equity. In conclusion, while the reduction in datapoints is an important step towards proportionality, entities should be encouraged to disclose beyond the minimum when information is material, and EFRAG should closely monitor whether critical information gaps emerge under the amended framework.			
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree that the six datapoints identified are appropriately moved from voluntary ("may") to mandatory ("shall"), as they represent indicators that are decision-useful and good to ensure transparency.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	The rationale behind introducing these four additional mandatory datapoints seems reasonable, as they address areas of high stakeholder relevance and align ESRS with ongoing EU policy developments.			
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	Explicitly requiring undertakings to adopt the principle of fair presentation when preparing ESRS sustainability statements is an important clarification. This step strengthens the materiality filter by shifting the emphasis away from a purely compliance- and checklist-driven approach, towards one that prioritizes the faithful representation of material impacts, risks, and opportunities. Reducing the likelihood of excessive or immaterial information being reported, improving the relevance of disclosures for stakeholders. This amendment also enhances alignment with international standards. The concept of fair presentation is already embedded in IFRS Accounting Standards, ensuring conceptual consistency and interoperability. At the same time, adopting fair presentation introduces a necessary balance with simplification. One of the risks of the Amended ESRS is that over-simplification could create ambiguities and encourage companies to reduce reporting to the bare minimum. The fair presentation principle provides a safeguard. In conclusion, this amendment is both necessary and beneficial. It reinforces the purpose of the ESRS as more than a compliance exercise, ensuring that disclosures remain meaningful.			
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We do not support the exemption of financial institutions from reporting absolute GHG emission reduction targets. While intensity targets (e.g., emissions per unit of financing or investment) can provide useful insights into portfolio decarbonization pathways, they are insufficient on their own to convey the full scale of financed emissions and their alignment with global climate goals. There is a need to have information on both intensity and absolute figures to properly assess whether financial institutions are contributing to the EU Green Deal's objective of climate neutrality. We acknowledge the challenges faced by financial institutions in setting and achieving absolute reduction targets, given the reliance on client and investee data. However, this complexity does not justify exemption. There could be a way to put in place a phased-in approach with transitional reliefs, allowing institutions time to strengthen methodologies and data coverage. Exempting financial institutions from disclosing absolute GHG reduction targets would create a major gap in transparency and comparability, weakening both ESRS credibility and alignment with global standards.			
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	Under the previous ESRS, the requirement was clear: disclose for all countries where the undertaking employs 50 or more employees. This approach struck a fair balance between proportionality and decision-usefulness. It ensured that information was reported for all countries where there was a significant enough workforce to raise meaningful sustainability considerations, without being overly burdensome for entities with only very small presences globally. By limiting reporting to the "top 10 countries by workforce," the amendment risks excluding precisely those jurisdictions where social risks may be most acute, for example, countries with weaker labor protections, higher human rights risks, or systemic gender pay gaps. Fewer employees in such countries may still present material risks or impacts for both the company and affected stakeholders. Investors and regulators will lose visibility over these exposures, reducing the effectiveness for risk assessment. The argument of burden relief is not compelling. Once employee data is collected for workforce management, disclosing country-level information for all countries above the 50-employee threshold does not represent an unreasonable effort, especially considering the importance of these disclosures. We are in disagreement with the proposed amendment. The original threshold of 50 employees per country should be maintained, without a "top 10" limitation.			
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	There is value in clarifying the methodology for calculating adequate wages in non-EU countries. The hierarchy now proposed provides a clearer and more consistent framework for the undertakings. This reduces ambiguity, enhances comparability, and strengthens alignment with international human rights and labor standards. While the clarification is positive, practical guidance and safeguards will be necessary to ensure that entities apply the hierarchy in good faith and with sufficient rigor. For example, disclosure of the source, methodology, and assumptions used to determine adequate wages should be explicitly required. Without this, the datapoint risks becoming a minimal compliance exercise rather than a meaningful contribution to assessing social impacts in global operations. In conclusion, while we welcome clarification and agree with the direction of the amendment, we believe additional safeguards are required.			
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	I generally agree with the way the SFDR Principal Adverse Impacts (PAIs) have been incorporated into the Amended ESRS, because the approach delivers clear benefits in terms of regulatory coherence, interoperability and usability for financial market participants. By embedding SFDR datapoints directly into the ESRS architecture, undertakings can prepare one dataset that serves multiple reporting regimes (CSRD/ESRS, SFDR, EU Climate Benchmarks, and Pillar 3). This reduces duplication, provides clarity to investors subject to SFDR, and enhances consistency across the EU sustainable finance framework. As a suggestion for improvement, it would be very useful if each Disclosure Requirement (DR) explicitly included a reference indicating when a datapoint is linked to the SFDR. This would allow companies to immediately recognise that the information they are providing also fulfils an SFDR obligation, without having to consult a separate table or appendix. Such a direct reference within each DR would significantly improve usability and efficiency for preparers.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	EFRAG should review AR 26 in the Amended ESRS E4. While the original and now deleted AR 26 may have reflected approaches considered "outdated," it provided valuable methodological guidance for companies, particularly those in biodiversity-intensive sectors such as agriculture, forestry, infrastructure, and extractives, on how to define and disclose measurable biodiversity targets. Even non-traditional sectors (e.g., tourism, retail, real estate) are increasingly expected to address biodiversity impacts and dependencies. These sectors would benefit from practical examples such as habitat restoration (including urban habitats), nature-based solutions, or biodiversity-inclusive procurement practices. Moreover, the recommendations included in AR 26 were aligned with international frameworks, including the Kunming-Montreal Global Biodiversity Framework (Target 2 on restoration, Target 3 on conservation, Target 8 on minimizing impacts, and Target 15 on corporate disclosure), as well as guidance from the Taskforce on Nature-related Financial Disclosures (TNFD) and the Science-Based Targets for Nature (SBTN). The current AR on biodiversity targets (AR 17) appropriately emphasizes the importance of free, prior, and informed consent of local and Indigenous communities. However, it does not fully replace the practical function of AR 26, which offered concrete examples of how to express biodiversity-related targets in measurable terms. The absence of such examples may hinder companies' ability to operationalize biodiversity commitments, especially in sectors where biodiversity is not yet fully integrated into risk and impact management. Therefore, we recommend that EFRAG reintegrate a revised AR 26 that: • Retains examples such as the size and location of protected or restored areas, number of projects with improved ecological integrity, and recreated habitats; • Expands scope to include biodiversity investments, engagement with the value chain to reassess dependencies and impacts, and integration into procurement or land-use planning. Such guidance would support companies in setting material, sector-relevant, and actionable targets, while maintaining alignment with evolving global frameworks.			
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	While there is a need to acknowledge that simplification and burden reduction are important objectives of the Amended ESRS, removing this datapoint risks weakening transparency in an area that is central to social equity, fairness, and the EU's gender equality agenda. The unadjusted pay gap provides an important but limited insight, as it only measures average differences in pay between men and women without accounting for structural factors such as role, seniority, working hours, or contract type. The adjusted pay gap, by contrast, reflects whether employees performing comparable work receive equal pay. It is therefore a more accurate indicator of potential gender-based discrimination and of the effectiveness of company policies on equal pay and career progression. The adjusted gap is widely recognized as a best practice metric by investors, regulators, and civil society. Deleting it from ESRS may undermine the relevance of disclosures for users seeking to assess companies' progress on diversity, equity, and inclusion. Moreover, many undertakings calculate and disclose adjusted pay gaps, either voluntarily or in response to regulatory requirements in certain jurisdictions. It is recommended to reinstate the adjusted gender pay gap as a datapoint, to ensure that ESRS remain aligned with EU policy priorities on gender equality. Previously, this datapoint was voluntary, which allowed flexibility for entities with lower maturity while still encouraging leading companies to report. It could and should remain voluntary, but removing the option altogether is reductive.			
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	No, the current replacement and formulation of disclosure requirements G1-2 and G1-6 are not sufficient to meet the CSRD's objectives regarding SME protection. The previous G1-2 explicitly required companies to disclose policies to prevent late payments to SMEs and approaches to supplier relationships, including social and environmental criteria. This offered a clear mechanism to assess procurement practices and their impacts on SMEs. In the amended version, references to SMEs were removed, and the requirement reduced to a general statement on supplier relationships, mainly covering corruption and bribery. While aligned with simplification, this weakens visibility of SME-specific practices, particularly payment behavior and fair treatment. Companies may omit SME engagement altogether, reducing transparency and accountability. Similarly, the previous G1-6 required disclosure of average payment times, standard terms by supplier category (including SMEs), legal proceedings related to late payments, and contextual information on impacts. The amended version retains only two elements: standard payment terms (including SMEs) and number of legal proceedings. This shifts focus from impact to performance, eliminating requirements to explain how payment practices affect SMEs or to disclose improvement strategies. Such omissions undermine incentives for fairer practices, despite the CSRD's explicit aim of supporting SMEs. The removal of SME-specific disclosures limits stakeholders' ability to assess how companies contribute to or mitigate SME vulnerability, particularly in sectors where SMEs are structurally dependent on large buyers and where late payments have severe economic consequences. To align with CSRD objectives, we recommend that EFRAG: • Reintroduce SME-specific elements in G1-2 on payment policies and impact assessment; • Ensure G1-6 requires reporting on both performance (e.g., days to pay) and strategies to improve practices; • Include qualitative disclosures on SME engagement, such as support, capacity building, and fair contracting, within G1-2.			
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The Amended ESRS represents a meaningful attempt to simplify reporting while still aligning with the EU Green Deal, albeit the balance might not be fully achieved. On the positive side, consolidation of requirements, clearer wording, and the reduction of immaterial datapoints will reduce reporting fatigue and may help companies focus their disclosures on the most material impacts, risks, and opportunities. This is aligned with the Green Deal's objective of steering resources towards the sustainability issues that matter most, with the principle of fair presentation acting as a safeguard, discouraging box-ticking reporting and reinforcing the link between sustainability performance and the EU's ambitions. We support burden reliefs and proportionality, but simplification should not create loopholes that weaken transparency on systemic risks. The broadened acceptance of purely qualitative DMA assessments, reduced disaggregation requirements, and the possibility to omit parts of the value chain under "undue cost or effort" could lead to the omission of information critical for tracking progress on climate neutrality, biodiversity protection, and social justice. Similarly, the proposal to exempt financial institutions from absolute GHG reduction targets and to limit workforce disclosures to the "top 10 countries" would leave significant blind spots in areas that the Green Deal explicitly aims to address, sustainable finance, and safeguarding labor rights and fair working condition.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	GRACE - Empresas Responsáveis	Business association (other than association of financial institution)	Portugal	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	DGB	Trade union	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The materiality analysis is the cornerstone of sustainability reporting, as sustainability matters are reportable only if material impacts, risks, or opportunities are identified through this process. It is reassuring and important that double materiality has been preserved, ensuring a thorough approach to sustainability reporting. The principle of double materiality must always be upheld and must not be weakened by any simplification or dilution of the regulation. We support including stakeholder engagement and recognizing employees and their representatives as key stakeholders, as suggested in the new draft. However, their involvement should not only be "central" but "mandatory" in the DMA process. It must also be added in the draft that employee representatives must participate in all key steps of the materiality analysis process. Employee representatives need to be involved in all stages of the materiality analysis, as they directly represent the interests of the workforce and possess unique insights into the everyday operations and challenges faced by employees. The amended ESRS 1 AR 11 no longer includes the explanation on stakeholder involvement in the materiality assessment process. Specifically, the previous standard emphasized that: "Engagement with affected stakeholders is central to the undertaking's ongoing due diligence process (see chapter 4 Due diligence) and sustainability materiality assessment. This in-cludes processes to identify and assess actual and potential negative impacts, which then inform the assessment of material impacts for sustainability reporting." This clarification from section 3.1 of the old standard must be reinstated. Otherwise, there is a risk that employee representatives will not be properly involved in these processes and will have no real influence.			
Survey	DGB	Trade union	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	The draft suggests that when determining material impacts, only gross risks are considered, and existing mitigation measures are not taken into account. We consider it important that companies report not just their net impacts but also their gross impacts, and the proposed text maintains this principle. For this reason, we support the draft.			
Survey	DGB	Trade union	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Many explanations and examples, including guidance on calculations, have been removed. While this reduces the overall scope and complexity of the ESRS, it increases the need for external examples and support. Moreover, no prescribed structure of reporting is provided (e.g., general disclosures, environment, social, governance), leaving content organization to the company. This poses a risk to transparency and may make it difficult for users to locate the information they need.			
Survey	DGB	Trade union	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The elimination of duplicate requirements through the reassignment between general requirements (ESRS 2) and topic-specific standards significantly reduces the number of reporting points. However, it is unacceptable that the draft ESRS weaken stakeholder engagement by remov-ing essential reporting requirements on the involvement of employee representatives and other stakeholders. In particular, the deletion of reporting on strategic and business model changes in response to stakeholder views eliminates information that is crucial for transpar-ency and accountability. Equally concerning is the removal of provisions detailing how companies engage with their own employees and employee representatives about significant actual and potential positive or negative impacts, and how the perspectives of the workforce are reflected in decision-making processes. Unlike the old standards, the draft no longer specifies: •whether engagement takes place directly with employees or through their representa-tives, •at which stage(s) the engagement occurs, the type and frequency of such engage-ment, and •the role and highest-ranking position within the company responsible for ensuring that this dialogue happens and that its results are integrated into company practices. Leaving reporting on these critical processes optional undermines meaningful participation. Without clear and mandatory disclosure requirements, there is a high risk that employees and their representatives will not be adequately involved.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DGB	Trade union	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Many of the 'may' (voluntary) data points should not be removed. Voluntary disclosures on working conditions for employees without collective agreements, for example, are important because they concern a particularly vulnerable group.			
Survey	DGB	Trade union	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	-The NMIG contains important explanations that were moved from the standards into the NMIG for the purpose of streamlining the standards. In our view, this does not represent a real improvement for users, since the NMIG, while not formally part of the standards, will in practice likely be treated as implementation guidelines. For this reason, and against the background of the stated goal of "burden reduction," the essential and indispensable content of the NMIG should either be reintegrated into the respective standards or the NMIG should formally become part of the standards.			
Survey	DGB	Trade union	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	The clause on "undue cost or effort" lacks sufficient clarity and leaves companies with too much discretion. Similarly, limiting the use of data in value chain reporting weakens transparency, as direct data is indispensable. In addition, the exemption for operations not deemed "significant drivers of IROs" creates excessive flexibility and weakens the reliability of reporting. The relief measures, in their current form, extend beyond what is reasonable and risk undermining the balance between feasibility and transparency.			
Survey	DGB	Trade union	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Estimating financial effects is essential for integrating sustainability into strategy, planning, and risk management, and for determining financial materiality. Reporting these effects is key to aligning sustainability and financial reporting under the EU's double materiality approach. Companies must remain required to assess financial impacts to provide investors with reliable data and to support sound business planning.			
Survey	DGB	Trade union	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	DGB	Trade union	Germany	22.S1	Comments on deleted datapoints in ESRS S1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The reduction in both mandatory and voluntary data points far exceeds a reasonable balance between reporting effort and transparency. The deletion of the S-1 data points should be re-versed. It affects the following disclosures: •Breakdown of the company's age structure •Information on non-employees (except for their total number), as no further data is provided (e.g., deletion of disclosures on working conditions, fair remuneration, career development discussions, deaths due to illness) •Information on pension payments (social protection) •Breakdown by gender (e.g., employees without guaranteed working hours, persons with disabilities, career development discussions, training and skills development indi-cators) •Gender pay gap, adjusted by employee category or country/segment •Data point 'complaints filed with the OECD National Contact Point' •Voluntary disclosures on working conditions for employees without collective agree-ments. As part of the updated standards, several data points that were previously mandatory have now become voluntary. However, certain data points should remain mandatory, including participation in performance and career development, average training hours with a gender breakdown, parental leave uptake, and annual total remuneration adjusted for purchasing power differences. The reporting structure has been simplified to consist solely of topics and subtopics, which is acceptable as long as former sub-subtopics are fully integrated into their respective subtop-ics. While data points for S2 correspond to those of S1, those related to water and sanitation have been removed. These data points should be reinstated, as they are critical factors in the value chain outside of Europe.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DGB	Trade union	Germany	23.	Six datapoints exceptionally moved from “may” to “shall” In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, “may disclose” datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Adding a datapoint on training of the procurement team is needed to support the implementation of human rights in the supply chain. The addition of a datapoint on confirmed incidents of bribery is needed to improve transparency on the effectiveness of bribery/corruption policies and measures.			
Survey	DGB	Trade union	Germany	25.	Emphasis on ESRS being a “fair presentation” reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	Regarding fair presentation and regardless of the chosen approach - top-down or bottom-up - the result of the materiality analysis needs to be accurate, transparent, and free from distortion. The standards must ensure that any simplifications in the materiality analysis - such as the chosen approach or the omission of the consideration of time horizons or severity dimensions - do not result in incomplete or inadequate assessments. This requirement and the associated obligations should be emphasized much more strongly by the standards and clearly expressed.			
Survey	DGB	Trade union	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking’s employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	We very much welcome the improvements in country-specific reporting on employment. Reporting will now apply to the ten countries with the largest number of employees, with a threshold of 50 or more employees - instead of the previous requirement for countries repre-senting 10 % of the total workforce. For these "Top 10" countries, disclosures on employment numbers, collective bargaining coverage, and social dialogue are now mandatory. Shifting to a "Top 10" country approach is a clear step forward, as it ensures that reporting captures a larger and more representative portion of the workforce. Under the previous 10 % threshold, country-level disclosures often reflected only a small fraction of employees, leav-ing gaps in understanding the real impacts. Expanding coverage to the largest 10 countries provides more meaningful insights into how collective bargaining and social dialogue are ap-plied across different regions.			
Survey	DGB	Trade union	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	An analysis of the first year ESRS reports shows that most companies are simply reporting that they pay minimum wages, whereas the intention (as outlined in the ESRS Basis for Conclusions) is that companies should be enabled to disclose commitments to paying a wage "sufficient to support themselves and their families in dignity" as well as the extent to which they do this. This shows that the methodology for non-EU countries needs to be changed. Furthermore, the new ILO agreement on a methodology for living wages needs to be taken into account. While the proposed new methodology takes a step forward in both regards, two key changes are needed: •The methodology for reporting on 'adequate wages' should measure actual wages against an adequate/living wage for all employees, not only those within the EU. In particular, for employees outside the EU, the methodology should allow employees' actual wages to be measured: oA) against the local legal minimum wage only when this is set in line with the ILO principles on estimating living wages; or oB) against living wage estimates that are set in line with ILO principles on estimating living wages. •Companies should be able to rely on local legal minimum wages or living wage estimates when the authorities or organisations that set them provide public evidence of their alignment with the ILO principles for estimating living wages. Furthermore, the transitional provision for the EU needs to be reinstated, as not all Member States have transposed the Adequate Minimum Wage Directive.			
Survey	DGB	Trade union	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary (“may”) datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	The unadjusted gender pay gap should be kept as mandatory, since the methodology for calculating it is clear. The adjusted pay gap figure as voluntary, since the methodology for calculating the adjusted figure is not standardized.			
Survey	DGB	Trade union	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of “‘compatibility with 1.5 degrees’” for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	DGB	Trade union	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of “‘compatibility with 1.5 degrees’” for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	DGB	Trade union	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of “‘compatibility with 1.5 degrees’” for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	S1 and S2: Regarding the social standards, we are opposed to the removal of key data points and the shift of previously mandatory data points to voluntary. We are concerned that the elimination of many worker-related data points will result in unspecific disclosures, providing less insight into impacts, risks, and opportunities. The reduction in specificity and granularity diminishes the usefulness of the reporting for understanding the real effects on different employee groups. At the same time, we fully support the improvements in country-specific reporting, particularly for disclosures on employment numbers, collective bargaining coverage, and social dialogue. We appreciate the clarification that, when a company applies ESRS S1, the following disclosures must always be reported: S1-5: Characteristics of the company's employees S1-6: Characteristics of the company's non-employee workers S1-16: Discrimination and other human rights violations. In addition, the draft now introduces reporting on all human rights incidents, rather than only "serious" cases. This represents a very positive improvement.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DGB	Trade union	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	DGB	Trade union	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		In conclusion, the draft ESRS weaken stakeholder engagement by removing previously mandatory provisions. Specifically, it eliminates reporting on strategic and business model changes in response to stakeholder views, as well as requirements on how companies engage with employees and their representatives—covering who is consulted, when and how often, and which senior role is responsible. Turning these obligations into optional disclosures undermines transparency, accountability, and meaningful workforce participation. The scope of the definition of "own workforce" should be broadened to explicitly include franchise workers. On a positive note, we welcome the clarification in the draft that companies may voluntarily include information on non-material topics. In addition, the draft now includes explicit references to Article 19a(5) and Recital 52 of the CSRD, requiring management to inform and consult employee representatives and, where relevant, share their feedback with governing bodies. It also clarifies reporting on how boards are informed about the views and interests of key stakeholders, including employee representatives. This marks a notable step forward in transparency and stakeholder engagement and represents a significant enhancement in reporting clarity.			
Survey	World Benchmarking Alliance	NGO	Netherlands	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The weakening of requirements for value chain reporting in ESRS E2–E5 is particularly concerning. It would significantly reduce the decision-usefulness of disclosures. Many companies' most severe environmental impacts occur in their value chains, not their direct operations, so the current draft risks obscuring the majority of these companies' ecological footprint. Company disclosures regarding their value chain are already lagging far behind those for own operations. For example, WBA's Nature Benchmark shows that while 43% of assessed companies demonstrate evidence of reducing plastic use and waste in their own operations, only 7% and 17% respectively do so for upstream and downstream activities. Omitting value-chain metrics risks: - further reducing comparability and usefulness of disclosures for report-users, - creating uneven burden across sectors (with those with higher direct impacts disproportionately affected), and - undermining necessary collaboration along value chains to address systemic challenges. This approach would also diverge from best practice established by the TNFD, which requires disclosure of asset and activity locations across both operations and value chains. Flexibility on phased timelines may be justified, but it must not prevent companies from beginning their disclosure journey. We recommend reinstating robust value-chain disclosure requirements across ESRS E2, E3 and E4, with practical guidance to support implementation.			
Survey	World Benchmarking Alliance	NGO	Netherlands	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E2; E3; E4; E5; S3	The removal of metric examples from ESRS E4 has created a significant gap, as companies often need support and guidance in identifying appropriate metrics to use. This runs the risk of reducing comparability and consistency, as well as making the process more complex and opaque for companies. This gap could be addressed by providing clearer references to well-established sources—such as those developed by the Science-Based Target Network (SBTN), the Nature Positive initiative, and the Taskforce on Nature-related Financial Disclosures (TNFD). The current draft does not adequately address the social–environment nexus. Many companies struggle to assess and report on how environmental impacts at specific sites (e.g. on water, biodiversity, or pollution) affect local communities. Providing illustrative examples in the NMIG for S3 would help companies understand how to disclose in these integrated cases. This would improve decision-usefulness for stakeholders while also encouraging companies to address interconnected environmental and social risks.			
Survey	World Benchmarking Alliance	NGO	Netherlands	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We recognise the need for burden reliefs, but we are concerned that some of the proposed amendments risk undermining the transparency needed to achieve the objectives of the EU Green Deal. In particular, the removal of the systematic preference for direct data in value chain metrics (ESRS 1, Paragraph 91) significantly weakens disclosure. Value-chain impacts are often where the most severe environmental harms occur, especially in relation to pollution, water, and biodiversity. Allowing companies to rely on estimates without clear safeguards risks reducing comparability and decision-usefulness, and creates disincentives for companies to invest in building robust data systems. Similarly, the weakening of location-specific disclosures poses a major gap. Actual impacts are inherently site-dependent, and aggregated reporting obscures the ecosystems and communities most affected. For example, our Nature Benchmark shows that while nearly half of companies disclose where they operate, only 10% report on whether those sites are near areas of biodiversity importance, and less than 3% have management plans for such sites. Without site-level information, investors and stakeholders cannot meaningfully assess risks or dependencies. While flexibility may be needed in early implementation, such reliefs should be clearly temporary and accompanied by guidance that encourages companies to progressively expand coverage and improve data quality and specificity over time. Otherwise, these reliefs risk entrenching current disclosure gaps rather than helping companies overcome them.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	World Benchmarking Alliance	NGO	Netherlands	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I would like to skip this question and provide my feedback in Part 3				
Survey	World Benchmarking Alliance	NGO	Netherlands	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We agree with Option 1. Quantitative disclosures on anticipated financial effects are essential for comparability, decision-usefulness, and ensuring credibility of sustainability reporting. Allowing companies to omit quantitative disclosures entirely (Option 2) risks reducing disclosures to high-level narratives that provide little insight to investors, regulators, or civil society. At the same time, reliefs must be carefully defined. Broad or indefinite reliefs create the risk that companies avoid reporting meaningful information on anticipated financial effects, particularly outside climate. To maintain integrity, these reliefs should be explicitly temporary and subject to clear disclosure of the reasons for omission, along with a timeline for when full coverage will be achieved. Without such safeguards, companies could indefinitely rely on these reliefs, undermining the objectives of the ESRS and comparability across companies. Maintaining quantitative disclosure as the baseline, while allowing targeted reliefs where methodologies are immature or uncertainty is exceptionally high, strikes the right balance between transparency and feasibility. This approach will incentivise companies and financial institutions to develop more robust methodologies over time, while ensuring that stakeholders continue to receive meaningful, decision-useful information.			
Survey	World Benchmarking Alliance	NGO	Netherlands	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	World Benchmarking Alliance	NGO	Netherlands	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	World Benchmarking Alliance	NGO	Netherlands	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Absolute targets are essential to understand an undertaking's true progress on climate. Intensity targets capture efficiency but can mask rising emissions if business activity expands. Complex estimates are not unique to financial institutions. They are common across sectors, and granting an exemption would undermine comparability and create an unlevel playing field. We also strongly support retaining ESRS E1-1 and keeping financial institutions fully in scope. Climate mitigation transition plans are vital to Europe's net-zero shift, acting as credible blueprints that provide a pathway for real-world change and investment. While all transition plans matter, those from financial institutions (FIs) are pivotal: real-economy companies cannot implement their own transition plans without financing, and the EU's transition will succeed or fail depending on the financial sector's willingness to provide "transition finance." Evidence shows the current requirements are already driving systemic change. WBA's Financial System Benchmark finds that while only a small share of global FIs currently disclose viable transition plans, more than 70% of these are European institutions – directly reflecting the impact of ESRS requirements. Removing or weakening these requirements would undermine this progress and threaten Europe's wider transition. The sector is also prepared and supportive. Many European FIs have invested in the skills needed to produce credible transition plans and are now aligning with voluntary frameworks such as the SBTi. These plans are increasingly being extended to cover nature and social issues, laying the foundation for holistic sustainability strategies. For these reasons, we urge EFRAG to retain ESRS E1-1, maintain absolute target requirements for FIs, and ensure simplification does not compromise Europe's transition to a sustainable economy.			
Survey	World Benchmarking Alliance	NGO	Netherlands	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	To date, too few companies report or take action on living wages: according to WBA's data, only 4% of the largest 2,000 companies globally pay or have a target to pay their workers a living wage. Given this, S1-9 is key to track progress and increase the visibility of this issue. However, the current methodology to calculate adequate wages entrenches global inequalities, setting a much lower standard for non-EU workers, and wrongfully equating minimum wages to adequate wages. While for EU workers companies are directed to compare actual wages with the adequate wages determined in accordance to Directive 2022/2041, outside of the EU they are directed to compare actual wages with the established minimum wage, as long as this is set in accordance with ILO wage-setting principles. However, as evidenced by WageIndicator, only 29 out of 178 countries globally have a minimum wage equal to or higher the national living wage – and most of these are in the EU. This change means the reporting standard does not, in fact, fulfil its purpose to report on whether employees earn an adequate wage, and instead creates a disparity between the standard applied to EU vs non-EU workers. This in turn affects the comparability of reports between companies depending on the geographical distribution of their workforce and undermines the disclosure's usefulness for investors and other stakeholders. We recommend: Ensure the methodology compares actual wages with living/adequate wages for all employees globally. In practice, this means no longer centring on the ILO wage-setting principles, but instead using minimum wages only when set using the ILO principles for estimating living wages; and otherwise, using other credible living wage benchmarks and estimates set in line with said ILO principles.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	World Benchmarking Alliance	NGO	Netherlands	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree				
Survey	World Benchmarking Alliance	NGO	Netherlands	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Partially agree. Reliefs such as the removal of preference for direct value-chain data (para 91) and indefinite scope for partial disclosures (para 92) risk weakening transparency. Reliefs must be explicitly time-bound, with safeguards to encourage companies to improve data systems over time.			
Survey	World Benchmarking Alliance	NGO	Netherlands	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Partially agree. Reliefs such as the removal of preference for direct value-chain data (para 91) and indefinite scope for partial disclosures (para 92) risk weakening transparency. Reliefs must be explicitly time-bound, with safeguards to encourage companies to improve data systems over time.			
Survey	World Benchmarking Alliance	NGO	Netherlands	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	WBA strongly supports retaining ESRS E1-1 and maintaining mandatory transition plan disclosures for financial institutions: 1. FI transition plans drive systemic change. Without FI transition plans, and the commitments to transition finance contained within them, European companies will not be able to finance their own transitions. Since their introduction, the current requirements have helped put the foundations in place for this to happen - our Financial System Benchmark shows that while only a small share of global FIs currently disclose viable transition plans, over 70% of these are European institutions, reflecting the impact of the ESRS requirements. However, removing or weakening the requirements would undermine this progress and threaten the wider economy's transition. 2. The sector is prepared and supportive. Many European FIs now not only comply with ESRS E1-1 but, having invested in the skills needed to produce transition plans, are now using the model to identify and realise financing opportunities. FIs are also increasingly aligning with voluntary frameworks, including SBTi methodologies, demonstrating that the sector can both meet mandatory requirements and go beyond these. The sector has now upskilled to the point where it can not only meet the requirements, but utilise them for economic gain - removing the requirement would undermine this capability. 3. FIs are now using transition plans to take the next step. FIs within scope of CSRD are now extending their transition planning expertise to integrate social and broader sustainability considerations, creating the foundation for holistic ESG strategies helping them progress on multiple fronts. For example, many FIs are developing transition plans focused on nature, using ESRS E1-1 as a model. Weakening ESRS E1-1 would risk dismantling this additional momentum.			
Survey	World Benchmarking Alliance	NGO	Netherlands	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Disagree. Allowing companies to self-define pollutants (para 28a) and use estimates without methodological transparency weakens comparability and regulatory alignment. Site-level pollution data is essential.			
Survey	World Benchmarking Alliance	NGO	Netherlands	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The removal of site-specific disclosures undermines the ability to capture localised water risks and impacts. Value-chain reporting must be reinstated to reflect companies' full footprint.			
Survey	World Benchmarking Alliance	NGO	Netherlands	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Removal of metric examples and site-specific requirements significantly weakens disclosure. ESRS should align with TNFD, SBTN and Nature Positive. Methodological guidance (e.g. AR 26) should be retained and updated.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	World Benchmarking Alliance	NGO	Netherlands	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Partially agree. Simplification is welcome, but omission of value-chain datapoints risks obscuring the majority of impacts (e.g. plastics).			
Survey	World Benchmarking Alliance	NGO	Netherlands	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The revised methodology for non-EU adequate wages entrenches global disparities, weakening comparability. We recommend a global adequate/living wage benchmark. Removal of family leave datapoint also reduces gender equality insights.			
Survey	World Benchmarking Alliance	NGO	Netherlands	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Removal of explicit "no mechanism" disclosure and weakening of grievance/engagement datapoints risks concealing gaps in practice. Negative assertions should remain mandatory.			
Survey	World Benchmarking Alliance	NGO	Netherlands	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Clarification is welcome, but requirements on board expertise (para 9(b)) remain too weak; stronger disclosures are needed to ensure boards have sustainability competence.			
Survey	World Benchmarking Alliance	NGO	Netherlands	35.ESRS1_7.4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We partially agree with the proposed amendments to 7.4. Reliefs for metrics. While limited reliefs can help companies address genuine challenges in data availability or measurement uncertainty, the current drafting of paragraphs 92 and 93 provides overly broad exemptions that risk undermining the ESRS as a whole. In particular, these reliefs could allow undertakings to indefinitely omit disclosure of key environmental metrics beyond climate, creating a loophole that companies could abuse. Reliefs must be explicitly temporary, with a clear expectation of progressive improvement in coverage and quality over time. Otherwise, the comparability, reliability, and faithful representation of disclosures will be compromised. We therefore recommend that: 1. Reliefs be time-bound, with mandatory disclosure of a timeline for achieving full coverage. 2. Companies be required to disclose the proportion of operations or value chain excluded, and justify why exclusions are materiality-consistent. 3. Reliefs not be applied to financial institutions' absolute targets, as these are critical for ensuring a level playing field and tracking progress toward the EU's climate and Green Deal objectives.	ESRS1	7.4 Reliefs for metrics	
Survey	World Benchmarking Alliance	NGO	Netherlands	35.ESRS2_GDR-M.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We partially agree with the amendments to GDR-M. While we welcome the clarification on methodologies, data sources, and environmental conditions, the revised text weakens location-specific disclosures. Impacts on nature are inherently site-specific and aggregated figures alone do not provide decision-useful information for investors or stakeholders. For example, changes to ESRS E2 paragraph 10 remove the requirement to identify which facilities or sites contribute most to impacts, reducing transparency into hotspots that may drive financial, regulatory, or reputational risks. We recommend: 1. Reinserting a clear requirement for site- or facility-level disclosure of environmental metrics (at least at ecosystem level) for E2, E3, and E4. 2. Embedding this as a cross-cutting requirement within ESRS 2 GDR-M to ensure consistency across topical standards. 3. Aligning definitions and disclosure expectations with TNFD, the Nature Positive Initiative, and GRI to maximise comparability and efficiency. Without such requirements, the amended ESRS risks omitting critical data that is necessary to understand local impacts and to mobilise capital towards nature-positive outcomes. Also, we recommend that the amended ESRS explicitly include disclosure of the quantities of high-risk commodities sourced. These commodities are among the most significant global drivers of deforestation, biodiversity loss, and human rights risks, yet the current draft omits this critical datapoint. Embedding this requirement within ESRS 2 (GDR-M) would ensure consistency across topical standards (E2, E3, E4, and relevant social disclosures) and provide investors and stakeholders with decision-useful information on material supply chain risks. It would also support stronger connectivity with the EU Deforestation Regulation (EUDR)	ESRS2	General Disclosure Requirement for metrics - GDR-M	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	World Benchmarking Alliance	NGO	Netherlands	35.E1-1.	Do you agree with the amendments of this chapter?	I disagree	WBA strongly supports retaining ESRS E1-1 and maintaining mandatory transition plan disclosures for financial institutions: FI transition plans drive systemic change. Without FI transition plans, and the commitments to transition finance contained within them, European companies will not be able to finance their own transitions. Since their introduction, the current requirements have helped put the foundations in place for this to happen - our Financial System Benchmark shows that while only a small share of global FIs currently disclose viable transition plans, over 70% of these are European institutions, reflecting the impact of the ESRS requirements. However, removing or weakening the requirements would undermine this progress and threaten the wider economy's transition. The sector is prepared and supportive. Many European FIs now not only comply with ESRS E1-1 but, having invested in the skills needed to produce transition plans, are now using the model to identify and realise financing opportunities. FIs are also increasingly aligning with voluntary frameworks, including SBTi methodologies, demonstrating that the sector can both meet mandatory requirements and go beyond these. The sector has now upskilled to the point where it can not only meet the requirements, but utilise them for economic gain - removing the requirement would undermine this capability. FIs are now using transition plans to take the next step. FIs within scope of CSRD are now extending their transition planning expertise to integrate social and broader sustainability considerations, creating the foundation for holistic ESG strategies helping them progress on multiple fronts. For example, many FIs are developing transition plans focused on nature, using ESRS E1-1 as a model. Weakening ESRS E1-1 would risk dismantling this additional momentum.	E1	Disclosure Requirement E1-1 - Transition plan for climate change mitigation	
Survey	World Benchmarking Alliance	NGO	Netherlands	35.E2-4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The current drafting of paragraph 16(a) and AR 2 allows undertakings to define their own pollutant scope, rather than requiring systematic alignment with EU pollutant registries. This represents a major simplification compared to Set 1 and risks undermining comparability and regulatory coherence. If companies can self-define the pollutants to disclose, they may omit substances that are legally regulated or material to stakeholders, producing non-comparable and incomplete datasets. We recommend reinstating mandatory alignment with the EU pollutant registries as a baseline, with additional pollutants reported only as a complement. The current drafting of paragraph 16(b) and AR 5 allows undertakings to disclose pollutant data based on estimates without requiring disclosure of the basis, assumptions, or limitations of those estimates. This significantly reduces transparency compared to Set 1 and hampers the ability of stakeholders to assess the credibility and rigour of emissions data. We recommend that whenever estimates are used, undertakings be required to disclose: (i) the estimation methodology applied, (ii) key assumptions and data sources	E2	Disclosure Requirement E2-4 - Pollution of air, water and soil	
Survey	World Benchmarking Alliance	NGO	Netherlands	35.E3-4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We are concerned that the amended drafting only requires disclosure of aggregated totals in cubic meters for water consumption, withdrawal, and discharges. While paragraph 17(b) refers to "areas at water risk," this is too broad and does not require companies to identify specific sites or basins where water stress and related impacts occur. Water is inherently location-specific, and impacts depend on local conditions. Aggregated figures obscure where the most material risks and impacts arise, reducing decision-useful information for investors, regulators, and communities. For example, a company may operate in both high-risk and low-risk basins, but aggregate disclosure masks which facilities drive the greatest pressure on scarce resources.	E3	Disclosure Requirement E3-4 - Water metrics	
Survey	World Benchmarking Alliance	NGO	Netherlands	35.E4-5.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We are concerned that the amended text of E4-5 (para. 21 and AR 9–11) removes the illustrative metric examples. While companies are still required to report biodiversity metrics, the absence of concrete examples significantly reduces clarity, comparability, and consistency. The broad categories in AR 9 and the high-level guidance in AR 10–11 are useful but insufficient on their own, leaving undertakings with limited direction on which indicators are credible and decision-useful. We recommend reinstating references to well-established sources of biodiversity metrics, such as the Science-Based Targets Network (SBTN), the Taskforce on Nature-related Financial Disclosures (TNFD), and the Nature Positive Initiative. Providing clear links to these frameworks would help companies select appropriate metrics, strengthen comparability across reports, and improve alignment with global nature-related disclosure standards.	E4	Disclosure Requirement E4-5 - Metrics related to biodiversity and ecosystems change	
Survey	World Benchmarking Alliance	NGO	Netherlands	35.S1-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We're concerned that the revised draft removes the explicit requirement for companies to disclose when no engagement process or grievance mechanism exists. Without this "negative assertion," companies could omit the absence of mechanisms, leaving significant gaps in transparency. We recommend reinstating the requirement for companies to explicitly state if no engagement process or grievance mechanism exists and to provide a time-bound plan to establish one. In addition, mandatory disclosure of key effectiveness features (such as coverage, multiple access points, confidentiality/anonymity, non-retaliation, and remedy outcomes/KPIs) should be maintained to ensure comparability and usefulness for stakeholders.	S1	Disclosure Requirement S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	
Survey	World Benchmarking Alliance	NGO	Netherlands	35.S1-9.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	WBA data shows that only 4% of the world's 2,000 most influential companies pay or have a target to pay a living wage. The current approach in AR 22 (para. 32) entrenches inequality by allowing minimum wages to be treated as adequate wages for non-EU workers. Since only 29 of 178 countries globally have a minimum wage at or above the national living wage, this methodology sets a much lower standard for workers outside the EU and undermines comparability between companies. We recommend revising AR 22 to require that actual wages be compared to living/adequate wages globally, not just statutory minimum wages. Where ILO-compliant living wage estimates exist, they should be the benchmark; only where they do not exist should statutory minimum wages be used. Other credible benchmarks aligned with ILO principles (e.g. WageIndicator, Anker methodology) should be referenced to ensure consistency and fairness.	S1	Disclosure Requirement S1-9 - Adequate wages	
Survey	World Benchmarking Alliance	NGO	Netherlands	35.S1-14.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We're concerned that the amendment to para. 42 reduces the usefulness of this disclosure. Removing the requirement to report the percentage of entitled employees who actually took family-related leave makes it difficult to assess whether policies are genuinely effective. Uptake data is essential for understanding systemic challenges in gender equality and the real impact of leave policies on working parents, particularly women.	S1	Disclosure Requirement S1-14 - Work-life balance metrics	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	World Benchmarking Alliance	NGO	Netherlands	35.G1-6.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We're concerned that the current draft omits tax transparency, which is a critical dimension of responsible business conduct. At a minimum, companies should disclose the amount of corporate income tax paid for each jurisdiction where they are a tax resident. Ideally, disclosures should also include statutory vs. effective tax rates (STR and ETR). According to WBA's 2024 Social Benchmark, only 9% of the world's 2,000 most influential companies currently provide this information, with EU companies performing only slightly better at 17%. Adding a disclosure requirement on taxes, whether as a new standalone DR or by expanding G1-6 on payment practices, would help address this gap and strengthen accountability.	G1	Disclosure Requirement G1-6 - Metrics in relation to payment practices	
Survey	YIT Corporation	Business association (other than association of financial institution)	Finland	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Subject: Feedback on ESRS Exposure Drafts – Suggestions for Further Simplification Dear EFRAG Team, Thank you for the opportunity to provide feedback on the revised ESRS standards currently under public consultation. We appreciate the efforts made to streamline the standards and reduce the reporting burden. However, we believe there is still room for further simplification to enhance clarity and usability for reporting entities. For example, we would like to propose the following suggestions: 1.Remove Application Requirements (AR) Sections The Application Requirements (AR) sections, while intended to provide guidance, often add complexity and length to the standards. We suggest integrating the relevant content from AR sections directly into the Disclosure Requirements (DRs) text so that separate AR sections exist anymore. This would make the standards more concise and easier to follow without losing essential guidance. 2.Reduce and Clarify References The current drafts contain numerous references to other standards, frameworks, and documents. While cross-referencing is useful, excessive and unclear references can hinder comprehension. We recommend reducing the number of references and ensuring that any remaining ones are clearly explained within the text, ideally with brief contextual summaries. 3.Simplify the Double Materiality Assessment (DMA) The DMA process remains overly complex, particularly with the expectation of scoring or quantifying impacts. We propose a simplified approach where companies identify which ESRS topics are material for company from both impact and financial perspectives and provide a clear rationale for their assessment. Eliminating the need for scoring would make the process more accessible and reduce subjectivity. We hope these suggestions contribute to the ongoing improvement of the ESRS framework and support its successful implementation across diverse reporting entities. Yours sincerely, For and on behalf of YIT Oyj Tommi Kokkonen			
Survey	LG Energy Solution Wrocław Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We welcome all clarifications regarding the description of the DMA process. However, we would like to highlight several key points: 1. The DMA is extremely time-, resource-, and cost-intensive for companies. It requires the involvement of numerous employees who must dedicate a significant number of working hours solely to this task. 2. We recommend introducing a minimum, standardized list of disclosures applicable to all companies (similar to ESRS 2), and replacing the DMA and topical standards with sector-specific standards developed by EFRAG. These standards should be uniform and mandatory for all companies within a given industry. This approach would significantly reduce the effort and cost associated with identifying material topics. 3. If the DMA is retained, we wish to emphasize the following: - The assessment of whether a topic is material remains subjective. On one hand, this may mislead users; on the other, it may lead auditors to question the outcome of the assessment. Market practice shows that companies tend to declare topics as material out of caution, which influences benchmarks and the decisions of other companies. We recommend further clarification in this area or training provided by EFRAG for both companies and auditors. - Since there is no clear guidance on how the process should be conducted, its evaluation will depend on the auditor's interpretation. Market experience indicates that auditors often require the use of multiple assessment methods from the available catalogue. We recommend explicitly stating in paragraph 62 that the use of all tools is not mandatory. - The non-binding nature of Appendix A: List of topics may be confusing for companies. We recommend specifying a required set of topics for analysis, along with a note that companies must additionally include company-specific topics.			
Survey	LG Energy Solution Wrocław Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree			
Survey	LG Energy Solution Wrocław Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	LG Energy Solution Wrocław Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We greatly appreciate the efforts to avoid overlapping information requirements between ESRS 2 and the topical standards, as well as the architectural changes to the PAT structure (replacing MDR with GD – P, A, T, M). However, we would like to emphasize that for large companies with complex internal structures and extensive value chain, preparing a sustainability report in line with the ESRS remains a highly resource-intensive task. It requires the involvement of a dedicated team and subject-matter experts from across the organization, resulting in significant effort and cost. Preparing the report requires support from external consultants, particularly during the initial years of reporting, which entails significant costs.			
Survey	LG Energy Solution Wrocław Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We welcome the significant improvement in the clarity and readability of the draft standards. To maintain this positive outcome, it will be essential to ensure high-quality translations into the official languages of EU Member States, as this was a major challenge with the first version of the standards. For reporting teams, the Excel-based data point mapping prepared by EFRAG is an extremely valuable tool. We strongly recommend that such a file be made available as soon as possible following the adoption of the new standards.			
Survey	LG Energy Solution Wrocław Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We appreciate the practical guidance provided in the NMIG regarding report preparation and data compilation. These materials will be particularly valuable for entities preparing their reports for the first time. However, we wish to highlight that the non-binding status of the NMIG may be misleading. As a non-mandatory document, it should not influence the auditor's assessment. Past experience shows that guidance issued by EFRAG, such as that related to the DMA or value chain, was also formally non-binding, yet in practice it was treated as de facto mandatory and considered by auditors during report evaluations. A similar dynamic may emerge with the NMIG, effectively making it another document that companies will be expected to comply with. Consequently, its removal from the list of mandatory materials may prove to be only nominal.			
Survey	LG Energy Solution Wrocław Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	We appreciate the reduction in the volume of the draft ESRS and the number of data points. However, we would like to highlight that the content of the ESRS and its accompanying documents remains extensive. The number of data points is still considerable, with individual disclosures often requiring multiple indicators and drawing from several data sources. In particular, the Environmental section (E) continues to be highly demanding and complex.			
Survey	LG Energy Solution Wrocław Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We positively assess the proposed solution. Based on our own experience, we know how difficult it is to obtain reliable and accurate data, which is why we appreciate EFRAG's position allowing non-disclosure of information when its collection is either impossible or entails excessive costs. However, we would like to highlight that it will be up to the auditor to determine whether a company had valid grounds for not disclosing certain data and whether it made sufficient efforts to obtain it. Based on market experience, we are concerned that some companies may overuse this provision, while others may hesitate to apply it at all. This could affect audit outcomes. We therefore recommend that data points which may result in disproportionate effort be reclassified by EFRAG as non-mandatory. This would help ensure that companies are not solely responsible for making complex judgments—especially in cases where auditors might question the validity of use of 'undue cost or effort' principle. We are strongly convinced that EFRAG is the appropriate body to make these decisions. Additionally, we do not support the decision to exclude ESRS E1-6 from this relief (paragraph 91 ESRS 1). Calculating Scope 3 emissions is particularly challenging, as reliable data is often difficult to obtain. In our view, allowing partial disclosures in this area would be both practical and justified.			
Survey	LG Energy Solution Wrocław Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	We firmly believe that anticipating the financial effects of material risks is a vital component of effective risk management. However, we wish to highlight that operating within a young and heavily regulated sector such as the battery market makes estimating financial effects across different time horizons an exceptionally challenging task. As a result, this requirement entails a disproportionate administrative burden relative to the informational value of the disclosures. The difficulty in assessing financial impacts is primarily driven by evolving legislative obligations, which also affect financial liabilities. Emerging regulations designed to address the environmental and societal impacts of industrial activity, such as CBAM, CRMA, EUBR, EU ETS, IED2, frequently introduce new and difficult-to-predict cost burdens for companies. Furthermore, as we operate in a rapidly developing industry, the pace of technological change—driven by the need to adapt to a volatile market, means that risk assessments quickly become outdated. Therefore, we recommend removing this disclosure requirement or significantly simplifying it, beyond what is currently proposed under Option 2. Even large companies do not have units with sufficient resources to perform such analysis.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	LG Energy Solution Wroclaw Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	As highlighted in our response to Question 19, estimating the financial impacts of material risks is exceptionally complex and time-consuming. The proposed data points 40, 41, and 42 in ESRS E1 impose highly detailed requirements. Collecting and processing the necessary information will involve multiple teams and departments, and the resulting data is likely to become outdated quickly. This leads to a disproportionate reporting effort relative to the value of the disclosures. We recommend removing this disclosure requirement or significantly simplifying it, beyond what is currently proposed under Option 2.			
Survey	LG Energy Solution Wroclaw Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	LG Energy Solution Wroclaw Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	As previously noted, we appreciate the efforts made to reduce the overall volume of the ESRS. However, we wish to point out that the number of required disclosures remains substantial—particularly within the Environmental section (E), which continues to be disproportionately extensive compared to other areas. It is also important to highlight that many of the required disclosures are multidimensional, with a single indicator often relying on multiple data sources. Moreover, the removal of certain data points does not necessarily translate into a reduction in workload—for instance, the deletion of the 'total GHG emissions' [ESRS E1-6] item does not alleviate the underlying reporting effort.			
Survey	LG Energy Solution Wroclaw Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	22.E1.	Comments on deleted datapoints in ESRS E1	I disagree	As previously noted, we appreciate the efforts made to reduce the overall volume of the ESRS. However, we wish to point out that the number of required disclosures remains substantial—particularly within the Environmental section (E), which continues to be disproportionately extensive compared to other areas. It is also important to highlight that many of the required disclosures are multidimensional, with a single indicator often relying on multiple data sources. Moreover, the removal of certain data points does not necessarily translate into a reduction in workload—for instance, the deletion of the 'total GHG emissions' [ESRS E1-6] item does not alleviate the underlying reporting effort.			
Survey	LG Energy Solution Wroclaw Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	22.E2.	Comments on deleted datapoints in ESRS E2	I disagree	As previously noted, we appreciate the efforts made to reduce the overall volume of the ESRS. However, we wish to point out that the number of required disclosures remains substantial—particularly within the Environmental section (E), which continues to be disproportionately extensive compared to other areas. It is also important to highlight that many of the required disclosures are multidimensional, with a single indicator often relying on multiple data sources. Moreover, the removal of certain data points does not necessarily translate into a reduction in workload—for instance, the deletion of the 'total GHG emissions' [ESRS E1-6] item does not alleviate the underlying reporting effort.			
Survey	LG Energy Solution Wroclaw Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	22.E3.	Comments on deleted datapoints in ESRS E3	I disagree	As previously noted, we appreciate the efforts made to reduce the overall volume of the ESRS. However, we wish to point out that the number of required disclosures remains substantial—particularly within the Environmental section (E), which continues to be disproportionately extensive compared to other areas. It is also important to highlight that many of the required disclosures are multidimensional, with a single indicator often relying on multiple data sources. Moreover, the removal of certain data points does not necessarily translate into a reduction in workload—for instance, the deletion of the 'total GHG emissions' [ESRS E1-6] item does not alleviate the underlying reporting effort.			
Survey	LG Energy Solution Wroclaw Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	22.E4.	Comments on deleted datapoints in ESRS E4	I disagree	As previously noted, we appreciate the efforts made to reduce the overall volume of the ESRS. However, we wish to point out that the number of required disclosures remains substantial—particularly within the Environmental section (E), which continues to be disproportionately extensive compared to other areas. It is also important to highlight that many of the required disclosures are multidimensional, with a single indicator often relying on multiple data sources. Moreover, the removal of certain data points does not necessarily translate into a reduction in workload—for instance, the deletion of the 'total GHG emissions' [ESRS E1-6] item does not alleviate the underlying reporting effort.			
Survey	LG Energy Solution Wroclaw Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	22.E5.	Comments on deleted datapoints in ESRS E5	I disagree	As previously noted, we appreciate the efforts made to reduce the overall volume of the ESRS. However, we wish to point out that the number of required disclosures remains substantial—particularly within the Environmental section (E), which continues to be disproportionately extensive compared to other areas. It is also important to highlight that many of the required disclosures are multidimensional, with a single indicator often relying on multiple data sources. Moreover, the removal of certain data points does not necessarily translate into a reduction in workload—for instance, the deletion of the 'total GHG emissions' [ESRS E1-6] item does not alleviate the underlying reporting effort.			
Survey	LG Energy Solution Wroclaw Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	22.S1	Comments on deleted datapoints in ESRS S1	I disagree	As previously noted, we appreciate the efforts made to reduce the overall volume of the ESRS. However, we wish to point out that the number of required disclosures remains substantial—particularly within the Environmental section (E), which continues to be disproportionately extensive compared to other areas. It is also important to highlight that many of the required disclosures are multidimensional, with a single indicator often relying on multiple data sources. Moreover, the removal of certain data points does not necessarily translate into a reduction in workload—for instance, the deletion of the 'total GHG emissions' [ESRS E1-6] item does not alleviate the underlying reporting effort.			
Survey	LG Energy Solution Wroclaw Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	22.S2	Comments on deleted datapoints in ESRS S2	I disagree	As previously noted, we appreciate the efforts made to reduce the overall volume of the ESRS. However, we wish to point out that the number of required disclosures remains substantial—particularly within the Environmental section (E), which continues to be disproportionately extensive compared to other areas. It is also important to highlight that many of the required disclosures are multidimensional, with a single indicator often relying on multiple data sources. Moreover, the removal of certain data points does not necessarily translate into a reduction in workload—for instance, the deletion of the 'total GHG emissions' [ESRS E1-6] item does not alleviate the underlying reporting effort.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	LG Energy Solution Wroclaw Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	22.S3	Comments on deleted datapoints in ESRS S3	I disagree	As previously noted, we appreciate the efforts made to reduce the overall volume of the ESRS. However, we wish to point out that the number of required disclosures remains substantial—particularly within the Environmental section (E), which continues to be disproportionately extensive compared to other areas. It is also important to highlight that many of the required disclosures are multidimensional, with a single indicator often relying on multiple data sources. Moreover, the removal of certain data points does not necessarily translate into a reduction in workload—for instance, the deletion of the 'total GHG emissions' [ESRS E1-6] item does not alleviate the underlying reporting effort.			
Survey	LG Energy Solution Wroclaw Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	22.S4	Comments on deleted datapoints in ESRS S4	I disagree	As previously noted, we appreciate the efforts made to reduce the overall volume of the ESRS. However, we wish to point out that the number of required disclosures remains substantial—particularly within the Environmental section (E), which continues to be disproportionately extensive compared to other areas. It is also important to highlight that many of the required disclosures are multidimensional, with a single indicator often relying on multiple data sources. Moreover, the removal of certain data points does not necessarily translate into a reduction in workload—for instance, the deletion of the 'total GHG emissions' [ESRS E1-6] item does not alleviate the underlying reporting effort.			
Survey	LG Energy Solution Wroclaw Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	22.G1	Comments on deleted datapoints in ESRS G1	I disagree	As previously noted, we appreciate the efforts made to reduce the overall volume of the ESRS. However, we wish to point out that the number of required disclosures remains substantial—particularly within the Environmental section (E), which continues to be disproportionately extensive compared to other areas. It is also important to highlight that many of the required disclosures are multidimensional, with a single indicator often relying on multiple data sources. Moreover, the removal of certain data points does not necessarily translate into a reduction in workload—for instance, the deletion of the 'total GHG emissions' [ESRS E1-6] item does not alleviate the underlying reporting effort.			
Survey	LG Energy Solution Wroclaw Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	We do not support the amendment to ESRS G1 regarding the disclosure of confirmed incidents of business conduct (Amended ESRS G1, paragraph 14). The nature, scale, and consequences of such incidents vary significantly and are often not comparable. Presenting purely quantitative data without accompanying qualitative context may mislead users and distort the perceived impact of these events.			
Survey	LG Energy Solution Wroclaw Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	We do not support the inclusion of E2-4, E5-4 and E5-5 new data points. We respectfully recommend its removal. For lithium-ion battery manufacturers disclosure requirement regarding qualitative information on secondary microplastics is extremely difficult to assess, particularly in relation to unintentional microplastic generation throughout the product life cycle. Moreover, the lack of standardized methodologies for identifying and quantifying secondary microplastics, especially those arising indirectly or post-consumer, makes the requirement impractical and potentially unreliable. Introducing such a disclosure at this stage risks generating inconsistent and non-comparable data across sectors. The battery industry is already subject to an increasingly complex web of regulations and reporting obligations. Introducing a new data point under E5-4 would impose an additional burden, requiring companies to collect and calculate further data. Moreover, this requirement duplicates information already mandated under other legislative frameworks, such as the Critical Raw Materials Act (CRMA) and the EU Battery Regulation (EUBR). We also see a significant risk of inconsistencies between data reported across different regulatory instruments, for example, environmental disclosures. Moreover, cross-sector data comparisons may be misleading for stakeholders who are unfamiliar with the specific characteristics and context of each industry. We do not agree with the ESRS E5-5 paragraph 18e requirement, because according to the Polish Waste Act, the producer transfers waste only to an authorized entity, which becomes its owner at the moment of takeover. In the case of handing over waste to the R12 process, the further destination will never be fully known, which is in accordance with the law and cannot burden the original producer with reporting obligations. Disclosure could therefore be misleading to the user.			
Survey	LG Energy Solution Wroclaw Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	LG Energy Solution Wroclaw Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	LG Energy Solution Wroclaw Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	LG Energy Solution Wroclaw Sp. z o.o.	Preparer (non-financial preparing a sustainability report)	South Korea	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	OTP Bank	Bank	Hungary	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	OTP Bank	Bank	Hungary	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	If in sectors with strict regulations on a given topic, the primary goal should be to meet and comply with those standards. However, if the topic is material, it should still be reported. The reporting should clearly reflect that the regulatory framework covers the relevant actions, and that the objective is to fulfill those requirements. This ensures that the principle of materiality is respected, and that important topics are not omitted from the report simply due to high regulatory compliance.			
Survey	OTP Bank	Bank	Hungary	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We also prepared a summary this year, but it was not included in the report — instead, it was issued as a separate document.			
Survey	OTP Bank	Bank	Hungary	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	It's a good that it's no longer necessary to detail each material IRO individually, especially when they are managed under a common strategy or set of actions. In our case, an additional challenge was the lack of a unified approach to PATs at group level.			
Survey	OTP Bank	Bank	Hungary	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	I wouldn't eliminate sector-specific datapoints, as they would provide much better comparability.			
Survey	OTP Bank	Bank	Hungary	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	OTP Bank	Bank	Hungary	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	OTP Bank	Bank	Hungary	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	the goal should be to encourage companies to manage sustainability matters more consciously. However, I would develop methodological approaches to support them in doing so.			
Survey	OTP Bank	Bank	Hungary	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	while the information is important, it's very challenging to provide reliable answers. There's a clear need for well-developed methodological approaches to support companies in addressing this requirement effectively.			
Survey	OTP Bank	Bank	Hungary	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	OTP Bank	Bank	Hungary	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	OTP Bank	Bank	Hungary	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	As long as there is no unified definition or approach to the issue, comparing measures remains difficult. For example, in our case, addressing biodiversity has been particularly challenging due to the lack of available data and a consistent methodology.			
Survey	OTP Bank	Bank	Hungary	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	I have limited information on this topic.			
Survey	OTP Bank	Bank	Hungary	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	I even trust that this will support more accurate and meaningful data disclosure.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	OTP Bank	Bank	Hungary	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	OTP Bank	Bank	Hungary	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	OTP Bank	Bank	Hungary	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	OTP Bank	Bank	Hungary	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Apendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	OTP Bank	Bank	Hungary	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	OTP Bank	Bank	Hungary	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	I see the value in the adjusted gender pay gap, and in fact, its disclosure will be mandatory starting from 2027.			
Survey	OTP Bank	Bank	Hungary	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree				
Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Overall we agree that the proposed amendments strike an appropriate balance between simplifying the Double Materiality Assessment (DMA) while preserving the integrity of the framework. Clarifying the role of information materiality as an overarching filter is welcome and rightly reinforces the emphasis on the provision of information that is most decision-useful for users of reporting. Providing flexibility for reporting entities to disclose on additional topics deemed 'non-material' when specifically requested by users will help to facilitate investor stewardship and engagement. We recognise the efforts that have been made to clarify the relationship between impacts, risks and opportunities ('IROs'), topics, and sub-topics, and the flexibility to report at the level deemed appropriate for the entity. However, there is a risk that these related but distinct concepts are perceived as interchangeable. Topics address broad thematic areas for disclosure whereas IROs are specific to the entity and therefore of most relevance for users in the context of decision-making based on reporting. The emphasis should be on IROs, in keeping with the approach taken by international reporting frameworks such as IFRS S1 and S2. We would also like to see a more explicit integration of a sector-specific lens as part of the DMA, particularly for reporting entities operating in high-emitting and high impact sectors. Sector-specific guidance is important for informing effective implementation of materiality assessments and increasing understanding of the most material impacts, risks and opportunities across key sectors. In the absence of dedicated sectoral standards, we recommend that the work EFRAG has already done on this topic is repurposed as non-binding implementation guidance, building on existing SASB and GRI sectoral standards to facilitate interoperability.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	IIGCC partially agrees that the proposed amendments provide an appropriate level of flexibility and should help to reduce overall reporting burdens by allowing for effective summarisation of key information and cross-referencing to other parts of the report. While we welcome improvements in readability and structure, we do not support any weaking of the connectivity between the narrative report and financial statements, which could have highly detrimental impacts on investor decision-making. The proposal to make cross-references to financial statements optional ('may cross-refer') rather than mandatory is concerning. From an investor perspective, connectivity between sustainability reports and financial statements is a fundamental requirement for assessing how material climate risks and opportunities impact financial position and performance. Investors need clear linkages between narrative sustainability disclosures and underlying financial statement assumptions to make informed capital allocation decisions. Without this connectivity, it will be extremely challenging for the market to meaningfully assess the financial impacts of sustainability factors. We recommend maintaining stronger emphasis on mandatory connectivity between sustainability and financial reporting to preserve the decision-usefulness as these are material disclosure rather than voluntary communication.			
Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Overall the proposed changes are sensible. We emphasise the need to ensure that higher aggregation of information at the PAT level rather than the level of IROs should not compromise users' ability to understand how the preparer of reporting is identifying and managing entity-specific, material IROs. Additionally, we recommend that the following disclosures are retained, to inform investor assessments of preparers' policies and processes for managing IROs on an ongoing basis and to support engagement efforts: Whether and when an entity plans to implement policies, action plans and targets for material topics. Information on the progress of actions or actions plans disclosed in previous periods. Key actions taken (and the results) to provide for and cooperate in or support the provision of remedy for those harmed by actual material impacts.			
Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	The proposed changes make it much easier to identify requirements to comply with on a mandatory basis and the general reconfigurations proposed should help to improve accessibility. It will be important to ensure that 'may disclose' datapoints that have been moved to the Non-Mandatory Illustrative Guidance (NMIG) are still given due weight and visibility, as in many instances they could help to support implementation and provide useful illustrative examples for reporting entities.			
Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	See our responses to subsequent questions for our substantive feedback on the proposed reliefs. We welcome the decision to exclude reliefs that would allow for the omission of Scope 3 GHG emissions disclosures. We support the rationale in the Basis for Conclusions that this metric is too important for supporting the goals of the Green Deal and sustainable finance more broadly. It will be important to mitigate the risk that proposed reliefs are used in a way that does not unduly inhibit users of disclosures' access to decision-useful information. We therefore recommend that EFRAG provides supporting guidance that sets out how and when preparers should use these reliefs, with illustrative examples.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	To an extent, we acknowledge the rationale underpinning the 'undue cost or effort' relief to mitigate the risk of incurring excessive costs or expending undue effort to procure data. However, without more stringent accompanying disclosures setting out how the reporting entity seeks to improve data coverage and quality over a clearly-defined time period, the relief could be seen as overly permissive. Moreover, the proposed wording leaves a considerable amount of room for subjectivity and interpretation. Perceptions of 'undue' costs and efforts will vary from entity to entity and there is a real risk that the relief is applied on a highly inconsistent basis. We therefore recommend that these reliefs are accompanied by explicit requirements for companies to set out how they intend to improve coverage and data quality within specific timeframes. Without this, investors are less able to engage with reporting entities to encourage progress and hold them to account for progress on delivering improvements. Moreover, applying these reliefs to all quantitative data points could significantly weaken data quality and fragment the readability and comprehensibility of data for investors, creating aggregation difficulties at the portfolio and sectoral levels. Additionally, while we understand the need for a degree of flexibility around the use of direct data and estimates, particularly for areas like value chain reporting where disclosures are less mature, we would caution against excessive pushback against what is referred to as 'the systematic preference for direct data'. The rollout of mandatory, standardised sustainability disclosures is a key driver in helping to increase the availability, quality and comparability of directly reported data, as well as encouraging entities across the value chain to improve their own disclosures. All things considered, direct data remains preferable to over-reliance on estimates and proxies where possible and this hierarchy should be acknowledged and preserved.			
Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We have concerns about both options presented, but in the interest of securing quantitative disclosure, our preference would be Option 1. Our strong preference however would be for EFRAG to retain both quantitative and qualitative disclosures relating to anticipated financial effects with significantly stricter criteria for reliefs. These disclosures are critical for preparers to incorporate sustainability factors into their business strategy and financial planning, and for users looking to understand how climate change is expected to impact the bottom line. The disclosure of material climate information is already required under existing IFRS accounting standards used in the EU.. The IASB's educational materials, recent illustrative examples and ISSB's works demonstrate that quantitative disclosure of anticipated financial effects is not only feasible but required when material. We support the rationale for the proposed omission of reliefs based on a lack of skills, capabilities or resources in Option 1 on the basis that it would not be compatible with the revised scope of the ESRS, which will consist of the largest, most sophisticated and well-resourced companies in the EU. However, if broadening CSRD scope to include smaller entities requires some form of capabilities-based relief, we would support a proportionate approach where such reliefs apply only to smaller companies. We agree with the concerns that Option 2 would result in the loss of highly material and decision-useful information for investors. It is also a critical component of the CSRD's financial materiality lens, as evidenced by its inclusion across all main standards that adopt a 'single materiality approach' (ISSB, TCFD, etc). We acknowledge that these disclosures can be particularly challenging, but methodologies and practices have improved in recent years and to make these disclosures voluntary would represent a significant step backwards. Supporting implementation guidance could be developed to further accelerate progress in this area.			
Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	We partially agree with the proposed simplifications but have significant concerns about some of the proposed deletions. We acknowledge some improvements in coherency and welcome the revised wording on material impacts, risks and opportunities of identified financial effects. The revised wording is more consistent with the wider assessments required under the CSRD, increasing the overall coherency of the standards. We also note the increased alignment with the language used in IFRS S2. However, the proposed deletion of specific requirements to disclose potential financial effects from material physical and transition risks, and how these might materialise over the short-, medium- and long-term, fundamentally undermines the decision-usefulness of these disclosures for investors. These time horizons are essential for investment analysis, portfolio risk assessment, and integration with financial planning processes. Without this temporal granularity, investors cannot properly assess the timing of financial impacts or align sustainability risks with investment time horizons. Equally concerning is the proposed deletion of disclosures relating to the use of scenario analysis to inform assessments. Scenario analysis provides critical transparency on the assumptions underlying financial effect calculations and enables investors to understand the range of potential outcomes. This deletion limits the overall picture that investors depend upon for confidence in reported financial effects. The current balance sacrifices decision-useful information in favour of simplification. We recommend retaining the temporal specifications and scenario analysis requirements, as these elements are fundamental to meaningful financial risk assessment and are already established practice among leading companies.			
Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We agree that most of EFRAG's proposed amendments strike the right balance between promoting interoperability and meeting simplification objectives, and welcome efforts to improve interoperability with the ISSB standards. Where proposed revisions could negatively impact interoperability, we generally believe the rationale provided by EFRAG has justified these decisions (e.g. rejecting reliefs on the omission of Scope 3 emissions given the importance of this metric for the Green Deal and sustainable finance). However, as noted in our previous answers, we have significant concerns about certain areas where EFRAG proposes to deviate from the IFRS S1 and S2, specifically in relation to disclosures on anticipated financial effects. We note and welcome the commitment to further joint work on interoperability between EFRAG and the IFRS Foundation. While we recognise and welcome the permanent reference to the IFRS Industry Based Guidance and SASB Standards, we remain concerned about the lack of dedicated EU sectoral standards in the ESRS. Investors have repeatedly emphasised the decision-usefulness of sector specific disclosures, particularly where reporting entities operate in high-impact and material sectors whose decarbonisation will have the greatest impact on the transition.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	We acknowledge and welcome the balance that has been struck in the context of the ESRS-E1 standards, where simplification efforts have, on the whole, not compromised the substance of the climate-related disclosure requirements. IIGCC has carried out mapping of the ESRS-E1 datapoints against our own proprietary disclosure frameworks and found each of them to be relevant and decision-useful for investors looking to assess the credibility of investee transition efforts and allocate capital in line with the transition. The preservation of ESRS-E1 in full must be a priority for EFRAG to ensure investors have the data they need to allocate capital in line with the goals of the EU Green Deal. We are concerned about the dilution of datapoints under ESRS-E4 (Biodiversity and ecosystems). While we are strongly supportive of the decision to make transition plan disclosures for biodiversity and ecosystems mandatory, other aspects of the standard that are important to inform investor decision-making have been diluted and largely moved to general standards or non-mandatory guidance. For example, disclosures relating to the resilience of the reporting entity's strategy and business model in relation to biodiversity and ecosystems have been moved up a level to General Disclosures. But this will likely result in a loss of decision-useful granularity that is important for investors, not least because of their context-specific nature. Additionally, while entities are expected to disclose biodiversity metrics when deemed material, the disclosure requirements under E4-5 lack specificity as to what these metrics should be (e.g. site-level disclosures). We note and support the suggestion by stakeholders to provide additional methodological guidance on metrics in future guidance and the need to align with the work of relevant frameworks, such as the Taskforce on Nature Related Financial Disclosures.			
Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We support the decision to amend biodiversity transition plan disclosures to a mandatory datapoint. It would be helpful for EFRAG to take forward the development of guidance to support preparers with the implementation of these transition plans, and how they interact with wider climate transition plans. We would also recommend the introduction of additional 'comply or explain' provisions for preparers that have identified biodiversity as a material impact, risk and opportunity or dependency, but do not have a biodiversity transition plan in place. Where this is the case, these entities should be required to explain why a plan has not been developed and specify if and when one will be published.			
Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We do not agree with either of the options or the broader framing of the question, which does not align with the approach we have developed to target-setting in collaboration with asset managers and owners as part of the Net Zero Investment Framework (NZIF). NZIF recommends using a broader alignment-based approach for setting targets, rather than focusing on financed emissions (this is also known as a multi criteria maturity scale). Should investors wish to express their objectives quantitively, we believe disclosures should include a mix of absolute and intensity metrics—like a scorecard—to give a holistic picture of progress. We would also note that different types of financial institutions should be encouraged to take different approaches to target-setting. For example, through their loan portfolios, banks provide new capital for companies' activities and should be encouraged to disclose both intensity and absolute emissions-based targets, as set out in IIGCC's Net Zero Standard for Banks. Both sets of targets have different uses and drawbacks. Banks should set sector-specific emissions intensity targets using a physical denominator. Sector intensity metrics are valuable because they ensure that a bank is seeking to align its activities in each sector with climate objectives, independent of overall changes in the volume of activity and any shifts between sectors. Absolute metrics remain essential for calculating financed emissions and portfolio-level climate risk assessment. However, we acknowledge that transition-supporting activities may lead to short-term increases in absolute emissions and therefore suggest that longer-term absolute metrics are more useful.			
Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree				
Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	We are broadly comfortable with the changes made to datapoints within the Environmental Standards that correspond to SFDR PAIs. We acknowledge and welcome the proposed deletion of wording in ESRS E1-5 that would limit disclosure to high impact sectors only. Disaggregated information on energy usage (particularly of fossil fuels) is a highly decision-useful datapoint irrespective of sector as it enables the measurement of energy efficiency improvements amongst other issues. While we agree that it should still be feasible for users of reporting to derive some of the deleted datapoints from information published elsewhere, we note that in some cases the numerator (emissions) and the denominator (energy consumption) where disclosed separately are often on an inconsistent boundary.			

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Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	We would encourage greater alignment with existing, well-established frameworks on biodiversity and ecosystems-related metrics, which the previous application requirements supported. The Taskforce for Nature-related Financial Disclosures (TNFD) have stated a list of core global disclosure indicators and metrics which provide an opportunity to align with and reduce reporting burden. The specifications outlined in AR 26 (a) and (b) aligned with TNFD core Metric C1.0 of Land/freshwater/ocean-use change, under which is it required to state: "Total surface area controlled/ managed by the organisation, where the organisation has control (km2); • Total disturbed area (km2); and • Total rehabilitated/restored area (km2)." Both AR disclosure points could be consolidated within the total rehabilitated/restored area (km2) metric. AR 26 (c) was aligned with TNFD additional Metric A23.0 Changes to nature (dependency and impact): mitigation hierarchy steps, under which it is required to state the "Proportion of sites producing and effectively implementing nature action plans.". While this technically does not measure those where ecological integrity is improved, arguably, the effective implementation of nature action plans is a suitable proxy for this as effective implementation should enable improvements in ecological integrity.			
Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	IIGCC has carried out mapping of the ESRS-E1 datapoints against our own proprietary disclosure frameworks, as well as others including the Climate Action 100+ Net Zero Company Benchmark, to assess the extent to which the datapoints align with investors' data needs. Overall, ESRS-E1 provides a strong basis for assessing the credibility and integrity of transition plans, and the proposed amendments generally preserve this. However, while streamlining and reduced granularity can help to reduce reporting burdens, there is a risk that this will compromise comparability of disclosures and increase implementation costs, particularly for more complex topics that would benefit from additional guidance. In this context, we encourage EFRAG to finalise the draft transition plan guidance it was working on to support preparers' implementation efforts. Although ESRS-E1 includes limited provisions around how companies exert influence on material risks, it stops short of requiring comprehensive transparency on lobbying. ESRS G1 includes more explicit disclosures on lobbying but we would like to see stronger links made between these datapoints and transition plan disclosures under ESRS-E1. A company's external engagement—whether through industry groups or direct advocacy—can be a key metric for investors assessing its climate commitments. Related to this, the ESRS G1 disclosures lack specific requirements to disclose on indirect lobbying activities, i.e. via industry associations. Given that this typically constitutes the bulk of lobbying activities an entity is associated with, we recommend that EFRAG revises the wording here to explicitly account for both direct and indirect lobbying efforts, in line with the investor-led Global Standard on Responsible Climate Lobbying.			
Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	35.E1-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	In the absence of accompanying guidance on transition plans, preparers also require clarity on their implementation and the components to prioritise. From the perspective of the preparer, the main purpose of these plans is to set out their planned response to climate change, underpinned by forward-looking actions that ensure the business model and strategy is resilient to, and well positioned to realise opportunities arising from, climate change. We recommend that some form of guidance, leveraging the work EFRAG has already done on this topic, is taken forward to help support effective implementation and to encourage the development of plans that are genuinely useful and informative for users. With regards to key components of credible transition plans, we would emphasise: 1.Comprehensive, net zero aligned emissions targets. 2.A credible strategy to deliver those targets (including allocation of capital expenditure). 3.Demonstrable engagement to support the achievement of targets (including across the value chain). 4.The contribution to "climate solutions" and wider products/services). 5.Supporting emissions and accounting disclosure.	E1	Disclosure Requirement E1-1 - Transition plan for climate change mitigation	
Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	35.E1-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The consistent disclosure of climate-related risks and opportunities and the quantification of potential impacts in different scenarios is critical for investors understanding and managing climate risk at portfolio level. One element missing from the current DR is to clearly request that the preparer specify the temperature related to the scenario they are using as its central assumption for forward looking planning. This will help investors understand the extent to which they are factoring in a transition, whether their assumptions about physical risk impacts are material and hence where the balance of risk lies relative to the scenarios they may be using.	E1	Disclosure Requirement E1-2 - Climate-related risks and scenario analysis	
Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	35.E1-4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Although ESRS-E1 includes limited provisions around how companies exert influence on material risks, it stops short of requiring comprehensive transparency on lobbying. ESRS G1 includes more explicit disclosures on lobbying but we would like to see stronger links made between these datapoints and transition plan disclosures under ESRS-E1. A company's external engagement—whether through industry groups or direct advocacy—can be a key metric for investors assessing its climate commitments. Related to this, the ESRS G1 disclosures lack specific requirements to disclose on indirect lobbying activities, i.e. via industry associations. Given that this typically constitutes the bulk of lobbying activities an entity is associated with, we recommend that EFRAG revises the wording here to explicitly account for both direct and indirect lobbying efforts, in line with the investor-led Global Standard on Responsible Climate Lobbying.	E1	Disclosure Requirement E1-4 - Policies related to climate change	

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Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	35.E1-6.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We note that compatibility of transition plans with 1.5 degrees is not in scope of the review of the Level 2 standards, and the Standards no longer include a definition of net zero targets. However, EFRAG should provide clarity at the technical level on the level of ambition needed for transition plan targets, and their alignment with the goals set out in wider EU legislation, at the earliest opportunity. It is important for users and preparers to understand what is expected and what is feasible in this context, particularly in relation to 'Paris-aligned' targets, and whether this requires a narrow interpretation of alignment with a 1.5c pathway (as set out in the European Green Deal) or a 'well below 2c' pathway. Transition plans are, on account of their forward-looking nature, subject to inherent uncertainties and in part dependent on factors outside of the preparer's control. In this context, it may be advisable to consider disclosure requirements that focus on the extent to which transition plans are "Paris-aligned" and highlighting the plan's resilience to multiple scenarios. The ESRS-E1 disclosures do not include short-term GHG emissions reduction targets (e.g. before 2030). While medium- and long-term target disclosures are required from 2030 onwards, short-term targets are also vital to ensure that boards and management are actively steering towards decarbonisation. We caution against the proposals to no longer require updated target disclosure at 5-year intervals after 2030. The NZIF encourages investors to establish portfolio objective 'stocktakes' on a 5-yearly basis where possible as a means of reflecting on progress against portfolio alignment objectives, and to support the adjustment of net zero strategies where necessary. This helps to align investor actions with the ratchet mechanism of the Paris Agreement, as well as other interim targets under the EU Climate Law (for example the 2040 target).	E1	Disclosure Requirement E1-6 - Targets related to climate change	
Survey	Institutional Investors Group on Climate Change (IIGCC)	NGO	United Kingdom	35.E1-9.	Do you agree with the amendments of this chapter?	I disagree	We are concerned about the deletion of the provision requiring explanations on residual GHG emissions and neutralisation pathways. While we note stakeholder concerns over the reliability of long-term projections, it is precisely this uncertainty that made the disclosures of underlying assumptions so useful.	E1	Disclosure Requirement E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	
Survey	TomTom NV	Preparer (non-financial preparing a sustainability report)	Netherlands	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	The amended version offers significant relief in the auditing process and enhances the practicality of conducting the DMA process. We particularly support the top-down approach and the newly introduced practical considerations.			
Survey	TomTom NV	Preparer (non-financial preparing a sustainability report)	Netherlands	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Unclarity remains regarding the definition of "significant ongoing effort" and why it is treated differently compared to a "normal" mitigation action. While Appendix C provides some explanation, it is still complex and difficult to follow. Further simplification is needed. We agree with the overall concept of the net approach that considers both prevention and mitigation actions.			
Survey	TomTom NV	Preparer (non-financial preparing a sustainability report)	Netherlands	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	TomTom NV	Preparer (non-financial preparing a sustainability report)	Netherlands	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	GDRs are still quite lengthy.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	TomTom NV	Preparer (non-financial preparing a sustainability report)	Netherlands	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	Understandability has been improved: in particular, "Application Requirements" section is better presented.			
Survey	TomTom NV	Preparer (non-financial preparing a sustainability report)	Netherlands	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	TomTom NV	Preparer (non-financial preparing a sustainability report)	Netherlands	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2				
Survey	TomTom NV	Preparer (non-financial preparing a sustainability report)	Netherlands	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	For companies that choose to disclose E1, even if it is not material because they are not part of a high carbon emission-producing industry, the entire E1-11 DR is unnecessary, when ESRS 2 SBM-3 suffices. This disclosure can be made as a best practice or if certain conditions are met. Furter simplification and relief is needed on this DR. Also, it is very difficult to attribute financial effects to only climate change (other variables might be involved: macroeconomics trends…), that's why qualitative information provide a better context on certain anticipated effect, especially in those situations where quantitative effects are not quantifiable for above reasons.			
Survey	TomTom NV	Preparer (non-financial preparing a sustainability report)	Netherlands	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	TomTom NV	Preparer (non-financial preparing a sustainability report)	Netherlands	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	TomTom NV	Preparer (non-financial preparing a sustainability report)	Netherlands	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	We agree on the simplification of the table on GHG emissions (previously AR48), removing the milestones and targets section (which was a repetition of other DR and did not add valuable information).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	TomTom NV	Preparer (non-financial preparing a sustainability report)	Netherlands	23.	Six datapoints exceptionally moved from “may” to “shall” In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, “may disclose” datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	We disagree on the changes on G1: we believe they should not be mandatory but rather kept them voluntary.			
Survey	TomTom NV	Preparer (non-financial preparing a sustainability report)	Netherlands	25.	Emphasis on ESRS being a “fair presentation” reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	TomTom NV	Preparer (non-financial preparing a sustainability report)	Netherlands	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking’s employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	For the reader/user of the annual report, this change does not provide any real additional value. It only results in increased audit burden and an overload of information that does not enhance the report’s usefulness (i.e., a country with 60 employees out of 3,500 equals 1.7% of the workforce but has to be disclosed under the proposed legislation. Including this information does not provide any value; it merely clutter the Annual Report.)			
Survey	TomTom NV	Preparer (non-financial preparing a sustainability report)	Netherlands	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary (“may”) datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	The adjusted gender pay gap by employee category could be removed, provided that companies can still report some form of adjusted pay gap metric (adjusted by employee type, countries…) as entity-specific information in the same table. For example, in tech companies such as TomTom (which have historically employed a predominantly male workforce), the adjusted gender pay gap is necessary to accurately reflect reality and avoid misleading the reader.			
Survey	TomTom NV	Preparer (non-financial preparing a sustainability report)	Netherlands	35.E1-7.	Do you agree with the amendments of this chapter?	I disagree		E1	Disclosure Requirement E1-7 - Energy consumption and mix	
Survey	Forvis Mazars Group	Auditor	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: “[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process”.Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in “Gross versus Net” as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We welcome EFRAG's efforts to simplify the DMA process and promote a pragmatic approach to identifying material IROs. We note that the proposed changes will put greater emphasis on management's judgement given the practical considerations that are introduced. As auditors, we will especially exercise our professional judgement on topics that are not "clearly" material or immaterial, based on the documentation prepared by the undertaking. We nonetheless encourage EFRAG to further clarify that regardless of the approach adopted to perform the materiality assessment (i.e., top-down or bottom-up), the objective of the DMA is still to identify material IROs which is notably not clear under AR 23 in ESRS 2. Even if we agree with the fact that information can be presented at an aggregated level (i.e., either at topical or IRO level), we encourage EFRAG to provide further illustrations in the NMIG on how to determine "what provides the most relevant information" (see para 22 in ESRS 1). We also welcome the reinforcement of the information materiality filter. However, we deem it important to further clarify what is meant by "users of general purpose sustainability statements", how it differs from "users of sustainability statements" and how it compares to "affected stakeholders". This is key to ensure that the filter is appropriately and consistently applied. Though we recognise that it is reasonable to allow companies presenting information about non-material topics, we recommend EFRAG ensure that users can differentiate between information that is required by ESRS (including entity-specific information) and other information. We therefore recommend the presentation of information about non-material topics in an appendix to the sustainability statement. Such information should be limited to the information needed to meet specific demands from stakeholders. In this regard, we encourage clarifying the concept of "specific user" under para 108 in ESRS 1.			
Survey	Forvis Mazars Group	Auditor	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called “gross versus net” issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating ‘actual’ from ‘potential’ impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Though we acknowledge that there has been divergence in practice regarding how to consider implemented remediation, mitigation and prevention actions in the DMA, and therefore that clarifications are needed to address the so-called "gross vs net" issue, we consider that the current proposals do not fully solve this issue. The results of the field test conducted by EFRAG will be critical to decide on the changes to be ultimately brought to ESRS 1. Para 34 and 35 in ESRS 1 read in conjunction with appendix C indeed do not sufficiently clearly and consistently state that negative impacts are generally to be assessed before mitigation, prevention and remediation actions. It is therefore unclear what the practical outcome of applying the proposed requirements will be. We believe an appendix can be helpful, but it should stay principle-based clarifying concepts introduced in the Standard such as "significant ongoing mitigation and/or prevention actions" and explaining further how such actions are to be considered in the materiality assessment of negative impacts. Adding illustrations in the NMIG, covering environmental and social impacts, for instance regarding health and safety topics, would also be useful to support consistent application of ESRS. Besides, we disagree with EFRAG's view that it is not necessary to also address risks, as we think binding guidance is equally needed given the practical questions raised in implementing the Set 1. We encourage EFRAG to collaborate with the ISSB to ensure that any clarification that may be provided in the ESRS is interoperable with the IFRS SDS. Finally, though we welcome the attempt to define positive impacts, we consider that EFRAG should clarify that any results of the undertaking's mitigation or remediation actions on its own negative impacts are not positive impacts, for instance even if such actions go beyond compliance with law and regulation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Forvis Mazars Group	Auditor	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We welcome the flexibility introduced, as current Standards are very strict regarding the presentation of sustainability statements, which has sometimes hampered the readability and therefore the relevance of the information presented. We support the proposals to allow the addition of an executive summary and the use of separate sub-parts and appendices in the sustainability statement. Nonetheless, we believe it is necessary to further clarify: -that the executive summary shall present fairly the undertaking's material IROs; -under which circumstances some information could be presented as an appendix since the reader might interpret that such information is less important than that presented in the main body of the statement. Besides, though we agree that the sustainability statement shall be structured in four parts, we recommend allowing companies to present the environmental, social and governance parts in the most relevant order considering their material IROs. To support the readability and the comparability of the sustainability statements, we also encourage EFRAG to propose a table for the most complex metrics (e.g. pollution). This could be done either in the ARs or the NMIG depending on whether the use of the table is mandatory or not. Last but not least, we deeply regret that though the general principle of connected information has been maintained, EFRAG now proposes to no longer be obliged to formally evidence in the sustainability statement the direct / indirect connectivity with financial statements (see para 114 and 115 in ESRS 1) whereas it is critical to present consistent information. Not only do the proposed modifications seem to contradict the requirement under para 111 (b), but they also represent a significant step backwards that may negatively impact the overall consistency of corporate reporting.			
Survey	Forvis Mazars Group	Auditor	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	Overall, we support the way EFRAG has restructured the architecture of the ESRS and the interaction between ESRS 2 and the topical Standards. We believe that the revised structure is clearer and that the streamlining of the GDRs along with the related datapoints on PATs in the topical Standards will significantly contribute to reducing the burden as the previous requirements included many overlaps. We also welcome the fact that the datapoints that have been removed regarding PATs related to topical matters have been kept as illustrative narrative information in the NMIG. Regarding point 5., though we agree in principle with the possibility given to report information on PATs at a higher aggregation level than the material IROs, we recommend EFRAG clarifying the circumstances under which such aggregation would be relevant. Finally, we support the deletion of the topical specifications to GOV, SBM and IRO as proposed by EFRAG.			
Survey	Forvis Mazars Group	Auditor	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	Overall, we agree that the proposed amendments improve the understandability, clarity and accessibility of the Standards. However, we would like to make the following comments: -Some concepts that already existed in ESRS 1 and which have raised many questions in practice are still unclear (e.g. "own operations" in para 59 in ESRS 1 – see our detailed comments in Part 3 – or "operational control" in ESRS E1). -New concepts have also been introduced without always providing the appropriate definitions / explanations (e.g. "ongoing mitigation and/or prevention actions" in para 35 in ESRS 1). -The revised Standards should be reviewed again to ensure that no datapoint is included in the ARs (for instance, see AR 6 in ESRS E4). -The "shall consider" requirements in the ARs which are elements of methodology for preparing the disclosure are not well understood (e.g. it is uncertain what is meant by mandatorily "considering" the GHG Protocol Corporate Standard when preparing GHG emissions under AR 21 in ESRS E1). We therefore suggest adopting more explicit wording on what companies should do in practice. -Finally, EFRAG should clearly indicate that the previous issued implementation guidance and FAQs are no longer to be considered once the revised ESRS come into force. EFRAG should nonetheless make a thorough review of the related content to ensure that the revised Standards and the NMIG incorporate all relevant elements that are still applicable/useful to support a consistent implementation of the new Set.			
Survey	Forvis Mazars Group	Auditor	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We support the NMIG being non-binding and not being included in the Delegated Act on the revised ESRS, but only for as long as the NMIG contains only examples of possible items to cover when disclosing in accordance with a mandatory datapoint (mainly for narrative PAT disclosures) or explanatory content that has no implication on the way to prepare the information to report. "How to report" guidelines (i.e. methodology) should be systematically presented in the ARs and therefore be binding to ensure consistent application of the ESRS. For instance, NMIG 5 for para 51 in ESRS 1 presents helpful explanations that are relevant to consider to properly apply ESRS requirements. We therefore recommend that such explanation be included in ESRS 1. Besides, even though NMIG is non-binding, EFRAG should ensure that this guidance is consistent with the revised Standards. For instance, there is an inconsistency in the NMIG in the introductory paragraph to the flowchart for determining disclosures under ESRS whereby it is indicated that companies are asked to disclose a brief explanation of the conclusions of the materiality assessment for a given non-material topic whereas this is not a requirement in ESRS 2 IRO-2. In the future, if EFRAG continues to act as the interpreting body for ESRS, which is something we support, we believe it is important that EFRAG's answers to implementation questions asked by stakeholders be addressed through a formalized and robust due process. The distinction between what should be considered additions to the NMIG (as non-binding guidance) and what should be considered formal interpretations of the Standards (therefore binding guidance) should be made very clear. Finally, we believe that the EC should ultimately clearly explain the different levels of publication and its respective status (i.e., legal/authoritative or non-binding).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Forvis Mazars Group	Auditor	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	As auditors, we cannot comment on whether the right balance has been struck between simplifying ESRS and the need for transparency. However, the proposed reliefs need further clarification to ensure consistent application. We therefore recommend: -clarifying that applying the reliefs does not prevent from achieving a fair presentation. That said, the reliefs should, of course, be applied appropriately (e.g. they should not be applied systematically so as not to give information about the upstream/downstream value chain whereas such information would be necessary considering the material IROs identified); -providing factors or criteria to rely on to exercise one's judgment regarding the implementation of the "undue cost or effort" relief and clarifying whether the assessment of what constitutes undue cost or effort is supposed to evolve over time as access to information may improve over time; -clarifying the interactions between all the reliefs: what is a mere illustration of the general relief on "undue cost or effort" and what is an additional separate relief? It is critical to be able to clearly identify which relief applies in which situation; -precising at which level the relief in para 90 applies: is it applicable only when an "activity", due to its nature, is not expected to be a significant driver of the IROs the metric purports to represent, or is the relief also applicable at a more granular level (e.g. at subsidiary or site level). Besides, an undertaking should ensure that, overall, what is excluded from the calculation is not material. We also recommend deleting the relief on joint operations given that the general treatment of such complex transactions is not explicit in the Standard. EFRAG should therefore first clarify this. Besides, this relief is based on operational control which is a concept that is not well defined in ESRS.			
Survey	Forvis Mazars Group	Auditor	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We believe it is important to clarify whether the relief provided under para 91 in ESRS 1 is an illustration of the general "undue cost or effort" relief or whether it can be applied following a different assessment by the undertaking. Besides, EFRAG should clarify if there is a relief applicable for the reporting of GHG emissions as the exception in para 91 in ESRS 1 seems to contradict the general relief on "undue cost or effort" notably applicable to the disclosure of all metrics in accordance with para 87 (d) in ESRS 1.			
Survey	Forvis Mazars Group	Auditor	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Though we acknowledge the difficulties for companies in providing quantitative information about anticipated financial effects, for instance in isolating these effects with respect to a given material risk or opportunity, we support option 1 as it best preserves a high level of interoperability with IFRS SDS, while still allowing companies to withhold quantitative information if they are unable to provide such information, considering the different reliefs that can be used. Option 1 is also key to supporting connectivity between sustainability and financial information. However, we recommend that EFRAG develop NMIG to support both companies and auditors in, respectively, preparing and verifying this information, building on the IFRS Foundation's educational material issued in August 2025 on "Disclosing information about anticipated financial effects applying ISSB Standards". As an alternative approach to Option 1, and if necessary, we propose that EFRAG adopt a hybrid approach whereby climate-related anticipated financial effects would be presented according to Option 1 and whereby other anticipated financial effects would be presented according to Option 2, at least for a certain period of time, given the different levels of maturity regarding the calculation of such effects (calculation methodologies regarding climate-related anticipated financial effects being more mature than other methodologies).			
Survey	Forvis Mazars Group	Auditor	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				
Survey	Forvis Mazars Group	Auditor	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We appreciate EFRAG's efforts to preserve interoperability with IFRS SDS as much as possible considering the overall objective of burden reduction. It is indeed key to avoid duplication of efforts and to ensure that information presented under different frameworks is comparable to the greatest extent possible. Nevertheless, we question why different wording has been used in the proposed revised Standards where ESRS are meant to be fully aligned with IFRS SDS (e.g. the fair presentation principle, the general "undue cost or effort" relief, etc.). Wording that is not fully aligned without proper justification will inevitably create confusion and unnecessary analysis for companies reporting under both frameworks. Overall, we encourage EFRAG to use as much as possible the same language as the one used in IFRS SDS when the underlying principle, relief or requirement is meant to be the same. Even more, there are important areas where interoperability could be further enhanced without undermining the EC's simplification objective. Especially, we regret that EFRAG is not proposing to fully align with IFRS S2 regarding the reporting of GHG emissions by allowing companies to decide on which approach offered by the GHG Protocol it wishes to apply. Above all, this would reduce complexity for companies used to applying the GHG Protocol. This being said, we also note that the GHG Protocol is currently under revision and that referring to all options in the GHG Protocol would probably imply that EFRAG reinforce its collaboration with the Protocol.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Forvis Mazars Group	Auditor	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	First of all, we do not believe that adopting fair presentation in preparing sustainability information according to ESRS will support a more effective functioning of the materiality filter. Fair presentation is indeed often confused with materiality which makes it even more important to provide a clear definition of what fair presentation is in the context of sustainability reporting. To avoid divergent interpretations, sufficient guidance/illustrations should be provided to ensure that the consequences of the fair presentation principle are well understood, notably regarding the presentation of ESRS metrics. Section 2 in ESRS 1 should clearly make the link with para 10 on entity-specific information acknowledging that such information will be even more critical considering the fair presentation principle. Adding complementary information where necessary to achieve fair presentation is aligned with the requirement in IFRS S1. Besides, since the objective of sustainability reporting prepared according to ESRS is to present fairly the undertaking's material IROs, there are questions on how the reporting at topical level, which is allowed by ESRS 1 when certain conditions are met, can be assessed to convey a fair presentation of the material IROs. Finally, we do not believe that ESRS being a fair presentation reporting framework will alleviate the burden on companies. On the contrary, we believe that this will increase complexity as we understand fair presentation comes in addition to compliance. Sustainability reporting under ESRS is not mature enough to introduce right now fair presentation as an explicit principle in the Standards. In practice, this will increase companies' responsibility in view of the significant judgements they will have to make. Therefore, though we do not oppose to fair presentation as such, we believe adopting such principle in preparing ESRS sustainability statements can only be relevant once preparers and auditors have gained sufficient experience in this regard.			
Survey	Forvis Mazars Group	Auditor	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The amended methodology for the calculation of adequate wages outside of the EU set out in para AR 22(b) of ESRS S1 is not consistent with the objective of the DR as it allows for the use of statutory minimum wage established by legislation or collective bargaining agreement taking into account the ILO wage setting principles, whereas a minimum wage is often not an adequate wage. Considering the complexity of the issue and the fact that adequate wage benchmark is not always available, we recommend putting emphasis, in the disclosure requirement, on the importance of providing sufficient qualitative information to explain the methodology applied and the extent to which it enables to meet the objective of the DR.			
Survey	Forvis Mazars Group	Auditor	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	Overall, we agree with the way that the SFDR PAI have been incorporated in the amended ESRS. This being said, we would like to insist on the need for consistency between the ESRS, the SFDR, and other EU regulations (e.g. the provisions of Pillar III disclosures on ESG risks). In particular, it is key that, when revising the SFDR and PAI indicators, the EC takes into account the simplifications that have been introduced in the revised Set of ESRS.			
Survey	Forvis Mazars Group	Auditor	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	We agree with the deletion of the voluntary datapoint on adjusted gender pay gap in the final text (compared to what was proposed in the so-called "v1.6") consistently with EFRAG's approach to remove all voluntary datapoints from the revised ESRS, as we understand this deletion will not prevent a company from disclosing adjusted amounts for the gender pay gap (e.g. a disaggregation by employee category or by country) if it is necessary to provide a fair presentation of the underlying material IRO, which may often be the case. Should EFRAG nonetheless want to clarify that such adjusted amounts may be relevant in addition to the required unadjusted ESRS metric depending on the entity's specific facts and circumstances, we suggest including an illustration in the NMIG related to ESRS S1.			
Survey	Forvis Mazars Group	Auditor	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We acknowledge the efforts made by EFRAG to clarify and simplify the general requirements that are applicable to sustainability reporting under the ESRS. In particular, we welcome the promotion of a pragmatic and efficient double materiality approach, the reinforcement of the information materiality filter, the inclusion of new reliefs and the flexibilities introduced regarding the presentation of the sustainability statement. However, we have identified several critical areas (namely the fair presentation principle and the "gross vs net" approach as currently defined) where EFRAG's proposals may not reduce the reporting burden on companies. We therefore strongly encourage EFRAG to review the draft standard on these issues to better serve the objective of simplification. We also encourage EFRAG to refine its proposals on the reliefs that are now provided to ensure consistent application. Other detailed comments are included in the Excel template.			
Survey	Forvis Mazars Group	Auditor	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Forvis Mazars Group	Auditor	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Overall, we welcome the simplification efforts and the clarifications brought by EFRAG on ESRS E1, in particular the focus on "key features" when reporting on transition plan for climate change mitigation as well as the possibility to demonstrate the 1.5°C compatibility of GHG emissions reduction targets by providing the validation of an independent third party. With respect to GHG emissions reporting boundaries, and consistently with our proposal to align ESRS E1 with IFRS S2, we recommend allowing different approaches as per the GHG Protocol. As indicated under question 34, we also regret the removal of the guidance on net-zero targets. Other detailed comments are included in the Excel template.			
Survey	Forvis Mazars Group	Auditor	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Forvis Mazars Group	Auditor	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Forvis Mazars Group	Auditor	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Forvis Mazars Group	Auditor	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Forvis Mazars Group	Auditor	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Forvis Mazars Group	Auditor	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Forvis Mazars Group	Auditor	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Forvis Mazars Group	Auditor	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Forvis Mazars Group	Auditor	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Forvis Mazars Group	Auditor	Belgium	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Forvis Mazars Group	Auditor	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Considering the timing of the consultation, which is concurrent with the preparation of sustainability information for FY 2025 for wave 1 companies, we urge EFRAG to clarify in the basis for conclusions which amendments are only clarifications of the current requirements and can therefore be anticipated when applying the Set 1, and which amendments introduce new (and therefore different) requirements compared to the Set 1. Besides, we regret that EFRAG has not been able to develop even limited specific guidance for the financial sector notably to take into account of the specificities of the downstream value chain. Clarifying the requirements for the calculation of financed and insured emissions is also critical. Regarding ESRS E1, we note that EFRAG has removed the definition / requirement on "net zero targets" considering that it is not able to define this concept. We recommend to at least require in ESRS E1 to clearly explain how such target has been defined and how it will be met by the undertaking in the future. The clarifications brought in the Set 1 have indeed enabled to significantly improve the transparency and consistency of this critical information. Finally, we note that the sustainability statement includes ESRS information that is standardised by the EC with the help of EFRAG, but also EU Taxonomy disclosures that are defined by the EC with the support of the Platform on Sustainable Finance. Currently, both reporting frameworks are independent overall, but we encourage the EC to identify points of convergence as much as possible to further reduce complexity for companies. For instance, the relief that is proposed in ESRS 1 for acquisitions and disposals is not consistent with the approach retained by the EC in FAQ 152 published in March 2025, which will inevitably raise questions in practice.			
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We appreciate most of the proposed changes as they will significantly streamline the DMA. Especially the simplification that topics can be deemed non-material by analyzing the companies business model and value chain will support this. Also, the introduction of fair presentation and the changes to the information materiality (e.g., allowing materiality judgement in the "Flowchart for determining disclosures under the ESRS" also for policies, actions, and targets) is welcomed. However, some aspects of the DMA process are still not fitting for the concept of fair presentation. An example is paragraph 21 (b) in which it is currently stated, that the Sust. Statement should "enable users to understand...". Fair presentation/materiality is not about enabling a general understanding, it is about communicating only the information needed for a decision of the respective user (i.e. stakeholder). Understanding, however, has no limiting effect on the information to be included. Aside from this aspect, more guidance regarding some aspects (e.g., how Scale can be assessed or how to model in DMA cases in which "severity of an impact takes precedence over its likelihood in case of a potential negative human rights impact" would be welcomed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	While it is definitely necessary to clarify the "gross vs. net" issue, the guidance developed is complex, theoretical and not all terms are clearly defined (example for unclear definitions: significant ongoing activities; is having a compliance office to deal with bribery and corruption an significant ongoing activity, or is fulfilling the minimum legal requirements regarding safety an significant ongoing activity?). Differentiating between actual and potential impacts, first year and future years of occurrence is complex to communicate (1) to experts during the actual DMA and (2) to the reader of the report as she/he has not the same insights as the company itself. We would welcome a simpler and consistent application of the gross vs. net view for all IROs. It is also crucial to take into account that many industries are already highly regulated (e.g., health and safety for chemical industry or data protection for IT industry). Taking activities to fulfill such regulations not into account when assessing materiality of an IRO would lead to many IROs becoming material.			
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We highly welcome this flexibility. The changes in the structure of the ESRS increase their readability: having the ARs in a box right next to the respective paragraph, deleting "explanatory" paragraphs, and combining paragraphs makes it easier to navigate and read. The latter also increases the flexibility of companies as the paragraphs are now more principles based as they still define the data to be reported but are less prescriptive. Positive is also the increased flexibility regarding the use of tables (many are shifted to "may present"), the use of appendices and the possibility shift details about the GHG calculation methodology into such appendices. Lastly, also the added possibilities to (1) exclude sensitive information and to (2) exclude certain activities from metric calculations are greatly increasing flexibility without substantially decreasing information value. Despite the positive aspects, we noticed, that new mandatory disclosures have been added – clearly against the request of the EU commission and the aim of the revision to reduce reporting burden. Additional mandatory data points should be avoided.			
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We agree, the new principles based approach can be considered a major improvement as it increases the companies flexibility. Also changes like the fact that only key actions need to be disclosed, the reduction of negative statements (i.e., something is not implemented or in place), and the clarification that targets can also be qualitative are positive.			
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We consider the NMIG as a valuable source for additional guidance on how to approach certain topics. However, we consider it as crucial, to make sure that NMIGs do not create an implicit expectation that the examples provided must be followed or justified if not applied. To achieve this, we would suggest a clear communication on NMIGs including a clarification, that the NMIG cannot be used for audit purposes. Having all "shall disclose" datapoints in the main body of the standard is valuable and having the respective ARs in a box right under the respective paragraph eases understanding. However, especially in more complex standards like E1 the ARs are quite extensive and contain requirements that previously would have been considered DPs (e.g., ESRS E1 Paragraph 14 (a) a description of "financial and investment planning" is required, then AR2 requires CAPEX/OPEX figures for the short- and medium-term and a range for the long term). It would be reasonable to either include such extensive additional details in the main body of the standard or (preferred option) indicate in the main body that significant additional requirements are located in the respective AR. While we see a lot of positive changes to make the ESRS more understandable and clearer, we do not think the reduction of datapoints will lead to a likewise reduction of report content and effort on preparer side, as e.g., sometimes several datapoints/paragraphs from the "old" ESRS have been combined in one new paragraph.			
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We consider NMIG as valuable addition to the ESRS. We also concur with the recommendation of the EFRAG to not include them in the delegated act. Having deleted content included in structured NMIG's helps to (1) ease understanding and (2) maintain some control over the content and frame the guidance correctly. However, we would welcome EFRAG to carefully consider how the single NMIG's are phrased. Example: ESRS E1 NMIG 12 (e) gives the reader the impression of a requirement to use a certain formula when calculating GHG emissions in monetary units. Such cases should either be re-located to the ARs within the standard or rephrased do clearly indicate it as voluntary.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	Most of the reliefs are a step in the right direction. Especially the reliefs for 2. Lack of data quality, 4. Exclusion of certain activities from metrics and 7. Relief for acquisitions are helpful in overcoming the challenges preparers faced during the first ESRS reporting period. In the social area certain activities related to corporate culture (e.g., performance talks, employee surveys or corporate roles) can´t be immediately extended to acquired entities and thus presented major challenges when calculating related metrics. The three above-mentioned reliefs mitigate this problem. However, especially regarding the relief for acquisitions it should be noted, that the one-year timeframe might be insufficient. Sustainability reporting is far more complex than financial reporting, and greater flexibility should be offered to disclose metrics once the subsidiary is fully integrated.			
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	In many cases estimation will be possible and will result in meaningful disclosures. However, we encountered cases, in which this held not true; esp. in case of social (entity specific) metrics.(examples are % of employees with performance talks, or training completion rates). For such cases we consider this relief beneficial. We do not see a problem to not include a time limit for the relief. If the respective disclosure is important for stakeholders the companies have sufficient incentives to improve the respective disclosure for the next years. Furthermore, the disclosure of the planned measures to be improved gives stakeholders sufficient leverage to hold the respective company accountable and demand improvements.			
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Preference: option2. If quantification is done by companies, it should be explicitly stated in the ESRS that ranges are possible as one single number might create the false impression of accuracy. Calculating anticipated financial effects for risks and opportunities is challenging, requires a lot of assumptions (esp. for the long-term time horizon of more than 5 yrs) and can be considered misleading by readers if those effects don't materialize eventually One example to illustrate challenges are reputational risks. The estimation of long-term reputational risks for sustainability topics can change from one year to another depending, e.g., on the political landscape and economic situation. Another example relates to the necessity to state anticipated financial effects on a risk/opportunity level. In practice this is not realistic as many risks/opportunities are interconnected and can´t be viewed in isolation. Finally, it's even uncommon to report a monetized figure in more sophisticated financial risk management systems; they usually give a broad range or qualitative indication. Furthermore, if anticipated financial effects have a certain probability of materializing, they would already be reported in companies financial reporting. Examples are the outlook in case of opportunities materializing or a provision or a contingent liability in case of a risk. While option 2 doesn't automatically leads to ISSB aligned reporting, it gives companies enough freedom to do so, i.e., they can disclose quantitative information and only "fall back" on qualitative information in cases allowed by ISSB. Please note: if option 1 should be chosen, we think it's appropriate, to place the text from AR 17 directly in the main body of the text to reflect its importance. If option 2 is chosen, that other parts of ESRS like ESRS E.1 AR 7, 40 (e) and 41 (g) should be revised and parts like E1-11 should be made voluntary.			
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Regarding 40 (d): Depending on the site at risk it might not be possible to identify the revenue at physical risk. Sales offices, sites that provide service to the whole group (e.g. Shared Service Centers), revenue generated by datacenters which serve several customers across the globe, etc. do not generate any revenue but might be at risk. Consequently, the value of such disclosure would be decreased. Regarding 41 (c): While within Europe there are standardized energy efficiency categories for real estate, outside Europe this is not the case. Also, within Europe while the categories are standardized, the thresholds are different depending on the country. Also in general, those additional disclosures are to a large extent sector specific. Examples: for companies in the service sector stranded assets ESRS E1 – 41 (f) are oftentimes not relevant, ESRS E1 – 41 (c) might be of interest primarily for real estate companies.			
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	The biggest ISSB to ESRS differences we identified when internally mapping our 2024 Sustainability Statement to the ISSB requirements are settled with the changes described above. The anticipated financial effects have been the biggest difference we identified. Above that the now principle based ESRS that allow fair presentation should allow sufficient flexibility to fulfill ESRS and ISSB requirements with one single Sustainability Statement.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	While we agree that the more principle based approach and the deletion of certain "shall" datapoints is helpful , we observed some notable exceptions. In some cases, datapoints have "just" been combined and summarized in one paragraph (e.g., Waste disclosures: previously E5 37 to 40, now E5 (revised) 18 and 19 remain essentially unchanged), we do not consider this a reduction. In some cases even new requirements were added (again e.g., E5: waste with unknown destination; we observed similar examples in E1, S2 and G1). In other cases, the main body of the standard was reduced but requirements previously considered a datapoint have been moved to ARs (example: S2 AR 1: disclose how policies are communicated). Lastly, the requirements are shortened but disclosures might remain the same as a certain level of context is necessary (e.g., when describing actions). In general, we are against the new mandatory disclosure requirements that have been introduced and suggest deleting them all to fulfill the purpose of the revision of the ESRS. Lastly, the changes may help to reduce effort in data collection, documentation, and coordination with auditors. For example, the introduced options for burden reliefs may simplify internal discussions and reduce the need to justify the omission of non-material items, however, we do not expect a significant reduction in volume.			
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	First of all, we observed more moves from may to shall datapoints than the ones mentioned above (e.g., S2 (10) and (AR 1), communication of policy). In general, we do not agree with this step as it contradicts the exercise of reducing the reporting burden for companies. The datapoints mentioned above are to some extent sensitive information (G1 confirmed incidents of corruption) that rather creates legal uncertainty for the company than any benefit. Those datapoints have been voluntary in the previous ESRS version for a reason. Also, please note, that a disclosure of confirmed incidents of corruption and bribery requires extensive context. A number together with the nature of the incident is simply not creating that needed context. In general, we strongly disagree with the introduction of new mandatory datapoints as this contradicts the overarching goal of the ESRS revision.			
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	First of all, and in line with our observation reg. Q 23, we observed more new datapoints especially in E1 not listed here (e.g., E1 (AR 2) Creates a new requirement for non SBTi certified companies to benchmark their GHG emissions target, or E1 (AR 2) CAPEX/OPEX for transition plans over the short- and mid-term as well as range over long term). We do not agree to the addition of new datapoints as this contradicts the goal of reducing the burden for reporting companies.			
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	Especially auditors have relied heavily on the checklist approach when auditing ESRS Sustainability Statements and required companies to disclose information that would have considered non-material in other reporting frameworks. This pushed companies towards over-disclosing, usage of a highly technical language and in general an increased reporting burden. Due to fair presentation not being mentioned, the ESRS gave companies no effective argument to push back. Consequently, we expect the explicit statement of fair presentation to be a/the major relief for preparers. It is (1) easier to achieve comparability with other frameworks (esp. ISSB), it is (2) easier to streamline the presentation of information and (3) fair presentation can serve as a lever to effectively reduce disclosure overload and increase the efficiency of the reporting. However, in our opinion two aspects need to be refined (1) "fair presentation" should be defined within the ESRS to avoid misunderstanding (there is plenty of scientific literature about the different interpretation of "fair presentation" in Europe after the term was introduced in the accounting directive). When defining "fair presentation" we would welcome to also explicitly state that the concept of fair presentation is used to remove information but also to evaluate possible additional, entity specific information. Secondly, ESRS 1 paragraph 21 (b) in its current form ("enable users to understand…") might lead to even more disclosures as this formulation lacks to give preparer and auditor any guidance on how to limit disclosures (see our response to Q11).			
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	The non-EU hierarchy described in AR 22 (b) ii creates a significant effort for preparers: "any living wage estimate produced by an institution mandated by the public authorities of the country where the workers are based" requires multinational companies to potentially reach out to local subsidiaries around the world. People within the local subsidiaries need extensive and specialized knowledge (1) of the local language and (2) the local regulatory environment to determine the appropriate source for "living wage estimate" (which might also not be a concrete number but range, since its an estimate). On a positive side, 22 (b) iii is opening up the field for any NGO that calculates living wages, and is no longer "suggesting" companies to go for Wage Indicator or Fair Wage Network, which is good as does not call out specific organizations, allowing flexibility.			
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	Consolidation exercise limits duplication of datapoints to consider during preparation Allows having overarching disclosure and refer to this disclosure in topical chapters Word "Severe" has been removed from the disclosure of "human rights incidents", while reference to SFDR PAI indicator remained, where disclosure of "severe human rights incidents" remained, this creates inconsistency. Suggested to add "severe" back to the DR. In addition, definition of "severe" should be provided in alignment with internationally recognized standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	No, we do not agree with the deletion of the voluntary datapoint. We would welcome, if either only adjusted gender pay gap has to be reported or the company can choose to report either the adjusted OR unadjusted metric. The adjusted gender pay gap is in our opinion better suited to reflect the principle of "equal pay for equal work or work of equal value." Only the adjusted gender pay gap takes into account factors like role, seniority, location, and performance, it provides a precise and actionable measure of pay equity. Furthermore, starting in 2027, the European Directive on Pay Transparency (EU Directive 2023/970) will require the use of the adjusted pay gap indicator. The ESRS should align with EU legislative requirements to (1) reduce the reporting burden for companies and (2) avoid confusion and ensure stakeholders can interpret and reconcile consistent data sets.			
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	We do not see the replacement/formulation as an improvement for preparers. Compared to the old ESRS G.1-6 effectively only paragraph 33 (d) "complementary information" was deleted. In practice, companies might still have to provide this complementary information to allow the reader to understand the other disclosures under G1-6, resulting effectively in no change at all. The requirement to report this numbers explicitly for SMEs is challenging, as (1) no generally accepted definition of an SME exists and (2) this requires information about the supplier that is usually not captured in the respective systems (e.g., no. of employees or revenue).			
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS 1: In general we see the changes as a big step in the right direction: (1) emphasizing "fair presentation" incl. the revised flowchart for information materiality in NMIG, (2) moving the ESRS more towards a principles based approach, and (3) the possibility to exclude certain activities from metric calculations will lower the burden for preparers significantly. We also appreciate, that key concepts like DMA, IROs and their connection to PAT is kept. A points for criticism are (1) the lack of a definition of fair presentation and (2) the rules of when to include remediation measures for negative impacts is very theoretical and complex to apply in practice. Beyond that we would appreciate more guidance esp. in the respective NMIG (e.g., how to determine DMA thresholds). Further ESRS 1 comments: -We do not see the benefit of adding the briefing of workers representatives to ESRS (AR 11 for paragraph 33). This is (a) mentioned in the CSRD itself already and (2) no disclosure requirement but a task. -Paragraph 59 and 70 contain a list of examples (e.g., assets and liabilities). Explicit mentioning, that this is just an example would be beneficial -Paragraph 59 also specifies cases in which financial non-material entities have to be included in the sustainability statement. As it is currently written, the paragraph would require companies to test all entities not consolidated for financial reporting. It would be more efficient if entities first check the entities business model, only in case the business model differs, different IROs can occur, consequently only those entities need to be screened. -Paragraph 62 allows value chain estimations, we see the need for the clarification, that the phased in criteria to not report on the value chain for the first three years, is not applied here.			
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	ESRS 2: For ESRS 2 we largely agree with the changes. The revised PAT show, that EFRAG understood reporting reality (e.g., the now explicitly mentioned possibility to use qualitative targets, to disclose headcount as resource). Also the amount of negative statements (we do not have, etc.) was significantly reduced and the proposed options to report about anticipated financial effects are helpful. However, we still see limited cases, in which tables are still mandatory (esp. due diligence). While a description of the due diligence is valuable, limiting the format to a table is unnecessary and reduces it to a mapping exercise for the preparer and yet another overview table for the reader. Regarding the voluntary datapoints we would appreciate a more nuanced approach; in general while voluntary they provide guidance what else could be valuable for the reader and disclosed if available. Instead of deleting all voluntary datapoints one could move at least some to NMIG or keep them in ARs. Further ESRS 2 comments: -In paragraph 9 (b) it is unclear to us, whether we have to disclose a process, the outcome of the process or both. Clarification would be needed. -Paragraph 14 and 15 refer to the risk management for sustainability reporting (as in the original ESRS). However, as the risk management system and internal controls are usually two separate systems, a change in wording would be appreciated, to clearly state which system needs to be described. -Paragraph 20: it is unclear to us, why workers' representatives are explicitly mentioned as stakeholder group. -Paragraph 24: Disclosure requirements about the resilience analysis are mentioned here AND in ESRS E1. It should be located in one standard only. -AR 22 gives the impression that companies have to conduct the DMA on site level, please re-word to avoid misconceptions.			
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS E.1: The largely positive revisions of ESRS E.1 are (1) making the use of pre-defined tables voluntary and (2) making it possible for all companies to have an financial scope of consolidation equaling the reporting boundary under ESRS 1 AND ESRS E.1. However, especially in this ESRS we observed some new datapoints (esp. in AR 2 and AR 10) requiring companies to (1) benchmark their emission reduction target and (2) disclose resources/investments for the short-, medium- and long-term. As we consider fulfilling this new datapoints challenging, we would appreciate EFRAG to take this feedback, as well as the feedback given on the preceding pages into account and re-visit the critical parts of E.1. Further ESRS E1 comments: -As climate scenario analysis is not mandatory under ESRS, it is not explicitly mentioned, we would suggest to clearly state that fact - AR 9 states companies "shall provide its climate resilience at the reporting date". This might imply a yearly update of the resilience analysis, please clarify that this is not the case in the next ESRS version. -Paragraph 26 and AR 16 require a breakdown of targets for Scope 1, 2 and 3. We, as well as many other companies, do not set targets on scope level. We suggest to delete this requirement. -We do not see the relevance of a distinct disclosure of biogenic emissions as required by paragraph 33 -In AR 21 (a) it remains unclear how to consider optional Scope 3 sub-categories or exemptions provided in GHGP. We would appreciate a clarification. -Paragraph 35 (c) about permanence of GHG storage seems not relevant to us. Therefore, we propose to delete it. -The leasing exemption in ESRS 1 might contradict requirements from the GHG protocol. We suggest to revisit this.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS E.5: Feedback already given on preceding pages; only thing to add: We would appreciate a clarification whether "thermal-based disposal" is something different to "thermal recovery".			
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS G.1: in our assessment G.1 has quite some parallels to S.2 revisions. While it is definitely positive to (1)allow companies to refer to the fact that the company is mandated to have a policy because of a regulation instead of disclosing the policy (again), and (2)to clarify previously unclear terms ("convictions" being clarified in paragraph 13 and AR 14), we object the change of the DP for confirmed incidents of corruption (paragraph 14) from may to shall.			
Survey	University of Warwick, Coventry, United Kingdom	Academia	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	University of Warwick, Coventry, United Kingdom	Academia	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	University of Warwick, Coventry, United Kingdom	Academia	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I would like to skip this question and provide my feedback in Part 3				
Survey	University of Warwick, Coventry, United Kingdom	Academia	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I would like to skip this question and provide my feedback in Part 3				
Survey	University of Warwick, Coventry, United Kingdom	Academia	United Kingdom	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				
Survey	PGE	Preparer (non-financial preparing a sustainability report)	Poland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Reduction of the number of topics to topics and subtopics (without an additional level). This is generally a positive change, but upon closer analysis, for those reporting entries in topics in brackets, it may cause difficulties in approach (both for companies and the auditor). Example: S1: Diversity and equal treatment (gender equality, equal pay for equal work, employment and integration of persons with disabilities, non-discrimination, anti-harassment) G1: Corporate culture (including anti-corruption and bribery, protection of whistleblowers and animal welfare). The explanation in ESRS1 states that we can indicate which topic applies to us, but in this arrangement – parentheses – it can be understood in different ways – to include all topics within corporate culture, which is an extremely important topic, but what about animal welfare? Will such a restriction require additional justification from the company in the report, or additional justification for the auditor that we are omitting certain issues?			
Survey	PGE	Preparer (non-financial preparing a sustainability report)	Poland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	In the communication concerning the changes, it was emphasized that there are no non-mandatory disclosures, at the same time some of the disclosures have been transferred to the NMIG document - there is a doubt whether it contains only non-mandatory or mandatory disclosures, Some of the mandatory disclosures have a comment in the "Log of Amendmends": NMIG contains related guidance for paragraph - how should this optional document be treated since it refers to mandatory disclosures (Example: Log of Amendments E1 page 24, line 1)? If an organization decides to disclose the issues contained in the NMIG, how will it be audited and should the continuity of disclosure of the issues contained in the NMIG be maintained in the following years, if they have been shown once?			
Survey	PGE	Preparer (non-financial preparing a sustainability report)	Poland	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Regarding topics S1 and S2, simplification seems logical (we report the same topics for S1 and S2 – one list), but in the case of S2, it should be clearly stated and defined for which part of the chain the information should be collected, at what level of the supplier (should every supplier be included, or can the organisation determine its own reporting level, to what level – how deep into the chain should we go). We suggest separating S1 and S2 – the importance of own employees is incomparably greater than that of employees in the chain. Topics within S2 should only cover basic issues: employment security, health and safety, equal treatment and respect for human rights/employee rights. Appendix C – is its use mandatory or purely voluntary? It is an extensive table, which is intended to help with definitions, but in practice it can significantly hinder the "classification" of individual issues for explanations and formulations used in the list. We support the possibility of referring to other parts of the Statement when, for example, a single policy concerns multiple areas, in order to avoid repetition (we had such a situation with the Code of Ethics and Code of Conduct for PB), which can significantly affect the content and number of repetitions. Additional clarification is required for 3.2.22, which means this distinction in the practice of reporting a material topic in accordance with the thematic standard OR in accordance with the effects of risks: Information should be presented either at the topic level or at the level of impacts, risks and opportunities, depending on what provides the most relevant information, e.g. reflecting their nature or how they are managed (see the general requirement for the level of disaggregation in section 3.7).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	PGE	Preparer (non-financial preparing a sustainability report)	Poland	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Regarding BP1/point 5 (e) updating disclosures on events after the end of the reporting period (ESRS 1, paragraph 94); Does this require an erratum to the already published report, or does it require supplementary information in the next reporting year? SBM-1 vs SBM-3 – a new descriptive element has been added to SBM-3, which largely overlaps with SBM-1, which may result in the need to repeat content. IRO-1 / 26 (b) the description includes information on the scope of activities and value chain, indicating whether it focuses on specific activities, business relationships, geographical areas or other factors that cause an increased risk of negative impact. This may be a repetition of information from SBM-1. IRO-2 /28 (a) once again requires the disclosure of information that has already been included in SBM-1, IRO-1, in particular regarding the links between the topics and the business model and value chain. This will make it difficult for both companies and auditors to agree on the required content of the disclosure. Simplifying environmental reporting throughout the value chain. Currently, entities are required to report throughout the value chain. Proposal to limit reporting to self-reporting or first-level supplier/contractor reporting. Such simplification would significantly improve the quality of reported data and would gradually include more actors in the value chain. Reporting throughout the value chain may be difficult due to the fact that some companies have been excluded from mandatory reporting and for some the reporting obligation has been extended over time - in such cases, companies may refuse to provide data.			
Survey	PGE	Preparer (non-financial preparing a sustainability report)	Poland	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	PGE	Preparer (non-financial preparing a sustainability report)	Poland	3S.E1-8.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	1.E1-8 – Gross Scopes 1, 2, 3 and Total GHG emissions Disclosure is mandatory, but in the comments section there is an explanation: [NMIG contains related guidance for paragraph 32] - won't this cause confusion that the explanations in the document that are supposed to refer to non-mandatory disclosures are mandatory disclosures? 2.E1-8 – Gross Scopes 1, 2, 3 and Total GHG emissions Clarification of the meaning of "Significant categories" is needed - what are the criteria for selecting such categories. Does this refer only to volumes of emissions?	E1	Disclosure Requirement E1-8 - Gross Scopes 1, 2, 3 emissions	
Survey	PGE	Preparer (non-financial preparing a sustainability report)	Poland	3S.E2-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Reduced pollution data points to only relevant air, water and soil pollutants - a definition of the meaning of the term 'relevant' is needed to allow for a uniform reference point and to ensure comparability.	E2	Disclosure Requirement E2-1 - Policies related to pollution	
Survey	PGE	Preparer (non-financial preparing a sustainability report)	Poland	3S.E2-4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The reference to the E-PRTR Regulation has been removed from the requirements due to disclosure challenges for subsidiaries/installations in non-EU territories, however, this has been moved to AR as a methodological identification for entities covered by this Regulation that wish to use this data reported for the purposes of the E-PRTR for reporting under E2 We propose to unify the source of reference - e.g. to indicate directly the reference as before PRTR for all companies in the EU. It will avoid problems during the audit and a comparison process between the companies will be ensured. Leaving a loose record will cause chaos and discrepancies in the disclosure of data, and this is not what the ESRS were for.	E2	Disclosure Requirement E2-4 - Pollution of air, water and soil	
Survey	PGE	Preparer (non-financial preparing a sustainability report)	Poland	3S.E3-4.	Do you agree with the amendments of this chapter?	I disagree	We do not agree with the rigid definition of "water consumption" related to the water balance in the presented system. In our organization, it is very difficult to meet due to the extensive portfolio of activities and various variants of water circulation, for example: water returned to cooling circuits, incomplete emptying of tanks in hydroelectric power plants, evaporation, etc. Alternatively, we request the addition of a provision introducing the possibility of justification in the event of non-balancing of volumes in the intake and discharge of water and its actual consumption	E3	Disclosure Requirement E3-4 - Water metrics	
Survey	PGE	Preparer (non-financial preparing a sustainability report)	Poland	3S.E4-5.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The need to clarify the definition: " is near such an area shall be determined". The meaning of the term "near" = if the company influences the BSA - biodiversity sensitve area) is proposed, as well as a reference to buffer zones from IBAT (based on suggestions from stakeholders). Can we understand that if we believe that we do not affect a given protected area, we do not describe it in the statement?	E4	Disclosure Requirement E4-5 - Metrics related to biodiversity and ecosystems change	
Survey	PGE	Preparer (non-financial preparing a sustainability report)	Poland	3S.S1-6.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	7. Data Points (DP): (S1) 55a Own Workforce Provide the number of number of non-employees forming part of the undertaking's own workforce, broken down into: i)people with contracts with the undertaking to supply labour ('self-employed people') ii)and people provided by third party undertakings primarily engaged in 'employment activities' (NACE code N78). Comment on the challenge: There is a need for a broader description of which workers to include in this group. Should individuals employed under a work contract in the organization but also having service contracts and/or task-specific contracts be reported in this data point?	S1	Disclosure Requirement S1-6 - Characteristics of non-employees in the undertaking's own workforce	
Survey	PGE	Preparer (non-financial preparing a sustainability report)	Poland	3S.S1-15.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Data Points (DP): (S1) 93a, 93b Work-Life Balance Provide the percentage of the company's own employees entitled to family leave and who have taken family leave, broken down by gender. Comment on the challenge: According to the description for 93a and 93b and Polish legislation, the group entitled constitutes 100%. Suggestion: It is necessary to specify the types of absences. Since caregiving leave is included in the absences, the group entitled constitutes 100%. Exclude caregiving leaves.	S1	Disclosure Requirement S1-15 - Remuneration metrics	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	PGE	Preparer (non-financial preparing a sustainability report)	Poland	35.S1-16.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Data Points (DP): (S1) 97b Adequate wages Provide the ratio of the highest-paid individual's salary to the median employee salary Comment on the challenge: The indicator does not clearly specify the group of employees for calculating the median. Suggestion: Consider employees employed on December 31st of the given year. Active employees – excluding suspended individuals. For this group of employees, apply the same salary components as for (S1) 97a and (S1) 98 related to the pay gap. An instruction for calculation would be helpful: 1.Create a list with the sum of annual salaries of employees employed on December 31st of the reporting year (excluding suspended individuals). 2.Sort by salaries. 3.Find the middle position (Median), excluding the highest-paid individual. 4.Numerator - total annual salary for the highest-paid individual in the organization (annual highest salary). 5.Denominator - median annual total salary of all employees (excluding the highest-paid individual). Data Points (DP): (S1) 97a Gender Equality and Diversity Provide the gender pay gap between women and men, defined as the difference in the average salary level between female and male employees, expressed as a percentage of the average salary level of male employees. Data Points (DP): (S1) 98 Gender Equality and Diversity Provide data on the gender pay gap between women and men by employee category or by country/segment, as well as broken down into regular base pay and supplementary or variable components. Comment on the challenge: The indicator does not clearly specify the group of employees for calculating the gender pay gap. Suggestion: An instruction for calculation would be helpful:	S1	Disclosure Requirement S1-16 - Incidents of discrimination and other human rights incidents	
Survey	The Biodiversity Footprint Intelligence Company	Consultant (including software vendor)	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The ESRS have been greatly improved. We emphasize the need for coherent ESRS, capable of achieving their goals to provide meaningful sustainability reporting. They should be maintained and cannot be further simplified or trimmed without losing their meaning.			
Survey	The Biodiversity Footprint Intelligence Company	Consultant (including software vendor)	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	The Biodiversity Footprint Intelligence Company	Consultant (including software vendor)	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	It is helpful to reduce confusion to separate clearly mandatory and non-mandatory datapoints. However, removing entirely the non-mandatory datapoints from the Delegated Act is probably not the best solution. It is a shame companies do not have to consider the non-mandatory datapoints at all any more. It would be better if companies still had to report or explain NMIG datapoints. The move of ESRS E4 biodiversity and ecosystems metrics metric specifications to the NMIG is especially problematic because standardisation is more limited at present than with other metrics At the very least, if the NMIG remains outside the Delegated Act, they should be updated on a timely basis, particularly for guidance on topics where data/tools for reporting are evolving rapidly.			
Survey	The Biodiversity Footprint Intelligence Company	Consultant (including software vendor)	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The balance seems to have gone too far in the direction of burden relief. It should be adjusted back in favour of transparency. In particular, direct data should still be preferred (while estimate should be allowed, but not preferred).			
Survey	The Biodiversity Footprint Intelligence Company	Consultant (including software vendor)	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	The relief for lack of data quality could be removed since there is already a relief for "undue cost or effort" which means if producing direct or estimated data requires undue cost or effort, they do not have to be reported. At a minimum, a time limit for partial disclosure should be added.			
Survey	The Biodiversity Footprint Intelligence Company	Consultant (including software vendor)	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	The Biodiversity Footprint Intelligence Company	Consultant (including software vendor)	France	23.	Six datapoints exceptionally moved from “may” to “shall” In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, “may disclose” datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	The Biodiversity Footprint Intelligence Company	Consultant (including software vendor)	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	The Biodiversity Footprint Intelligence Company	Consultant (including software vendor)	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 (“when only setting intensity targets”), to disclose also the associated absolute values” (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking’s progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	I agree with the reasoning described by "those who oppose this exception" in the text of question 26.			
Survey	The Biodiversity Footprint Intelligence Company	Consultant (including software vendor)	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	I agree While useful, the three suggested target types (a) to (c) of AR 26 are not insufficient to properly convey the ambition a company should have with regard to biodiversity and ecosystems. In particular, it does not align with the SBTN framework – which should be used as an inspiration for a high level of ambition – or the expected contribution of companies to the achievement of the Global Biodiversity Framework. AR 26 should thus be further revised and could include: a) extent of natural ecosystems converted (no conversion target) b) land footprint reduction, natural land cover extent (% of total site area), soil organic carbon content (t/ha), soil erosion (t soil/ha/yr), terrestrial acidification (kg SO2-eq/kg) c) improvement of landscape ecosystem indicators (landscape engagement, see Table 15: "List of potential metrics for ecological and social conditions" of the SBTN draft Land targets for a list of potential indicators).			
Survey	The Biodiversity Footprint Intelligence Company	Consultant (including software vendor)	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of “'compatibility with 1.5 degrees'” for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	It is vitally important for principle of double materiality to be maintained in order for the information reported to be meaningful for users.			
Survey	The Biodiversity Footprint Intelligence Company	Consultant (including software vendor)	France	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of “'compatibility with 1.5 degrees'” for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Overall, yes the balance is good and changes are meaningful. It is especially important to maintain the following points in the final version: - alignment with the Nature Positive Initiative's framework: mention of site condition & landscape condition - (partial) alignment with the TNFD in the Location Prioritization Guidance - preference for "Site-level measurement using 'state of nature metrics'" but possibility to use "Estimation using impact drivers or state of nature estimates" - definition of "Near" Biodiversity Sensitive Areas The major gap is the exclusion of supply chains from the scope of datapoints. The previous datapoint on Land use (E4-5_03 or E4-5 par 36) should be reinstated in the ESRS (instead of NMIG) and/or datapoints should cover upstream Scope 3 as much as possible since much of EU industry's effects happen in its supply chains. It should be clear that ecosystem extent, condition and species are all needed for assessing the state of nature for a material location (AR 9), rather than a selection from these. In AR 10,national and global datasets could also be mentioned as an alternative to site-level measurements and estimates when both are not feasible. Such datasets should meet strict criteria such as NPI's Credible and science-based, Responsive, Flexible, Aligned, Accessible and affordable, Auditable) and in particular should demonstrate high responsiveness, spatial resolution and accuracy.			
Survey	FERMA	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: “[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process”.Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in “Gross versus Net” as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The identification of topics that are most likely to be material (top-down approach) is essential and will result in the reduction of the scope and complexity of the materiality assessment, without compromising the quality of the results and ignoring key issues. At the same time, the data and information used to draw conclusions should be comprehensive and meaningful. There should not be a detailed analysis of every single risk, but rather an overview that does not omit any critical issues. sectoral guides analyzing material sustainability issues within the same business sector would facilitate the exercise (type ESG materiality maps of the financial services company MSCI, which show the most important ESG matters by industrial sector, the Sustainability Accounting Standards Board's (SASB) ... Regarding materiality filter, FERMA is also in favour. We believe it would be coherent and reasonable to identify IROs at subtopic level (leaving the company free to choose the subtopics and not imposing an analysis and communication on the exhaustiveness of the subtopics); then to consolidate these assessments at topic level. Indeed, through this materiality assessment, companies should evaluate not just whether a topic is material, but also which parts of that topic are material. The reporting should be deeper if justified by the significance of specific IROs of each company. Communicating IROs at subtopic level has the advantage of providing a clear understanding of the organization's challenges. For the sake of readability, we could imagine having a summary communication on material topics in the general information section, then within each environment/social/governance section, a more detailed communication at IRO level. For instance, a table of a) opening remediation efforts, b) completed, c) new, d) outstanding remediation efforts at year end for material issues could be included.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FERMA	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	FERMA would like to insist on several points. 1) The assessment of materiality should be appraised on a net rather than gross basis, in a pragmatic way. Therefore, the assessment of materiality should take into account •The existing mitigation measures that are intrinsic or inherent or by design to the activity (e.g. mandatory third-party approval before a product is marketed). •The mitigation measures / control activities put in place by the organisation before each reassessment of the double materiality analysis. 2) If the Gross assessment approach is confirmed, sectoral guides would enable to compare different companies in a dedicated sector. The gross assessment would be the starting point for every company in the same sector. •This would enable the organization to focus on the actions still to be carried out. This would be more consistent with an Enterprise Risk Management (ERM) approach and with the global risk mapping disclosed in the dedicated chapter in the annual report of the organisations. 3) Clarify the risk manager's key role in the double materiality analysis, as he/she has the knowledge and tools needed to identify, assess and coordinate ESG risk management. •Pooling approaches would avoid over-soliciting internal contacts. •It would ensure consistency with the company's ERM system, which has the role of supervision of all risks. •This would increase efficiency for the teams in charge of the analysis rather than wasting time on pedagogy towards contributors and management. 4) Overall, the DMA should be regulated on the basis of a few methodology-process requirements to make the whole process simpler (involvement of relevant stakeholders, transparency of the process, high level of governance in the results approval, existence of internal procedure, etc.) An implementation guide based on such a practical approach on these would be recommended in our view.			
Survey	FERMA	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	FERMA supports this idea provided that one can found some indicators (example: GHG/revenues) that can show value creation/impacts into the value chain and not pure numbers. One could imagine an introduction presenting the organization's sustainability strategy, the material issues that are the focus of the company's attention, and a few key indicators for monitoring the deployment of this strategy, with the main milestones. In this first exercise, some companies have produced an executive summary in their report. On appendices: FERMA supports this idea as it will make reading easier. Some FERMA members decided to do so already as a matter of fact. Also, we support including data relating to the EU Taxonomy or non-material matters in specific appendices.			
Survey	FERMA	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	On MDRs: FERMA stresses that it's important to keep in mind the spirit of structuring responses to material challenges: policies, actions, targets. Nonetheless, one must give the company more freedom "to tell its story". The level of granularity in RFPs is far too high in our view. It is necessary to categorize these data points into compulsory data points and voluntary data points: this would still ensure comparability of information between organizations. On PAT: FERMA is not against non-mandatory guidelines as they could help to ensure that the approach is progressive over time. Nonetheless, FERMA recalls that it is important to focus one's attention on key mandatory datapoints as long as they relate to material topics. On limiting reporting on PAT's if related to material topics: Theoretically, FERMA believes it is an interesting idea. Indeed, a policy may cover several IROs within a single topic. However, FERMA also sees a risk of potentially creating additional confusion (e.g. what happens if "you don't have it" whereas others do, will it create an unintended distinction between companies eventually?) In addition, one could follow a tiered approach, depending on the size of the company, with SMEs following a non-mandatory guidance, as far as PATs are concerned. FERMA supports reinforcing flexibility and readability of streamlined disclosures by clarifying (i) that there should be no duplication of content on the same PATs in different parts of the sustainability statement, (ii) that a policy covering different topics should only be described once and (iii) that PATs can be limited to a sub-topic without triggering disclosures at the topical level – this idea will avoid redundancies and make the document easier to read. There are too many duplications and redundancy at present.			
Survey	FERMA	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	FERMA supports separating the mandatory requirements from the non-mandatory ones, as this approach seems to provide more transparency.			
Survey	FERMA	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	FERMA strongly supports the exclusion of non-material activities from calculations as it will improve the overall data quality. If some exclusions are added into the calculation, they must be explained for transparency's purposes.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FERMA	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	By adopting this relief on metrics, we will enhance both proportionality and data quality, as only material activities and risks will be assessed and monitored. This approach ensures that reporting efforts are concentrated on the areas that truly matter, avoiding the unnecessary burden of collecting exhaustive data from activities that do not significantly influence the sustainability metrics.			
Survey	FERMA	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	FERMA is in favour as interoperability between different framework is always desirable to achieve greater consistency. In any event, FERMA reminds that it is key that only datapoints related to material topics are reported. FERMA is in favour of the financial consolidation approach for GHG emission boundary.			
Survey	FERMA	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	FERMA also supports this proposal as this would also be consistent with the principles governing the preparation of financial statements. Overall, the CSRD/ESRS approach have made the DMA and sustainability reporting process a mere compliance exercise and the initial aim of comparing information was not fulfilled precisely for this reason. Emphasizing fair presentation means that sustainability reports should go beyond mechanical compliance and reflect relevant and accurate information. By adopting fair presentation we prioritize communication of substance, we encourage transparency without unnecessary complexity and inform deeply stakeholders on the company's sustainability profile.			
Survey	FERMA	Business association (other than association of financial institution)	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	FERMA does not have a strong view on the SFDR precisely, but we wish to recall that, since its review should be issued by the Commission by the end of the year, it is important to keep as much consistency as possible between different EU dossiers related to sustainability.			
Survey	FERMA	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		FERMA is a strong supporter of the Commission's ambition to simplify the ESRS (and the sustainability framework overall) without undermining the objectives of the Green Deal. Therefore, it is paramount to preserve the double materiality assessment in the CSRD while strengthening a proper ERM methodology for companies in order to allow for both consistency and efficiency between EU companies. The CSRD provides the right framework for sustainability disclosures for the first time at EU level and this ambition must be preserved. Overall, FERMA finds that most of the changes suggested are going in the right direction, especially the need to focus on material information; the identification of IROs at subtopic level; the assessment of materiality to be appraised on a net rather than gross basis or the possibility for the company to produce an executive summary in their report. FERMA recalls that it is important to focus one's attention on key mandatory datapoints as long as they relate to material topics. Regarding the DMA, sectoral guides analyzing material sustainability issues within the same business sector would facilitate the exercise (type ESG materiality maps of the financial services company MSCI, which show the most important ESG matters by industrial sector, the Sustainability Accounting Standards Board's (SASB) ...) Finally, regardless of the standards (International or European) around sustainability reporting, as Risk Managers, we need to make sure that appropriate disclosures are made in the sustainability reports vis-à-vis how companies have implemented efficient checking mechanisms to avoid or mitigate adverse environmental and/or societal impacts.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Seznam	Preparer (non-financial preparing a sustainability report)	Czechia	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	Seznam	Preparer (non-financial preparing a sustainability report)	Czechia	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree				
Survey	Seznam	Preparer (non-financial preparing a sustainability report)	Czechia	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	In my opinion, we should keep ESRS (as well as CSDDD) as demanding as possible. Companies (also SMEs) already started to work internally to be prepared for the needed transparency, allowing them to build on it with concrete actions to improve their sustainability. If Omnibus package diminishes the demands, the companies will not change as much as it is needed to comply with Paris agreement, etc. It is not easy for them, but adaptation to harsh effects of climate change will be much more difficult. And then, no discussion will be possible anymore. By trying to be less strict to companies, we should not lose what was done by ESRS and CSDDD so far. It is from my perspective as a founder (volunteer) of an NGO, sustainability auditor at a large company and externally cooperating with academia as well.			
Survey	Seznam	Preparer (non-financial preparing a sustainability report)	Czechia	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree				
Survey	Seznam	Preparer (non-financial preparing a sustainability report)	Czechia	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	Seznam	Preparer (non-financial preparing a sustainability report)	Czechia	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	Seznam	Preparer (non-financial preparing a sustainability report)	Czechia	22.E2.	Comments on deleted datapoints in ESRS E2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The most crucial ones should be put back			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Seznam	Preparer (non-financial preparing a sustainability report)	Czechia	22.E4.	Comments on deleted datapoints in ESRS E4	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The most crucial ones should be put back			
Survey	Seznam	Preparer (non-financial preparing a sustainability report)	Czechia	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Seznam	Preparer (non-financial preparing a sustainability report)	Czechia	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Seznam	Preparer (non-financial preparing a sustainability report)	Czechia	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Generation Investment Management and Just Climate	User (analyst, data provider, rating agency, etc.)	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	The draft ESRS propose new mandatory guidance on how to consider the implemented remediation, mitigation and prevention policies and actions when assessing the materiality of an impact (so called 'gross versus net' issue). Remediation (and other related) practices undertaken by an entity will affect the residual risk experienced by the entity, and we understand preparers and users' desire for guidance. That said, the proposed approach applying prescriptive instructions on how to consider mitigation, prevention and remediation actions in each situation gives rise to a new risk to interoperability, given that such prescriptive guidance does not apply under ISSB standards. An alternative approach, that would allow for continued interoperability, would be to request preparers explain which logic (gross or net) they have applied in their assessment of related risks. This would also reduce burden on preparers, as it would allow preparers to analyse and communicate risks in the manner to which they have become accustomed and/or would be preparing to do so under ISSB.			
Survey	Generation Investment Management and Just Climate	User (analyst, data provider, rating agency, etc.)	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I disagree	Interoperability between ESRS and the ISSB Standards would be further enhanced if information that was presented to investors was required to be clearly identifiable and not obscured by information that is reported to a broader range of stakeholders. This requirement has not been included in the proposed changes.			
Survey	Generation Investment Management and Just Climate	User (analyst, data provider, rating agency, etc.)	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	In general, we believe burden on preparers would be reduced if reliefs provided for in ESRS were aligned to those provided for by ISSB. In particular, the proposal to introduce a relief relating to acquisitions and disposals acquired in the reporting period will also cause differences in the reporting boundary compared to the financial statements which will cause complexity for entities to comply with both ESRS and the ISSB Standards and affect the connectivity in information provided in sustainability disclosures and the financial statements for those using ESRS.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Generation Investment Management and Just Climate	User (analyst, data provider, rating agency, etc.)	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The draft ESRS's proposal to make disclosure of quantitative information about anticipated financial effects voluntary would negatively affect interoperability with ISSB Standards. Under the draft ESRS all quantitative information about anticipated financial effects would become optional even, when that information is straightforward and readily available. Instead, Option 1 for paragraph 48(e) of ESRS 2 would enhance interoperability between ESRS and ISSB Standards and reduce the reporting burden for companies preparing information about anticipated financial effects applying ESRS. In addition, aligning the reliefs provided in ESRS with those provided for in ISSB Standards would reduce burden on preparers, and encourage greater disclosure. In particular, ISSB Standards permit an entity not to provide information about anticipated financial opportunities that relate to opportunities considered commercially sensitive (as described in IFRS S1) – this relief is not included in the draft simplified ESRS.			
Survey	Generation Investment Management and Just Climate	User (analyst, data provider, rating agency, etc.)	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	Generation Investment Management LLP ("Generation") is an independent, private, owner-managed partnership dedicated to long-term investing, integrated sustainability research, and client alignment. We are also writing on behalf of Just Climate, a business established by Generation in 2021 to direct and scale capital towards the most impactful climate solutions and support capital markets to incorporate climate and just transition considerations into capital allocation decisions. We observed a very high degree of interoperability achieved between the first set of ESRS and ISSB Standards. The EFRAG draft simplified ESRS, however, propose many amendments that potentially have a significant impact on interoperability. A lack of interoperability would result in an unnecessary and unacceptable level of cost and complexity for both Generation and the companies that we invest in, as well as the risk of information not being comparable across global portfolios. We remain seriously concerned about the real risk of duplication, unnecessary complexity and fragmentation of requirements with the global baseline set by the ISSB. These risks remain in light of simplification. We believe that the most effective way for EFRAG to ensure efficient reporting is to enable companies to use the ISSB Standards as a starting point, and to build upon ISSB with specific impact disclosures, reflecting EFRAG's double materiality approach. This is referred to as 'equivalence' and follows the ISSB's 'building blocks approach'. We urge EFRAG to engage directly with the ISSB, reviewing each disclosure line by line, and to adopt full equivalency per disclosure. Our expectation of the current simplification process was that it would include this in-depth, technical interaction, and we are deeply disappointed to see this has not been the case. Where agreement cannot be made, EFRAG should publish the rationale for each item of why the difference and to whom it serves.			
Survey	Generation Investment Management and Just Climate	User (analyst, data provider, rating agency, etc.)	United Kingdom	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Organisational boundary – GHG emissions: The EFRAG draft simplified ESRS propose the use of the financial control organisational boundary for measuring GHG emissions. In addition, if reporting would fail to convey a fair presentation, it is proposed that ESRS E1 requires disclosure of Scope 1 and 2 GHG emissions based on operational control as defined in the GHG Protocol. Such an approach fails to align to the GHG Protocol, and could be further simplified, reducing burden on preparers, if ESRS were to more simply refer to the GHG Protocol and allow measurement choices aligned with that document. To conclude: We are encouraged by the opportunity for ESRS simplification, and appreciate the opportunity to respond to this consultation. We strongly encourage EFRAG to consider using this opportunity to reduce preparer burden, increase usefulness of the information to users, and increase interoperability with ISSB Standards by: applying the building blocks approach (adopting full equivalency per disclosure), requiring information relevant for investors to be clearly identified and not obscured, maintaining alignment with methodological principles defined by the GHG Protocol, and limiting the introduction of additional requirements.			
Survey	Triodos Bank N.V.	Bank	Netherlands	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Triodos Bank N.V.	Bank	Netherlands	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	Triodos Bank N.V.	Bank	Netherlands	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	As Triodos Bank, we acknowledge that the proposed amendments, such as the inclusion of executive summaries and the use of appendices, improve the readability and structure of sustainability statements. The emphasis on connected information and reduced fragmentation is a positive development that supports better integration with broader corporate reporting. However, while these changes enhance transparency and accessibility, the ESRS framework remains primarily focused on disclosure. It does not require companies to demonstrate progress on sustainability topics. Organizations can report on negative impacts without being expected to show how they are being addressed or improved. From Triodos Bank's perspective, this limits the transformative potential of sustainability reporting. Reporting should not only reflect the current situation but also encourage and track progress toward positive outcomes. Without mechanisms that promote improvement, sustainability statements risk becoming static records rather than tools for accountability and change. We recommend that future versions of the ESRS include provisions that encourage or require companies to disclose their trajectory toward sustainability goals. This could involve expectations around targets, actions, and progress over time, especially for material topics.			
Survey	Triodos Bank N.V.	Bank	Netherlands	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	As Triodos Bank, we welcome the streamlined approach to simplifying the standards through the elimination of duplications between ESRS 2, which reduces reporting burden whilst preserving essential content. We also endorse the renaming of minimum disclosure requirements to general disclosure requirements. Furthermore, we disagree with eliminating the requirement to disclose whether the undertaking plans to implement PAT for material topics and the timeline. Whilst we support not mandating PAT for all material IROs, transparency requires explanation when PAT are absent, particularly for material negative impacts and risks. An "explain if not" approach would better serve stakeholders: undertakings should disclose why PAT have not been developed for material topics, distinguishing these from topics where PAT may be less critical. This maintains accountability without excessive prescription, ensuring that the absence of PAT represents a deliberate strategic choice rather than oversight. Transparency about risk management decisions is essential for stakeholder confidence and comparability between undertakings. The explanations on why PAT isn't followed is a key aspect for civil organisations and NGOs, auditors and regulators to be able to assess to keep undertakings held accountable especially regarding minimisation of negative impacts.			
Survey	Triodos Bank N.V.	Bank	Netherlands	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	As Triodos Bank, we agree that the Amendments improve understandability, clarity and accessibility by improving language and eliminating "may disclose," relocating mandatory application guidance under each Disclosure Requirement (DR).The removal of "sub-subtopics" simplifies interpretation. The distinction between impact and financial materiality in the double materiality assessment supports application across sectors. We suggest these improvements: 1.Label the assurance scope on AR. Open ESRS 1 with a single sentence that Application Requirements attached to a DR are mandatory and within assurance scope. In the standards text, prefix every AR block with "Mandatory application requirements" (not just "AR"). This removes residual ambiguity created by moving content out of appendices and ensures preparers, assurers, and users interpret AR consistently. 2.Introduce stable IDs for every mandatory datapoint and AR. Assign durable identifiers (e.g., E1-6.M1 for a datapoint and E1-6.AR1 for its application requirement) and require their use in cross-references and digital tagging. Stable IDs will make the standards easier to navigate reduce mis-tagging risk and facilitate high-quality digital reporting.. 3.The exclusion of remediation actions from the materiality assessment of actual negative impacts could understate risk exposure. We recommend clearer guidance on how to reflect the outcomes of such actions. 4.The guidance on value chain reporting is pragmatic, especially the allowance for estimates and proxies. More concrete examples or thresholds for disaggregation are needed, particularly when impacts are material only to a subset of operations. We welcome the emphasis on stakeholder engagement and the recognition of civil society and NGOs as users of sustainability information and groups that can demand accountability. This aligns with our values of transparency and accountability to a broad stakeholder base. We support the guidance that positive impacts must be assessed independently and not netted against negative ones, reinforcing the importance of intentionality in impact reporting.			
Survey	Triodos Bank N.V.	Bank	Netherlands	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	As Triodos Bank, we support the decision to move certain content from mandatory requirements to Non-Mandatory Illustrative Guidance. This approach appropriately balances the need for practical guidance with the objective of reducing prescriptive requirements and compliance burden on undertakings. We agree with EFRAG's recommendation that the European Commission should not include NMIG content within the Delegated Act. Including this material in legally binding regulation would risk creating ambiguity about its status and potentially trigger additional compliance efforts, undermining the simplification objectives. However, if the European Commission decides to include NMIG content in the Delegated Act, it should be structured as an annex with clear introductory language stating that the content provides guidance and examples only. The annex introduction should explicitly clarify that undertakings are not required to justify non-compliance with these illustrative elements, distinguishing them clearly from mandatory disclosure requirements.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Triodos Bank N.V.	Bank	Netherlands	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Triodos Bank Comments per relief: 1. Undue cost: guidance appreciated from EFRAG on what is considered on undue cost or effort. 2. Lack of data quality: actions to improve coverage considered mandatory. 3. Partial scope: the relative size in total portfolio of the partial scope should be mandatory. For proxies, sustainability data providers must be regulated to avoid distortion of estimated or calculated impact/ risk. 4. Lack of operational control: decreases incentives to improve data quality and monitoring of these topics in a systematic further down the value chain, with negative impact often hurting emerging market economies with lower regulatory standards. Reduces EU's role in pushing forward the transition to sustainable and just. Guidance needed for financial institutions. Companies, especially SMEs are looking for clarity and standardisation of sustainability information. While sustainability should not be diminished to one figure, progress should not be stopped on trying to better understand how our economic activities impact environmental and societal factors. Decisions should be made using information, based on sustainable values and a vision for the future. b) A key concern remains that not all mandatory SFDR PAI indicators are yet fully covered by ESRS datapoints. PAI 3 (GHG intensity of investee companies) and PAI 6 (Energy consumption intensity) are not directly addressed. For financial institutions this creates significant challenges: if they are required to calculate these indicators themselves, it will be resource-intensive, risk inconsistent methodologies across the market, and ultimately run counter to the policy objective of reducing reporting burdens.			
Survey	Triodos Bank N.V.	Bank	Netherlands	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	As Triodos Bank, we acknowledge the introduction of the 'undue cost or effort' relief for all elements of reporting, including the identification of material IROs and the calculation of metrics, as outlined in paragraph 89 of ESRS 1. This extension to all metrics aligns with the provisions in IFRS S1 and S2, providing necessary flexibility for preparers. However, we emphasize that actions to improve the coverage of calculations should be considered mandatory. When disclosing a metric with a partial scope, it is essential to include the relative size of the partial scope in the total portfolio. This transparency ensures that stakeholders understand the extent of the data coverage and the efforts being made to improve it. The lack of a time limit increases the risk that entities take no effort to improve the measurement. We caution for the relief for lack of operational control in joint operations as this may decrease incentives to improve data quality and monitoring further down the value chain. This could reduce the EU's role in pushing forward the transition to a sustainable and just economy, these lower regulatory and market standards negatively impacting people and nature worldwide. In conclusion, while we support the flexibility provided by the relief for lack of data quality, we believe that clear guidance and mandatory actions to improve data quality and coverage are crucial. This approach ensures that sustainability reporting remains robust, transparent, and aligned with the objectives of the EU Green Deal. Guidance would also help small and medium enterprises that often have many different sustainability data they need to deliver in different formats.			
Survey	Triodos Bank N.V.	Bank	Netherlands	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	As Triodos Bank, we strongly support Option 1 for the relief on anticipated financial effects. The fundamental objective of the CSRD is to elevate sustainability reporting to a level of rigour and utility comparable to financial reporting. Option 2, by making quantitative disclosure entirely voluntary, undermines this core goal. It would create a significant gap in decision-useful information for investors and stakeholders, and it would fail to incentivise undertakings to develop the necessary methodologies for quantifying climate-related financial impacts. Option 1 strikes the correct and necessary balance. It establishes quantitative disclosure as the clear expectation while acknowledging legitimate current challenges. The requirement for an undertaking to explain the omission of quantitative data would be critical. This transparency provides crucial insight in itself. It forces a distinction between an inability to report due to inherent, high uncertainty versus a conscious decision not to (yet) allocate the resources or develop the capabilities to do so. This "comply or explain" mechanism would challenge undertakings to be transparent about their progress and priorities. It pushes the field forward by encouraging the development of more mature reporting practices, rather than allowing a default to less informative qualitative disclosures. For sustainability reporting to be truly meaningful, it must connect impacts and risks to financial figures. Option 1 is the only choice that upholds this principle and supports the long-term integrity and purpose of the ESRS framework.			
Survey	Triodos Bank N.V.	Bank	Netherlands	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	Triodos Bank partly agrees that the amended paragraphs 40, 41, and 42 of ESRS E1 strike an appropriate and necessary balance between simplification and the essential information needs of users. The datapoints concerning the monetary amounts and percentages of assets and revenues at material physical and transition risk are important for investors and lenders to assess an undertaking's exposure. Retaining these quantitative disclosures is vital for understanding the financial implications of climate change. However, we recognize the practical challenges undertakings may face due to evolving methodologies and data availability. To ensure these disclosures are both feasible and effective, we strongly advocate for the consistent application of the "comply or explain" principle. This approach would require undertakings to disclose the required quantitative information by default. If they are unable to do so, they must provide a clear and substantive explanation for the omission. This explanation is, in itself, a valuable piece of information, offering insight into a company's risk management maturity and data infrastructure. Applying the "comply or explain" principle will increase adoption rates by providing necessary flexibility in the short term, while simultaneously fostering greater transparency. It maintains the ambition of achieving full quantitative disclosure as methodologies mature, ensuring that the reporting framework remains both practical for preparers and decision-useful for stakeholders.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Triodos Bank N.V.	Bank	Netherlands	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	As Triodos Bank, we agree that the proposed amendments achieve a balance between increasing interoperability with the ISSB's IFRS S1 and S2 standards and meeting the simplification objectives. Improved interoperability is key to realize a coherent baseline for sustainability reporting. This alignment is essential for reducing the administrative burden on companies that report under multiple frameworks and to provide investors and other stakeholders with consistent, comparable, and decision-useful data. We support the steps taken to bridge the gap between the two standards. The alignment of language for requirements, the adoption of the financial consolidation approach for GHG emission boundaries, and the permanent reference to IFRS and SASB industry guidance are significant improvements.			
Survey	Triodos Bank N.V.	Bank	Netherlands	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Triodos Bank N.V.	Bank	Netherlands	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	We acknowledge and appreciate the amendments' objective of reducing reporting burdens by streamlining the number of mandatory datapoints, especially through the removal of less relevant narrative disclosures and the prioritisation of quantitative indicators. This has indeed improved the readability and usability of the standards, which is a welcome development. At the same time, it is difficult to assess the actual extent of burden reduction. Many datapoints have been moved, merged, or reformulated rather than entirely eliminated. In practice, situations where undertakings previously had to report similar information twice, and now only once, do not necessarily translate into a proportional reduction of workload. The reported 57% reduction is therefore not fully reflected in practice. A key concern remains that not all mandatory SFDR PAI indicators are yet fully covered by ESRS datapoints. In particular, PAI 3 (GHG intensity of investee companies) and PAI 6 (Energy consumption intensity) are not directly addressed. For financial institutions this creates significant challenges: if they are required to calculate these indicators themselves, it will be resource-intensive, risk inconsistent methodologies across the market, and ultimately run counter to the policy objective of reducing reporting burdens. We therefore strongly encourage further alignment with the SFDR PAI indicators. Ensuring that datapoints such as PAI 3 and PAI 6 are directly and consistently embedded in ESRS will be critical to avoiding the unintended consequence of shifting complexity and costs onto financial institutions. In conclusion, the Amendments strike a step in the right direction, but are a living document to ensure both effective burden reduction and the preservation of high-quality, comparable information in support of the EU Green Deal objectives.			
Survey	Triodos Bank N.V.	Bank	Netherlands	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Agree with additions, one comment or suggestion to improve the metric: ESRS E4 Biodiversity and ecosystems- Disclosure of transition plan for biodiversity and ecosystems. We welcome mandatory requirement for the transition plan for biodiversity and ecosystems. As proposed, this is only applicable when a plan exists. We want to stress the importance that all high risk sectors should be required to have a transition plan. The way it is proposed now is too voluntary.			
Survey	Triodos Bank N.V.	Bank	Netherlands	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Triodos Bank agrees with the inclusion of the four new mandatory datapoints. These datapoints clarify existing disclosure objectives and improve reporting clarity. Currently the ESRS framework requires disclosure only rather than progress. Clarity vs. Substance: The bank recognizes that the new datapoints such as the statement of compliance with ESRS 1, the separate disclosure on secondary microplastics, and the waste destination metrics help clarify reporting expectations. These additions are seen as justified exceptions that do not undermine the overall simplification effort. Triodos Bank emphasizes that while the ESRS promotes transparency, it does not require undertakings to demonstrate progress on sustainability topics. This is a critical limitation. Organizations can report on negative impacts without being expected to show how they are being addressed or improved. Triodos recommends that future iterations of the ESRS should include mechanisms that encourage or require companies to disclose their trajectory toward sustainability goals. This could involve expectations around targets, actions, and progress over time, especially for material topics.			
Survey	Triodos Bank N.V.	Bank	Netherlands	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	We strongly agree that explicitly requiring fair presentation will support more effective functioning of the materiality filter and enable more relevant reporting. As a sustainable bank making investment decisions based on sustainability information, we require meaningful insights rather than compliance-driven data. The current checklist mentality produces voluminous reports that obscure material information beneath boilerplate disclosures. This compliance-focused approach fails to serve users' needs and creates unnecessary burden for preparers. Fair presentation addresses this by requiring undertakings to exercise judgement about what information is necessary to provide a complete picture. Fair presentation should not be viewed as introducing new requirements but rather clarifying the intended approach to existing obligations. This clarification should not result in additional audit costs, as auditors should already be evaluating whether sustainability statements provide fair representation. The amendment simply makes explicit what was implicit in the framework's design. Whilst we acknowledge concerns about judgement complexity, particularly for impact materiality, these challenges exist regardless of the framework adopted. Fair presentation provides clearer guidance by establishing that the objective is complete representation rather than mechanical compliance.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Triodos Bank N.V.	Bank	Netherlands	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Triodos Bank maintains that both absolute and intensity-based GHG emissions targets are essential to ensure transparency, comparability, and accountability in climate-related disclosures. While intensity targets provide insight into efficiency improvements, they may obscure the actual growth in emissions resulting from portfolio expansion. Absolute targets, by contrast, reflect the total climate impact and are necessary to assess alignment with science-based decarbonisation pathways. Triodos Bank has adopted the absolute contraction approach as defined by the Science Based Targets initiative (SBTi). This approach is applied across all relevant asset classes and is supported by the Partnership for Carbon Accounting Financials (PCAF) methodology, which enables consistent and robust measurement of financed emissions. The Bank acknowledges the complexity involved in estimating absolute targets, particularly for financial institutions. However, such complexity is not unique to the sector and should not justify exemption. Instead, Triodos advocates for harmonised and science-based disclosures that reflect the real-world impact of financial activities and support informed decision-making by stakeholders. Importantly, Triodos Bank emphasises that high-emission sectors are precisely those in need of transition financing. Not disclosing absolute emissions risks perpetuating the financial support of high-emitting activities without sufficient accountability, thereby delaying the transition to a low-carbon economy. Transparent disclosure of absolute targets ensures that financing decisions are aligned with climate objectives and that investors have foresight into the evolution of emissions and the credibility of transition strategies. Exempting financial institutions from this requirement would undermine the integrity of the European Sustainability Reporting Standards (ESRS) and create an unlevel playing field across sectors. Triodos Bank believes that meaningful climate disclosures must go beyond compliance and reflect a commitment to fair presentation and long-term value creation. So that the financial sector works towards a long-term vision of a more sustainable and resilient society.			
Survey	Triodos Bank N.V.	Bank	Netherlands	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I would like to skip this question and provide my feedback in Part 3	Triodos Bank does not have any comments on this amendment.			
Survey	Triodos Bank N.V.	Bank	Netherlands	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	Not applicable to Triodos Bank, thus no comments.			
Survey	Triodos Bank N.V.	Bank	Netherlands	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	The Amendments have retained broad coverage of SFDR Principal Adverse Impact (PAI) indicators within ESRS, even after the general reduction of datapoints. However, not all mandatory PAIs are yet fully reflected. Two important gaps remain PAI 3 and PAI 6. For financial institutions, these gaps are highly problematic. If institutions are required to calculate such indicators themselves, this will be resource-intensive, risk inconsistent methodologies across the market, and undermine the stated policy goal of reducing reporting burdens. For the Social Standards (S1–S4), SFDR-related datapoints corresponding to PAI 10 (Severe human rights violations) and PAI 11 (UN Global Compact/ OECD Guidelines alignment) have been spread across the four standards. While this strengthens alignment with international due diligence frameworks (UNGP and OECD MNE Guidelines) and the ESRS double materiality approach, it complicates SFDR reporting. Investors must consolidate disclosures across multiple standards to report a single PAI indicator, increasing complexity and the risk of inconsistency. Greater centralisation or clearer cross-references would improve usability without undermining ESRS principles. In conclusion, the Amended ESRS improves clarity and reduces duplications, but overall coverage of SFDR PAIs is not fully preserved. Specific indicators (notably PAI 3, 6, 10, and 11) remain insufficiently addressed, and the distribution of social datapoints across multiple standards adds consolidation challenges. Addressing these issues is essential to align ESRS with SFDR requirements and ensure the intended data infrastructure supports efficient and consistent reporting.			
Survey	Triodos Bank N.V.	Bank	Netherlands	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Triodos Bank strongly supports the inclusion of additional methodological guidance for biodiversity and ecosystems-related targets in ESRS E4, particularly within AR 26. We welcome a review of this application requirement to better reflect the evolving methodological landscape and to align more closely with science-based frameworks such as SBTN. There is a growing body of understanding around biodiversity impacts, and Triodos Bank recognizes the importance of setting meaningful targets that reflect ecological realities. However, we caution against oversimplifying biodiversity impact into a single metric or number. Biodiversity is inherently complex and context-dependent, and its measurement requires nuanced approaches that consider ecological integrity, local conditions, and the interconnectedness of ecosystems. Triodos Bank advocates for values-based action alongside quantitative metrics. While metrics such as area restored or number of sites improved are useful, they must be complemented by qualitative assessments and strategic choices that reflect a commitment to nature-positive outcomes. This includes redirecting financial flows away from harmful activities and toward regenerative practices, as outlined in our biodiversity vision paper. We recommend that AR 26 be expanded to: •Include references to ecological thresholds and tipping points. •Encourage site-specific measurement where feasible, and allow for proxy indicators where direct measurement is not possible. •Promote alignment with frameworks such as SBTN and TNFD. •Emphasize the importance of stakeholder engagement and values-driven decision-making in target setting. This approach ensures that biodiversity targets are not only measurable but also meaningful and transformative.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Triodos Bank N.V.	Bank	Netherlands	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	The gender pay gap metric in the ESRS has been aligned with SFDR PAI requirements through the mandatory unadjusted ratio. While this ensures regulatory alignment, experience from investors and asset managers indicates that the adjusted gender pay gap provides more meaningful, decision-useful information. It allows a clearer understanding of pay disparities across roles and jurisdictions, which is critical for investment assessments and corporate comparisons. Previous guidance from the ESAs suggested replacing the unadjusted metric with the adjusted indicator in the revised RTS, reflecting its practical relevance. The adjusted metric is already widely reported by companies due to investor demand, meaning that making it mandatory would not create a significant additional reporting burden. We recommend that EFRAG signal that both ESRS and SFDR PAIs should consider the adjusted gender pay gap as the primary datapoint. This would improve the quality and comparability of disclosures for investors while remaining feasible for reporting entities. If revising SFDR is not possible in the short term, the unadjusted gender pay gap should remain mandatory to maintain alignment between ESRS and SFDR. At the same time, the adjusted gender pay gap should be made mandatory in ESRS, given its higher relevance and the limited incremental effort required. In summary, requiring the adjusted metric alongside the unadjusted ratio would enhance decision-usefulness, provide investors with more granular insights, and maintain consistency across frameworks without imposing substantial additional burdens on companies. This approach balances investor needs, regulatory alignment, and practical feasibility.			
Survey	Triodos Bank N.V.	Bank	Netherlands	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	No strong opinion.			
Survey	Triodos Bank N.V.	Bank	Netherlands	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Detailed comments provided by paragraph in part 3.			
Survey	Triodos Bank N.V.	Bank	Netherlands	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Detailed comments provided by paragraph in part 3.			
Survey	Triodos Bank N.V.	Bank	Netherlands	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Detailed comments provided by paragraph in part 3.			
Survey	Triodos Bank N.V.	Bank	Netherlands	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Detailed comments provided by paragraph in part 3.			
Survey	Triodos Bank N.V.	Bank	Netherlands	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Detailed comments provided by paragraph in part 3.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Triodos Bank N.V.	Bank	Netherlands	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Detailed comments provided by paragraph in part 3.			
Survey	Triodos Bank N.V.	Bank	Netherlands	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Detailed comments provided by paragraph in part 3.			
Survey	Triodos Bank N.V.	Bank	Netherlands	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Detailed comments provided by paragraph in part 3.			
Survey	Triodos Bank N.V.	Bank	Netherlands	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Detailed comments provided by paragraph in part 3.			
Survey	BDEW	Other - please specify (required)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	BDEW	Other - please specify (required)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The new clarifications, including Appendix C, are highly complex and don't achieve the intended goal of providing greater clarity regarding the assessment of impacts. While the additional guidance offers detailed explanations, it adds layers of complexity that may make practical application challenging, particularly for companies operating in sectors with intricate regulatory environments. An issue that remains insufficiently addressed is the distinction between gross and net assessments. In the German utilities sector, potential impacts are already mitigated by laws and regulatory frameworks. Extensive consultation processes are required for infrastructure projects, which help minimize negative effects on residents and local communities. It's unclear whether such legally required processes should be treated as mitigation measures or whether they should already be incorporated into gross assessment. This uncertainty can result in inconsistent reporting and interpretation. ESRS 1 paragraph 36 specifies that positive and negative impacts mustn't be offset against each other and that legally mandated mitigation measures do not constitute positive impacts. However, it's still unclear whether this allows for a net assessment where countermeasures are required by law. Similarly, Appendix C states: "If the potential impact was material within the reporting year, but prevention or mitigation action has been taken before the reporting date such that the impact no longer exists." In practice, this guidance is of limited utility: Potential impacts that no longer exist due to prior mitigation needn't to be reported. This raises a potential conflict with Paragraph 34, which requires evaluation of impact severity considering mitigation measures implemented before the impact occurred. Referring to "gross vs. net" without explicit mention in the ESRS isn't intuitive. The links between "gross vs. net" and "actual vs. potential" are unclear. The connection to the reporting period outlined in Appendix C is complex to follow, complicating consistent implementation. Also see feedback in part 3.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BDEW	Other - please specify (required)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The option to provide a summary and work with annexes is, in principle, positive. From the perspective of the reporting company, greater flexibility in the overall reporting structure would be desirable in order to avoid redundancies and improve readability. For example, ESRS E1 requests information on the transition plan at the outset. Such a plan typically includes climate targets and measures, which are then requested again at a later stage. Moreover, it is not consistent to present measures before communicating the corresponding targets. Explicitly mentioning the option of including an 'executive summary' putting detailed information in the appendices increases audit reliability. While we have assumed that such flexibility was already available under the previous version, the explicit mention of certain presentation options now raises a risk that other formats might no longer be considered permissible Generally, we appreciate flexibility in reporting when full connectivity/interoperability is given. Please see Excel file attached for those cases, where we have identified divergences.			
Survey	BDEW	Other - please specify (required)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	a. It should be clarified that there is flexibility in structuring topics within the ESG areas without having to follow the ESRS order, and that paragraph numbers within ESRS chapters do not need to be addressed chronologically. b. Tagging of graphics should be enabled so that not every disclosure requirement must also be presented in text form. c. The current level of simplification of the minimum disclosure requirements is not sufficient and continues to restrict reporting options. Since the PATs form the core of the CSRD, a large portion of the report remains almost unchanged. Further simplification could be achieved by reclassifying some of the minimum disclosure requirements as application requirements. Generally, we appreciate flexibility in reporting when full connectivity/interoperability is given. Please also see the Excel file attached for those cases, where we have identified divergences.			
Survey	BDEW	Other - please specify (required)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I disagree	Overall, the new proposals are positive. Nevertheless, implementation efforts will arise, especially for companies that are already reporting. One example is the new numbering, which requires reports to be re-tagged. The extent of this effort depends on the timing pressure created by the date of adoption. There should therefore be a transitional period in which companies already subject to reporting obligations may, for one or two reporting years, continue to apply the old ESRS on a voluntary basis. b. At the same time, the introduction of additional mandatory data points clearly contradicts the political mandate for simplification. The upgrade from "may disclose" to "shall disclose," as well as the inclusion of new data points, effectively creates new obligations. The quantitative requirements in E2 and E5 are particularly critical. For instance, in E5 – such as the disclosure of the percentage of the total weight of critical and strategic raw materials – the necessary information is not available in practice. Companies do not capture this data at the required level of granularity. In our assessment, reliable estimates are currently not feasible, leaving companies with virtually insurmountable hurdles. The argument that the removal of narrative disclosures compensates for these numerous new quantitative requirements is methodologically untenable. Narratives typically build on information that is already available, whereas quantitative disclosures require entirely new processes, significant system adjustments, and substantial costs. For more details, please notice the attached Excel Sheet.			
Survey	BDEW	Other - please specify (required)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The NMIG contains many clarifications that are important for understanding the mandatory reporting requirements. In some cases, the information it provides will still be necessary for preparing the report. While moving this information into a separate document may reduce the length of the mandatory reporting standards, it also raises questions. From our perspective, there is a considerable likelihood that auditors will rely heavily on the NMIG when interpreting requirements. Therefore, there is a risk that these guidelines will be interpreted by auditors as a kind of checklist which could even limit the adjustability to company specific content. As a result, this voluntary guideline could, in practice, become an indirect obligation. We therefore consider it important to clarify the status of the document.			
Survey	BDEW	Other - please specify (required)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The alignment of reporting boundaries is, in our view, a positive development; however, some uncertainties remain: ESRS 1 paragraph 59 states: "The undertaking may exclude from the sustainability reporting boundary a subsidiary that has been excluded from the scope of the consolidated financial statements due to its non-materiality from a financial perspective, unless there are specific facts and circumstances that expose the group to material impacts, risks and opportunities arising from such subsidiary." The second clause suggests that subsidiaries outside the financial reporting boundaries would still need to be analyzed in detail for materiality, which does not provide any relief compared to the current approach. In our view, this exception should either be removed entirely or clarified to specify which particular facts and circumstances would trigger such an exception, in order to avoid a detailed review of all non-consolidated subsidiaries and the associated documentation burden. The new Paragraph 92 does not yet make clear whether a "partial scope of calculation" can also refer to a shifted fiscal year. Due to additional national and European legislation such as IED or EPRTR, we are required to provide official reports on a calendar-year basis. It should be possible to report these calendar-year values even in the case of a shifted fiscal year, otherwise there will be enormous adjustment efforts and confusion among report users caused by contradictory reporting of the same data. Please also see comment above on connectivity/interoperability. For details, see attached Excel file.			
Survey	BDEW	Other - please specify (required)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	In principle, this relief is welcome. However, in our view, it would be helpful to clearly define the circumstances in which such a provision applies. Otherwise, it could lead to differing interpretations by companies and auditors. Also see feedback in part 3.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BDEW	Other - please specify (required)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	We generally support Option 2, i.e., voluntary reporting of quantitative data. All material sustainability risks can and must be reported in the risk report of the financial statements. Separate reporting in the non-financial section is redundant. Also see feedback in part 3.			
Survey	BDEW	Other - please specify (required)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	40d: It is more logical and beneficial to evaluate the monetary amount and percentage of revenue at material physical risk after considering climate change adaptation actions. Evaluating risks before adaptation actions creates unnecessary alarm, misrepresents the company's actual vulnerability, and undermines the value of proactive climate resilience strategies. 41d: All reporting should follow accounting recognition criteria, across financial and non-financial reporting. 42: Users don't benefit from this information. Also see feedback in part 3.			
Survey	BDEW	Other - please specify (required)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We welcome the alignment of the methodology with the GHG Protocol regarding the financial control approach. However, it should be more clearly explained in which cases reporting under the operational control approach is additionally required (ESRS E1 AR19). Furthermore, it remains unclear under which types of ownership interests proportional accounting should apply (ESRS E1 AR20).			
Survey	BDEW	Other - please specify (required)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	BDEW	Other - please specify (required)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	In our view, the amendments to ESRS 1 under the principle-based approach do not lead to simplification. Rather than providing structural clarity, they shift key uncertainties onto companies. This increases reliance on ESRS 2, even though the logical linkage between IROs, Topics, and MDRs remains weak there. The renaming of "matters" to "topics" and the option to choose between topic and subtopic levels create a "do-it-yourself logic." While this may offer short-term flexibility, it reduces comparability, complicates auditability, and makes overall application more complex. In our view, it would have been more effective to strengthen the topical standards to enhance precision, consistency, and verifiability.			
Survey	BDEW	Other - please specify (required)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree				
Survey	BDEW	Other - please specify (required)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree				
Survey	BDEW	Other - please specify (required)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BDEW	Other - please specify (required)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Setting absolute targets for financial institutions can lead to wrong incentives, as every investment leads to additional emissions, even and especially when financing green technologies. This contradicts the Green Deal's primary goal of redirecting financial flows. By reporting the mandatory absolute Green house emissions as a simple metric, which is not a target, the required transparency is given.			
Survey	BDEW	Other - please specify (required)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I would like to skip this question and provide my feedback in Part 3				
Survey	BDEW	Other - please specify (required)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	We cannot assess the complexity of this topic and rely on the results of the proposed field test.			
Survey	BDEW	Other - please specify (required)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	Investors can and in practice already do address their individual requirements to their investees bilaterally. There is no need for covering the SFDR requirements in a general regulatory approach.			
Survey	BDEW	Other - please specify (required)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	Companies with significant environmental impacts should inform themselves about the current state of scientific knowledge. This is not a regulatory task.			
Survey	BDEW	Other - please specify (required)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree				
Survey	BDEW	Other - please specify (required)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	We welcome the deletion of ESRS G1 33(a). However, collecting data for the unchanged requirement of the new data point 20(a) ("the percentage of its payments aligned with these standard terms") remains challenging. While it is possible to describe the standard payment terms, it would be difficult to determine how many payments actually complied with these terms. To capture deviations from the standard payment terms, we consider data point 20(b), regarding pending legal proceedings for late payment, to be sufficient. We advocate, however, that the requirements on payment practices should also be removed. They generate extremely high administrative effort without yielding substantial sustainability information or benefits for the report users.			
Survey	BDEW	Other - please specify (required)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	In our view, reporting should be clearly limited to Tier 1 suppliers, in line with the CSDDD. Extending beyond this would disproportionately increase complexity and be regulatorily inconsistent. Practical implementation would be virtually impossible.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BDEW	Other - please specify (required)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BDEW	Other - please specify (required)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BDEW	Other - please specify (required)	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	BDEW	Other - please specify (required)	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	BDEW	Other - please specify (required)	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BDEW	Other - please specify (required)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BDEW	Other - please specify (required)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	see Excel.			
Survey	BDEW	Other - please specify (required)	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BDEW	Other - please specify (required)	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	BDEW	Other - please specify (required)	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	BDEW	Other - please specify (required)	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BDEW	Other - please specify (required)	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BDEW	Other - please specify (required)	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The proposed amendments achieve the goal of simplification only to a very limited extent. Positive elements certainly include the stronger emphasis on fair presentation, the clarification that unnecessary or disproportionate efforts ("undue cost or effort") should be avoided, as well as the alignment of the CO_2 consolidation perimeter primarily with the financial control approach, which can contribute to greater consistency in practice. At the same time, the assertion that eliminating numerous data points results in significant relief is, in our view, misleading, as these consist almost exclusively of narrative disclosures. By contrast, new quantitative data points have been introduced—contrary to the clear political mandate—which will entail considerable additional effort. The actual relief effect will therefore, in our view, be minimal. Proposals for genuine simplification would include, for example: limiting specific topics such as substances and microplastics exclusively to manufacturers and importers; applying the E5 requirements only to manufacturing companies; and clearly restricting the value chain to Tier 1. Moreover, we consider it essential to strengthen the topical standards in a targeted manner to enhance precision and comparability. In our view, this would be far more effective than shifting an increasing number of questions to the discretion of companies and auditors. Such targeted limitations and structural improvements would significantly reduce the reporting burden while simultaneously increasing the relevance and quality of the disclosures.			
Survey	Transparency International France	NGO	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	We welcome the fact that the proposed amendments have retained the Double Materiality Assessment, and we believe that the amendments to the Double Materiality Assessment process have struck an acceptable balance between simplification and robustness.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Transparency International France	NGO	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Transparency International France	NGO	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We see the merits of standardising General Disclosure Requirements (GDRs) for policies, actions and targets (GDR-PAT) across the topical standards. However, we believe this could lead to reporting companies not disclosing material information in three main instances: (1)deleting Disclosure Requirements (DRs) requiring certain specific datapoints risks companies omitting material information from their disclosures. For example, deleting DR 10c) requiring companies to provide "details on the establishment of internal whistleblower reporting channels, including whether the undertaking provides for information and training to its own workers and information about the designation and training of staff receiving reports". (2)deleting DRs on the company's timetable for implementing a policy where it does not have a policy in place. For example, DR 10 b) (amended) stated, "where the undertaking has no policies on anti-corruption or anti-bribery consistent with the United Nations Convention against Corruption, it shall state this and whether it has plans to implement them and the timetable for implementation". Amended DR 10b (now DR 8) now states, "In addition to the information required by ESRS 2 GDR-P, the undertaking shall disclose: a) the circumstance when it has no policies on anti- corruption or anti-bribery consistent with the United Nations Convention against Corruption". We find the wording "the circumstance when" to be unclear and recommend amending ESRS 2 paragraph 30 (62 amended) to include the wording "and the timetable for implementation" after "it shall disclose this fact". (3)lack of requirement for companies to disclose their plans and/or timeline for implementing policies or procedures where these are not in place.			
Survey	Transparency International France	NGO	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	While it is positive that voluntary disclosures have been retained, the legal status of the NMIG remains unclear. This uncertainty risks limiting its effectiveness within the ESRS, as stakeholders may question the authority of the guidance. Placing voluntary disclosures in a separate document, particularly one whose legal standing is not yet defined, creates a risk that key examples will be overlooked. For example, the guidance in NMIG 1 relating to paragraph 7 (Policies – anti-corruption and bribery) which, provides important information that enables stakeholders to hold companies accountable for their approach to anti-bribery and corruption.			
Survey	Transparency International France	NGO	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The lack of a clear legal status of the NMIG within the ESRS framework reduces its authority and risks weakening its role in guiding consistent sustainability reporting.			
Survey	Transparency International France	NGO	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We welcome the move to make new DR 10 (c) mandatory and the recognition of the importance of training for high-risk teams, such as procurement. Sales and business development teams are all higher risk Recommendation: Retain wording as included in the amended exposure draft in new DR 10 (c).			
Survey	Transparency International France	NGO	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		No DRs on "corporate culture" despite being a G1 Business Conduct sub-topic. A company may not be prompted to disclose material information on how it fosters its corporate culture, and related actions, targets and metrics, by ESRS GDR-P because companies do not tend to have a specific policy on their culture. Opportunity to reinsert DRs on beneficial ownership. The April 2022 exposure draft G2 Business Conduct at DR G2-8 stated: "43. The undertaking shall provide information about its beneficial owners (as defined in article 3(6) of Directive (EU) 2015/849) and control structure. 44. The principle to be followed under this disclosure requirement is to provide transparency on the individuals who ultimately own or control the undertaking's organisational and control structure, including beneficial owners. 45. The disclosure required by paragraph 43 shall include information on the identity of who the ultimate beneficial owners or those who control the undertaking are, together with their respective ownership or control percentages." This DR was removed from the November 2022 exposure draft because, "the EFRAG considered the information to be superfluous in the context of beneficial ownership registers in the EU and a tenuous link to bribery/corruption." As included in the due process note. However, a ruling of the Court of Justice of the European Union (CJEU) on 22 November 2022 annulled provisions in the 5th Anti-Money Laundering Directive requiring public access to beneficial ownership information. This means that DR G2-8 is no longer superfluous and is indeed critical for understanding corruption and bribery related IROs and performance. We would like to note that this submission is supported by Transparency International France and Transparency International UK.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	WaterAid	NGO	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	WaterAid largely agree with the changes made, and hold that Chapter 3 of ESRS 1 has been made significantly simpler and clearer. We agree with that the materiality filter has been reinforced, and support this decision. In particular as paragraph 10 (11) specifies that if the undertaking concludes that a topic related to one or more material impacts, risks or opportunities is not covered, or not covered with sufficient granularity by an ESRS, it shall provide additional entity-specific disclosures on that topic. It strengthens the case for not treating the exercise as a check-list. Moreover, we believe that the clarified requirement specifying the information to be reported at sub-topical level (AR 21 For para. 50) will result in more focused and streamlined reporting. However, we have some reservations around the aggregation and disaggregation criteria for reporting information at the right level. AR 23 for para. 52 specifies that "The undertaking shall consider disaggregating reported information by location–such as by site, water basin or local ecosystem–when material impacts, risks or opportunities are highly dependent on local context." We support this, but hold that the undertaking shall not only consider, but should be required to disaggregate information when IROs are highly dependent on local context.			
Survey	WaterAid	NGO	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	WaterAid finds the newly added guidance helpful in resolving the 'gross vs net issue'. We support the approach to disregard implemented actions when assessing materiality of potential impacts, as we agree with the members of the EFRAG SRB who hold that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported.			
Survey	WaterAid	NGO	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	WaterAid support the introduction of the option to have an 'executive summary', as well as the option to use appendices for the most granular information. We also strongly commend the effort of EFRAG to reduce duplications, in particular in reference to PAT, which we think will significantly improve the conciseness of the reports			
Survey	WaterAid	NGO	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	WaterAid largely agrees with the changes proposed. We recognise that the drastic reduction in datapoints to a large degree has been achieves through avoiding duplication, and streamlining requirements, whilst still maintaining the integrity of the Directive. However, we have strong reservations with regards to undertakings no longer having to disclose plans to implement a PAT for material topics and associated timeline. We strongly hold that in order to drive action beyond reporting, undertakings should be held accountable to actually deliver on policies, actions, and targets, within a specified timeframe. Removing this requirements and limiting undertakings to only having to disclose on PAT without specifying when and how is a significantly missed opportunity which significantly weakens the Directive.			
Survey	WaterAid	NGO	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	WaterAid support the changes made. We commend the shift of all 'shall disclose' datapoint into the main body of the standard and the shift of mandatory Application Requirements to be situated below the associated DR. This significantly clarifies the structure and the flow of the text, and makes requirements more clear.			
Survey	WaterAid	NGO	United Kingdom	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	WaterAid considers the NMIG useful, with clarifying guidance which will assist the process of disclosing accurate and relevant information.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	WaterAid	NGO	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	WaterAid agrees with many of the proposed changes. We support the exclusion of non-material activities from calculations, as we agree that this will reduce the unnecessary reporting burden. We also support that when disclosing financial effects, the information is now limited to plans that are already announced. However, we have reservations regarding the data relief for "undue cost or effort". Whilst we recognise that data collection comes at a cost for which there may need to be reliefs, we still hold that introducing such relief, both for metric in value chains, as well as own operation may send the wrong signal as it may discourage transparency, and limit the shift towards the data availability which we need to see. We also hold reservations against the systematic preference for primary data from the value chain being removed. Whilst we recognise that the lack of maturity of counterparts in the value chain may lead to unreliable data, we still hold that primary data should be prioritised since collecting this data will likely lead to improvements and strengthening in value chain capacity over time. Furthermore, under the scope of horizontal burden-reduction reliefs, we also hold significant reservations of the replacement of the anticipated LSME with VSME, and VSME being used as the harmonising voluntary standard for all companies not in scope for CSRD. Especially in light of the undertakings not in scope for CSRD is expected to increase through the EC Omnibus Proposal. Whilst a more simplistic standard may be justified for SMEs, VSME does not provide the appropriate granularity of data. Since VSME was not designed to be used for this purpose, we urge that EFRAG is tasked to review VSME and ensure that it will drive the appropriate data collection to be in line with the wider EU Green Deal.			
Survey	WaterAid	NGO	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	WaterAid agrees with the relief presented in Paragraph 91, and considers it reasonable that a metric can only be partially reported when the underlying data is insufficient. We also support that any actions taken to increase data coverage and the progress made to increase data coverage should be reported. However, we hold that a time limit should be imposed for own operations to ensure that companies do not abuse this, and report indefinitely about parts of the relevant scope.			
Survey	WaterAid	NGO	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	WaterAid supports option 1, and in line with some EFRAG SRB members hold that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. We also note that Option 1 is in line with the Objective of EFRAG's mandate on the ESRS simplification, which is to ensure that the revisions do not undermine the interoperability with other global reporting Standards. As Option 1 is substantially aligned with the IFRS relief, we support this option.			
Survey	WaterAid	NGO	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	WaterAid support the effort to increase interoperability with other global standards, and IFRS S1 and S2 in particular. We think that the proposed amendments strike the right balance between interoperability and maintaining the integrity of the EU Directive, and the wider aims of the EU Green Deal. In particular, we support EFRAG's decision to not allowing to omit Scope 3 GHG emissions when impracticable.			
Survey	WaterAid	NGO	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	WaterAid	NGO	United Kingdom	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	WaterAid largely agrees with the reductions made, and considers that the systematic review has achieved the purpose of simplification. However, we do believe some deleted aspects of datapoints should be maintained, as noted in some of our reservations for other questions. In particular, ESRS 2. 30 (62 amended), where both the reference to timeframe and whether the undertaking plans to implement a PAT for material topics has been eliminated.			
Survey	WaterAid	NGO	United Kingdom	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	WaterAid strongly support the shift of 'may' to 'shall' for the six listed datapoints. The datapoints all make explicit a separate critical element of required information, and should make the disclosure clearer without adding a big reporting burden.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	WaterAid	NGO	United Kingdom	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	WaterAid support the inclusion of the four new datapoints as we agree that it will help clarify reporting requirements.			
Survey	WaterAid	NGO	United Kingdom	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	WaterAid firmly agrees with those members of EFRAG SRB and SR TEG who note that both absolute and intensity targets are needed to capture the full understanding on the green transition. Solely setting intensity targets, whilst capturing efficiency, could still mask rising emission levels.			
Survey	WaterAid	NGO	United Kingdom	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	WaterAid recognises the effort that has gone into consolidating the indicators, and feel that the revised standard has achieved the right level of simplification without substantially limiting the coverage.			
Survey	WaterAid	NGO	United Kingdom	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	In line with the broader objective to improve interoperability with other standards, it would be beneficial to ensure stronger alignment with relevant content from science-based frameworks such as SBTN.			
Survey	WaterAid	NGO	United Kingdom	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	WaterAid strongly urges that 'water and sanitation' is made applicable not only to S2 but also to S1 under the new topic workforce and workers in the value chain ([Draft] Amended ESRS S1/S2), sub-topic other labour-related human rights. Water and sanitation can be a material topics for own workers, even within the EU. For example, in Spain, migrant seasonal agricultural workers (MSAWs) living in informal settlements often lack reliable clean water for drinking, cooking, and hygiene. A recent study led by the Biomedical Research Institute of Lleida (IRBLleida) and the University of Lleida (UdL) highlighted the precarious water situation faced by these workers in regions like Andalusia and Murcia in Spain. Many MSAWs live in areas without basic amenities such as running water, sanitation, or electricity. Settlements, often located near farmlands, include shantytowns and abandoned buildings, lacking facilities for drinking water or hygiene. Workers frequently must rely on distant, often unsafe water sources, such as public taps or irrigation pools. Water sources can be as far as 8 kilometres from settlements. MSAWs frequently transport water by foot or bicycle in containers that include repurposed pesticide barrels, risking chemical contamination. Clean water is further complicated by restricted or inconvenient access to town water sources (Source: https://equityhealthj.biomedcentral.com/articles/10.1186/s12939-024-02112-8) As this example demonstrates, inadequate access to water and sanitation can both be a significant risk and an impact, even within an undertakings own workforce, within an EU context.			
Survey	BDO	Auditor	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BDO	Auditor	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	•We would appreciate further clarification and illustrative examples of what qualifies as a 'significant ongoing action' to promote consistent interpretation and application across preparers. •There appear to be some inconsistencies between paragraph 35 and Appendix C. Appendix C seems to imply that a gross approach applies to all potential impacts in the current reporting year, while paragraph 35 indicates that a gross approach is only required when significant ongoing actions are necessary. •Moreover, Appendix C prescribes a net approach for future years in cases of significant actions, which conflicts with the guidance in paragraph 35. •We also note that paragraphs 34 and 35 focus on the materiality assessment, whereas Appendix C addresses both the assessment and the reporting requirements. This dual focus may lead to confusion in practice. •In light of the above, we are of the view that the principles in the main part of the standard paragraphs should be strengthened. •Overall, we recommend retaining Appendix C as part of non-mandatory implementation guidance (NMIG) and for it to be amended with illustrative examples and additional guidance, and for it to be ensured that there are no contradictions with the standard itself. •Finally, we suggest refining the wording in Appendix C to clarify that gross reporting of potential impacts—after prevention and mitigation actions—should continue in future years, but only where significant ongoing actions are required to reduce the severity or likelihood of those impacts.			
Survey	BDO	Auditor	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	•We welcome the inclusion of an executive summary at the beginning of the sustainability statement (as per ESRS 1.109) as well as option to present certain disclosures in appendices (refer to ESRS 1.110). •Regarding the executive summary, we recommend requiring a balanced summary that reflects the most material IROs, which would help ensuring fair presentation and enhancing the reliability of the executive summary for assurance purposes. •In the above context, we also recommend further clarification on how the content of the executive summary aligns with the principle of fair presentation, particularly in avoiding the omission of material matters. •With respect to connectivity, we note the replacement of ESRS 1 paragraph 125 with ESRS 1 ED paragraph 115. We believe this change weakens the emphasis on connectivity between the sustainability statements and financial reports. Given its relevance to primary users, we recommend reinstating or reinforcing the connectivity requirement, instead of making it optional.			
Survey	BDO	Auditor	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	•We support the decision to move the Minimum Disclosure Requirements (MDR) to the General Disclosure Requirements. This change encourages reporting on Impacts, Risks, and Opportunities (IROs) at the management level. It also discourages excessive detail and reinforces the principle of materiality. •To enhance clarity and usability, we recommend providing more explicit guidance on how undertakings should report Policies, Actions, and Targets (PATs) on IROs at the management level or for groups of IROs. Specifically, further explanation is needed on how a top-down approach should be applied—whether reporting should occur at the individual IRO level or whether grouping is acceptable. Examples or illustrations would be particularly helpful in supporting consistent implementation. •While we acknowledge efforts to improve interoperability with IFRS S1, we suggest a more thorough review of ESRS 2 to ensure full alignment with IFRS S1, including the use of fully consistent language and illustrative examples to improve consistency and interoperability between the two frameworks.			
Survey	BDO	Auditor	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	•We welcome the enhancements made. Specifically, reduction of 'may' disclosures and keeping the remaining 'may' as illustrative rather than as an additional disclosures, as well as moving of 'shall' disclosures to the main body of the standard.			
Survey	BDO	Auditor	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	•We support the approach to reduce the number of mandatory Application Requirements in the main body of the standard and to move illustrative content to the NMIG. We note and acknowledge that while some Application Requirements are not designated as 'shall' requirements, including certain 'may' ARs can provide helpful application guidance for users. •Given the accelerated timeline of the revised ESRS development and on the assumption that the NMIG will not form part of the Delegated Act, we strongly recommend that EFRAG revisits the NMIG with full and appropriate due process to ensure it does not introduce guidance that exceeds the scope of mandatory requirements or inadvertently creates additional disclosure obligations. The NMIG should be positioned clearly as educational and supportive material, and its content should be made more concise and robust. •We also encourage EFRAG to establish a process for updating and improving the NMIG, including full and appropriate due process to ensure that its content does not contradict the revised ESRS content and its objectives.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BDO	Auditor	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	•Overall, we welcome the introduction of additional reliefs, particularly the concept of 'undue cost or effort'. •We disagree with a new relief for acquisitions (disposals) of subsidiaries that has been introduced (ESRS 1, Chapter 5.4), which allows undertaking to include (exclude) subsidiaries starting from the subsequent (from the beginning of the) period. This provision introduces ambiguity and leaves room for interpretation. We believe that the existing concept of 'undue cost or effort' could sufficiently address such cases without the need for a separate relief.			
Survey	BDO	Auditor	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I would like to skip this question and provide my feedback in Part 3				
Survey	BDO	Auditor	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	•We strongly recommend retaining Option 1 as the mandatory approach for reporting anticipated financial effects. We understand that without encouraging companies to quantify future sustainability-related risks, the current disconnect between financial and sustainability reporting will persist, leading to incomplete information in the financial market. Moreover, failing to quantify long-term sustainability risks increases the likelihood of overlooking or underestimating systemic risks. •Given the high priority of interoperability between ESRS and IFRS S1 and S2, we suggest the option closest to IFRS SDS along with leveraging from the reliefs in IFRS SDS, with further alignment of the wording in order fully to align with IFRS S1 and S2. •We acknowledge that information about anticipated financial effects is highly relevant to users. While we acknowledge the high estimation uncertainty, we believe the concept of 'undue cost or effort relief' together with the exception for providing quantitative information if it is not useful are sufficient to address this concern. •Additionally, we suggest considering allowing a relief for commercially sensitive information in exceptional circumstances.			
Survey	BDO	Auditor	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	•We note that EFRAG took steps to further align the wording in ESRS with IFRS S1 and S2 to enhance interoperability. However, we note that the proposals in the ED in fact increase rather than reduce the differences. We urge further collaboration with the ISSB to help improve interoperability with IFRS SDS as with a global baseline while finalising the ESRS standards. We recommend that EFRAG takes steps to ensure further alignment with the ISSB standards, particularly in relation to the treatment of reliefs and the concept of 'undue cost or effort' as noted in the feedback provided in response to questions 17 and 19 of this survey. Also, as we have noted, while some alignment has been achieved, there remain areas where the language and approach diverge. •Regarding the GHG emission boundary, we agree with only allowing the financial control approach. This increases comparability which we find more important than interoperability with other frameworks. The ED suggests that the financial control approach should be supplemented with operational control if financial control fails to convey a fair presentation. We believe that it should be clarified that this is only expected to happen in rare circumstances and that examples of such circumstances should be given in the non-mandatory guidance. •Additionally, the GHG Protocol is expected to undergo significant revisions in the coming years, which should address some of the deviations found in ESRS. We encourage EFRAG to actively participate in this revision process to enhance alignment.			
Survey	BDO	Auditor	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	BDO	Auditor	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	Please refer to our comments on questions 15 and 16.			
Survey	BDO	Auditor	Belgium	22.E1.	Comments on deleted datapoints in ESRS E1	I agree	Please refer to our comments on questions 15 and 16.			
Survey	BDO	Auditor	Belgium	22.E2.	Comments on deleted datapoints in ESRS E2	I agree	Please refer to our comments on questions 15 and 16.			
Survey	BDO	Auditor	Belgium	22.E3.	Comments on deleted datapoints in ESRS E3	I agree	Please refer to our comments on questions 15 and 16.			
Survey	BDO	Auditor	Belgium	22.E4.	Comments on deleted datapoints in ESRS E4	I agree	Please refer to our comments on questions 15 and 16.			
Survey	BDO	Auditor	Belgium	22.E5.	Comments on deleted datapoints in ESRS E5	I agree	Please refer to our comments on questions 15 and 16.			
Survey	BDO	Auditor	Belgium	22.S1	Comments on deleted datapoints in ESRS S1	I agree	Please refer to our comments on questions 15 and 16.			
Survey	BDO	Auditor	Belgium	22.S2	Comments on deleted datapoints in ESRS S2	I agree	Please refer to our comments on questions 15 and 16.			
Survey	BDO	Auditor	Belgium	22.S3	Comments on deleted datapoints in ESRS S3	I agree	Please refer to our comments on questions 15 and 16.			
Survey	BDO	Auditor	Belgium	22.S4	Comments on deleted datapoints in ESRS S4	I agree	Please refer to our comments on questions 15 and 16.			
Survey	BDO	Auditor	Belgium	22.G1	Comments on deleted datapoints in ESRS G1	I agree	Please refer to our comments on questions 15 and 16.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BDO	Auditor	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	•We support EFRAG's positioning of ESRS as a fair presentation framework, rather than a compliance framework. It is important that all qualitative characteristics of a fair presentation framework are incorporated into the final revised ESRS, fully aligned with IFRS SDS guidance to ensure interoperability. This includes linking disclosures to entity-specific information, which is important due to the reduction in mandatory datapoints and EFRAG's decision not to develop sector standards. •We recommend that the basis of preparation statement prepared by management is required explicitly to confirm that the sustainability statement has been prepared on a fair presentation basis and gives a fair presentation. This should be clearly articulated to avoid ambiguity and to anchor assurance expectations. •We propose that the revised ESRS include a definitive statement affirming that the preparation of a sustainability report in accordance with ESRS is presumed to result in a fair presentation of the sustainability statement as a whole. We suggest including educational language to help stakeholders understand the concept of fair presentation, how it differs from a compliance-only approach, and why it matters for the credibility and usability of sustainability disclosures.			
Survey	BDO	Auditor	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	•We agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets. •We welcome the EFRAG's discussion of specific rules for the sustainability reporting of financial institutions. As EFRAG realizes, the nature of the information provided by the financial institutions is very different from the information published by non-financial undertakings. While non-financial undertakings mostly report on its own greenhouse gas emissions and the targets set, including to some extent emissions and targets of the actors in their value chain, financial undertakings report mostly on the emission values of its counterparties. The information provided by financial undertakings should be able to demonstrate how they comply with the general objective of financing transition to a carbon neutral economy. Given these different goals in the reporting of financial and non-financial undertakings, creating different rules for the financial undertakings does not create any room for the unlevel playing field. We strongly recommend aligning the reporting requirements for the financial institutions with financial services -specific requirements set out on the global level, such as IFRS SDS.			
Survey	BDO	Auditor	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	•We would recommend for entities to be allowed to use a threshold that aligns with their organizational structure (e.g., regions, segments) to facilitate seamless information gathering. This approach should be consistent with the objective of ESRS S1, ensuring that users of sustainability statements can understand the impacts on the workforce in different geographic contexts.			
Survey	BDO	Auditor	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	•We welcome the simplification of the Sustainable Finance Disclosure Regulation (SFDR)-reporting and the reduction in the number of the data points required. It is important that the disclosure requirements of the revised ESRS are aligned with the requirements of the revised SFDR. This should include the possibility of removing any data points that are no longer required under the revised SFDR and are not considered necessary to meet the disclosure objectives of the CSRD/ESRS. In relation to application of the SFDR: oIn practice, the Principal Adverse Indicators (PAI) statement has proven to be confusing and overburdened with information, resulting in a lack of acceptance by users. oWe note that the changes proposed in the revised set of ESRS are unlikely to resolve all of the issues. This is because, while the proposed ESRS would require the disclosure of a number of the PAI indicators required by financial undertakings, the revised proposed CSRD scope would mean that many entities would not be within the scope of the CSRD/ESRS. Therefore, it would appear likely that there would not be enough information available for financial undertakings to create meaningful PAI statements.			
Survey	BDO	Auditor	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		While we acknowledge and understand that EFRAG's work to revise the ESRS was carried out within the constraints of an externally imposed deadline, we note that high quality standards together with their credibility and acceptance need appropriate and robust due process. We are concerned at the speed with which the ESRS have been revised and the associated increased risk of inconsistencies and unintended consequences, which brings the associated risk of further changes being required in the relative short term. The Omnibus proposals extend across a number of different reporting requirements to include not only the ESRS but also others such as the SFDR and EU Taxonomy. We encourage EFRAG to work with the European Commission in order that a holistic approach is taken to the update of these various reporting requirements, to ensure that inconsistencies in requirements, definitions and terminology are minimised.			
Survey	Transparency International UK	NGO	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	We welcome the fact that the proposed amendments have retained the Double Materiality Assessment, and we believe that the amendments to the Double Materiality Assessment process have struck an acceptable balance between simplification and robustness.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Transparency International UK	NGO	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	Transparency International UK	NGO	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We see the merits of standardising General Disclosure Requirements (GDRs) for policies, actions and targets (GDR-PAT) across the topical standards. However, we believe this could lead to reporting companies not disclosing material information in three main instances: (1) deleting Disclosure Requirements (DRs) requiring certain specific datapoints risks companies omitting material information from their disclosures. For example, deleting DR 10c) requiring companies to provide "details on the establishment of internal whistleblower reporting channels, including whether the undertaking provides for information and training to its own workers and information about the designation and training of staff receiving reports". (2) deleting DRs on the company's timetable for implementing a policy where it does not have a policy in place. For example, DR 10 b) (amended) stated, "where the undertaking has no policies on anti-corruption or anti-bribery consistent with the United Nations Convention against Corruption, it shall state this and whether it has plans to implement them and the timetable for implementation". Amended DR 10b (now DR 8) now states, "In addition to the information required by ESRS 2 GDR-P, the undertaking shall disclose: a) the circumstance when it has no policies on anti- corruption or anti-bribery consistent with the United Nations Convention against Corruption". We find the wording "the circumstance when" to be unclear and recommend amending ESRS 2 paragraph 30 (62 amended) to include the wording "and the timetable for implementation" after "it shall disclose this fact". (3) lack of requirement for companies to disclose their plans and/or timeline for implementing policies or procedures where these are not in place.			
Survey	Transparency International UK	NGO	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	While it is positive that voluntary disclosures have been retained, the legal status of the NMIG remains unclear. This uncertainty risks limiting its effectiveness within the ESRS, as stakeholders may question the authority of the guidance. Placing voluntary disclosures in a separate document, particularly one whose legal standing is not yet defined, creates a risk that key examples will be overlooked. For example, the guidance in NMIG 1 relating to paragraph 7 (Policies – anti-corruption and bribery) which, provides important information that enables stakeholders to hold companies accountable for their approach to anti-bribery and corruption.			
Survey	Transparency International UK	NGO	United Kingdom	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	G1	The lack of a clear legal status of the NMIG within the ESRS framework reduces its authority and risks weakening its role in guiding consistent sustainability reporting			
Survey	Transparency International UK	NGO	United Kingdom	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	We can only comment on ESRS G1, which we welcome the move to make new DR 10 (c) mandatory and the recognition of the importance of training for high-risk teams, such as procurement. Sales and business development teams are all higher risk Recommendation: Retain wording as included in the amended exposure draft in new DR 10 (c).			
Survey	Transparency International UK	NGO	United Kingdom	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		No DRs on "corporate culture" despite being a G1 Business Conduct sub-topic. A company may not be prompted to disclose material information on how it fosters its corporate culture, and related actions, targets and metrics, by ESRS GDR-P because companies do not tend to have a specific policy on their culture. Opportunity to reinsert DRs on beneficial ownership. The April 2022 exposure draft G2 Business Conduct at DR G2-8 stated: "43. The undertaking shall provide information about its beneficial owners (as defined in article 3(6) of Directive (EU) 2015/849) and control structure. 44. The principle to be followed under this disclosure requirement is to provide transparency on the individuals who ultimately own or control the undertaking's organisational and control structure, including beneficial owners. 45. The disclosure required by paragraph 43 shall include information on the identity of who the ultimate beneficial owners or those who control the undertaking are, together with their respective ownership or control percentages." This DR was removed from the November 2022 exposure draft because, "the EFRAG considered the information to be superfluous in the context of beneficial ownership registers in the EU and a tenuous link to bribery/corruption." As included in the due process note. However, a ruling of the Court of Justice of the European Union (CJEU) on 22 November 2022 annulled provisions in the 5th Anti-Money Laundering Directive requiring public access to beneficial ownership information. This means that DR G2-8 is no longer superfluous and is indeed critical for understanding corruption and bribery related IROs and performance. We would like to note that this submission is supported by Transparency International France and Transparency International UK.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	I think the guidelines are excessively complex and unnecessary. Please consider that these guideline can create confussion since the undertaking have their own rules to manage the actions according the nature and the assessment of negative impacts.			
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	I believe that this balance could be further simplified by specifying more clearly that a reference can be included in the ESRS 2 reporting requirements, given that a detailed description will be included in the relevant thematic ESRS. It should be noted that some companies will want to voluntarily adapt these standards to their reports and, if the effort involved in preparing the information and the report is significant, they may consider continuing as before, applying other standards that they have been using for years.			
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	From the preparer's point of view, it would be clearer and simpler if the disclosure requirements (DR) and application requirements (AR) were not separated. After reading each of the DRs, you have to go to the corresponding AR to complete the information on what needs to be disclosed. The AR could be described after each DR, rather than having the DRs for each chapter in the first part and then the ARs for each section behind them.			
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2				
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	I would like to express my disagreement with including all this information on anticipated financial effects. I believe that including the monetary estimate of those effects is sufficient to understand the possible future impact on a company.			
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	The GHG emissions estimation is complex to all sectors. Among other reasons, the exception to institutions would result in an unlevel playing position for the other sectors and could be understand as a lower intention to contribute to decarbonization			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	If this change contributes to burdening non-European companies, the implications of this information should be examined. The field test will contribute to take decission.			
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	The incorporation of the SFDR PAIs into the revised ESRS appears balanced and does not appear to compromise the ability to assess adverse impacts. This benefits companies by facilitating regulatory compliance and maintaining the relevance of information.			
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	I align my opinion which those that think it could be further reviewed to better reflect latest trends in biodiversity and so, have a stronger alignment with relevant content from science-based frameworks such as SBTN.			
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	UBE CORPORATION EUROPE	Preparer (non-financial preparing a sustainability report)	Spain	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Clearer instructions on materiality and DMA in ESRS 1 and 2 is welcome. However, double materiality is essential and must remain at the heart of the ESRS framework and European Union sustainability regime for corporate reporting to be credible and useful. The simplification of the process must not be at the cost of a fair and full consultation of the stakeholders at this stage. In particular, the principle of "materiality of information" is concerning since it introduces a further filter for companies to not report information. For example, it represents a step backwards from ID-177, which says that most S1 metrics must be reported if S1 Own Workforce is material. It is essential to maintain the principle of fair presentation in the reporting standards. It is positive that the revision of the AR 16 list of topics has maintained all of the sub-subtopics for S1 + S2. These are based on the list of social topics in the CSRD and should all be maintained. The emphasis on aggregation (as opposed to disaggregation) is concerning, as disaggregated information (both site-specific and country-specific) is key to understanding the distribution of IROs and identify remediation actions/opportunities.			
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	It is important that companies report not just their net impact – the gross impact should be reported, and the recommended text preserves this principle.			
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Para 22 addresses the issue of appropriate aggregation or disaggregation of information on material impacts, risks and opportunities and their management. It should set rules regarding the location of such disclosures depending (or not) on the level of aggregation.			
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The Exposure Draft removes duplications between the cross-cutting and topical standards. The preservation of the 4-part architecture in the social standards is important to respect the distinctiveness of different affected stakeholder groups. However, we have two critical concerns ; First, the original DR in environmental standards concerning screening of sites in materiality assessment were replaced by an application requirement to ESRS 2 IRO-1. This in effect makes transparency on this aspect optional. Consideration of local context is a key element of an appropriate materiality assessment. This should be both recognised in Chapter 3 of ESRS 1, and in ESRS 2 IRO-1, which should include an explicit datapoint on how the undertaking screened its locations and value chains. We welcome that E standards provide a clearer reference on the importance of disaggregation of disclosures, but this can only be done well if locations are properly screened. Second, we strongly recommend adding an explicit reference to the disclosure of relevant, entity-specific metrics directly in S standards. The fact that S2, S3 and S4 do not include any metrics should not imply that entity-specific metrics for S topics should not be disclosed.			

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Survey	CFDT - Confédération française démocratique du travail	Trade union	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The "may" (voluntary) data points should not be eliminated. In many cases they are "shall" in GRI standards, so it is important to keep them to align with GRI standards. Also, many of them were originally proposed as mandatory by EFRAG to the EC. The first wave of reports show that many companies have reported some "may" data points. Retaining them would help ensure standardization/comparability between company reports. Almost all of the datapoints for non-employee workers are voluntary, thus most datapoints for this vulnerable group of workers has been lost. Also, important datapoints on full time versus part time workers has been eliminated.			
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	It is concerning that mandatory guidance in the Set 1 ESRS has been downgraded to "non-mandatory". Mandatory guidance is key to ensuring comparability and completeness of sustainability reporting. At a minimum, Non-mandatory Implementation Guidance (NMIG) should be included in the Delegated Act, and ideally called Mandatory Implementation Guidance. A major point of concern is that ID-177, which provided guidance that most S1 metrics should be reported if S1 Own Workforce is material, has now been downgraded into NMIG. Instead, EFRAG should preserve and promote the guidance that most S1 metrics shall be reported.			
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	As a whole the reliefs go too far, overshooting the balance between cost/effort and transparency. There is a danger of enabling green/social washing. The relief for "undue cost or effort" is too vague thus leaving too much room for interpretation. The relief for direct data for value chain reporting is too extensive, as direct data is key for transparency. The relief for reporting on operations which are not "significant drivers of IROs" also opens up too much leeway for interpretation.			
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	These combined reliefs overshoot the balance between transparency and cost/effort and risk enabling green/social washing. At a minimum, there should be a time limit introduced for these reliefs on value chain metrics.			
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ability to estimate financial effects is critical for the undertaking's ability to integrate sustainability into its business strategy considerations, planning and risk management. It is also key for the determination of financial materiality, including in terms of overreporting topics as financially material. Reporting on financial effects is crucial to achieving the objective of putting sustainability reporting on the same level as financial reporting and integrating both. The European Union has recognised the value of a double materiality approach to corporate reporting which requires disclosure of both material environmental and social impacts, risks and opportunities as well financially material data, It is important to keep the requirement on businesses to analyse and understand the financial effects of their business model. This will ensure investors have access to credible data as well as providing the underpinning for future business planning.			
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	ESRS reliefs should not go beyond those set in IFRS. The principle of fair presentation needs to be protected to provide transparency on all material IROs. As noted in the response to question 15, it is also important to consider interoperability with GRI when considering changes to the ESRS, rather than only considering ISSB's standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	22.S1	Comments on deleted datapoints in ESRS S1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The new threshold reporting metric is a real improvement of the reporting scope regarding employees. However, it does only make sense with the S datapoints. The reduction in the number of mandatory and voluntary datapoints goes far beyond striking an acceptable balance. An explicit quantitative goal of 50%+ reductions was never set by the European Commission for EFRAG A number of S1 datapoint metrics have been eliminated which should be reinstated: •S1-5 Employees: gender breakdown for zero-hour employees •S1-8 Diversity: age distribution; •S1-10 Social protection: reinstatement of retirement •S1-12: Training and development: gender breakdowns, •S1-13 Health and safety: fatalities from ill-health for non-employees and other workers on site; •S1-14 Work-life balance: employees that took family related leave; As mentioned above, the voluntary datapoints must be maintained to provide alignment with GRI, which is currently in the process of strengthening its labor standards, as well as guidance and standardization for companies reporting more than just the mandatory datapoints.. A number of S1 datapoint metrics have been eliminated which should be reinstated: •S1-5 Employees: gender breakdown for zero-hour employees •S1-8 Diversity: age distribution; •S1-10 Social protection: reinstatement of retirement •S1-12: Training and development: gender breakdowns, •S1-13 Health and safety: fatalities from ill-health for non-employees and other workers on site; •S1-14 Work-life balance: employees that took family related leave;			
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	The "fair presentation" principle is essential to reduce the risk of green/social washing, as it emphasizes the full disclosure of all material impacts, risks and opportunities and their management. It is not understandable why this principle is under attack, as it is included as one of the general principles of the Accounting Directive.			
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	It is essential that financial institutions disclose absolute targets to assess how their strategies align with the economy-wide transition to net zero. Absolute targets are relevant for users of sustainability statements and for understanding the real-world climate impact of financed activities. While intensity measures provide insights into efficiency, they can mask rising absolute emissions in growing portfolios or sectors. Granting an exemption would also undermine fairness in a sector-agnostic standard. Other industries could equally argue for exceptions based on their own difficulties, reducing comparability across sectors. Moreover, absolute financed emissions are already recognised in existing standards and regulations: the SBTi financial sector net-zero standard, the UNEP FI/NZBA recommendations, and EU SFDR all require or encourage absolute emissions disclosure. Exempting banks would risk misalignment and reduce the usefulness of reported data for stakeholders, including asset owners who depend on it for their own disclosures.			
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The "top 10" threshold for reporting country-level data on employment, collective bargaining and social dialogue is a major improvement over the current 10% employment threshold. An analysis of the first sustainability statements from Wave 1 companies shows that the current 10% threshold results in country-level disclosures on as little as 21% of total employees. More country-level information is needed to understand the distribution of impacts across countries, as well as whether employment thresholds for specific labour rights have been exceeded. The new threshold does not require additional effort/cost by companies, since they must gather country-level data anyways to calculate the global figures. Furthermore, it does not result in extra datapoints, since the information currently is (and can be under the revised ESRS) reported as one table.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	An analysis of the first year ESRS reports shows that most companies are simply reporting that they pay minimum wages, whereas the intention (as outlined in the ESRS Basis for Conclusions) is that companies should be enabled to disclose commitments to paying a wage "sufficient to support themselves and their families in dignity" as well as the extent to which they do this. This shows that the methodology for non-EU countries needs to be changed. Furthermore, the new ILO agreement on a methodology for living wages needs to be taken into account. While the proposed new methodology takes a step forward in both regards, two key changes are needed: •The methodology for reporting on 'adequate wages' should measure actual wages against an adequate/living wage for all employees, not only those within the EU. In particular, for employees outside the EU, the methodology should allow employees' actual wages to be measured: oA) against the local legal minimum wage only when this is set in line with the ILO principles on estimating living wages; or oB) against living wage estimates that are set in line with ILO principles on estimating living wages. •Companies should be able to rely on local legal minimum wages or living wage estimates when the authorities or organisations that set them provide public evidence of their alignment with the ILO principles for estimating living wages. Furthermore, the transitional provision for the EU needs to be reinstated, as not all Member States have transposed the Adequate Minimum Wage Directive.			
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	The new, simplified framework makes it easier for companies to report on these SFDR-related matters in a way that corresponds to how their policies are set. For users, this consolidation makes it easier to locate the relevant information. However, the SFDR datapoints are very helpful and should only selectively be amended.			
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	The unadjusted gender pay gap should be kept as mandatory, since the methodology for calculating it is clear. The adjusted pay gap figure as voluntary. In practice many companies are reporting both figures, which is useful for improved transparency. However, since the methodology for calculating the adjusted figure is not standardized, the unadjusted should be kept mandatory.			
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	As detailed above, cumulative impact of the various reliefs is concerning			
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The improved language on DMA is welcomed, including on the engagement with workers' representatives. It would be key to provide for additional means in time and training for worker's representatives.			
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The proposed "top 10" threshold for the reporting of country-level information for employee headcount, collective bargaining and social dialogue is a significant improvement over the current 10% employment threshold. Country-level information needs to be reported in more detail, and on other metrics as well, in order to have more transparency on the distribution of impacts across countries. In the metrics, voluntary datapoints need to be reinstated as well as the datapoints on gender breakdowns, workforce age distribution, etc. detailed above need to be reinstated. The proposed new methodology for adequate wages outside of the EU also needs attention, and the transition language for EU member states needs to be reinstated, since the Adequate Minimum Wage Directive has not been implemented in some Member States. We would also like to reiterate our longstanding demand for including franchise workers in the S1 definition of own workers, as well as the need for sector-specific standards to supplement the Set 1 sector-agnostic standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We are concerned that the loss of many specific datapoints related to workers in the value chain will mean that disclosures about material impacts, risks and opportunities become more generic and have less information about the specific stakeholder groups because specifications about the level of granularity have been deleted. Many of the points that are being deleted from ESRS S2 had originally been included because they reflected effective practice in relation to improving supply chain labour rights, for example, AR 6 awareness of the impacts on value chain workers from an undertaking's strategy or business model, AR 20 illustrating how the perspectives of value chain workers have informed specific decisions or activities of the undertaking and AR 25 which looks at retaliation and whether workers can use grievance mechanisms confidentially. An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S3, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	CFDT - Confédération française démocratique du travail	Trade union	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		CFDT welcomed the adoption of CSRD as a major progress to accelerate the ambitions of the Green Deal for a just transition. CFDT is worried by current backlash and the whole Omnibus process. We support a limited review of ESRS, that should aim at only simplifying, not diminishing the principles of transparency, exhaustivity and comparability of sustainable Environment, Social and Governance reporting. We also support compulsory reporting for mid-caps, with meaningful and ambitious reporting standards, which participate in driving the sustainable transformation of enterprises.			
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We welcome the proposed amendments and recognise that they represent a significant step towards simplifying the DMA process. The proposed changes make it much easier to comply with reporting requirements within the group. Strengthening the materiality filter is particularly helpful as it increases clarity and helps prepar-ers focus on information that is relevant to decision-making. In this respect, the changes con-tribute to a more workable balance between simplification and robustness. The revised wording of Chapter 3 of ESRS 1 is also clearer and more understandable, which should facilitate com-prehension and consistent application. Furthermore, the top-down approach will help to im-plement the DMA in a more 'business-oriented' manner, as certain standards have now proven to be essential in the industry. Last but not least, implementation of the DMA as and when re-quired is much more practical. The DMA and the associated reporting requirements are therefore effective in terms of content and do not represent an unnecessary additional burden. At the same time, we remain cautious as to whether the simplifications are sufficient in practice. Although the general direction is positive, certain aspects of the DMA process may still leave room for interpretation and could therefore lead to inconsistent application in individual com-panies. For example, there is still no definition of positive impacts. We also see a risk that further simplification could compromise the robustness of disclosures in areas where stakeholders expect a high degree of transparency. Against this background, we recommend continuing to monitor practical implementation and providing additional guidance where necessary. This will help to ensure that the simplifications achieve the intended effect without compromising reliability or comparability. In addition, it would be helpful to clarify that companies that have performed the DMA in ac-cordance with the 'old' ESRS standard do not need to repeat or redocument the analysis.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Overall, we see the guidelines as a positive development that strengthens the consistency of DMA outcomes. We agree that the new guidelines provide greater clarity on how remediation, mitigation, and prevention measures should be considered in the DMA. This clarification is an important step towards enhancing the relevance and comparability of sustainability reporting, as it helps preparers better understand how to integrate implemented actions into their materi-ality assessments and disclosures. Furthermore, we welcome the fact that early engagement with the CSRS requirements and implementation of measures are recognised. All at once, we note that practical applications may still present challenges. In particular, the distinction between remediation and mitigation, as well as the way in which prevention measures should be reflected, could benefit from further illustrative guidance or examples to avoid divergent interpretations across entities. Furthermore, the new approach may result in certain topics not being reported on, even though companies might wish to communicate them because they have implemented meaningful and effective measures. For leasing companies in particular, but also for supervised institutions monitored by banking regulators in general, cer-tain topics (such as corruption, bribery, whistleblowing, etc.) are already subject to specific reg-ulatory requirements. This raises the question of whether these topics will continue to be con-sidered material - as has been the case in practice so far - or whether they will be excluded going forward. While this strengthens the materiality filter, it also reduces flexibility for entities to pre-sent positive action in areas that stakeholders may find valuable. To maximise the effectiveness, we would encourage close monitoring of their implementation in practice and the provision of additional clarifications where recurring uncertainties arise, while also considering ways to al-low for voluntary disclosures of impactful measures beyond the strict DMA outcome.			
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We agree that the proposed amendments provide an appropriate degree of flexibility to enable more relevant and concise reporting and promote a stronger link to overall corporate reporting. Reporting will become more flowing, understandable and structured, enabling it to be used effectively in the broader context of the company and by third parties. In particular, we welcome the explicit aim of avoiding unnecessary repetition, as this directly contributes to clearer and more focused disclosures. Equally, the possibility to move more de-tailed information to the appendix is sensible, as it improves the readability and usability of the main report while still ensuring that all relevant information remains accessible to stakeholders. Although the reference concept contradicts international and national accounting standards, it is sensible and effective in this context. Finally, we welcome the new option to summarise the content, as this makes the sustainability report clearer and easier to understand for users. It also makes sense not to present PATs multiple times, as this makes the report more concise.			
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	In general, we acknowledge that the proposed amendments move in the right direction and in many respects help strike a more appropriate balance between reducing preparation effort and ensuring the provision of relevant and comparable information. The proposed changes also mean that readers can process relevant information directly, rather than having to search labo-riously for it among various other irrelevant data. In particular, we consider the removal of the "may disclose" options to be reasonable, as it in-creases clarity regarding what is required and helps avoid unnecessary ambiguity. Likewise, the streamlining of narrative requirements is welcome, since the comparability of purely qualitative data points is inherently limited and often results in a high preparation burden without corre-sponding value for users. We also strongly support the initial possibility to use estimated data, as this is crucial - espe-cially for financed portfolios or for smaller foreign subsidiaries - where collecting precise figures can be highly resource-intensive. However, in the long term (in about five years), we believe that companies should submit vali-dated data at a specified point in time to ensure comparability and avoid competitive ad-vantages or disadvantages. Ideally, a standard for calculating such data will have been estab-lished to ensure that the transition from estimates to solid figures is both consistent and fair. Until then, an individual implementation concept could help, whereby, for example, if data quali-ty is insufficient, the age of the data and the underlying estimation parameters must be specified by the issuer. In addition, we support a cut-off date approach, i.e. changes in the scope of consolidation dur-ing the year are no longer included pro rata in the data collection.			
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	This proposed change will reduce misunderstandings, making it easier to compare results and significantly simplifying the preparation process. The new structure follows international regula-tions, which is more intuitive and easier for users to navigate. The 'jungle' of confusing sources that need to be taken into account is being streamlined. However, we still see further potential for improvement. It would be helpful if all regulations re-lating to an ESRS X.X could be found in one place, analogous to the structure 'Obligation – Ap-plication Requirements – Voluntary implementation advices – Examples'.			
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	this is useful and beneficial			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We believe that the proposed Amendments provide sufficient relief while maintaining the level of transparency required to support the objectives of the EU Green Deal and to ensure interopera-bility with the ISSB's IFRS S1 and S2. In addition, companies will not be subjected to unneces-sary time pressure during what are already time-critical work phases. The exclusion of non-material key performance indicators is appropriate, as it meaningfully re-duces the reporting burden without compromising the relevance or credibility of the disclosures. This targeted focus allows companies to concentrate their efforts on the most impactful topics and ensures that stakeholders receive decision-useful information rather than excessive detail. Moreover, we strongly welcome the initial acceptance of estimates, particularly for Scope 3 emissions. For many entities - especially in the early phases of data collection across complex value chains - reliable primary data is simply not yet available, and the ability to provide well-founded estimates is essential to enable timely reporting and to foster a gradual build-up of more precise data over time. The simplification can therefore lead to a noticeable reduction in costs, as certain data is difficult to collect or can only be collected at high cost.			
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We agree that the proposed relief for situations where data quality is not yet fully established strikes an appropriate balance between offering the necessary flexibility for preparers and main-taining the integrity of sustainability reporting. As with the previous points, this is particularly helpful in the context of climate-related disclosures. However, this approach compromises comparability. We are critical of a permanent extension of the undue cost and effort methodology to all disclosure requirements. This provision could dis-courage companies from even attempting to collect data or improve data quality. The clause 'undue cost and effort' can also lead to different interpretations by reporting companies and auditors. Therefore, there should be a generous phase-in/transition period (approximately 5 years), but ultimately there should be a requirement to collect all key figures. Otherwise, com-panies might be tempted to argue for the permanent use of estimates on the basis of this sim-plification, which would lead to a dilution of reports. The 'comply or explain' approach already enshrined in the CSR-RUG/NFRD, which was intended to ensure greater transparency, would also be gradually watered down. In addition, we would like to point out that, in order to achieve true comparability, for example in the carbon footprint, it is absolutely necessary to use uniform data for emission factors. If com-panies use different data sources, very different emission values will result from the same con-sumption values. This leads to massive distortions and opens up opportunities for greenwash-ing by deliberately selecting one-sided data sources.			
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The first option offers greater compatibility with ISSB standards, particularly for internationally active companies (which may in future constitute the main group of sustainability report prepar-ers under CSRD), thereby simplifying double reporting. The second option prevents the disclo-sure of sensitive company data and makes it easier for companies to comply with reporting re-quirements. As interoperability with ISSB standards is very important and companies can also opt for quali-tative disclosure under option 1, we consider option 1 to be a viable option even if they are not yet able to quantify the financial impact.			
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	ESRS E1 para. 40a-c: Leased assets represent a significant portion of a leasing company's as-sets and could therefore be classified as 'assets' or 'key assets'. Individual reporting of the loca-tions of key assets affected by physical risks, as required in paragraph 40b), would entail a high reporting burden for leasing companies in some circumstances. For leasing companies, it should therefore be clarified that climate risks do not have to be re-ported for individual leased assets. Instead, a general risk assessment of the leased asset could be made, possibly bundled by country, region, type of asset, etc. (in my opinion, this would also be analogous to our DNK rec-ommendation for the VSME on data point DNK 1, B1 para. 24).			
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	It is essential to ensure interoperability, to avoid that in the medium to long term European standards may be complemented or even superseded by international frameworks. Establishing a high degree of alignment now is therefore crucial to avoid imposing unnecessary additional work on companies should global standards (such as those of the ISSB) gain wider acceptance. At the same time, the amendments successfully simplify reporting requirements, reducing com-plexity without undermining the overall quality or completeness of sustainability information. This dual focus-greater interoperability combined with practical simplification-supports compa-nies in streamlining their processes and facilitates comparability across jurisdictions, which is valuable for both preparers and users of reports. Moreover, by harmonising key definitions and disclosure requirements, the amendments lower the risk of duplication or conflicting guidance, making it easier for entities to comply efficiently with both European and international standards. We view the adaptation to the financial consolidation approach positively, as it further harmo-nises financial and non-financial reporting. However, in this context, consideration should once again be given to the inclusion of a company solely on the basis of the so-called 'autopilot func-tion' (cf. SIC 22). Including financial special purpose entities in a consolidation group under CSRD is not expedient and does not provide any decision-relevant information for addressees. It is good that the location concept is thus no longer applicable.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	The proposed requirements not only ensure that the effort involved in preparing the report is proportionate to the report's outcome, but also that readers can directly process relevant infor-mation instead of having to laboriously search for it among various other irrelevant data. We therefore see a clear advantage in the simpler structure. We also consider the planned summary of all non-mandatory information in the Non-Mandatory Illustrative Guidance to be useful. In general, however, it should be noted that although user-friendliness is improved, this does not lead to a noticeable reduction in the effort required to collect the underlying data.			
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We consider mandatory disclosure of data points to be sensible. The materiality analysis ensures in advance that only preparers for whom these mandatory data points are material are required to report them.			
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Microplastics are one of the main causes of global pollution and a threat to all life. In this re-spect, mandatory disclosure or the extension of disclosure requirements in this context is un-derstandable. Essentially, this mainly concerns waste products that arise during the production process or accumulate over time as by-products. The difficulty in this case lies in the collection of data. The amendment to ESRS 2 with regard to compliance with the requirements or disclosure in the event of deviating application of ESRS 1 serves to clarify the issue, is effective and constitutes a necessary qualitative disclosure.			
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	Yes, we consider this requirement to be necessary, as the sustainability report according to CSRD serves specific purposes and should not be misused as an advertising brochure for the company by including additional information. This also counteracts greenwashing. Furthermore, it simplifies the audit process.			
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	If financial institutions will be exempted from disclosing absolute GHG emission targets when they have only set intensity targets, this exemption should explicitly extend to leasing compa-nies so that they are treated on an equal footing with banks. For many financial institutions and leasing companies, the business model is primarily focused on financing or leasing activities rather than direct operational emissions. Their climate impact is therefore largely driven by financed or leased portfolios, where absolute emissions are often outside their direct control and depend heavily on client behaviour and sectoral developments. In such cases, intensity targets (e.g., emissions per unit of financing or per asset class) provide a more meaningful and actionable metric to track progress towards decarbonisation. To ensure transparency and foresight for investors, these institutions could rather disclose the methodology and key assumptions behind their intensity targets, including the sectors and as-set classes covered or provide scenario analyses or pathway descriptions, explaining how their intensity targets align with relevant climate scenarios (e.g., net-zero by 2050). And probably the most important one should be engagement strategies with clients and counterparties to influ-ence real-economy emissions reductions. This combination of detailed disclosures will give investors clear insight into the ambition, cred-ibility and trajectory of the institutions' climate strategies, even in the absence of absolute tar-gets.			
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	In principle, we can understand the adjustment of the threshold for country-specific disclosure, and in many cases the proposal will lead to simpler handling. However, in cases where a com-pany employs many low-paid workers abroad, it could fall under the disclosure requirements of ESRS S-1 and ESRS S-7. This will be particularly the case if the majority of turnover is generated domestically, but the work is carried out abroad in the low-wage sector there.			
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	A precise definition from EFRAG of what is meant by 'serious human rights violations' would be helpful.			
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	We agree with the deletion of the voluntary data point on the adjusted gender pay gap, as the current legal situation is already insufficiently aligned with other existing legal requirements. In many jurisdictions, national or EU-wide legislation – such as the EU Pay Transparency Directive – already sets out specific rules and methods for assessing and disclosing gender pay differences. The introduction of an additional voluntary data point with potentially different definitions or calculation methods risks confusion, duplication of effort and inconsistent reporting across different frameworks. By removing this voluntary data point, the ESRS avoids overlap or conflict-ing requirements and allows companies to focus on complying with the mandatory rules that will apply uniformly once they are transposed into national law. This increases clarity and com-parability while avoiding unnecessary administrative burdens. Furthermore, the overall gender pay gap provides little information and may not accurately re-flect the reality in companies, with the result that derived targets and measures may be less concrete. For some companies and their stakeholders, the specific pay differences by employee category are therefore of interest. Companies should therefore be allowed to publish these fig-ures on a voluntary basis.			
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	We welcome the proposed revision. In our opinion, very few companies are likely to have an in-terest in disclosing payment practices.			
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
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Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
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Survey	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

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Survey	InfraMobility	Preparer (non-financial preparing a sustainability report)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Some clarifications are very welcome (e.g. the top-down approach). The concept of fair presentation is a welcome addition as well. However, both of these keep things vague and subjective. The same issue that existed in the previous version of the ESRS persists: When is a topic material? What is the threshold companies should compare their IROs to? You will still have companies making this a prioritization exercise rather than a materiality exercise as the context against which to determine materiality is still not there. A concrete example based on my experience: Our 2024 DMA led us to the conclusion that we only have 1 non-material topic. In comparison, DHL has 4 or 5 non-material topics, whereas their footprint on all topics (E, S & G) is many times higher than ours. This is a typical case of companies deeming topics to be non-material relative to other topics in their case, rather than relative to some more absolute threshold/context/parameter/...			
Survey	InfraMobility	Preparer (non-financial preparing a sustainability report)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and hanv reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	InfraMobility	Preparer (non-financial preparing a sustainability report)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree				
Survey	InfraMobility	Preparer (non-financial preparing a sustainability report)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	InfraMobility	Preparer (non-financial preparing a sustainability report)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	Great that all mandatory disclosures are now in the main body, and not in the AR anymore.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	InfraMobility	Preparer (non-financial preparing a sustainability report)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	"Undue cost or effort" is vague, which opens the door to abusing the concept. How many € or man-hours is considered to be undue?			
Survey	InfraMobility	Preparer (non-financial preparing a sustainability report)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	"Undue cost or effort" is vague, which opens the door to abusing the concept. How many € or man-hours is considered to be undue?			
Survey	InfraMobility	Preparer (non-financial preparing a sustainability report)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	I agree with the stance of the EFRAG SRB members that this would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices			
Survey	InfraMobility	Preparer (non-financial preparing a sustainability report)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	InfraMobility	Preparer (non-financial preparing a sustainability report)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	InfraMobility	Preparer (non-financial preparing a sustainability report)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	InfraMobility	Preparer (non-financial preparing a sustainability report)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	InfraMobility	Preparer (non-financial preparing a sustainability report)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	See my comment on the DMA process. I understand the risk this minority of the EFRAG SRB members sees, but think "fair presentation" is a necessary principle in any sustainability reporting set-up. Specific guidance to auditors how to deal with this should be produced, to avoid discussions on the topic.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	InfraMobility	Preparer (non-financial preparing a sustainability report)	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	InfraMobility	Preparer (non-financial preparing a sustainability report)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	InfraMobility	Preparer (non-financial preparing a sustainability report)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	In my view adjusted gender pay gap gives a better view on the issue. An unadjusted gender pay gap misses a lot of necessary nuance.			
Survey	InfraMobility	Preparer (non-financial preparing a sustainability report)	Belgium	35.E1-6.	Do you agree with the amendments of this chapter?	I disagree	The removal of a mandatory target for 2030 is a mistake. This opens the door to vague non-committal ambitions towards 2040 and 2050. We're in the decade of action and substantial cuts to our GHG emissions need to be made between now and 2030. This is important information from an impact perspective as well as for investors to assess the strategy of the reporting company. We should make it very clear that short-and medium-term are necessary, with long-term targets being more optional (if we want to make anything optional).	E1	Disclosure Requirement E1-6 - Targets related to climate change	
Survey	InfraMobility	Preparer (non-financial preparing a sustainability report)	Belgium	35.S1-12.	Do you agree with the amendments of this chapter?	I disagree	Removing the gender breakdown risks losing a lot of relevant information regarding gender equality.	S1	Disclosure Requirement S1-12 - Training and skills development metrics	
Survey	UNEP-WCMC	NGO	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	UNEP-WCMC	NGO	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	UNEP-WCMC	NGO	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The exposure draft includes clarifications that enable companies to consolidate topics in their sustainability reports, thereby avoiding repetition of impacts, risks, and opportunities across multiple topics. This is useful but should be complemented with requirements around referencing the reported information to the relevant disclosure requirements, ideally in the same way as currently recommended by the GRI Standards to support alignment and make uptake easier for companies.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UNEP-WCMC	NGO	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	In the exposure drafts, several disclosures that were repeated under topical standards were merged into a combined disclosure requirement in ESRS 2, with the provision that the reporting company should report on these issues in relation to the different material topics. This improves the readability of the standards, which is helpful. This streamlining is, however, likely to confuse companies on the required scope of value chain coverage. ESRS 1 and 2 specify that companies should report on impacts, risks and opportunities beyond their own operations and also cover the upstream and downstream value chain. To simplify the wording of the topical standard, this is not repeated in the topical standard disclosure requirements, but companies are asked to refer to ESRS E2. To provide clearer guidance on this for report preparers, we recommend adding a note to each topical standard that the disclosure requirements included (unless specified otherwise) all apply to direct operations as well as the upstream and downstream value chain.			
Survey	UNEP-WCMC	NGO	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	See more detailed comments in Part 3. The decision to move all the previous non-mandatory data points and guidance to the Non-Mandatory Illustrative Guidance (NMIG) makes the structure of the standard clearer. It is helpful when report preparers do not have to distinguish between "shall" and "may" disclosure requirements. However, the general and topical standards should make more explicit links to relevant points in the NMIG, directing companies to this additional voluntary guidance. We would also recommend amending the title from 'Non-Mandatory Illustrative Guidance' to 'Non-Mandatory Guidance to Support the Implementation of the Standard' to better reflect its purpose as additional guidance for report preparers.			
Survey	UNEP-WCMC	NGO	United Kingdom	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	S4	The recommended metrics in NMIG 18-21 should be based on the core and additional disclosure metrics from TNFD. We also recommend reviewing the NMIG for consistency in the use of terms: NMIG 3 for para. 13 refers to "protected areas or key biodiversity areas" as opposed to the term "biodiversity sensitive areas" used in the ESRS E4. NMIG 20 for para 21 point (b) refers to "landscape condition and site condition" but the text that follows refers to landscape condition only. This could be used as an opportunity to make minor updates to the NMIG wording, for example: NMIG 5 for para 13 could in addition to the Nagoya Protocol and the Convention for Biological Diversity refer to the Kunming-Montreal Global Biodiversity Framework (KMGBF) and National Biodiversity Strategies and Action Plans (NBSAPs) of the relevant countries. A reference to the Convention on Migratory Species (CMS) and UN Convention to Combat Desertification (UNCCD) could also be added. NBSAPs could also be mentioned under NMIG 10 for para 17 on biodiversity target-setting, where KMGBF is already highlighted.			
Survey	UNEP-WCMC	NGO	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	The definition of the term "undue cost and effort" used within ESRS should remain aligned with the double materiality approach, which is critical for driving positive impact from the implementation of ESRS reporting. IFRS definition of "undue cost and effort" also acknowledges that new information obtained in ways where costs and efforts of the company are balanced out by the benefits of improved information, is still considered as obtained "without undue cost and effort". Given the ESRS double materiality approach, the benefit of obtaining new information should be considered as a benefit to the company as well as people and nature. This is well described in para 89 of ESRS 1, however it is not at all reflected in para 47. "Without undue cost and effort" should not be defined as "using already available information only". The purpose of the ESRS is to drive improvements in the availability of data on corporate impacts, risks and opportunities as well as improvements in the accuracy of these data points. For the large companies that remain subject to the Corporate Sustainability Reporting Directive (CSRD), the investments needed to improve assessment processes for their impacts, risks and opportunities, do not represent a significant portion of their budgets. Regarding the reliefs, it is understandable that companies might not be able to comply with all ESRS requirements from year 1. Most of the relief provisions, however, do not specify an end period, which may undermine the objectives of the ESRS and CSRD.			
Survey	UNEP-WCMC	NGO	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I would like to skip this question and provide my feedback in Part 3				
Survey	UNEP-WCMC	NGO	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I would like to skip this question and provide my feedback in Part 3				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UNEP-WCMC	NGO	United Kingdom	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				
Survey	UNEP-WCMC	NGO	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	The alignments with the IFRS S1 and S2 that have been made are useful to align reporting requirements for companies that report against both ESRS and ISSB Standards. We strongly recommend a similar effort for alignment with GRI Standards, which would allow achieving interoperability between ESRS and established frameworks and standards on the issues related to impact materiality, which are not covered in IFRS S1 and S2.			
Survey	UNEP-WCMC	NGO	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	UNEP-WCMC	NGO	United Kingdom	22.E4.	Comments on deleted datapoints in ESRS E4	I partially agree and partially disagree	See detailed comments in Part 3.			
Survey	UNEP-WCMC	NGO	United Kingdom	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Regarding ESRS E4 Disclosure of transition plan, it is good that disclosing a transition plan is made mandatory. However, this does not likely apply to many companies, because 'Disclosing information on a transition plan (TP) is conditional to have one that is publicly released.' We recommend removing this condition. The data points should be applied to all companies that have in their materiality assessment identified high risks and dependencies on nature.			
Survey	UNEP-WCMC	NGO	United Kingdom	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	UNEP-WCMC	NGO	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	An explicit requirement for a "fair representation" approach in ESRS reporting is useful. We note that in Annex B of ESRS 1 "fair representation" is referred to as "faithful representation" and recommend aligning the terminology throughout the ESRS standards. The definition of fair representation in Annex B of ESRS 1 should be updated to better cover impact materiality considerations. For example, point QC6 emphasizes that fair representation means that the reporting company should report not only the impact, risk or opportunity in question but also how it has adapted its strategy, risk management and governance in response. Applying a double materiality lens, it would be equally important for the company to report its impact management measures or the affected stakeholders that were negatively impacted by a given impact.			
Survey	UNEP-WCMC	NGO	United Kingdom	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We recommend formulating the revised AR in a way that encourages biodiversity and ecosystem target setting using other recognized methodologies besides SBTN, for example many companies set targets in line with the mitigation hierarchy or in line with no net loss or net positive approaches. See recent brief on corporate target setting from our team at UNEP-WCMC: https://resources.unep-wcmc.org/products/WCMC_RT678 A pragmatic approach could be to outline in the AR what the disclosing company should specify for any target set. For example, that they should indicate the baseline and the expected target achievement and any milestones, how the target aligns with international and national policy objectives on biodiversity (e.g. KMGBF and NBSAPs), actions through which the company expects to achieve the target and whether any safeguards have been adopted to avoid unintended negative impacts from making progress on these actions. UNEP-WCMC remains available to review an updated version of this AR.			
Survey	UNEP-WCMC	NGO	United Kingdom	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Appendix A: Sub-topic "Communities' economic, social and cultural rights (land-related impacts, security-related impacts, adequate housing and food, water and sanitation)" should include health rights as well. We recommend keeping the sub-topics 'State of species' and 'The extent and condition of terrestrial and marine ecosystems' separate (as they are now). They are inherently interlinked, and assessing biodiversity requires taking both levels into account. Merging them could indicate that you are encouraged to assess one or the other.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UNEP-WCMC	NGO	United Kingdom	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We strongly recommend maintaining the E4 standard, as removing it would result in the ESRS inadequately covering corporate impacts, risks and opportunities on biodiversity and ecosystem services. Information on these impacts, risks and opportunities from large companies is critical for users of sustainability reports and for achieving the EU Biodiversity Strategy 2030. This is also in line with Target 15 of the Kunming-Montreal Global Biodiversity Framework.			
Survey	UNEP-WCMC	NGO	United Kingdom	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Annex II: Glossary. We recommend aligning the definition of "threatened species" with the IUCN Red List of Species and replacing the term "endangered species" with "threatened species" throughout. In the IUCN Red List of Species, the term "threatened species" is used to describe species in the Vulnerable (VU), Endangered (EN) and Critically Endangered (CR) risk categories (see the question "What are the IUCN Red List Categories and Criteria?" in the IUCN Red List FAQ for more info). This is a long-standing scientific consensus. The interpretation would also be in line with other disclosure frameworks and standards, such as TNFD and SBTN.			
Survey	Koan Group	Consultant (including software vendor)	Netherlands	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	While the introduction of the bottom-up/top-down approach provides welcome clarity on methodology, numerous ambiguities remain, making the overall DMA process appear more complicated than before. Firstly, the introduction of systemic risk significantly complicates matters for preparers, who now face new concepts without adequate practical guidance. A critical gap remains in Paragraph 29, which fails to provide sufficient clarity on when the DMA should be updated. This lack of a clear timeline complicates compliance processes and resource planning for all undertakings. Although Appendix A has been streamlined by eliminating the most detailed sub-sub-topic level and given an illustrative status, the result is not sufficiently shortened. Further guidance on its non-mandatory use is required. Specifically, for the Biodiversity sub-topics in Appendix A, the reporting requirement for the "state of species" appears duplicated across other sub-topics, which confuses the actual scope of disclosure required. The guidance in Appendix A, paragraph 48 (concerning the assessment of materiality) does not adequately consider the audit process. How an auditor will verify the distinction between material and non-material information remains a significant concern. Furthermore, Paragraph 51 concerning the bottom level of reporting is unclear on the necessary level of aggregation and disaggregation. The requirements regarding stakeholder involvement remain insufficiently defined. Similarly, for the Social sub-topics in Appendix A, there is no clear instruction on whether preparers must report across all social themes included in the sub-topic or are expected to 'pick and choose' based on the materiality outcome, creating significant compliance uncertainty.			
Survey	Koan Group	Consultant (including software vendor)	Netherlands	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	While the aim to clarify the "gross versus net" issue is necessary, the proposed solution introduces significant complexity and potential for divergent interpretations in practice. The new guidance, particularly the differentiation between the current reporting period and future reporting periods for assessing impacts, adds unnecessary complexity. This time-based distinction does not simplify the process but rather leads to different interpretations regarding whether an impact should be reported based on the severity before or after the action taken. The proposed solution for potential negative impacts where significant ongoing actions are taken, may prove impractical for the audit process. The "gross approach" of assessing the impact before prevention/mitigation actions will result in excessive reporting and high documentation demands, complicating assurance efforts. For the guidance to be effective in practice, there is an urgent need for clearer, more precise definitions regarding the types of impacts and remediation actions. Specifically, a clearer definition is needed for what constitutes past, present, and future remediation actions, along with explicit guidance on how to classify and report different types of impacts that occurred in past years but are still relevant in the current period.			
Survey	Koan Group	Consultant (including software vendor)	Netherlands	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The allowance for the inclusion of an executive summary at the beginning of the sustainability statement is very welcomed. This will allow preparers to articulate the most critical sustainability findings and link them directly to the company's financial strategy and risks, which fundamentally enhances connectivity with corporate reporting. By summarising the main conclusions of the DMA and the most material disclosures in one place, the executive summary dramatically improves the statement's readability and conciseness for stakeholders.			
Survey	Koan Group	Consultant (including software vendor)	Netherlands	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	While some changes are useful, others undermine accountability and introduce new complexities, contradicting the simplification objective. Specifically, we disagree with the deletion of the point on "key actions related to providing and cooperating in remedy for those harmed by actual material impacts', as it removes information essential for users. The requirement to disclose whether and how environmental targets consider ecological thresholds is premature. While scientifically sound, this concept is highly advanced and complex for most preparers to comprehend and apply reliably, going directly against the simplification principle and risking non-comparable reporting. Moreover, the elimination of the requirement to disclose planned PATs and associated timelines for all material topics creates a critical deficit in transparency and accountability. Materiality demands a corresponding management intention to plan policies and actions and deleting this requirement essentially renders the materiality assessment less action-oriented. We also view the renaming of Minimum Disclosure Requirements (MDR) to General Disclosure Requirements (GDR) as an unnecessary change that adds no substantive clarification or simplification to the standards. The deletion of topical specifications for GOV, SBM, and IRO is very useful. It successfully streamlines the architecture and reduces complexity by avoiding the forced duplication of information across different standards. Lastly, the drastic reduction of mandatory datapoints supports the goal of reducing preparation effort, even if it sacrifices some detail.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Koan Group	Consultant (including software vendor)	Netherlands	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	While the restructuring is a significant step toward simplification, the language still requires refinement. We strongly agree with the complete elimination of all voluntary datapoints. These provisions created significant confusion, so their removal provides essential clarity. The relocation of all mandatory datapoints into the main body of the standard and the corresponding placement of mandatory Application Requirements below their respective Disclosure Requirements is very useful, creating a much more logical and accessible document architecture. We believe that some editorial changes were unnecessary, and in certain cases, the language is still not sufficiently clear or concise. Certain editorial amendments to the wording of specific Disclosure Requirements appear to be minor or stylistic, adding little value to clarity and instead requiring preparers to review every sentence for non-substantive changes.			
Survey	Koan Group	Consultant (including software vendor)	Netherlands	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	The introduction of several targeted reliefs demonstrates a practical understanding of the challenges faced by preparers during the first application of the ESRS, particularly regarding value chain data collection. The changes introduced, such as the new relief for acquisitions/disposals and the clarification on disclosing financial effects (limiting information to already announced investments and plans), are necessary to align reporting with common corporate practices. The most critical area of relief is the systematic removal of the preference for direct data in value chain metrics. This change is crucial, as the initial reliance on direct data was a major point of burden. Allowing undertakings to use reliable estimates substantially reduces reporting effort and acknowledges the practical limitations of primary data collection. Similarly, introducing a relief for lack of data quality (allowing partial scope reporting with an action plan to improve future coverage) makes sense, as it avoids penalising companies for first-time data gaps while committing them to continuous improvement. However, the new "undue cost or effort" relief may complicate matters regarding audit consistency. There is currently a lack of clarity on who validates whether the data collection was causing undue cost and how auditors will ensure the same criteria are applied across different companies to prevent arbitrary reporting boundaries. The relief concerning the systematic preference for direct data introduces a significant risk that data quality will be diminished. There is a concern that companies may not actively pressure suppliers to collect relevant data, which is essential for accountability. This aspect requires close monitoring to ensure the transparency of actual impacts is not compromised.			
Survey	Koan Group	Consultant (including software vendor)	Netherlands	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	While we support providing flexibility to first-time preparers, the relief introduces a significant risk of losing too much critical information, potentially resulting in disclosures that are both misleading and non-comparable. The risk stems from the lack of a defined endpoint or enforcement mechanism for achieving full data coverage. Allowing an undertaking to report metrics with a perpetual "partial scope" of calculation creates a situation where reports may appear compliant but fail to provide a true and complete picture of the undertaking's material impacts. This is particularly problematic for metrics related to the value chain, where the most significant impacts often lie. The decision to not include a time limit for the use of the relief is a critical oversight. Without a mandatory deadline for achieving a full scope, it is highly likely that some undertakings will continue to rely on the partial scope provision indefinitely, claiming that cost reduction is not feasible in the short term. A time limit is essential to 'police' the improvement process and provide an external incentive for investment in data quality. Lastly, the relief encourages preparers to set their own standards for improvement and disclosure, which fundamentally undermines the comparability of the reported metrics across different entities.			
Survey	Koan Group	Consultant (including software vendor)	Netherlands	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Quantitative information is particularly important for investors and analysts to accurately price climate and sustainability-related risks into valuations. Option 1 strikes a necessary balance between meeting user needs and acknowledging the current immaturity of reporting methodologies. Particularly, Option 1 provides the necessary flexibility by allowing the omission of quantitative information only under specific, justifiable conditions. These conditions, such as the inability to measure financial effects separately or high levels of uncertainty, are valid reasons for temporary omission. To prevent the conditional omission from becoming an indefinite loophole, we recommend the inclusion of a mandatory time limit for the use of the quantitative omission relief within Option 1. A deadline would provide a strong incentive for undertakings to invest in the necessary methodologies, skills, and data systems required to mature their quantitative reporting. It would also guarantee that all reporting entities will transition to providing quantitative data within a foreseeable timeframe.			
Survey	Koan Group	Consultant (including software vendor)	Netherlands	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	We agree that the amended paragraphs on Anticipated Financial Effects have been sufficiently simplified and generally strike the right balance between the reporting effort required and the users' need for essential financial information. However, the language within the remaining paragraphs could be streamlined further. We recommend a final editorial pass to ensure the wording is more direct and concise, which would reduce the risk of ambiguity and divergent interpretation among preparers.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Koan Group	Consultant (including software vendor)	Netherlands	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	The amendments successfully advance interoperability by aligning the GHG emission boundary and adopting many IFRS S1/S2 reliefs, which is a significant positive step. However, a lack of clarity in certain key areas risks introducing new implementation burdens and undermining the perceived simplification. Specifically, the guidance in ESRS E1, AR 20 (concerning complex ownership structures and the separate disclosure based on operational control) is highly ambiguous and needs further simplification. The current wording is prone to varied interpretation, which will burden companies with complex ownership structures and potentially lead to non-comparable disclosures. The implementation of the "undue cost or effort" relief, while necessary, needs clearer definition. Currently, there is insufficient clarity on when a company can legitimately invoke this principle. To maintain integrity and prevent misuse, explicit guidance should be provided on how this principle should be interpreted and, crucially, how the auditor will police its application across different entities. Without this, the relief risks becoming a loophole that undermines the transparency it aims to achieve.			
Survey	Koan Group	Consultant (including software vendor)	Netherlands	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Koan Group	Consultant (including software vendor)	Netherlands	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Koan Group	Consultant (including software vendor)	Netherlands	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	While we support the underlying intent to clarify existing disclosure objectives, two of the added datapoints risk introducing unnecessary reporting complexity without providing proportional value to the user. Specifically, E5-4 is likely too specific and complex when it comes to practical data collection and reporting. This level of granular detail seems to be a case where the reporting effort outweighs the utility of the resulting information.			
Survey	Koan Group	Consultant (including software vendor)	Netherlands	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We agree that the concept of fair presentation is important and its explicit inclusion is beneficial, as leaving it out may encourage a checklist mentality. Adopting the concept aligns the ESRS with IFRS S1 and S2, which is critical for achieving global interoperability and reinforcing the notion that sustainability reporting requires judgment, not just compliance. This high-level statement is a necessary philosophical foundation for relevant reporting. However, we disagree that the amendments immediately translate into an effective functioning of the materiality filter or a reduction of documentation and this is due to a lack of clarity in the implementation guidance. Specifically, Section 2 of ESRS 1 does not sufficiently clarify how companies can operationalise the principle of fair presentation. t is very difficult to legislate a subjective concept like "fairness." This ambiguity may lead to increased legal risks and audit costs as assurance providers struggle to validate the required judgment, particularly where established reporting practices are lacking. Additionally, the explicit inclusion of fair presentation does not inherently solve the issue of a "checklist" mentality because the standards remain inherently rules-based. Preparers will still focus on documenting the omission of every non-material datapoint to mitigate legal liability. The simple inclusion of the term, without stronger enforcement guidance, is unlikely to override this compliance-driven behaviour.			
Survey	Koan Group	Consultant (including software vendor)	Netherlands	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	The rationale for exemption, while acknowledging implementation difficulties, fundamentally conflicts with the goal of driving real-world decarbonisation and maintaining market transparency. Particularly, intensity targets can mask rising absolute emissions that result from business growth. An FI could meet an intensity target while simultaneously increasing the total volume of emissions it finances. Absolute targets counter this risk by capturing the true, total impact on the climate. Since banks and insurers are driving decarbonisation, it is crucial that they disclose their ambition to reduce total, real-world emissions. By publishing this information, FIs create both an internal commitment and an external signal of their role in the low-carbon transition.			
Survey	Koan Group	Consultant (including software vendor)	Netherlands	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The new threshold, requiring disaggregation for the top 10 largest countries by employee headcount, is a vast improvement because ensures that the social disclosures reflect the countries where the undertaking has its most significant workforce presence. This information is typically easily accessible by country, as companies already track employee headcount and location for payroll and human resources management. Therefore, the incremental burden of disaggregating this specific data for the top 10 countries is estimated to be limited for most companies. Lastly, by standardising the disclosure to the top 10 countries, the amendments establish a consistent benchmark across similar multinational undertakings, significantly improving the comparability of social metrics.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Koan Group	Consultant (including software vendor)	Netherlands	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Koan Group	Consultant (including software vendor)	Netherlands	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	The existing guidance, though useful, should be clarified and rewritten to provide preparers with the most current and effective examples of biodiversity-related targets. This proactive step helps companies avoid setting targets that quickly become obsolete. It is crucial that ESRS maintains a strong alignment with relevant content from science-based frameworks, such as the Science Based Targets Network (SBTN). These frameworks represent the evolving methodological best practices for measuring and managing nature-related impacts.			
Survey	Koan Group	Consultant (including software vendor)	Netherlands	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree				
Survey	Koan Group	Consultant (including software vendor)	Netherlands	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Koan Group	Consultant (including software vendor)	Netherlands	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	Koan Group	Consultant (including software vendor)	Netherlands	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Koan Group	Consultant (including software vendor)	Netherlands	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Koan Group	Consultant (including software vendor)	Netherlands	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	Koan Group	Consultant (including software vendor)	Netherlands	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Koan Group	Consultant (including software vendor)	Netherlands	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Koan Group	Consultant (including software vendor)	Netherlands	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Koan Group	Consultant (including software vendor)	Netherlands	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Koan Group	Consultant (including software vendor)	Netherlands	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Koan Group	Consultant (including software vendor)	Netherlands	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Koan Group	Consultant (including software vendor)	Netherlands	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Koan Group	Consultant (including software vendor)	Netherlands	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Koan Group	Consultant (including software vendor)	Netherlands	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	E3G - Third Generation Environmentalism	NGO	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	E3G - Third Generation Environmentalism	NGO	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	E3G - Third Generation Environmentalism	NGO	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	E3G - Third Generation Environmentalism	NGO	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	E3G welcomes EFRAG's proposed changes to simplify the ESRS by reducing the number of datapoints, introducing specific reliefs, and shortening the length of the ESRS format. We believe the removal of all 'may disclose' elements is helpful to streamline the standards. Nonetheless, not all such elements need to be transposed in the Non-mandatory Illustrative Guidance (NMIG). In doing so, corporate entities would need to review additional guiding documents on top of existing implementation guidelines. This would be difficult to incentivise systematically and would go against the principle of simplifying the reporting process. If needed, E3G believes that it would be more effective to have the most relevant 'may disclose' elements within the ESRS framework, in the format of examples and references to existing disclosure requirements.			
Survey	E3G - Third Generation Environmentalism	NGO	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We partially agree with the introduction of the new reliefs. In principle, the introduction of reliefs in the ESRS format should be exceptional and accompanied by a time limit, as other reliefs and phased-in provisions are. Although we acknowledge their introduction was aimed at simplifying the ESRS compliance, we believe that the combined use of all the additional reliefs would systematically lower the quality and comparability of sustainability-related information. EFRAG and the European Commission should consider additional options to limit the risks for misuse and abuse of such reliefs. Undue cost or effort; We are supportive of the introduction of this relief but suggest introducing a specific time limit for its use. Such relief is helpful to establish a favourable regulatory environment for companies approaching sustainability reporting for their first time. Plus, the integration of such relief aligns closely with the 'undue cost or effort' relief present in the IFRS standards, benefitting the interoperability between the two. Nonetheless, we stand firm about the potential misuse or abuse of the relief. If not limited, preparers would be free to avoid reporting on material information because they consider the process too costly or complex, regardless of the materiality assessment. Over time, the relief seriously risks diminishing the quality of information reported and the comparability of ESG data. We ask EFRAG to introduce a time-limit for the relief. Anticipated financial effects; E3G provides information on this relief in Question 19 of this consultation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	E3G - Third Generation Environmentalism	NGO	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	E3G firmly disagrees with Option 2, which limits the disclosure of anticipated financial risks and opportunities to only qualitative information. Quantitative information on future financial effects arising from ESG risks and opportunities is central to business planning. Furthermore, it is the basis of the financial materiality perspective, central to the global standards of the ISSB and fully integrated in the CSRD. The calculation of anticipated financial effects allows preparers to integrate a long-term risk-management approach to sustainability issues into its business strategy. Investors and other users of sustainability information are dependent on the availability of such information to assess the effects of risks and opportunities on companies' financial performance, financial position and cash flow. Additionally, Option 2 would create a significant risk to the ESRS's interoperability with the IFRS standards. Considering that the IFRS standards constitute the global baseline for sustainability reporting, there is no viable argument to create additional inconsistencies. Moreover, non-EU and EU corporate voices have regularly advocated for maintaining the high degree of interoperability between ESRS and IFRS. Such interoperability would ensure better comparability of sustainability information and less reporting costs. Creating incongruences now means putting additional costs to companies operating in multiple jurisdictions. We believe Option 1 is acceptable. We disagree however on the mention that "different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources". In this case, the new undue cost and effort relief would account for such a situation.			
Survey	E3G - Third Generation Environmentalism	NGO	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We believe that the reliefs introduced in the new iteration of the ESRS satisfy the European Commission and EFRAG's objective of maintaining a high degree of interoperability with the IFRS standards. Nonetheless, we need to acknowledge that the pursuit of this objective could lead to lower availability and quality of ESG data. As detailed in Question 17 and 19 of this consultation, we advise EFRAG to cautiously recommend the introduction of these reliefs, as their unconditional and compound use can severely hinder the usefulness of sustainability information. We welcome the permanent reference to IFRS industry-based guidance and SASB standards as a source of possible disclosure when reporting entity-specific sector information. However, we recommend explicitly referring that SASB sector-specific guidelines take a financial-materiality-only approach. We welcome companies incorporating such guidelines in their own disclosure exercise, especially for the assessment of financial-related risks and opportunities in a given sector. On ESRS E1, E3G welcomes the addition of a disclosure requirements on 'dependencies' in the transition plan criteria. This provides additionally a closer alignment with IFRS S2 wording on dependencies. As mentioned in E3G's previous consultation response, we believe adaptation should be further integrated by adding adaptation-related policies and actions within the ESRS E1-1 format. Adaptation and mitigation in transition planning remain crucially interlinked. Merging the two separate disclosures would allow companies to better manage climate-related risks and opportunities, and avoid double-reporting. Doing so would make the ESRS even more consistent with the IFRS S2 language and the TPT framework. Recently, also the Australian Treasury's draft guidance on transition planning integrated adaptation fully within the transition planning format.			
Survey	E3G - Third Generation Environmentalism	NGO	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	E3G - Third Generation Environmentalism	NGO	United Kingdom	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	We believe EFRAG's reduction of datapoints represents a good effort of reducing corporates' compliance costs and reporting efforts without excessive loss of data quality and comparability. We advise the European Commission not to pursue further reduction of the ESRS datapoints beyond the EFRAG's proposal, once the finalised version of the new ESRS format will have to be transposed into a Delegated Act. Further lowering the number of datapoints would excessively tilt the balance of the simplification effort towards deregulation. An even lower amount of datapoints would make the reporting process more costly than beneficial for long-term investments. Companies and investors have already set up data collection systems, and the policy uncertainty stemming from the Omnibus process is seriously hindering integration of sustainability information into decision-making processes. Reducing again the amount of ESRS datapoints is particularly dangerous for the interactions between banks and financed companies. As mentioned in the ECB's legal opinion, the sustainability information disclosed is fundamental for the risk assessment and monetary policy of European banks. E3G would like to add that if such information were not to be disclosed, due to the lower amount of datapoints, EU banks would pursue bilateral operations to receive the specific information from the companies they finance, relying on a much costlier and complex system of data gathering.			
Survey	E3G - Third Generation Environmentalism	NGO	United Kingdom	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	E3G acknowledges that financial institutions often disclose GHG emissions reductions using intensity-based values. However, the disclosure of intensity targets coupled with absolute figures, better enables stakeholders to assess the progress of lowering financed emissions over time and to understand financial institutions' exposure to transition risks. For this reason, E3G recommends that financial institutions continue disclosing their climate targets also in absolute values.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	E3G - Third Generation Environmentalism	NGO	United Kingdom	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	E3G welcomes that the duplication of SFDR-related datapoints was addressed and resolved. EFRAG's proposed changes provide an easier compliance approach for companies reporting on SFDR-related matters. For users of sustainability reports, the new ESRS framework provides easier accessibility to the information they need.			
Survey	E3G - Third Generation Environmentalism	NGO	United Kingdom	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We agree with EFRAG's proposal to achieve a balance between simplification and efficiency of the ESRS standards. The only section of the new ESRS format in which we do not totally agree with EFRAG's options, is the ESRS 1. As already mentioned, we are seriously concerned about the combined effect of the additional reliefs. For this reason, E3G has left a few recommendations to address such concerns at Question 17 and 19 of this consultation.			
Survey	E3G - Third Generation Environmentalism	NGO	United Kingdom	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	E3G - Third Generation Environmentalism	NGO	United Kingdom	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We welcome that the EFRAG's proposal does not propose any radical changes to the transition plan criteria under E1-1. In particular, we acknowledge that the new format of E1-1 paragraph 14 covers fully the transition plan criteria under CSDDD Art.22. This level of technical alignment across EU regulation is exactly what the Omnibus I should achieve with its process.			
Survey	Disability:IN	NGO	United States	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	Disability:IN	NGO	United States	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Disability:IN	NGO	United States	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Disability:IN	NGO	United States	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Disability:IN	NGO	United States	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Disability:IN	NGO	United States	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	Disability:IN	NGO	United States	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	Disability:IN	NGO	United States	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I would like to skip this question and provide my feedback in Part 3				
Survey	Disability:IN	NGO	United States	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Disability:IN	NGO	United States	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Disability:IN	NGO	United States	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Disability:IN	NGO	United States	22.S2	Comments on deleted datapoints in ESRS S2	I agree	Grateful that you maintained so many of the disability data points originally listed in S2			
Survey	Disability:IN	NGO	United States	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Disability:IN	NGO	United States	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Disability:IN	NGO	United States	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	Disability:IN	NGO	United States	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Disability:IN	NGO	United States	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Disability:IN	NGO	United States	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	The business disability community is delighted that EFRAG has opted to maintain standards for disability inclusion, including the self identification of disability status, in the revised standards. This is of tremendous import to the business disability community, and we commend EFRAG for maintaining its commitment to sustainable, inclusive workforces that include and prioritize people with disabilities.			
Survey	Disability:IN	NGO	United States	35.S1-2.	Do you agree with the amendments of this chapter?	I agree		S1	Disclosure Requirement S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	
Survey	Disability:IN	NGO	United States	35.S1-10.	Do you agree with the amendments of this chapter?	I agree		S1	Disclosure Requirement S1-10 - Social protection	
Survey	Disability:IN	NGO	United States	35.S1-11.	Do you agree with the amendments of this chapter?	I agree	Disability:IN is delighted that EFRAG has elected to maintain this important disclosure in its standards. Over 100 jurisdictions around the world have disability employment mandates that require companies to measure disability in the workforce. Repeated research on disability in the workforce has shown that disability employment drives business value, so this is a critical dimension of impact and financial performance. Thank you for including this measure and modernizing it to allow voluntary self-identification of disability status to stand as a source of data for the reporting requirement.	S1	Disclosure Requirement S1-11 - Persons with disabilities	
Survey	Disability:IN	NGO	United States	35.S1-13.	Do you agree with the amendments of this chapter?	I agree		S1	Disclosure Requirement S1-13 - Health and Safety metrics	
Survey	Disability:IN	NGO	United States	35.S1-14.	Do you agree with the amendments of this chapter?	I agree		S1	Disclosure Requirement S1-14 - Work-life balance metrics	
Survey	Disability:IN	NGO	United States	35.S1-16.	Do you agree with the amendments of this chapter?	I agree		S1	Disclosure Requirement S1-16 - Incidents of discrimination and other human rights incidents	
Survey	Disability:IN	NGO	United States	35.S2-2.	Do you agree with the amendments of this chapter?	I agree		S2	Disclosure Requirement S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	
Survey	Disability:IN	NGO	United States	35.S3-2.	Do you agree with the amendments of this chapter?	I agree	This section provides space for companies to consider the impacts of the accessibility of their products and services on consumers and affected communities. We commend this disclosure.	S3	Disclosure Requirement S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	
Survey	Disability:IN	NGO	United States	35.S4-3.	Do you agree with the amendments of this chapter?	I agree	This is an exemplary standard for documenting targets to remediate consumer/end-user problems related to accessibility/disability in company products.	S4	Disclosure Requirement S4-3 - Actions and resources related to consumers and end-users	
Survey	UNICEF	NGO	United States	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	UNICEF welcomes the simplified DMA process, which will enable companies to focus their efforts on the most material topics. The more extensive guidance on impact materiality is beneficial for companies, given the greater familiarity that exists for financial materiality. UNICEF seeks decision-useful material disclosures on the impacts companies have on children, and these are often specific to a particular company or sector and therefore not included in the ESRS. For this reason—and given that EFRAG will no longer create sector-specific standards—we encourage emphasis on the importance of entity-specific material disclosures in EFRAG's communications. We recommend EFRAG highlight that DMAs will establish entity-specific material topics and that companies should not rely solely on the ESRS as an exhaustive checklist. See our response to ESRS 1 in the Excel document for Part 3 of this consultation. Furthermore, UNICEF welcomes the emphasis on alignment between the double materiality assessment and due diligence undertaken in accordance with international standards of responsible business conduct. This "joined-up" strategic approach is essential, given the importance of companies undertaking due diligence relating to the impact of products, services, and technologies on children and the associated need to disclose these impacts for informed decision-making and policy-making by stakeholders. The coherent step-by-step logic that requires (1) identifying and prioritizing impacts on children, (2) determining material impacts ("impact materiality"), and (3) understanding material risks and opportunities ("financial materiality") should be maintained. Alignment between the double materiality assessment and risk-based due diligence under the international standards will ensure that these are not separate processes, but a single, strategic approach to both the management and reporting of sustainability impacts. See our response to ESRS 1-4 (Due Diligence) in the Excel document for Part 3 for specific suggestions that will enhance the clarity of the ESRS.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UNICEF	NGO	United States	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	UNICEF	NGO	United States	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	UNICEF welcomes the option for companies to "use appendices or separate sub-parts in its sustainability statement." Decision-useful disclosures about impacts on child rights may require the inclusion of detailed, nuanced, and complex information, especially for experts, and this might be facilitated by the option to refer to appendices with more information.			
Survey	UNICEF	NGO	United States	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	UNICEF welcomes the revised relationship between ESRS 2 and the Topical Standards, which we believe will reduce duplication and enable companies and report users to focus on the most decision-useful disclosures. However, while we welcome references to the UNGPs, OECD Guidelines, and ILO Declaration on Fundamental Principles and Rights at Work in ESRS 2, we believe that ESRS 2 can be strengthened through reference to other relevant international human rights instruments, such as the UN Convention on the Rights of the Child (CRC). We note that the CRC is referenced in Recital 49 of the CSRD as a core international human rights instrument against which companies should disclose, but the CRC is not referenced anywhere in the ESRS. Since the CRC is relevant to multiple ESRS topics, we believe that referencing the CRC in ESRS 2 will help ensure that companies appropriately consider the relevance of child rights across all topics, not simply where the term "child" is used in the ESRS. This addition will fill a gap in the original ESRS, while also being consistent with the emphasis on a principles-based approach. Please see our more extensive response on ESRS 2 in the Excel document for Part 3 of this consultation. While the emphasis on ESRS 2 helps with simplification and reduces duplication, UNICEF believes that the distinction between the four ESRS social standards should be maintained. Each standard addresses a distinctly different set of topics, including impacts, risks, and opportunities that exist in various parts of the company value chain and affect distinct stakeholders. Retaining the four well-defined ESRS social standards will be necessary for conceptual clarity within companies and facilitate the improved identification of entity-specific disclosures.			
Survey	UNICEF	NGO	United States	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	UNICEF	NGO	United States	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	UNICEF	NGO	United States	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	UNICEF welcomes the emphasis on a "fair presentation framework," which we believe will enable companies to focus their efforts on the most material topics and no longer view the ESRS as a checklist of requirements. However, the "fair presentation" approach will require companies to undertake an authentic DMA that successfully identifies entity-specific and sector-specific material topics. To help ensure that material impacts on child rights are appropriately considered in DMAs and the resulting disclosure, we encourage EFRAG to reference, as part of the ESRS, (1) the Convention on the Rights of the Child and (2) reporting guidance and disclosure recommendations that have been published by UNICEF. Please refer to our comments on ESRS 1 in Part 3 of this consultation for further details.			
Survey	UNICEF	NGO	United States	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The topic of adequate/living wages is significant for UNICEF given its importance for ensuring that families have enough income to cover the basic needs of children, reducing the likelihood of child labor, and improving the health, education, and well-being of children. For this reason, we believe that ESRS S1-9 should be revised to remove the discrimination between workers inside and outside the EU. Specifically, the proposed methodology requires companies to compare wages to an "adequate wage" standard for their employees in the EU but only legal minimum wages for their employees outside the EU, so long as those minimum wages are agreed in line with the ILO's wage-setting principles. This approach is discriminatory against people living outside the EU, undermines the objective of adequate wages by including a lower standard (i.e., a legal minimum wage), is complex for companies (e.g., having to assess whether each country aligns with ILO wage-setting principles), and undermines the global comparability of reports. UNICEF believes that the methodology for reporting on "adequate wages" should measure actual wages against an "adequate wage" for all employees, where "adequate wages" are estimated in line with ILO principles on estimating living wages.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Works Council	Trade union	Austria	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Double materiality is essential and must remain at the heart of the ESRS framework and European Union sustainability regime for corporate reporting to be credible and useful. The principle of "materiality of information" is concerning since it introduces a further filter for companies to not report information. For example, it represents a step backwards from ID-177, which says that most S1 metrics must be reported if S1 Own Workforce is material. It is essential to maintain the principle of fair presentation in the reporting standards. It is positive that the revision of the AR 16 list of topics has maintained all of the sub-subtopics for S1 + S2. These are based on the list of social topics in the CSRD and should all be maintained. The emphasis on aggregation (as opposed to disaggregation) is concerning, as disaggregated information (both site-specific and country-specific) is key to understanding the distribution of IROs.			
Survey	European Works Council	Trade union	Austria	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	It is important that companies report not just their net impact – the gross impact should be reported, and the recommended text preserves this principle.			
Survey	European Works Council	Trade union	Austria	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The proposed changes are helpful. However, para 113 is difficult to understand: If the description of the material impacts, risks and opportunities prepared in accordance with [Draft] Amended ESRS 2 IRO-2 is not presented alongside the respective policies, actions and targets, the undertaking shall make explicit which policies, actions and targets relate to which material impacts, risks, or opportunities, in accordance with paragraph 22." Para 22 addresses the issue of appropriate aggregation or disaggregation of information on material impacts, risks and opportunities and their management, without setting any rules regarding the location of such disclosures depending (or not) on the level of aggregation.			
Survey	European Works Council	Trade union	Austria	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The Exposure Draft removes duplications between the cross-cutting and topical standards. The preservation of the 4-part architecture in the social standards is important to respect the distinctiveness of different affected stakeholder groups. However, we have two critical concerns. First, the original DR in environmental standards concerning screening of sites in materiality assessment were replaced by an application requirement to ESRS 2 IRO-1. This in effect makes transparency on this aspect optional. Consideration of local context is a key element of an appropriate materiality assessment. This should be both recognised in Chapter 3 of ESRS 1, and in ESRS 2 IRO-1, which should include an explicit datapoint on how the undertaking screened its locations and value chains. We welcome that E standards provide a clearer reference on the importance of disaggregation of disclosures, but this can only be done well if locations are properly screened. Second, we strongly recommend adding an explicit reference to the disclosure of relevant, entity-specific metrics directly in S standards. The fact that S2, S3 and S4 do not include any metrics should not imply that entity-specific metrics for S topics should not be disclosed.			
Survey	European Works Council	Trade union	Austria	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The "may" (voluntary) data points should not be eliminated. In many cases they are "shall" in GRI standards, so it is important to keep them to align with GRI standards. Also, many of them were originally proposed as mandatory by EFRAG to the EC. The first wave of reports show that many companies have reported some "may" data points. Retaining them would help ensure standardization/comparability between company reports. Almost all of the datapoints for non-employee workers are voluntary, thus most datapoints for this vulnerable group of workers has been lost. Also, important datapoints on full time versus part time workers has been eliminated.			
Survey	European Works Council	Trade union	Austria	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	It is concerning that mandatory guidance in the Set 1 ESRS has been downgraded to "non-mandatory". Mandatory guidance is key to ensuring comparability and completeness of sustainability reporting. At a minimum, Non-mandatory Implementation Guidance (NMIG) should be included in the Delegated Act, and ideally called Mandatory Implementation Guidance. A major point of concern is that ID-177, which provided guidance that most S1 metrics should be reported if S1 Own Workforce is material, has now been downgraded into NMIG. Instead, EFRAG should preserve and promote the guidance that most S1 metrics shall be reported.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Works Council	Trade union	Austria	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	As a whole the reliefs go too far, overshooting the balance between cost/effort and transparency. There is a danger of enabling green/social washing. The relief for "undue cost or effort" is too vague thus leaving too much room for interpretation. The relief for direct data for value chain reporting is too extensive, as direct data is key for transparency. The relief for reporting on operations which are not "significant drivers of IROs" also opens up too much leeway for interpretation.			
Survey	European Works Council	Trade union	Austria	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	These combined reliefs overshoot the balance between transparency and cost/effort and risk enabling green/social washing. At a minimum, there should be a time limit introduced for these reliefs on value chain metrics.			
Survey	European Works Council	Trade union	Austria	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ability to estimate financial effects is critical for the undertaking's ability to integrate sustainability into its business strategy considerations, planning and risk management. It is also key for the determination of financial materiality, including in terms of overreporting topics as financially material. Reporting on financial effects is crucial to achieving the objective of putting sustainability reporting on the same level as financial reporting and integrating both. The European Union has recognised the value of a double materiality approach to corporate reporting which requires disclosure of both material environmental and social impacts, risks and opportunities as well financially material data, It is important to keep the requirement on businesses to analyse and understand the financial effects of their business model. This will ensure investors have access to credible data as well as providing the underpinning for future business planning.			
Survey	European Works Council	Trade union	Austria	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	ESRS reliefs should not go beyond those set in IFRS. The principle of fair presentation needs to be protected to provide transparency on all material IROs. As noted in the response to question 15, it is also important to consider interoperability with GRI when considering changes to the ESRS, rather than only considering ISSB's standards.			
Survey	European Works Council	Trade union	Austria	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	European Works Council	Trade union	Austria	22.S1	Comments on deleted datapoints in ESRS S1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The reduction in the number of mandatory and voluntary datapoints goes far beyond striking an acceptable balance. As mentioned above, the voluntary datapoints should be maintained to provide alignment with GRI, which is currently in the process of strengthening its labor standards, as well as guidance and standardization for companies reporting more than just the mandatory datapoints. An explicit quantitative goal of 50%+ reductions was never set by the European Commission for EFRAG. A number of S1 datapoint metrics have been eliminated which should be reinstated: •S1-5 Employees: gender breakdown for zero-hour employees •S1-8 Diversity: age distribution; •S1-10 Social protection: reinstatement of retirement •S1-12: Training and development: gender breakdowns, •S1-13 Health and safety: fatalities from ill-health for non-employees and other workers on site; •S1-14 Work-life balance: employees that took family related leave;			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Works Council	Trade union	Austria	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Adding a datapoint on training of the procurement team is needed to support the implementation of human rights in the supply chain. The addition of a datapoint on confirmed incidents of bribery is needed to improve transparency on the effectiveness of bribery/corruption policies and measures.			
Survey	European Works Council	Trade union	Austria	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Agree that the following mandatory datapoint should be added: ESRS 2 General disclosures – BP 1 the undertaking shall state that the general requirements of ESRS 1 have been applied for the preparation of its sustainability statement			
Survey	European Works Council	Trade union	Austria	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	The "fair presentation" principle is essential to reduce the risk of green/social washing, as it emphasizes the full disclosure of all material impacts, risks and opportunities and their management. It is not understandable why this principle is under attack, as it is included as one of the general principles of the Accounting Directive.			
Survey	European Works Council	Trade union	Austria	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	It is essential that financial institutions disclose absolute targets to assess how their strategies align with the economy-wide transition to net zero. Absolute targets are relevant for users of sustainability statements and for understanding the real-world climate impact of financed activities. While intensity measures provide insights into efficiency, they can mask rising absolute emissions in growing portfolios or sectors. Granting an exemption would also undermine fairness in a sector-agnostic standard. Other industries could equally argue for exceptions based on their own difficulties, reducing comparability across sectors. Moreover, absolute financed emissions are already recognised in existing standards and regulations: the SBTi financial sector net-zero standard, the UNEP FI/NZBA recommendations, and EU SFDR all require or encourage absolute emissions disclosure. Exempting banks would risk misalignment and reduce the usefulness of reported data for stakeholders, including asset owners who depend on it for their own disclosures.			
Survey	European Works Council	Trade union	Austria	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The "top 10" threshold for reporting country-level data on employment, collective bargaining and social dialogue is a major improvement over the current 10% employment threshold. An analysis of the first sustainability statements from Wave 1 companies shows that the current 10% threshold results in country-level disclosures on as little as 21% of total employees. More country-level information is needed to understand the distribution of impacts across countries, as well as whether employment thresholds for specific labour rights have been exceeded. The new threshold does not require additional effort/cost by companies, since they must gather country-level data anyways to calculate the global figures. Furthermore, it does not result in extra datapoints, since the information currently is (and can be under the revised ESRS) reported as one table.			
Survey	European Works Council	Trade union	Austria	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	An analysis of the first year ESRS reports shows that most companies are simply reporting that they pay minimum wages, whereas the intention (as outlined in the ESRS Basis for Conclusions) is that companies should be enabled to disclose commitments to paying a wage "sufficient to support themselves and their families in dignity" as well as the extent to which they do this. This shows that the methodology for non-EU countries needs to be changed. Furthermore, the new ILO agreement on a methodology for living wages needs to be taken into account. While the proposed new methodology takes a step forward in both regards, two key changes are needed: •The methodology for reporting on 'adequate wages' should measure actual wages against an adequate/living wage for all employees, not only those within the EU. In particular, for employees outside the EU, the methodology should allow employees' actual wages to be measured: oA) against the local legal minimum wage only when this is set in line with the ILO principles on estimating living wages; or oB) against living wage estimates that are set in line with ILO principles on estimating living wages. •Companies should be able to rely on local legal minimum wages or living wage estimates when the authorities or organisations that set them provide public evidence of their alignment with the ILO principles for estimating living wages. Furthermore, the transitional provision for the EU needs to be reinstated, as not all Member States have transposed the Adequate Minimum Wage Directive.			
Survey	European Works Council	Trade union	Austria	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	The new, simplified framework makes it easier for companies to report on these SFDR-related matters in a way that corresponds to how their policies are set. For users, this consolidation makes it easier to locate the relevant information. However, the SFDR datapoints are very helpful and should only selectively be amended.			
Survey	European Works Council	Trade union	Austria	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	The unadjusted gender pay gap should be kept as mandatory, since the methodology for calculating it is clear. The adjusted pay gap figure as voluntary. In practice many companies are reporting both figures, which is useful for improved transparency. However, since the methodology for calculating the adjusted figure is not standardized, the unadjusted should be kept mandatory.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Works Council	Trade union	Austria	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	As detailed above, cumulative impact of the various reliefs is concerning			
Survey	European Works Council	Trade union	Austria	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The improved language on DMA is welcomed, including on the engagement with workers' representatives.			
Survey	European Works Council	Trade union	Austria	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The proposed "top 10" threshold for the reporting of country-level information for employee headcount, collective bargaining and social dialogue is a significant improvement over the current 10% employment threshold. Country-level information needs to be reported in more detail, and on other metrics as well, in order to have more transparency on the distribution of impacts across countries. In the metrics, voluntary datapoints need to be reinstated as well as the datapoints on gender breakdowns, workforce age distribution, etc. detailed above need to be reinstated. The proposed new methodology for adequate wages outside of the EU also needs attention, and the transition language for EU member states needs to be reinstated, since the Adequate Minimum Wage Directive has not been implemented in some Member States. We would also like to reiterate our longstanding demand for including franchise workers in the S1 definition of own workers, as well as the need for sector-specific standards to supplement the Set 1 sector-agnostic standards.			
Survey	European Works Council	Trade union	Austria	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We are concerned that the loss of many specific datapoints related to workers in the value chain will mean that disclosures about material impacts, risks and opportunities become more generic and have less information about the specific stakeholder groups because specifications about the level of granularity have been deleted. Many of the points that are being deleted from ESRS S2 had originally been included because they reflected effective practice in relation to improving supply chain labour rights, for example, AR 6 awareness of the impacts on value chain workers from an undertaking's strategy or business model, AR 20 illustrating how the perspectives of value chain workers have informed specific decisions or activities of the undertaking and AR 25 which looks at retaliation and whether workers can use grievance mechanisms confidentially.			
Survey	European Works Council	Trade union	Austria	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	European Works Council	Trade union	Austria	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	European Works Council	Trade union	Austria	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The definition of own workforce should be expanded to include franchise workers. The term "non-employees" should be supplemented with the phrase "non-employee workers" or "non-employee workers in own workforce".			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	22.ESRS2	Comments on deleted datapoints in ESRS 2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	22.E1.	Comments on deleted datapoints in ESRS E1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	22.E2.	Comments on deleted datapoints in ESRS E2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	.			

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Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	22.E3.	Comments on deleted datapoints in ESRS E3	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	22.E4.	Comments on deleted datapoints in ESRS E4	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	22.E5.	Comments on deleted datapoints in ESRS E5	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	22.S1	Comments on deleted datapoints in ESRS S1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	1. Former paragraph 93b, which requires to report the "percentage of entitled employees that took family-related leave, and a breakdown by gender" has been moved to NMIG 34. However, this information is essential: without it, the disclosure required by paragraph 42 (formerly 93a)—which only requires the "percentage of employees eligible for family leave" — does not provide users of the sustainability statement with meaningful information about the company's measures and metrics related to work-life balance. In fact, without the information referred to in paragraph 93b above, the sustainability statement will only provide users with information on the number of employees who had a child or cared for a relative during the reporting year. It will not provide any indication of the measures implemented by the company to facilitate the balance between employees' personal needs and their professional duties. The breakdown by gender is also significant because, in many circumstances, these burdens fall disproportionately on women. It is useful to understand how companies intend to give men the opportunity to contribute to family needs as well. 2. In paragraph 38a (formerly 83a), the breakdown by gender of regular performance and career reviews has been removed in order to reduce granularity. However, as such reviews are often linked to career advancement, it would be ethical to assess how they affect men and women differently in order to evaluate the company's fairness in such processes.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	22.S2	Comments on deleted datapoints in ESRS S2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	22.S3	Comments on deleted datapoints in ESRS S3	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	22.S4	Comments on deleted datapoints in ESRS S4	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	22.G1	Comments on deleted datapoints in ESRS G1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Every sector, including finance, requires complex estimates to gain a full picture of a company's climate progress. New digital and analog technologies can help accurately quantify greenhouse gas emissions. Although intensity targets reflect efficiency, they can also mask increases in emission levels. Consequently, given the intention to promote sustainable investment (Regulation (EU) 2020/852), it is necessary for banks and other actors to make an effort to account for their activities, including through the formulation of absolute targets.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	.			
Survey	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		.			
Survey	Austrian Federal Economic Chamber, Division Bank and Insurance	Association of financial institutions	Austria	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Setting absolute GHG emission reduction targets for financed portfolios requires long-term projections — spanning 5 to 25 years — regarding the size and composition of financial assets. However, financial institutions face inherent limitations in making such forecasts, as asset and liability structures, including sectoral exposures, are subject to fluctuations driven by interest rates, macroeconomic developments, and other external factors. Given these uncertainties, we believe financial institutions should be exempt from the obligation to report absolute GHG emission reduction targets under the CSRD. We noted that an option to disclose intensity targets instead of absolute targets for financial institutions was included in initial version (v.0) of ESRS E1 (EFRAG SRB Meeting 19 June 2025) but was removed in version 1.5 (1./2. July) without any indication or explanation of the deletion.			
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	The amended DMA process is clearer and more user-friendly for preparers. The inclusion of practical considerations supports them in identifying material topics aligned with their business models, enabling them to focus on disclosing relevant issues rather than having to justify to assurance providers why certain topics were deemed not material. In addition to clarifying the DMA process, which enables a top-down approach – the clarification of AR16 as a reference point, along with the delineation of the relationship between IROs and associated disclosures, makes it clearer that prepares can conduct DMA from a group consolidation perspective. This reduces the interpretive burden and facilitates more robust alignment with ISSB and SSBJ requirements, enabling a more focused assessment of material sustainability-related risks and opportunities.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We welcome the clarification regarding the consideration of remediation, mitigation, and prevention actions in the assessment of the materiality of negative impacts. However, we find the approach remains practically complex, and it is difficult to understand how to apply the logics outlined in ESRS 1 paragraph 34 to 36, as well as in Appendix C. While the assessment of actual and potential impacts reflects due diligence risk assessment methodologies defined by international standards, in practice, it often takes time to fully assess actual negative impacts. As a result, remediation actions may begin before the full extent of that impact is understood. Consequently, actual and potential negative impacts are frequently interrelated. The current guidance appears to suggest that prevention and remediation activities undertaken during the reporting period should be excluded when assessing severity of impacts, while their consideration is allowed for potential negative impacts. This raises practical concerns, particularly regarding how to determine when mitigation or prevention measures are considered 'in place' before, during or after the impact and what constitutes 'significant ongoing mitigation/prevention.' We respectfully suggest that mitigation/prevention/remediation actions should also be taken into account at any stage of the assessment of actual negative impacts to better reflect practical circumstances.			
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Although the revision provides greater clarity for undertakings established in the EU, it does not address the case where non-EU parent companies of in-scope EU subsidiaries prepare a stand-alone, ESRS-aligned consolidated sustainability statement in order to apply Article 29a (8) of Directive 2013/34/EU (CSRD). In such cases, the consolidated sustainability statement may not necessarily be embedded within a consolidated management report of the non-EU parent company. The current wording of paragraph 104 of ESRS assumes that the reporting entity is an EU undertaking, which does not reflect the situation of non-EU parent groups applying Article 29a(8). We therefore propose the following revision to paragraph 104: Paragraph 104: Sustainability information shall be presented: (a) in a way that allows for clear identification of the information required by the ESRS and, where applicable, other information included in the management report, other accompanying reports, or a stand-alone consolidated sustainability report prepared in accordance with Article 29a(8) of Directive 2013/34/EU; and (b) under a structure that facilitates access to and understanding of the sustainability statement, in a format that is both human-readable and machine-readable, regardless of whether it is presented within a management report or as a stand-alone consolidated sustainability report under Article 29a(8) of Directive 2013/34/EU.			
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	Removing duplicative requirements from topical standards streamlines reporting, enabling preparers to focus more effectively on material topics.			
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We welcome EFRAG's efforts to address our previous concerns regarding the spread and duplication of Data Points (DPs) and Disclosure Requirements (DRs) across the ESRS framework. The initiative to minimise such duplications and to place greater emphasis on mandatory ("shall") disclosure requirements is a positive step forward. Furthermore, we welcome the elimination of "may" disclosure points, which contributes to greater clarity and consistency in reporting obligations. These changes are important to streamline preparers' efforts and enhance the usability of reported information for stakeholders.			
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We support EFRAG's view that the Non-Mandatory Illustrative Guidance (NMIG) should remain outside the scope of the Delegated Act and continue to serve as a supporting document. Maintaining this status helps avoid confusion regarding its legal enforceability and allows NMIG to serve its intended role as a practical aid for implementation.			
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	We welcome EFRAG's efforts to address the practical concerns of preparers. The introduction of burden relief measures is an important step that will support the effective and realistic implementation of the CSRD. In particular, these reliefs acknowledge the current challenges around data quality and availability—especially in relation to value chain information—which will require time to develop and mature. Just as it took many years for financial reporting to reach its current level of robustness and comparability, sustainability reporting should similarly be allowed to evolve along a learning curve. The introduction of these reliefs not only supports preparers during this transition period but also provides stakeholders with greater transparency regarding existing data limitations and the areas where further maturity is needed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We welcome this approach, as previous requirements caused disruptions within the value chain. Allowing metrics to be calculated with a partial scope supports preparers in conducting reporting while simultaneously enabling realistic improvements in data collection from the value chain. This approach helps avoid the difficult position of being caught between compliance obligations—including audits—and legal risks arising from disclosures. Given that value chains often extend beyond the EU, it is important to recognize the limited sphere of influence preparers have over data collection throughout the value chain. Therefore, we support EFRAG's decision not to impose a time limit on the use of this relief, as it appropriately reflects the practical realities faced by undertakings.			
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	While the primary focus of this question is on anticipated financial effects, it is important to recognize that the proposed Options 1 and 2 also introduce differing approaches to the treatment of current financial effects. The reported financial effects—both current and anticipated—can vary significantly depending on the underlying assumptions and estimation methodologies used. On the condition that a qualitative assessment is allowed for both current and anticipated financial effects, we support option 2. Should qualitative disclosure of the current financial impact not be permitted, we would not agree with either options. Therefore, we urge EFRAG to secure that a certain degree of flexibility should be allowed, whether the information is presented in quantitative or qualitative form. This flexibility ensures that preparers can effectively reflect the reliability and availability of data, as well as the specific circumstances surrounding the material risks and opportunities, without altering the underlying scope of what is considered material.			
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	As for the new disclosure on confirmed incidents of corruption and bribery, we support its inclusion under G1, as it aligns with business conduct and governance. However, we caution against interpreting the number of incidents as a straightforward performance indicator. The figure may reflect an entity's internal detection and reporting capability rather than the actual prevalence of misconduct. Therefore, newly added quantitative metrics should not be requested as mandatory datapoints. It is recommended to replace quantitative metrics with narrative disclosure such as training scope and frequency, reporting systems, and corrective actions taken—to support meaningful interpretation and avoid unintended disincentives for transparency.			
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree				
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We believe the principle of fair presentation is important in sustainability reporting. However, there are concerns about its practical application, especially regarding impact information. Such information frequently depends on estimates or assumptions, which can vary significantly depending on the methodologies and data sources employed. This inherent variability can affect both comparability and neutrality—core elements of the fair presentation principle. Furthermore, sustainability statements frequently include future-oriented targets, which by their nature involve uncertainties and risks, making faithful representation inherently challenging. While we acknowledge and support the importance of fair presentation, its practical implementation faces several obstacles. Overcoming these will require robust frameworks, clearer methodologies for diverse data points, and stronger assurance practices. Without these, we share the concerns expressed by EFRAG SRB members that this could lead to increased auditing costs.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The current application requirements offer a structured methodology by comparing the undertaking's lowest wage with relevant benchmarks. However, we suggest several improvements to enhance clarity, comparability, and practical implementation. First, while the benchmark hierarchy is helpful, the current approach relies heavily on minimum wage levels, which may not always reflect the actual needs of workers and their families. We recommend that EFRAG explicitly emphasise living wage benchmarks—aligned with ILO principles—as the preferred standard where available. Without this, there is a risk of inconsistent data quality. Secondly, AR 22 para.32 outlines a methodology for determining the lowest wage outside the EU, prioritizing the statutory minimum wage where applicable. However, in many jurisdictions, statutory minimum wages are significantly lower than living wages. As a result, we question whether this hierarchy provides an appropriate basis for assessing wage adequacy outside the EU. Reconsider the proposed hierarchy and provide greater flexibility for undertakings to assess wage adequacy based on locally relevant benchmarks, including ILO principles on estimating a living wage and living wage estimates where available.			
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

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Survey	Panasonic Holdings Corporation	Preparer (non-financial preparing a sustainability report)	Japan	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Japan Foreign Trade Council, Inc.	Business association (other than association of financial institution)	Japan	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	Japan Foreign Trade Council, Inc.	Business association (other than association of financial institution)	Japan	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree				
Survey	Japan Foreign Trade Council, Inc.	Business association (other than association of financial institution)	Japan	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Japan Foreign Trade Council, Inc.	Business association (other than association of financial institution)	Japan	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree				

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Survey	Japan Foreign Trade Council, Inc.	Business association (other than association of financial institution)	Japan	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree				
Survey	Japan Foreign Trade Council, Inc.	Business association (other than association of financial institution)	Japan	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	We are opposed to amendments that would harm the comparability of global sustainability reporting—that is, amendments that would cause additional differences from the ISSB standards (or, for Japan, the Sustainability Standards Board of Japan [SSBJ] standards) . For example, regarding reporting on greenhouse gas emissions, the Exposure Drafts stipulate that, even if the financial control approach is selected, an additional disclosure following the operational control approach be required in certain circumstances. （E1 AR19 for para 32） However, there are no such requirements in the ISSB standards. Because there are concerns that such differences among standards would not only create a duplicate burden on the non-EU companies subject to the extraterritorial application of the ESRS but also harm the global comparability of sustainability reporting, we request further elimination of differences among standards. Additionally, whereas the Amended ESRS 2 Exposure Draft proposes two disclosure methods to reduce the burden of disclosing quantitative information about anticipated financial effects, we request that the option mandating qualitative information only be adopted for the purpose of reducing the burden of preparers. The problem, however, is that this option would result in differences from the ISSB standards that require disclosure of quantitative information. Accordingly, to maintain consistency with the ISSB standards, we would like the European Financial Reporting Advisory Group (EFRAG) to urge the IFRS Foundation to implement amendments similar to the ESRS. If the amendment of the ISSB standards is difficult, then we request retaining the current ESRS provision (exemption from quantitative information disclosure only in cases where certain conditions are met) that is similar to the ISSB standards, as we believe that priority should be given to reducing the differences among standards.			
Survey	Japan Foreign Trade Council, Inc.	Business association (other than association of financial institution)	Japan	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	We are opposed to amendments that would harm the comparability of global sustainability reporting—that is, amendments that would cause additional differences from the ISSB standards (or, for Japan, the Sustainability Standards Board of Japan [SSBJ] standards) . For example, regarding reporting on greenhouse gas emissions, the Exposure Drafts stipulate that, even if the financial control approach is selected, an additional disclosure following the operational control approach be required in certain circumstances. （E1 AR19 for para 32） However, there are no such requirements in the ISSB standards. Because there are concerns that such differences among standards would not only create a duplicate burden on the non-EU companies subject to the extraterritorial application of the ESRS but also harm the global comparability of sustainability reporting, we request further elimination of differences among standards. Additionally, whereas the Amended ESRS 2 Exposure Draft proposes two disclosure methods to reduce the burden of disclosing quantitative information about anticipated financial effects, we request that the option mandating qualitative information only be adopted for the purpose of reducing the burden of preparers. The problem, however, is that this option would result in differences from the ISSB standards that require disclosure of quantitative information. Accordingly, to maintain consistency with the ISSB standards, we would like the European Financial Reporting Advisory Group (EFRAG) to urge the IFRS Foundation to implement amendments similar to the ESRS. If the amendment of the ISSB standards is difficult, then we request retaining the current ESRS provision (exemption from quantitative information disclosure only in cases where certain conditions are met) that is similar to the ISSB standards, as we believe that priority should be given to reducing the differences among standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Japan Foreign Trade Council, Inc.	Business association (other than association of financial institution)	Japan	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Comments on ESRS 2 or E1: We are opposed to amendments that would harm the comparability of global sustainability reporting—that is, amendments that would cause additional differences from the ISSB standards (or, for Japan, the Sustainability Standards Board of Japan [SSBJ] standards) . For example, regarding reporting on greenhouse gas emissions, the Exposure Drafts stipulate that, even if the financial control approach is selected, an additional disclosure following the operational control approach be required in certain circumstances. （E1 AR19 for para 32） However, there are no such requirements in the ISSB standards. Because there are concerns that such differences among standards would not only create a duplicate burden on the non-EU companies subject to the extraterritorial application of the ESRS but also harm the global comparability of sustainability reporting, we request further elimination of differences among standards. Additionally, whereas the Amended ESRS 2 Exposure Draft proposes two disclosure methods to reduce the burden of disclosing quantitative information about anticipated financial effects, we request that the option mandating qualitative information only be adopted for the purpose of reducing the burden of preparers. The problem, however, is that this option would result in differences from the ISSB standards that require disclosure of quantitative information. Accordingly, to maintain consistency with the ISSB standards, we would like the European Financial Reporting Advisory Group (EFRAG) to urge the IFRS Foundation to implement amendments similar to the ESRS. If the amendment of the ISSB standards is difficult, then we request retaining the current ESRS provision (exemption from quantitative information disclosure only in cases where certain conditions are met) that is similar to the ISSB standards, as we believe that priority should be given to reducing the differences among standards.			
Survey	Japan Foreign Trade Council, Inc.	Business association (other than association of financial institution)	Japan	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We are generally in agreement with the Exposure Drafts. We have no objections to the reduction of datapoints and the simplification of the materiality assessment process for the purpose of simplifying the European Sustainability Reporting Standards (ESRS) based on the Omnibus package published in February 2025, or to other amendments that would contribute to reducing the burden of preparers. Furthermore, in addition to the amendments proposed in the Exposure Drafts, we request that amendments aimed at simplification be similarly made to the extraterritorial application of the ESRS to non-EU companies, which is expected to begin from financial year 2028 . As disclosure pursuant to the ISSB standards has become mandatory in an increasing number of jurisdictions, entities in various countries are disclosing information in accordance with those standards. In this environment, separately implementing additional disclosure in compliance with the ESRS would place a large burden on preparers. In light also of the current situation where differences among standards remain even under the amendments this time, we believe that EFRAG should, in addition to developing the ESRS for Non-EU Groups (NESRS), allow non-EU companies subject to the extraterritorial application of the ESRS to choose the application of the ISSB standards, in order to realize globally consistent sustainability reporting. On top of mandatory disclosure pursuant to the SSBJ standards from financial year 2026, our members will be subject to the extraterritorial application of the ESRS. In view of this, we have strong concerns about an increase in the burden of preparing reports due to having to comply with two different standards. Finally, we request that EFRAG provide clear guidance soon regarding the timing of the formulation of the system for extraterritorial application to non-EU companies.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We welcome the clearer wording of ESRS 1 Chapter 3, which makes the Double Materiality Assessment (DMA) more usable by: (i) elevating a single materiality filter for information; (ii) clarifying the link between material IROs and "topics to be reported"; (iii) consolidating practical guidance on aggregation/disaggregation and group reporting; and (iv) relocating "may" disclosures into AR/NMIG to reduce noise after the DMA. We also value the explicit reference to reasonable and supportable information available without undue cost or effort, which eases execution without altering the DMA's purpose. However, we encourage EFRAG to include safeguards so that simplification does not dilute coverage or comparability—especially for issues underpinning the Ten UN Global Compact Principles (human rights, labour rights, environment and anti-corruption), and, secondarily, the SDGs. Clear sector-agnostic examples and decision trees would help apply the materiality filter consistently across value chains and reduce assurance frictions.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We welcome the added clarity on "gross vs net" for negative impacts: (i) actual impacts in the reporting period are assessed gross (before remediation in that same period) and, if fully remedied, are not carried forward; (ii) potential impacts may be assessed net only where mitigation/prevention is already implemented, demonstrably effective, and does not require significant, ongoing effort; otherwise they are assessed gross; (iii) future/planned actions cannot reduce potential impacts; and (iv) positive impacts do not offset negatives. Nevertheless, we believe that the explanations are complex and difficult to interpret, and therefore their level of detail and clarification should be increased. It is also important to consider their inclusion not as an appendix but as part of the main body of the standard, in order to provide deeper insight into the concept, as expressed by some EFRAG members. As the Spanish Network of the United Nations Global Compact, we urge EFRAG to incorporate this guide explicitly, in coherence with the Ten Principles of the United Nations Global Compact. Concretely: (a) adopt gross as the default for potential impacts linked to Principles 1–10 (human rights, labour, environment, anti-corruption) unless the undertaking evidences stable, effective controls that do not require significant ongoing effort; (b) when "net" is used, require a comply-or-explain disclosure of the controls, evidence of effectiveness, frequency of testing, and assurance-readiness; (c) require disclosure of grievance mechanisms, remedy provided and systemic fixes for material actual impacts; and (d) make clear that value-chain risks subject to continuous prevention must be assessed gross. These safeguards protect the Ten Principles (and, secondarily, the SDGs) while keeping the guidance clear, comparable and auditable.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We support the changes aimed at improving the clarity, legibility, and comparability of sustainability reports, especially the clear structuring of information and the harmonization of terminology. These changes will enhance the usability of disclosures for a wide range of stakeholders, including investors, regulators, and others. The introduction of flexible reporting options, such as appendices and subsections, is a welcome move towards reducing reporting redundancy and making the content more efficient. However, to ensure this simplification doesn't sacrifice transparency, we urge that materiality remains central. The focus on reducing duplication is critical, but we recommend the inclusion of clear, sector-agnostic decision trees and practical examples to support companies in identifying what truly matter. Moreover, we emphasize the importance of maintaining alignment with the Ten UN Global Compact Principles throughout the simplification process. This will ensure that the information disclosed is both decision-useful and comparable, without reducing the coverage of critical environmental, social, and governance issues.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We welcome the amendments under Lever 3, which aim to simplify the structure of the ESRS and improve the interaction between ESRS 2 and topical standards. The reduction in prescriptiveness, especially for PAT and the simplification of disclosure requirements, will help streamline the reporting process. We appreciate the improved connectivity between PAT and IROs, which enhances the transparency of how companies manage material risks and opportunities. However, we have concerns regarding the elimination of the requirement to disclose whether a company plans to implement a PAT for material topics and the timeline. While we understand the goal of simplification, removing this requirement could reduce transparency, limit accountability, and make it more difficult for stakeholders to assess companies' ongoing efforts and progress over time. We recommend that companies still be required to disclose their plans for implementing PATs for material topics. Additionally, while we support the simplification, it is crucial to ensure that the core datapoints related to the Ten UN Global Compact Principles (e.g., human rights, decent work, environment, anti-corruption) remain consistent and comparable across all companies. Proportionality should be maintained, but not at the expense of ensuring comprehensive, decision-useful information for all stakeholders.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We support the amendments aimed at improving the clarity, accessibility, and structure of the ESRS. The elimination of "may disclose" datapoints ensures that the information to be disclosed is clearly mandatory, which simplifies the process and enhances transparency across companies. The reorganization of mandatory disclosure points into the main body of the standards and the improved language for understandability are also important steps towards making the standards more user-friendly and consistent. However, while the simplification is positive, we believe it is important that the core material information remains comparable and relevant. For us, simplification should not lead to the removal of key disclosures related to the Ten UN Global Compact Principles (e.g., human rights, decent work, environmental protection, anti-corruption). In particular, clear guidance should be provided to ensure that material risks and opportunities are still disclosed in a manner that is comparable and useful for stakeholders. Additionally, while these changes improve the structure, it is crucial that the information remains consistent and comparable across different sectors and company sizes.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We appreciate the Non-Mandatory Illustrative Guidance (NMIG) provided as a useful tool for companies to better understand how to report on mandatory datapoints, particularly for narrative PAT disclosures. The inclusion of guidance on what should be covered helps companies, especially those with limited sustainability reporting experience, to ensure that their disclosures are consistent and comparable. This guidance is a valuable support resource, offering examples and methodologies on how to report in accordance with mandatory datapoints. However, we have concerns regarding the legal status of the NMIG. While it is designed to be non-binding, if included in the Delegated Act in the future, it could create confusion and an additional reporting burden for companies. We agree with EFRAG's recommendation that the NMIG should not be included in the Delegated Act as its non-mandatory nature is crucial in preventing unnecessary complexity for companies, especially smaller ones. *We also believe that the **NMIG should remain a purely supportive tool to help companies implement their sustainability disclosures effectively, without creating any ambiguity or imposing additional reporting obligations. For this to be truly helpful, its non-binding nature must be clearly emphasized.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We appreciate the proposed amendments, particularly the burden reliefs introduced to simplify the reporting process. The "undue cost or effort" relief is a key improvement, as it allows companies to avoid disclosing data when obtaining it would be excessively costly or difficult. This flexibility will help reduce the reporting burden while ensuring that companies focus on material disclosures. Additionally, the relief for lack of data quality is a welcome change, enabling companies to report partial data and outline actions to improve coverage in future periods. This is a practical solution, especially for companies that are still developing their sustainability data systems. Similarly, the flexibility in using estimates or direct data for value chain metrics will ease the burden on companies that may not have access to precise figures. However, while these reliefs provide useful support, it is important that the transparency of the disclosed information is maintained. Companies must continue to provide comparable, consistent, and relevant information that enables stakeholders to assess their sustainability performance effectively. The simplification of disclosures should not compromise the quality of the material issues being reported, particularly those aligned with the Ten UN Global Compact Principles. In conclusion, while the reliefs are beneficial, it is essential to strike a balance between reducing the reporting burden and ensuring that key sustainability issues remain adequately disclosed and transparent.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We welcome the introduction of the "undue cost or effort" relief in ESRS 1, as it allows companies to disclose partial metrics when they lack reliable data. The flexibility to report partial data while continuing to work towards better data quality is an important step in reducing the reporting burden without compromising the overall transparency of the sustainability reports. However, we believe that while this relief is necessary, it is important to ensure that companies do not use this relief indefinitely. The disclosure of actions to improve the scope of the metrics in future periods is crucial, as it provides transparency and incentivizes companies to make efforts to improve data quality over time. Without a time limit for the use of this relief, there is a risk that some companies may continue to rely on it without taking sufficient steps to enhance their data systems. We agree with the general direction of the amendment but recommend that a time limit for the use of this relief be introduced. This would ensure that companies remain accountable for their data quality improvement and do not use the relief as an excuse for ongoing lack of data reliability. This time limit should be extended if there is a significant change in the company, such as a restructuring, merger, or takeover.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We support Option 1 as it strikes the right balance between responding to stakeholders' demands for burden relief and maintaining the transparency and relevance of disclosed financial data. The flexibility to omit quantitative information when it cannot be reliably measured or when the level of uncertainty is too high is a reasonable relief, especially for companies in the early stages of sustainability reporting or those facing significant data gaps. However, we believe it is essential to maintain the requirement to disclose quantitative information as it ensures companies still provide useful insights into the financial implications of material impacts, even if the exact figures cannot be reported. The guidance to disclose actions being taken to improve data coverage in future periods is also an important step towards improving data quality over time. On the other hand, we have concerns about Option 2, which limits the disclosure to qualitative information only. While this might reduce the burden on companies, it could result in incomplete disclosures that fail to provide investors and other stakeholders with a clear picture of the financial implications of sustainability risks and opportunities.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	We appreciate the reduction in the disclosure requirements related to anticipated financial effects of both physical and transition risks in ESRS E1. This simplification should help reduce the reporting burden, by focusing on the most relevant data for investors and lenders. The removal of certain datapoints considered redundant helps streamline the reporting process, making it easier for companies to comply with the requirements. However, while the simplification is beneficial, we are concerned that the reduction in scope might result in the loss of valuable information for stakeholders. For example, the disclosure of stranded assets and financial opportunities related to climate change could provide essential insights into how companies are managing long-term financial risks and transitioning towards a *low-carbon economy. These disclosures are especially important for investors looking to assess the company's exposure to both physical and transition risks. In conclusion, while we support the overall direction of these changes, we recommend retaining certain disclosures that provide a more complete and comparable view of the financial effects of climate risks, particularly for investors and lenders. This information has a very high strategic value for investors.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We appreciate the efforts made to improve the interoperability between ESRS and IFRS S1/S2 standards. The alignment of GHG emissions boundaries with the financial consolidation approach and the implementation of IFRS reliefs (e.g., undue cost or effort, disclosure of quantitative financial effects) represent positive steps towards reducing the reporting burden and ensuring global comparability for companies. These changes help to facilitate the compatibility of ESRS with global standards, which is essential for multinational companies and those reporting in multiple jurisdictions. The simplification of certain datapoints, such as the reduction of seven mandatory datapoints, also contributes to making the reporting process more streamlined and manageable. The alignment of language between ESRS and IFRS in key areas further strengthens the clarity and coherence of the requirements, ensuring that the core disclosures remain consistent across both frameworks. While we understand the intention to simplify, it is essential to maintain transparency and ensure that the reduction in datapoints does not compromise the quality of the disclosures.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	The removal of less relevant datapoints, particularly in the narrative PAT disclosures, aligns with the objective of simplifying the reporting process while still ensuring that companies provide material and relevant information to investors and stakeholders. However, we have concerns about the potential loss of critical information that could be valuable for investors, especially regarding the financial effects of material climate risks, stranded assets, and transition opportunities. These types of data are essential for investors to assess a company's long-term sustainability performance, and their omission could limit transparency. While we agree with the general direction of simplifying the reporting framework, it is important to ensure that the reduced datapoints still allow for comprehensive disclosures that align with the EU Green Deal objectives. The Ten Principles of the UN Global Compact, including those related to human rights, decent work, and environmental responsibility, must remain central to any sustainability reporting framework. Maintaining the relevance and comparability of the disclosed information is crucial for investors and lenders to make informed decisions about sustainability risks and opportunities.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	The removal of less relevant datapoints, particularly in the narrative PAT disclosures, aligns with the objective of simplifying the reporting process while still ensuring that companies provide material and relevant information to investors and stakeholders. However, we have concerns about the potential loss of critical information that could be valuable for investors, especially regarding the financial effects of material climate risks, stranded assets, and transition opportunities. These types of data are essential for investors to assess a company's long-term sustainability performance, and their omission could limit transparency. While we agree with the general direction of simplifying the reporting framework, it is important to ensure that the reduced datapoints still allow for comprehensive disclosures that align with the EU Green Deal objectives. The Ten Principles of the UN Global Compact, including those related to human rights, decent work, and environmental responsibility, must remain central to any sustainability reporting framework. Maintaining the relevance and comparability of the disclosed information is crucial for investors and lenders to make informed decisions about sustainability risks and opportunities.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	22.E2.	Comments on deleted datapoints in ESRS E2	I partially agree and partially disagree	The removal of less relevant datapoints, particularly in the narrative PAT disclosures, aligns with the objective of simplifying the reporting process while still ensuring that companies provide material and relevant information to investors and stakeholders. However, we have concerns about the potential loss of critical information that could be valuable for investors, especially regarding the financial effects of material climate risks, stranded assets, and transition opportunities. These types of data are essential for investors to assess a company's long-term sustainability performance, and their omission could limit transparency. While we agree with the general direction of simplifying the reporting framework, it is important to ensure that the reduced datapoints still allow for comprehensive disclosures that align with the EU Green Deal objectives. The Ten Principles of the UN Global Compact, including those related to human rights, decent work, and environmental responsibility, must remain central to any sustainability reporting framework. Maintaining the relevance and comparability of the disclosed information is crucial for investors and lenders to make informed decisions about sustainability risks and opportunities.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	22.E3.	Comments on deleted datapoints in ESRS E3	I partially agree and partially disagree	The removal of less relevant datapoints, particularly in the narrative PAT disclosures, aligns with the objective of simplifying the reporting process while still ensuring that companies provide material and relevant information to investors and stakeholders. However, we have concerns about the potential loss of critical information that could be valuable for investors, especially regarding the financial effects of material climate risks, stranded assets, and transition opportunities. These types of data are essential for investors to assess a company's long-term sustainability performance, and their omission could limit transparency. While we agree with the general direction of simplifying the reporting framework, it is important to ensure that the reduced datapoints still allow for comprehensive disclosures that align with the EU Green Deal objectives. The Ten Principles of the UN Global Compact, including those related to human rights, decent work, and environmental responsibility, must remain central to any sustainability reporting framework. Maintaining the relevance and comparability of the disclosed information is crucial for investors and lenders to make informed decisions about sustainability risks and opportunities.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	22.E4.	Comments on deleted datapoints in ESRS E4	I partially agree and partially disagree	The removal of less relevant datapoints, particularly in the narrative PAT disclosures, aligns with the objective of simplifying the reporting process while still ensuring that companies provide material and relevant information to investors and stakeholders. However, we have concerns about the potential loss of critical information that could be valuable for investors, especially regarding the financial effects of material climate risks, stranded assets, and transition opportunities. These types of data are essential for investors to assess a company's long-term sustainability performance, and their omission could limit transparency. While we agree with the general direction of simplifying the reporting framework, it is important to ensure that the reduced datapoints still allow for comprehensive disclosures that align with the EU Green Deal objectives. The Ten Principles of the UN Global Compact, including those related to human rights, decent work, and environmental responsibility, must remain central to any sustainability reporting framework. Maintaining the relevance and comparability of the disclosed information is crucial for investors and lenders to make informed decisions about sustainability risks and opportunities.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	22.E5.	Comments on deleted datapoints in ESRS E5	I partially agree and partially disagree	The removal of less relevant datapoints, particularly in the narrative PAT disclosures, aligns with the objective of simplifying the reporting process while still ensuring that companies provide material and relevant information to investors and stakeholders. However, we have concerns about the potential loss of critical information that could be valuable for investors, especially regarding the financial effects of material climate risks, stranded assets, and transition opportunities. These types of data are essential for investors to assess a company's long-term sustainability performance, and their omission could limit transparency. While we agree with the general direction of simplifying the reporting framework, it is important to ensure that the reduced datapoints still allow for comprehensive disclosures that align with the EU Green Deal objectives. The Ten Principles of the UN Global Compact, including those related to human rights, decent work, and environmental responsibility, must remain central to any sustainability reporting framework. Maintaining the relevance and comparability of the disclosed information is crucial for investors and lenders to make informed decisions about sustainability risks and opportunities.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	22.S1	Comments on deleted datapoints in ESRS S1	I partially agree and partially disagree	The removal of less relevant datapoints, particularly in the narrative PAT disclosures, aligns with the objective of simplifying the reporting process while still ensuring that companies provide material and relevant information to investors and stakeholders. However, we have concerns about the potential loss of critical information that could be valuable for investors, especially regarding the financial effects of material climate risks, stranded assets, and transition opportunities. These types of data are essential for investors to assess a company's long-term sustainability performance, and their omission could limit transparency. While we agree with the general direction of simplifying the reporting framework, it is important to ensure that the reduced datapoints still allow for comprehensive disclosures that align with the EU Green Deal objectives. The Ten Principles of the UN Global Compact, including those related to human rights, decent work, and environmental responsibility, must remain central to any sustainability reporting framework. Maintaining the relevance and comparability of the disclosed information is crucial for investors and lenders to make informed decisions about sustainability risks and opportunities.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	22.S2	Comments on deleted datapoints in ESRS S2	I partially agree and partially disagree	The removal of less relevant datapoints, particularly in the narrative PAT disclosures, aligns with the objective of simplifying the reporting process while still ensuring that companies provide material and relevant information to investors and stakeholders. However, we have concerns about the potential loss of critical information that could be valuable for investors, especially regarding the financial effects of material climate risks, stranded assets, and transition opportunities. These types of data are essential for investors to assess a company's long-term sustainability performance, and their omission could limit transparency. While we agree with the general direction of simplifying the reporting framework, it is important to ensure that the reduced datapoints still allow for comprehensive disclosures that align with the EU Green Deal objectives. The Ten Principles of the UN Global Compact, including those related to human rights, decent work, and environmental responsibility, must remain central to any sustainability reporting framework. Maintaining the relevance and comparability of the disclosed information is crucial for investors and lenders to make informed decisions about sustainability risks and opportunities.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	22.S3	Comments on deleted datapoints in ESRS S3	I partially agree and partially disagree	The removal of less relevant datapoints, particularly in the narrative PAT disclosures, aligns with the objective of simplifying the reporting process while still ensuring that companies provide material and relevant information to investors and stakeholders. However, we have concerns about the potential loss of critical information that could be valuable for investors, especially regarding the financial effects of material climate risks, stranded assets, and transition opportunities. These types of data are essential for investors to assess a company's long-term sustainability performance, and their omission could limit transparency. While we agree with the general direction of simplifying the reporting framework, it is important to ensure that the reduced datapoints still allow for comprehensive disclosures that align with the EU Green Deal objectives. The Ten Principles of the UN Global Compact, including those related to human rights, decent work, and environmental responsibility, must remain central to any sustainability reporting framework. Maintaining the relevance and comparability of the disclosed information is crucial for investors and lenders to make informed decisions about sustainability risks and opportunities.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	22.S4	Comments on deleted datapoints in ESRS S4	I partially agree and partially disagree	The removal of less relevant datapoints, particularly in the narrative PAT disclosures, aligns with the objective of simplifying the reporting process while still ensuring that companies provide material and relevant information to investors and stakeholders. However, we have concerns about the potential loss of critical information that could be valuable for investors, especially regarding the financial effects of material climate risks, stranded assets, and transition opportunities. These types of data are essential for investors to assess a company's long-term sustainability performance, and their omission could limit transparency. While we agree with the general direction of simplifying the reporting framework, it is important to ensure that the reduced datapoints still allow for comprehensive disclosures that align with the EU Green Deal objectives. The Ten Principles of the UN Global Compact, including those related to human rights, decent work, and environmental responsibility, must remain central to any sustainability reporting framework. Maintaining the relevance and comparability of the disclosed information is crucial for investors and lenders to make informed decisions about sustainability risks and opportunities.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	22.G1	Comments on deleted datapoints in ESRS G1	I partially agree and partially disagree	The removal of less relevant datapoints, particularly in the narrative PAT disclosures, aligns with the objective of simplifying the reporting process while still ensuring that companies provide material and relevant information to investors and stakeholders. However, we have concerns about the potential loss of critical information that could be valuable for investors, especially regarding the financial effects of material climate risks, stranded assets, and transition opportunities. These types of data are essential for investors to assess a company's long-term sustainability performance, and their omission could limit transparency. While we agree with the general direction of simplifying the reporting framework, it is important to ensure that the reduced datapoints still allow for comprehensive disclosures that align with the EU Green Deal objectives. The Ten Principles of the UN Global Compact, including those related to human rights, decent work, and environmental responsibility, must remain central to any sustainability reporting framework. Maintaining the relevance and comparability of the disclosed information is crucial for investors and lenders to make informed decisions about sustainability risks and opportunities.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The six datapoints that have been moved from "may" to "shall" are an important step to ensure that companies disclose relevant and material information. For example, the mandatory disclosure of water usage and discharges is crucial for investors to assess the impact of companies on local water resources, which is a key component of sustainability performance. The six mandatory datapoints should be seen as a way to ensure that companies share material, comparable, and reliable data that are critical for stakeholders to assess long-term sustainability. We stress that transparency must be preserved, and the reduced burden of reporting should not compromise the quality of the disclosed information. Balancing simplification with comprehensive reporting is key for achieving the objectives of the EU Green Deal while maintaining transparency and trust in corporate reporting. The UN Global Compact Principles, including human rights, labor rights, and anti-corruption standards, should continue to be integrated in the reporting process to ensure that businesses meet their responsibilities to society.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	We support the introduction of the new mandatory datapoints, as they help clarify existing disclosure objectives and enhance the focus on material information. These datapoints, such as water usage, microplastics, and critical raw materials, are important for improving the clarity and relevance of sustainability reporting. They also contribute to increased transparency for stakeholders, especially in industries that impact water resources and material supply chains. However, while we welcome these changes, it is essential that these new mandatory datapoints do not add unnecessary burdens on businesses. The new requirements should remain proportional to what is material for each company, to ensure that they do not overcomplicate the reporting process. Additionally, while the simplification is welcomed, it is crucial that companies continue to align their reporting with broader sustainability principles, including those found in the Ten Principles of the UN Global Compact. These principles, particularly those related to human rights, labor standards, and anti-corruption, should continue to be integrated into the disclosure process. This ensures that companies do not just focus on environmental sustainability, but also uphold their social and ethical responsibilities, which are essential for building trust with investors and other stakeholders.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We support the requirement for fair presentation in the preparation of ESRS sustainability statements, as it can help to improve the effectiveness of the materiality filter and ensure that only relevant and actionable information is reported. This approach aligns with global reporting standards such as IFRS S1 and S2, which enhances the comparability and clarity of sustainability disclosures across industries and regions. However, while the adoption of fair presentation is beneficial for ensuring that disclosures are more relevant, we recognize the challenges companies may face in determining what is truly material, particularly in areas where reporting practices are less established. We agree that this approach will ultimately lead to more relevant reporting and help reduce the risk of excessive information, but we recommend that additional guidance and support be provided to ensure that companies can comply with these requirements effectively, without facing disproportionate challenges, particularly in the early stages of implementation.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Absolute targets are necessary for assessing the total climate impact of a company's activities, providing a clearer picture of its contribution to climate change mitigation. Without absolute targets, investors and stakeholders may miss key information about the company's overall emissions trajectory, especially in high-emission sectors. While estimating absolute targets may introduce complexity, it is important that all sectors, including financial institutions, provide consistent and comparable data on their climate performance. The exception for financial institutions would undermine the consistency of reporting across industries and could result in a lack of transparency in evaluating the climate-related risks and opportunities that financial institutions are managing. Thus, we believe it is essential for financial institutions to be required to disclose both intensity and absolute emission targets. This will ensure that their disclosures are comprehensive, transparent, and aligned with global standards.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	We support the proposed change in the threshold for reporting metrics disaggregated at the country level. The previous threshold, which required reporting for countries where employees represented at least 10% of the total workforce, led to limited information being disclosed for key markets. This new approach focusing on the top 10 countries by employee headcount will enhance transparency and comparability of information, ensuring that data for the largest markets is consistently reported. We recognize that this change might require more effort in some cases, as it could lead to the reporting of additional countries where the company has significant operations. The increased reporting is expected to provide stakeholders with more relevant data for assessing labor and social issues in key jurisdictions.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The Application Requirements for disclosure requirement S1-9 set out the methodology for reporting on employees' wages in relation to an adequate wage. The methodology references one norm for 'adequate wages' with regard to employees within the EU (namely, the adequate wage as defined in EU Directive (EU) 2022/2041) and a different norm for employees outside the EU (namely the legal minimum wage). This creates a number of problems: •The reference to legal minimum wages is not reflective of the title or purpose of the disclosure requirement. •It is discriminatory since the legal minimum wage is typically lower than an adequate or living wage estimate, and it therefore implies that the EU expects lower wage standards for employees outside the EU. •It creates confusion for companies, for which it is simpler and more appropriate to apply one reference norm across all their employees. •It makes the information reported by companies incomparable, since some have used the minimum wage and others have selected to apply the living wage estimate they use elsewhere.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	We partially agree with the proposed changes in the Amended ESRS, particularly with the simplification of reporting requirements. The consolidation of data points related to human rights policies and severe human rights incidents streamlines the reporting process, but we are concerned that simplifying the indicators too much could result in losing important details regarding specific human rights incidents, which could affect the transparency necessary for assessing companies' adherence to human rights standards. For example, the simplification of PAI 14 (severe human rights incidents) may omit context on affected groups or locations, which is critical for assessing companies' adherence to human rights standards. The new methodology should uphold the UN Global Compact's Principles, especially Principle 1 on respecting and supporting human rights, Principle 2 on avoiding complicity in human rights abuses, and Principles 3 to 6, which cover issues like freedom of association, forced and child labor, and discrimination in employment. These principles are essential for ensuring companies contribute to decent work and human rights protection (aligned with SDG 8). Furthermore, we believe it is important that these changes are in line with the guiding principles of human rights and business. We support the simplification, but emphasize that companies must continue to disclose clear and detailed information on human rights and labor conditions to ensure transparency and accountability.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We partially agree with the proposed amendments regarding the simplification of the disclosure requirements for biodiversity and ecosystems-related targets in ESRS E4. While the reduction of complexity is appreciated, particularly by streamlining the specific application requirements, we believe that the guidance for setting biodiversity and ecosystems-related targets should be further refined to ensure clarity and relevance for companies. The methodological guidance provided in E4 AR 26, such as the focus on protected areas or the number of sites with approved ecological integrity, is a positive step towards aligning with the evolving trends in biodiversity management. However, we encourage further alignment with the latest developments in science-based frameworks, such as the Science-Based Targets Network (SBTN), which are increasingly recognized as leading approaches for addressing biodiversity goals and ecosystem restoration. We suggest keeping the guidance flexible enough to accommodate the specific needs of different sectors, while still ensuring that it provides clear, actionable targets for companies to follow. This will enable them to contribute more effectively to global biodiversity preservation and ecosystem restoration, aligned with international frameworks and the UN Global Compact's Ten Principles related to environmental responsibility (Principle 7) and sustainability.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	We do not agree with the deletion of the voluntary datapoint on the adjusted gender pay gap by employee category. While simplifying reporting requirements is important, removing this datapoint would diminish the granularity of the data, which is essential for fully understanding gender pay disparities within companies and ensuring meaningful action towards equality. The adjusted gender pay gap offers crucial insights into the specific pay gaps that exist within different employee categories, such as by seniority, job function, or geographic location. This level of detail is fundamental for evaluating the effectiveness of a company's efforts to close the gender pay gap, and aligns directly with Principle 6 of the UN Global Compact, which calls for eliminating discrimination in employment and occupation. By maintaining this voluntary datapoint, companies are encouraged to actively identify and address these disparities in a transparent and accountable manner. The voluntary nature of the adjusted gender pay gap allows companies the flexibility to disclose more comprehensive data without overburdening them. This supports Principle 10 of the UN Global Compact, which focuses on transparency and accountability, by ensuring that companies can voluntarily share additional information on their efforts to address gender inequality in pay. In conclusion, we believe that the adjusted gender pay gap should remain a voluntary datapoint to foster greater transparency, accountability, and detailed reporting, helping companies to align with the UN Global Compact's principles on gender equality and human rights.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	While the new provisions focus on actions (PAT) taken by companies to ensure fair treatment of suppliers, we are concerned that the visibility of how companies engage with and support SMEs, particularly in terms of payment practices, could be reduced. The previous payment practices datapoints provided more direct transparency about how companies treated SMEs in their supply chains, including payment terms and conditions. In conclusion, while we support simplification efforts, we feel that there should be a stronger emphasis on visibility and transparency regarding SMEs in the Amended ESRS, ensuring that the changes do not compromise the protection of SMEs.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We partially agree with the simplifications introduced in the Amended ESRS. The reduction of datapoints and clarification of provisions are positive steps towards streamlining sustainability reporting. However, it is important to ensure that these simplifications do not compromise the integrity and transparency of information on key areas such as human rights, labor standards, and environmental sustainability. While the simplification of reporting requirements is necessary, companies must continue to provide detailed disclosures on their impact in these areas to ensure they are upholding their commitments to the UN Global Compact's Principles. This will also contribute to the achievement of relevant SDGs, ensuring that companies remain aligned with global sustainability goals. In conclusion, while we support the direction of the simplifications, it is crucial that the balance between reducing reporting burdens and maintaining relevant and comprehensive disclosures is carefully monitored. This will ensure that companies continue to meet their sustainability obligations effectively, in line with both the UN Global Compact and the SDGs.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We partially agree with the simplifications introduced in the Amended ESRS. The reduction of datapoints and clarification of provisions are positive steps towards streamlining sustainability reporting. However, it is important to ensure that these simplifications do not compromise the integrity and transparency of information on key areas such as human rights, labor standards, and environmental sustainability. While the simplification of reporting requirements is necessary, companies must continue to provide detailed disclosures on their impact in these areas to ensure they are upholding their commitments to the UN Global Compact's Principles. This will also contribute to the achievement of relevant SDGs, ensuring that companies remain aligned with global sustainability goals. In conclusion, while we support the direction of the simplifications, it is crucial that the balance between reducing reporting burdens and maintaining relevant and comprehensive disclosures is carefully monitored. This will ensure that companies continue to meet their sustainability obligations effectively, in line with both the UN Global Compact and the SDGs.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We partially agree with the simplifications introduced in the Amended ESRS. The reduction of datapoints and clarification of provisions are positive steps towards streamlining sustainability reporting. However, it is important to ensure that these simplifications do not compromise the integrity and transparency of information on key areas such as human rights, labor standards, and environmental sustainability. While the simplification of reporting requirements is necessary, companies must continue to provide detailed disclosures on their impact in these areas to ensure they are upholding their commitments to the UN Global Compact's Principles. This will also contribute to the achievement of relevant SDGs, ensuring that companies remain aligned with global sustainability goals. In conclusion, while we support the direction of the simplifications, it is crucial that the balance between reducing reporting burdens and maintaining relevant and comprehensive disclosures is carefully monitored. This will ensure that companies continue to meet their sustainability obligations effectively, in line with both the UN Global Compact and the SDGs.			

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Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We partially agree with the simplifications introduced in the Amended ESRS. The reduction of datapoints and clarification of provisions are positive steps towards streamlining sustainability reporting. However, it is important to ensure that these simplifications do not compromise the integrity and transparency of information on key areas such as human rights, labor standards, and environmental sustainability. While the simplification of reporting requirements is necessary, companies must continue to provide detailed disclosures on their impact in these areas to ensure they are upholding their commitments to the UN Global Compact's Principles. This will also contribute to the achievement of relevant SDGs, ensuring that companies remain aligned with global sustainability goals. In conclusion, while we support the direction of the simplifications, it is crucial that the balance between reducing reporting burdens and maintaining relevant and comprehensive disclosures is carefully monitored. This will ensure that companies continue to meet their sustainability obligations effectively, in line with both the UN Global Compact and the SDGs.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We partially agree with the simplifications introduced in the Amended ESRS. The reduction of datapoints and clarification of provisions are positive steps towards streamlining sustainability reporting. However, it is important to ensure that these simplifications do not compromise the integrity and transparency of information on key areas such as human rights, labor standards, and environmental sustainability. While the simplification of reporting requirements is necessary, companies must continue to provide detailed disclosures on their impact in these areas to ensure they are upholding their commitments to the UN Global Compact's Principles. This will also contribute to the achievement of relevant SDGs, ensuring that companies remain aligned with global sustainability goals. In conclusion, while we support the direction of the simplifications, it is crucial that the balance between reducing reporting burdens and maintaining relevant and comprehensive disclosures is carefully monitored. This will ensure that companies continue to meet their sustainability obligations effectively, in line with both the UN Global Compact and the SDGs.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We partially agree with the simplifications introduced in the Amended ESRS. The reduction of datapoints and clarification of provisions are positive steps towards streamlining sustainability reporting. However, it is important to ensure that these simplifications do not compromise the integrity and transparency of information on key areas such as human rights, labor standards, and environmental sustainability. While the simplification of reporting requirements is necessary, companies must continue to provide detailed disclosures on their impact in these areas to ensure they are upholding their commitments to the UN Global Compact's Principles. This will also contribute to the achievement of relevant SDGs, ensuring that companies remain aligned with global sustainability goals. In conclusion, while we support the direction of the simplifications, it is crucial that the balance between reducing reporting burdens and maintaining relevant and comprehensive disclosures is carefully monitored. This will ensure that companies continue to meet their sustainability obligations effectively, in line with both the UN Global Compact and the SDGs.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We partially agree with the simplifications introduced in the Amended ESRS. The reduction of datapoints and clarification of provisions are positive steps towards streamlining sustainability reporting. However, it is important to ensure that these simplifications do not compromise the integrity and transparency of information on key areas such as human rights, labor standards, and environmental sustainability. While the simplification of reporting requirements is necessary, companies must continue to provide detailed disclosures on their impact in these areas to ensure they are upholding their commitments to the UN Global Compact's Principles. This will also contribute to the achievement of relevant SDGs, ensuring that companies remain aligned with global sustainability goals. In conclusion, while we support the direction of the simplifications, it is crucial that the balance between reducing reporting burdens and maintaining relevant and comprehensive disclosures is carefully monitored. This will ensure that companies continue to meet their sustainability obligations effectively, in line with both the UN Global Compact and the SDGs.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We partially agree with the simplifications introduced in the Amended ESRS. The reduction of datapoints and clarification of provisions are positive steps towards streamlining sustainability reporting. However, it is important to ensure that these simplifications do not compromise the integrity and transparency of information on key areas such as human rights, labor standards, and environmental sustainability. While the simplification of reporting requirements is necessary, companies must continue to provide detailed disclosures on their impact in these areas to ensure they are upholding their commitments to the UN Global Compact's Principles. This will also contribute to the achievement of relevant SDGs, ensuring that companies remain aligned with global sustainability goals. In conclusion, while we support the direction of the simplifications, it is crucial that the balance between reducing reporting burdens and maintaining relevant and comprehensive disclosures is carefully monitored. This will ensure that companies continue to meet their sustainability obligations effectively, in line with both the UN Global Compact and the SDGs.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	We partially agree with the simplifications introduced in the Amended ESRS. The reduction of datapoints and clarification of provisions are positive steps towards streamlining sustainability reporting. However, it is important to ensure that these simplifications do not compromise the integrity and transparency of information on key areas such as human rights, labor standards, and environmental sustainability. While the simplification of reporting requirements is necessary, companies must continue to provide detailed disclosures on their impact in these areas to ensure they are upholding their commitments to the UN Global Compact's Principles. This will also contribute to the achievement of relevant SDGs, ensuring that companies remain aligned with global sustainability goals. In conclusion, while we support the direction of the simplifications, it is crucial that the balance between reducing reporting burdens and maintaining relevant and comprehensive disclosures is carefully monitored. This will ensure that companies continue to meet their sustainability obligations effectively, in line with both the UN Global Compact and the SDGs.			

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Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	We partially agree with the simplifications introduced in the Amended ESRS. The reduction of datapoints and clarification of provisions are positive steps towards streamlining sustainability reporting. However, it is important to ensure that these simplifications do not compromise the integrity and transparency of information on key areas such as human rights, labor standards, and environmental sustainability. While the simplification of reporting requirements is necessary, companies must continue to provide detailed disclosures on their impact in these areas to ensure they are upholding their commitments to the UN Global Compact's Principles. This will also contribute to the achievement of relevant SDGs, ensuring that companies remain aligned with global sustainability goals. In conclusion, while we support the direction of the simplifications, it is crucial that the balance between reducing reporting burdens and maintaining relevant and comprehensive disclosures is carefully monitored. This will ensure that companies continue to meet their sustainability obligations effectively, in line with both the UN Global Compact and the SDGs.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	We partially agree with the simplifications introduced in the Amended ESRS. The reduction of datapoints and clarification of provisions are positive steps towards streamlining sustainability reporting. However, it is important to ensure that these simplifications do not compromise the integrity and transparency of information on key areas such as human rights, labor standards, and environmental sustainability. While the simplification of reporting requirements is necessary, companies must continue to provide detailed disclosures on their impact in these areas to ensure they are upholding their commitments to the UN Global Compact's Principles. This will also contribute to the achievement of relevant SDGs, ensuring that companies remain aligned with global sustainability goals. In conclusion, while we support the direction of the simplifications, it is crucial that the balance between reducing reporting burdens and maintaining relevant and comprehensive disclosures is carefully monitored. This will ensure that companies continue to meet their sustainability obligations effectively, in line with both the UN Global Compact and the SDGs.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	We partially agree with the simplifications introduced in the Amended ESRS. The reduction of datapoints and clarification of provisions are positive steps towards streamlining sustainability reporting. However, it is important to ensure that these simplifications do not compromise the integrity and transparency of information on key areas such as human rights, labor standards, and environmental sustainability. While the simplification of reporting requirements is necessary, companies must continue to provide detailed disclosures on their impact in these areas to ensure they are upholding their commitments to the UN Global Compact's Principles. This will also contribute to the achievement of relevant SDGs, ensuring that companies remain aligned with global sustainability goals. In conclusion, while we support the direction of the simplifications, it is crucial that the balance between reducing reporting burdens and maintaining relevant and comprehensive disclosures is carefully monitored. This will ensure that companies continue to meet their sustainability obligations effectively, in line with both the UN Global Compact and the SDGs.			
Survey	UN Global Compact Country Network Spain	Standard setting initiative	Spain	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We partially agree with the simplifications introduced in the Amended ESRS. The reduction of datapoints and clarification of provisions are positive steps towards streamlining sustainability reporting. However, it is important to ensure that these simplifications do not compromise the integrity and transparency of information on key areas such as human rights, labor standards, and environmental sustainability. While the simplification of reporting requirements is necessary, companies must continue to provide detailed disclosures on their impact in these areas to ensure they are upholding their commitments to the UN Global Compact's Principles. This will also contribute to the achievement of relevant SDGs, ensuring that companies remain aligned with global sustainability goals. In conclusion, while we support the direction of the simplifications, it is crucial that the balance between reducing reporting burdens and maintaining relevant and comprehensive disclosures is carefully monitored. This will ensure that companies continue to meet their sustainability obligations effectively, in line with both the UN Global Compact and the SDGs.			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	We do not agree that the proposed amendments have sufficiently simplified the DMA process or reinforced the materiality filter. In our view, the current drafting leaves the process overly complex and resource-intensive, especially for large industrial companies with diversified operations. The obligation to document and re-validate all IROs on an annual basis remains a disproportionate burden and distracts from the issues that are truly material.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Yes, we agree that the new guidelines give more clarity on how to consider actions of remediation, mitigation and prevention in the DMA. This will help companies prepare more relevant and comparable reports and better show the real risks and measures already in place. At the same time, we think flexibility should also include the frequency of reviewing DMA and IRO. For companies with a stable business – without changes of profile, big expansions or large new projects – the DMA should be valid for at least three years. Doing a full review of all IRO every year only to confirm that nothing has changed is very time-consuming and creates extra work for the organization, without improving the quality of reporting.			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We believe the proposed changes give companies more flexibility when preparing their sustainability reports and allow them to focus on the most important information. It is useful that very detailed data or EU Taxonomy-related information can be placed in separate sections or appendices, as described in [DRAFT] ESRS 1 section 8.2. At the same time, we suggest removing or moving (amended) ESRS 1, AR 36. This requirement says that companies may present detailed GHG emission calculations in a separate appendix or section. Since it is not mandatory and only relates to ESRS E1, including it in ESRS 1 could create confusion. It would be clearer either to delete it or to place it under ESRS E1 (Climate Change).			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I disagree	We do not agree that the proposed amendments provide a sufficient level of simplification. In our view, the current form of the requirements still creates excessive administrative burdens which, in the case of large industrial companies such as KGHM, may lead to duplication of information and hinder the focus on issues that are truly material. 1. ESRS 2, paragraph 38 (a–c) – resources allocated to key actions The requirement to present detailed data on resources allocated to ESG actions is not adequate to the practice of large industrial enterprises. At KGHM, such data are monitored mainly at the level of specific projects (e.g. modernization of smelting installations, implementation of water recovery systems), and not through the Impact–Risk–Opportunity (IRO) structure. Attempting to adjust them to this framework and reconcile them with financial statements would be a highly time-consuming process, disproportionate to their informational value. A short narrative description should be sufficient instead of detailed numerical data. 2. ESRS 2 GDR-M, paragraph 41(b) – environmental conditions and characteristics of areas This requirement duplicates paragraph 41(d), which already covers contextual information. As a result, we would be obliged to present the same data twice, creating an additional administrative burden without improving the quality of reporting. Both requirements should be merged and streamlined. 3. ESRS 1, paragraph 40 – application of the materiality principle This requirement should explicitly state that the disclosure of metrics under topical standards is subject to the principle of double materiality and the materiality of information. For companies such as KGHM, with a very broad scope of operations, some metrics are not practically relevant. A clear application of the materiality principle would help reduce the excess of information and allow focus on key issues such as emissions, energy consumption, water management etc.			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We fully support the changes that make a clear distinction between mandatory and voluntary datapoints. This was one of the main sources of confusion when preparing sustainability statements and also created challenges with auditors. To make the ESRS even simpler, EFRAG could move definitions to the Annex II glossary, place illustrative examples in the NMIG, include presentation guidance directly in the datapoints, and remove optional ARs. In addition, the term "significant" is unclear. ESRS should explain that companies should assess significance in their own context, so that disclosures remain relevant and material.			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We welcome the development of the Non-mandatory Implementation Guidance (NMIG) as a useful tool to support preparers in applying the ESRS. Moving all voluntary and non-mandatory datapoints into a separate document is a positive step that improves the clarity of the standards and makes the overall framework more user-friendly.			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	We support the relief measures introduced by EFRAG, in particular those regarding acquisitions and disposals (ESRS 1, section 5.4) and the possibility to exclude joint operations without operational control from environmental metrics (ESRS 1, paragraph 92). For the latter, however, we recommend stronger alignment with financial reporting principles (e.g. IFRS 11). We see particular risk in the disclosure of highly detailed environmental data, especially in ESRS E5 (Resource use and circular economy) – covering mass balance, material flows, resource consumption, waste and recycling – as well as in selected requirements of ESRS E2 (Pollution) and ESRS E3 (Water and marine resources), which may reveal technologically sensitive and strategic information. Therefore, the scope of these requirements should be limited by allowing reporting at a higher level of aggregation and by adopting an approach similar to the GRI Standards, where "confidentiality constraints" are a valid reason for omission, provided that the reason is explained.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We support the relief measures allowing the use of available data without undue cost or effort – these should be permanent rather than time-limited. We also fully support ESRS 1 (paras. 91 and 92), which allow the use of metrics based on partial data coverage and the exclusion of joint operations without operational control. These are practical solutions that reduce the administrative burden, improve reporting reliability, and avoid duplicative information.			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	We do not agree that the current requirements for disclosing anticipated financial effects can be implemented in a proportional and practical manner. For companies operating internationally, a major challenge is the lack of official and authoritative databases that would allow comprehensive and reliable forecasting of environmental and climate-related risks. The available sources focus mainly on current risks, while consistent projections for a medium- or long-term horizon are missing. For this reason, we support the solution that limits mandatory reporting to qualitative information, while keeping the possibility to disclose quantitative information on a voluntary basis when a company has sufficient tools and reliable data (Option 2). Such an approach helps to avoid reporting uncertain or potentially misleading information, while at the same time encouraging companies to further develop methodologies and practices in this area.			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	We welcome the simplifications made in this requirement, but we still question the need for quantitative data. Companies highlight that preparing cash-flow forecasts is very difficult and can raise issues of confidentiality, strategy, and liability. We believe that investors are best placed to build their own forecasts based on information already disclosed by companies, such as business model, risks, historical data, and targets. We suggest that the ESRS should include the reliefs from IFRS S1 (§38 and §39), which allow companies not to disclose quantitative data when: the effects cannot be separately identified, the measurement uncertainty is too high, or the company does not have the skills or resources to prepare the data. Consistent with our response to Question 19, we support Option 2 and recommend that quantitative disclosures remain voluntary.			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	We support the changes introduced to enhance interoperability with the ISSB standards, especially the harmonisation of the reporting boundary for GHG emissions.			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	We support the deletion of mandatory datapoint as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.E1.	Comments on deleted datapoints in ESRS E1	I agree	We support the deletion of that mandatory datapoint as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.E2.	Comments on deleted datapoints in ESRS E2	I agree	We support the deletion of that mandatory datapoint as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.E3.	Comments on deleted datapoints in ESRS E3	I agree	We support the deletion of that mandatory datapoint as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.E4.	Comments on deleted datapoints in ESRS E4	I agree	The analysis foreseen in the ESRS regarding biodiversity is based on the LEAP approach, which includes: identifying the locations of activities affecting biodiversity, assessing dependencies on ecosystem services, analysing risks arising from these dependencies and impacts, as well as developing response strategies and reporting data. This process is highly complex, and in the case of large companies such as KGHM, its full implementation may take between 6 and 9 months. Therefore, we propose to discontinue the requirement for a comprehensive biodiversity transition plan and instead focus on the energy transition plan.			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.E5.	Comments on deleted datapoints in ESRS E5	I agree	We support the deletion of that mandatory datapoint as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.S1	Comments on deleted datapoints in ESRS S1	I agree	We support the deletion of that mandatory datapoint as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESR			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.S3	Comments on deleted datapoints in ESRS S3	I agree	We support the deletion of that mandatory datapoint as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESR			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.S4	Comments on deleted datapoints in ESRS S4	I agree	We support the deletion of that mandatory datapoint as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESR			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	22.G1	Comments on deleted datapoints in ESRS G1	I agree	We support the deletion of that mandatory datapoint as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESR			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	We agree that considering the significant reduction of mandatory datapoints, these do not excessively increase the reporting burden. However, these datapoints were assessed as voluntary after a thorough drafting process of the ESRS and should remain as such since their content, and therefore their relevance, have not changed.			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We do not support the additional disclosure requirement on secondary microplastics. Although EFRAG presents it as a clarification of existing obligations, it in fact significantly extends the scope of reporting to the downstream value chain, resulting in a substantial increase in the reporting burden and contradicting the objective of simplification. Estimating secondary microplastic emissions is currently not feasible due to the absence of a robust methodology and the limited control companies have over the downstream life cycle of products. Disclosure requirements should focus only on what companies can measure and control – namely emissions leaving their facilities. In addition, the definition of microplastics based on REACH is too broad and not fit-for-purpose in this context. To ensure consistency, the term "synthetic polymer microparticles" should be used instead. We therefore recommend deleting the proposed disclosure requirement on secondary microplastics from ESRS E2, as well as the related definition in Annex II.			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	n/a			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	The proposed new threshold risks triggering additional countries for companies to report on.			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The disclosure requirement on living wage continues to raise practical concerns. The lack of uniform benchmarks in many countries, as well as significant differences in how they are defined and calculated, makes comparability difficult and may lead to fragmented reporting and reputational risks. While the amendments in ESRS S1 bring more clarity and flexibility, the issue of global consistency remains unresolved.			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	We understand the need for consistency between EU laws, especially between CSRD and SFDR, and we welcome the proposed simplifications in ESRS. However, many of these data are not currently collected by companies. Other EU regulations should therefore also be simplified so that the benefits of the ESRS changes are not undermined.			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	We fully support the need for simplification in DR E4-4. In the area of biodiversity and other nature-related topics, the main challenge is the absence of uniform, clearly defined, and comparable metrics – in contrast to climate, where a widely accepted measure (CO_2 equivalents) already exists. This creates a risk of inconsistency and fragmented reporting. In addition, the LEAP analysis process foreseen in the ESRS as the basis for the biodiversity transition plan is highly complex and, in the case of large companies, may take 6–9 months, requiring significant resources and generating high costs, while still leaving uncertainty as to the comparability and decision-usefulness of the resulting data.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	The current indicator classifies miners, water production line workers, and miners in Canada in the same way, without taking into account purchasing power or other macroeconomic factors. As a result, the process of calculating the pay gap is time-consuming, while the outcomes do not provide users with meaningful information. We therefore propose either removing this indicator or modifying it in such a way that it delivers genuine informational value. We emphasize that [DRAFT] DR S1-15 paragraph 44(a) should be calculated on the basis of comparable profiles and replaced with "gender pay gap by employee category." With regard to [DRAFT] DR S1-15 paragraph 44(b), the ESRS should allow for the disclosure of only an adjusted ratio, or alternatively apply the concept previously defined by EFRAG of "countries with a significant number of employees," requiring disclosure for such countries, or for the five largest countries in which the company operates (e.g. current S1-8).			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	n/a			
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	KGHM POLSKA MIEDŹ S.A.	Preparer (non-financial preparing a sustainability report)	Poland	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		n/a			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Coop Italia	Preparer (non-financial preparing a sustainability report)	Italy	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	Provide descriptive examples			
Survey	Coop Italia	Preparer (non-financial preparing a sustainability report)	Italy	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Provide descriptive examples and extend the approach to risks as well			
Survey	Coop Italia	Preparer (non-financial preparing a sustainability report)	Italy	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Coop Italia	Preparer (non-financial preparing a sustainability report)	Italy	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Coop Italia	Preparer (non-financial preparing a sustainability report)	Italy	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Coop Italia	Preparer (non-financial preparing a sustainability report)	Italy	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	Develop guidelines/provide further explanations on how to estimate data in order to ensure greater comparability			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Coop Italia	Preparer (non-financial preparing a sustainability report)	Italy	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	Coop Italia	Preparer (non-financial preparing a sustainability report)	Italy	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Requesting at least qualitative data may be reasonable			
Survey	Coop Italia	Preparer (non-financial preparing a sustainability report)	Italy	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Coop Italia	Preparer (non-financial preparing a sustainability report)	Italy	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Partially agree: Requiring TP on biodiversity represents an excessive burden for companies in the immediate term. It could be implemented in the future.			
Survey	Coop Italia	Preparer (non-financial preparing a sustainability report)	Italy	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	Necessary to provide a clear and illustrative definition of what fair representation means and how to demonstrate that the disclosure made meets this requirement.			
Survey	Coop Italia	Preparer (non-financial preparing a sustainability report)	Italy	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Coop Italia	Preparer (non-financial preparing a sustainability report)	Italy	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	The answer refers to the proposal of running a fiel test			
Survey	Coop Italia	Preparer (non-financial preparing a sustainability report)	Italy	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	In reality, there has only been a reorganization where some DPs have been merged/put together in a new DP, and not an actual simplification.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Coop Italia	Preparer (non-financial preparing a sustainability report)	Italy	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	Biodiversity is a much more complex issue than how it is treated in the standard, because disclosure can vary depending on the aspects for which it is considered			
Survey	Coop Italia	Preparer (non-financial preparing a sustainability report)	Italy	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	Simplification is fine, but in this specific DP there is a risk of losing the significance of the information because normally differences occour mainly at some specific levels			
Survey	Coop Italia	Preparer (non-financial preparing a sustainability report)	Italy	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	WeeFin is more in favor of a bottom up approach as it allows more complete and granular analysis as pointed out by the TNFD. However, as this approach requires much more resources than the top-down methodology, we understand the decision taken in amended ESRS 1, and agree with the possibility to use a bottom up approach on a voluntary basis. Nevertheless, we would recommend 1) encouraging undertakings to implement a bottom-up approach by indicating that it is the best practice in the NGIM document and 2) defining a long-term objective of shifting to a bottom-up approach. In addition, it seems important to retain all parts of former paragraph 32. It appears important to clearly identify reasons for which a counterparty identities a topic as non-material.			
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	The guidelines clarify correctly how to consider remediation, mitigation and prevention actions in the DMA, a further improvement could be to recall the definitions of these three actions and the difference between potential and actual impact in a short introduction of appendix C, to ensure the good understanding and compliance of all actors.			
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	WeeFin supports the implementation of an executive summary at the beginning of the report. It would be interesting to provide examples of best practices to enable companies to target the important information that is specific to them, and needed to be included in an executive summary (e.g., GHG emissions, GHG emission reduction targets, etc.). WeeFin supports also a better connectivity with corporate reporting only if it enables the initial requirements of the CSRD to be met effectively, transparently, and simply (i.e., if the datapoint is replaced with a reference to a document where the information is difficult to access or find, then the requirements are not met).			
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Even if the amendment generally brought improvement to the ESRS 2, we disagree with some reduction proposals. Firstly, regarding amendment of topical specification, the new key stakeholders category introduced in ESRS 1 and referred to in AR of ESRS 2 - SBM2, does not fully cover the actors that were included in the previous SBM topical specification. Especially, information on integration of interest, views and right of value chains workers in undertakings' strategy and business model are now excluded. Secondly, we disagree with the removal of the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline. From our point of view, this information is important as it allows recognition of transition effort, and incents undertakings to engage on new topics.			
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	These changes improve the accessibility of the standard by providing a clearer structured standard. An explanation of the structure of the standard could be provided to ensure a sound understanding of all actors if not already done.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We support the initiative of gathering the "how to report" guidelines and examples in a separate document, the NGIM. It allows guidance for stakeholders without complicating or making the core standard more cumbersome. In addition the non-mandatory features of these guidance, allows a certain level of flexibility to stakeholders.			
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We agree with the principle of implementing this "undue cost or effort" system, but only in parallel with the introduction of additional constraints and clarifications to ensure that it does not impact the level of transparency of the regulation and continues to guarantee comparability between entities. We recommend that EFRAG should provide more details on this principle to prevent it from being used to completely limit reporting efforts. Indeed, without further clarification, an entity could decide not to include part of its value chain due to the complexity of collecting data, even though this part may represent a large portion of the company's impacts. Furthermore, regarding estimates, we support allowing entities to use proxies when data is not currently available. Nevertheless, transparency on the methodologies used must be required. We also recommend that EFRAG make estimation methodologies available for use to ensure maximum consistency between entities. Finally, we do not align with the proposal concerning requiring transparency of an entity's strategy resilience to risks only. Considering only risks goes against the principle of double materiality recognized in various regulations such as SFDR and only allows for a financial perspective on sustainability. Moreover, limiting this assessment to a qualitative analysis only could be appropriate if we consider that the quantitative evaluation is required in paragraph 23.			
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	WeeFin is aligned with considering the reality regarding data limitations for entities. Nevertheless, it is important to require companies to be transparent about the covered/not covered scope(s), via a coverage rate for example. Additionally, we consider it essential to include a time limit for the relief. Achieving comprehensive data coverage is important to prevent bias in reported data. For instance, if a stakeholder omits its most emissions-intensive activities from GHG emissions calculations due to data unavailability, this represents a significant issue requiring immediate resolution. What's more, this information is essential for investors that must report it themselves under the SFDR.			
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	WeeFin is aligned with the highlighted Option 1, which is transparency of anticipated financial impacts through qualitative and quantitative measures. Indeed, companies included in the scope of CSRD are large companies whose financial and human resources are considered high. Being aware that methodologies are not perfect and need to evolve to best represent the financial impact of sustainability issues on the entity, we recommend emphasizing transparency of the methodology used and understanding the evolving nature of this methodology. In addition, WeeFin agrees that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. To be noted that as part of Option 1, omission of quantitative information will need to be strictly regulated.			
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	WeeFin mostly agrees with the proposition, however some clarifications could be provided. 40.b: indication on the geographical level at which the information should be provided and a definition of "key assets" is required. 40.d & 42: definition of "business activities" is required.			
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Despite some residual differences, the strengthening of interoperability with the IFRS S1 and S2 is a good improvement. We particularly support the alignment of emission accountability with financial accountability with the implementation of a financial consolidation approach.			
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	WeeFin mostly disagrees with the substantial reduction in the number of mandatory and voluntary data points for multiple reasons: 1- It is important to remember that with regulations such as CSRD or SFDR, Europe is imposing its vision on the world economy and regaining leverage over its sovereignty.While extra-financial reporting can pose a challenge to the competitiveness of European companies, the reporting obligation for non-European companies should be maintained. Many financial sector players already comply with European standards like SFDR, drawn by the attractive European market, even with additional compliance rules. It is essential to recognize that regulations such as CSRD and SFDR allow Europe to assert its vision in the global economy and enhance its sovereignty. 2- By reporting on all material metrics, companies can secure funding and implement measures to build resilience against ESG risks. This is especially crucial given the sharp increase in physical risks, with significant shifts expected from 2030 onwards. Proactive engagement now is essential for resilience, as insurers will also be scrutinizing and holding companies accountable. 3/ First reports from 2025 demonstrate the feasibility and utility of CSRD for businesses, as well as its necessity for the economy. Companies that publish more maintain greater control over their communications and strategic plans. In the current era of AI and geospatial data, data will inevitably be generated. It's crucial to remember that 90% of ESG data utilized in finance is modeled. Therefore, a lack of publication can lead to non-European data providers modeling this information, potentially impacting competitiveness and data sovereignty. In conclusion, the removal of voluntary reporting does not appear to be consistent, and switching certain indicators from "mandatory" to "voluntary" would be more acceptable.			
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	23.	Six datapoints exceptionally moved from “may” to “shall” In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, “may disclose” datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	We agree on the importance of these data points and on the necessity to qualify them as "shall" metrics to be reported. However, in the case of water, it seems more coherent to require an analysis across the entire value chain and not only on the own operations, as the associated impact is generally not due to one's own operations, as it is for the climate and its scope 3. The data points that remain only mention their own operations whereas, as highlighted in a dedicated study, 'Indirect consumption: the scope 3 of water' carried out by Grégory Schneider-Maunoury, a member of the SFAF and professor at Sorbonne Paris Nord University, revealed that of the total water consumed by a company, direct water consumption represents only 0.001% to 1%. In that view, limiting the reporting to own operations appears insufficient.			
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	No comment.			
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	25.	Emphasis on ESRS being a “fair presentation” reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We agree that implementing fair presentation in the ESRS will reduce the risk of excessive reported information and relevant reporting. However, to ensure that the framework remains fair, we suggest adding a requirement stating that all undertakings shall be able to justify on authorities demand why they found topics or subtopics non-material in their DMA. It emphasizes the importance of conducting the DMA in a rigorous and comprehensive manner and reduces greenwashing risks.			
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 (“when only setting intensity targets”), to disclose also the associated absolute values” (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking’s progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	As highlighted by this article from la Banque de France, to reach carbon neutrality, the financial sector needs to focus on reducing the absolute emissions in the economy. We believe thus that in addition to the creation of intensity targets, financial institutions should also implement strategies to limit the absolute GHG emissions of their investments.			
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking’s employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	We agree with Efrag threshold change. Even if it increases the data reported by entities, it better reflects entities employment across Europe, in particular for companies for which workforce is distributed over many countries, where the former threshold would only capture a minority of employees.			
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	We agree with the necessity to conduct the experiment to tackle the 3 points raised by the SRB members.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	WeeFin promotes the alignment between regulations to ease the burden of regulations' compliance. Thus, we view two options: 1) option 1 should be that the data requested by the PAI in SFDR should be included in the amended ESRS or 2) option 2 that the level 2 of SFDR amendment should consider the modification of the ESRS. To note that both of the regulations are being amended at the same time and that neither of these two has been validated. The amended ESRS are confirming that the mandatory PAI are not being modified, that some optional PAI have been deleted, but this does not refer to the proposal of new PAIs under SFDR level 2 amendment. Thus, we cannot agree or disagree as we do not know the future of SFDR and thus cannot confirm that the amendments of the ESRS are aligned with the future of PAIs.			
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	In the current state ESRS E4-4 is too large which could lead to adoption of meaningless targets. A review of AR 26 would be appropriate to address this potential issue.			
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	Even this deletion would align better with SFDR, we think adjusted gender gap is an important data point, as it better reflects gender impact on wages differences than the absolute one.			
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Deletion of whether an undertaking is excluded from PAB could be considered as inappropriate as this information is very useful in particular for financial investors. (log changement page 10, ex point g)			
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The requirement to disclose assessment methodology of "impact on climate change, in particular, undertaking GHG emissions" has been deleted but not replaced in the amended ESRS E1. We think that this disclosure could be useful to maintain from a data quality perspective as CSRD could at a point apply to undertakings that are not experienced in reporting their GHG emissions.			
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	WeeFin	User (analyst, data provider, rating agency, etc.)	France	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The deletion of the former paragraph 25, on the minimum topics that climate policy should cover (log of change p16) is not adequate to reach Green deal objectives, it should at least be included in the NGIM.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Integrated Reporting Committee of South Africa	Standard setting initiative	South Africa	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	We agree with the ESRS positioning of double materiality in reporting on sustainability impacts, risks and opportunities (IROs). We see this as encompassing stewardship by the organisation's governing body and accountability through balanced, complete and transparent reporting. Furthermore, a double materiality approach facilitates integrated thinking within an organisation by considering its inputs, impacts and outcomes over the short, medium and long term. The ESRS double materiality approach aligns with the call for both financial and impact materiality in the King V Code of Corporate Governance Draft (and this is inherently implied in the current King IV Code) making it welcome for the South African organisations that fall within the scope for ESRS reporting. We put forward, for your consideration, that an integrated report prepared in accordance with the Integrated Reporting Framework can help stakeholders effectively assimilate the volume of detailed sustainability and financial information released by an organisation. This is because it affords a unique overview of the organisation, providing high-level business-critical information on overall governance, overall strategy, overall risks and opportunities, overall performance and overall outlook. The benefits of conciseness, readability and understandability make the integrated report a key document in the organisation's corporate reporting architecture.			
Survey	Integrated Reporting Committee of South Africa	Standard setting initiative	South Africa	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	While clarification in this area is welcomed, the updated wording may still prove challenging for organisations to implement, especially those with limited resources and experience in this area. Additional guidance could be considered using graphics, process diagrams and illustrative examples.			
Survey	Integrated Reporting Committee of South Africa	Standard setting initiative	South Africa	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We agree with the measures taken to simplify the sustainability statement. However, the best tool for improved readability, that we strongly recommend, is the inclusion of the integrated report in the reports referred to as allowable for "inclusion by reference", because it is the only report that offers users an overall and integrated view of the organisation including business-critical information. For users, the integrated report serves as a starting point in understanding the organisation in its entirety, after which the other detailed and subject-specific financial and sustainability reports and statements can be accessed. The integrated report offers users key and high-level information on the organisation and its main external environmental factors, the business model disclosing the inputs relied on and the consequential effects on society and the environment over time, the strategic objectives, performance, risks and opportunities, and the governance structure and processes. The experience of South African organisations that have prepared integrated reports for fifteen years is worthy of sharing. It has yielded significant external benefits and has also generated substantial internal benefits. Notably, it has assisted organisations in embedding integrated thinking and moving away from siloed financial and sustainability thinking. It has shifted the internal mindset away from a short-term financial perspective to a broader view encompassing the short, medium and long term with a focus on the consequential cause and-effect relationships across the six forms of capital. With regard to the term "connectivity", we point out that the integration reflected in the integrated report differs to connectivity - the latter refers to the connectivity of information among the various aspects of the organisation, while the former views the organisation as an integrated whole.			
Survey	Integrated Reporting Committee of South Africa	Standard setting initiative	South Africa	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We emphasise that the integrated report, using the guidance of the Integrated Reporting Framework, has a key role in the corporate reporting architecture of an organisation. The integrated report provides a unique and overall perspective of the organisation and its process of value creation, preservation or erosion over time. We believe that a concise integrated report is more accessible to stakeholders than a lengthy report with detailed information. We strongly recommend that the integrated report be included as an "inclusion by reference" report. Further, on a point of governance, the integrated report is regarded as a board report and is directed to the incapacitated company to which the directors owe their duties of good faith, care, skill and diligence. While the board approves the financial statements, as drawn up by management, as well as the sustainability report, as drawn up by management, it is the integrated report that is considered a board report in carrying out the board's statutory appointment and accountability.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree				
Survey	FAR AB	Business association (other than association of financial institution)	Sweden	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	P;1,2,4,5 FAR supports making the filter of information materiality more prominent and applicable for all datapoints. Allowing for the inclusion of voluntary information, however, contradicts the concept of materiality as an overarching principle. FAR suggests voluntary, non-material, information should not be part of the sustainability statement. FAR agrees that the proposed amendments to simplify and clarify the requirements for the DMA-process confirm that undertakings do not need to perform overly granular DMAs. The simplifications, however, impose some challenges from an assurance perspective. Early experience shows that there is sometimes insufficient evidence to support that IROs are clearly non-material. ESRS should clarify the requirements for such assessments, especially when using top-down approach in groups with complex compositions, where new material IROs may arise after some scrutiny. P;3,6 FAR is hesitant if the option to report on topical- or at the IRO-level leads to simplification or just risk undermining understandability of the relationship between identification of material IROs and the topics to be reported. CSRD and ESRS require undertakings to report, and to present, information on material IROs (not just topics). A solution might be to differentiate between the assessment and the disclosures by clarifying in ESRS 1 that only those datapoints linked to material IROs (not topics) should be reported. Undertakings should be able to present the connections between identified material IROs, connected topics, PATs to manage those IROs, and the relevant metrics, in a concise manner. Current references in ESRS 2 (e.g., paragraphs 28a, 28d, and AR27) imply this, but the guidance could be more transparent to support coherent and traceable sustainability reporting.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FAR AB	Business association (other than association of financial institution)	Sweden	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	FAR welcomes the proposed amendments on how remediation, mitigation and prevention implemented actions can be considered in the DMA. However, FAR suggests EFRAG to also address how the same reasoning can be applied on risks. Although many of the in-scope companies have some experience from financial reporting, a formal framework promoting comparability is missing. Currently, there is a gap regarding how companies consider remediation, mitigation and prevention actions. In practice many undertakings only consider the net effect cash flows. ESRS should clarify if risks should be assessed using net or gross cash flows. FAR agrees that Appendix C provides guidance, however, FAR suggests it to be moved to NMIG. Furthermore, the NMIG could include guidance on how to assess potential impacts arising during the reporting period. The timing of the DMA can impact whether an impact remains relevant or not. FAR also believes only confirmed actions or effects could be taken into consideration, not only general implemented policies. Thus, AR 12 could be further developed to specify what qualifies as an actual action and to clarify how policy effectiveness is measured.			
Survey	FAR AB	Business association (other than association of financial institution)	Sweden	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	FAR welcomes the enhanced flexibility to structure the sustainability statement, including the option to present taxonomy-related information in an appendix. In summary, while FAR supports the direction of the amendments, FAR believes further clarification and alignment with established financial reporting practices would enhance the effectiveness and understandability of the ESRS requirements. FAR is hesitant regarding the purpose and added value of an executive summary. As currently formulated, there is a risk of unnecessary repetition, since the introduction to the sustainability report should already cover the main messages. The use of appendices also raises questions regarding the location and status of supplementary information. Should appendices be included after the annual report, after the management report, or integrated within the sustainability report as supplementary notes? Clarity on this point would be helpful, as well as explicit guidance on the status of such appendices. For example, in financial reporting, all disclosures included in the notes are considered part of the primary set of statements. FAR suggests a clarification that the same principle goes for the sustainability statement. All information included in the sustainability statement, including appendices or notes, should be regarded as equally relevant and subject to the same level of assurance. Regarding taxonomy information, it is reasonable and practical to include it in an appendix. However, for other content, FAR requests more guidance on what is suitable for appendix placement. The concept of appendices does not have a direct equivalent in financial reporting, where disclosures are typically provided as notes. Therefore, FAR recommends aligning the approach with IFRS standards, focusing on structuring information in a way that ensures clarity for the reader while maintaining the equal importance of all disclosures.			
Survey	FAR AB	Business association (other than association of financial institution)	Sweden	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	FAR AB	Business association (other than association of financial institution)	Sweden	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	FAR AB	Business association (other than association of financial institution)	Sweden	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	FAR agrees that NMIG could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. The NMIG should only be provided for those requirements that remain in the ESRS, not for requirements- or optional disclosures that have been removed. In addition, FAR suggests that EFRAG clarifies the future role of the already published supporting materials (IG1-3 and Compilation of Q&A:s). FAR would like to draw EFRAG's attention to the risk that certain examples in ESRS 1 Appendix C may be interpreted as conflicting with the requirements of ESRS. Such as the example "If an impact occurred in the reporting period and remediation action has been taken, is fully completed and the impact is remediated" in relation to p 34. "If the undertaking has taken remediation actions during the reporting period to address actual negative impacts, these actions shall not be considered when assessing the materiality of the impact."			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FAR AB	Business association (other than association of financial institution)	Sweden	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	FAR overall supports the suggested amendments described but suggests improvements on the following paragraphs. 1) The relief of undue cost and effort raises the following questions/issues that need to be addressed: •How should an assurance provider determine undertakings strikes the right balance of cost vs benefit, what are the benefits of information for what user? •Reporting on data for a negative impact for stakeholders, how is that benefit determined and then assured? •There is no accumulated knowledge for judgements related to impacts, for financial risks this is probably easier. Thus guidance is needed. •Just because something required is difficult, is that then undue effort? FAR believes no, clarity of this aspect is needed. •How do various users assess the benefit of an impact and how is that to be considered by the preparer and then assured? •Who is the user in this context? There is a difference in how benefit is defined and valued for a financial user vs another type of stakeholder. 2) See FAR's answer to question nr 18. 3) It should be clarified that entity-specific reporting covering quantitative metric data from the value chain is not mandatory (even if material IROs). Focus should remain on own operations and qualitative disclosures for the value chain. If the framework requires inclusion of metric data from the value chain (in addition to Scope 3) this would significantly increase reporting burden. 7) Guidance is needed to ensure consistent measurement, for example, intensity metrics in relation to turnover where acquisitions/disposals are included. Undertakings should also include qualitative disclosures about material IROs, which ought to be known through due diligence process preceding an acquisition, thus not limiting disclosures to significant events.			
Survey	FAR AB	Business association (other than association of financial institution)	Sweden	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	The ambition should be for undertakings to provide complete reporting and use relevant estimations rather than limiting reporting to partial scope when data is lacking. Limited reporting risks providing less useful data for users. If data cannot be collected and relevant estimations cannot be made, clear criteria on what constitutes reasonable effort should be provided (see FAR's answer to question nr 17). At a minimum companies should explain why certain data is missing, as this transparency also benefits users.			
Survey	FAR AB	Business association (other than association of financial institution)	Sweden	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	FAR AB	Business association (other than association of financial institution)	Sweden	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	FAR agrees the proposed amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives. Full interoperability would mean directly referencing to the GHGP, however on the detriment for comparability since the GHGP opens for two alternatives. The financial control boundary is clear and aligned with the reporting boundary in ESRS 1. The financial control boundary strikes the right balance between simplification, comparability and usefulness when taking into consideration the guidance in AR 19.			
Survey	FAR AB	Business association (other than association of financial institution)	Sweden	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FAR AB	Business association (other than association of financial institution)	Sweden	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	FAR supports to adopt a fair presentation in preparing ESRS sustainability statements. To ensure consistency, the EC should clarify the level 1 regulation correspondingly. However, FAR, opposes the notion that adopting fair presentation would support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. FAR believes this objective is achievable by the other amendments presented by EFRAG, such as enforcing the information materiality filter and introducing guidance on the performance of the DMA (top-down approach, level of granularity in the assessment etc.) FAR opposes the narrative during the "administrative burden-debate" suggesting a fair presentation framework would provide more opportunities to remove requirements. However, the fair presentation principle involves a "stand-back approach" to identify both missing information as well as content that may obscure material information, which could potentially result in further disclosures, as indicated in E1 AR 19. Additionally, FAR does not identify immediate changes or reductions in assurance engagements, aside from the opinion presented in the assurance report, due to the proposed amendment. FAR notes that there may be varying perspectives regarding the interpretation of fair presentation. Some have suggested that a compliance framework may equate to a tick-box exercise. Regardless of whether the ESRS is considered a compliance framework or not, the concept of materiality has remained central in ESRS, requiring preparers to make assessments and use professional judgement.			
Survey	FAR AB	Business association (other than association of financial institution)	Sweden	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	Some actors obliged to report under the SFDR may find it burdensome to interpret or calculate, from other datapoints, the removed PAI-indicators. FAR would like to stress the need for SFDR and ESRS to be synchronized. The development of SFDR should follow ESRS. Thus, if certain PAI:s have been removed from ESRS it should be because they are also to be removed from SFDR.			
Survey	FAR AB	Business association (other than association of financial institution)	Sweden	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		In conjunction with the feedback provided in this questionnaire, FAR wishes to refer to the response from Accountancy Europe.			
Survey	SMEunited	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		As the revision of the ESRS can have a trickle-down effect on SMEs, SMEunited would like to share general feedback as part of the ongoing consultation. Please find below some key elements: -On non-employees: This notion does not bring any legal certainty as there is no legal definition across the EU of what 'non-employees' are. Therefore, it introduces challenges in supply chains and will not ensure comparability of information. -On payment practices: SMEunited supports strong provisions requiring large companies to disclose their payment practices. This datapoint should not be watered-down. -On question 15: We support the deletion of 'may' disclosures which contributes to simplification. However, some changes expand the scope and granularity of disclosures in certain areas. Removing references to 'severe' incidents will force companies to report on a wider range instead of focusing on significant cases. -On question 17: We support the better use of estimates instead of direct data regarding the supply chain. -The simplification exercise should not include any additional datapoints.			
Survey	Life Cycle Engineering	Consultant (including software vendor)	Italy	35.ESRS1_7.4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	It is proposed that there should be relief mechanisms for situations where providing certain data would be excessively burdensome (undue effort/cost/evidence), or where there is insufficient evidence. However, it is not clear how to define 'undue burden' and how the verifier can assess it. We suggest that 'undue burden' should be defined more clearly and precisely in concrete terms (thresholds, criteria) and/or with practical examples, especially in relation to metrics.	ESRS1	7.4 Reliefs for metrics	
Survey	Life Cycle Engineering	Consultant (including software vendor)	Italy	35.E2-4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The issue of secondary microplastics is a very specific one and difficult to quantify, due to the poor traceability of downstream processes, the variability of release factors and the lack of standardised measurement methods. Considering the general simplification to which the standards have been subjected, we believe that even the use of estimates, which would be characterised by very high variability in any case, has a limited relevance in this context.	E2	Disclosure Requirement E2-4 - Pollution of air, water and soil	
Survey	Life Cycle Engineering	Consultant (including software vendor)	Italy	35.S3-3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	It is not clear if is it possible to include in ESRS 3 (affected communities) philanthropic activities that are not directly related to the company's core strategy but still generate positive impacts on the communities	S3	Disclosure Requirement S3-3 - Actions and resources related to affected communities	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Unione Energie per la Mobilità Unem	Business association (other than association of financial institution)	Italy	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	DMA should remain a principles-led process, enabling the application of contextual judgment and supporting a meaningful connection between an undertaking's strategy and its sustainability reporting. This is essential to maintaining the integrity, usability and comparability of sustainability disclosures across business models and geographies. The recent simplifications in the ESRS are a positive step forward. However, greater emphasis is needed on the role of auditors, who should focus on assessing the soundness of the DMA methodology, rather than challenging its outcomes—such as the number or type of material topics selected. Companies should not be required to disclose detailed methodological descriptions in their CSRD reports, nor to provide unnecessary scoring details. The process must remain company-specific and principles-based, avoiding excessive documentation and supporting meaningful, decision-useful disclosures. While expanding the DMA into sector- or industry-specific instructions may appear helpful, it risks undermining its core purpose: empowering undertakings to apply professional judgment within their unique context. The ESRS framework rightly positions materiality as the primary filter for disclosures, strategy-driven approach rather than a compliance-oriented checklist. Efforts to pre-empt DMA outcomes—by implying sectoral relevance, suggesting indicative material topics, or embedding assumptions—risk reintroducing the complexity that the framework aims to eliminate. EFRAG should make the disclosure of positive impacts and opportunities voluntary. We recommend moving these disclosures to the NMIG, given the significant complexity involved in projecting future benefits and the inherent legal and reputational risks associated with these uncertain projections. We believe a voluntary approach would strike the correct balance, allowing companies to highlight positive impacts and opportunities where appropriate. EFRAG should clarify that the standards allow for partial materiality declarations within a topic or sub-topic supported by narrative disclosures that explain which elements of the sub-topic are material and why. This ensures transparency and avoids over-reporting or misrepresentation.			
Survey	Unione Energie per la Mobilità Unem	Business association (other than association of financial institution)	Italy	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We support adopting a net approach to assessing potential negative impacts within the DMA. This method evaluates impacts after considering effective prevention and mitigation measures—aligning sustainability reporting with actual business practices and risk management frameworks. Industrial companies invest significantly in regulatory compliance, site-level controls, monitoring systems and global frameworks (e.g.ISO, OGMP2.0). These measures are audited, budgeted, and continuously improved to reduce risk exposure. Requiring a gross assessment - where impacts are evaluated without considering these measures risks inflating disclosures with hypothetical risks that are already effectively managed —would create an administrative and excessive burden and misrepresent exposure to stakeholders and regulators. It would also dilute the clarity and relevance of sustainability statements by obscuring and de-prioritizing truly material issues. A net approach, instead, ensure that disclosures reflect the actual risk landscape and rewards companies for proactive, evidence-based prevention and mitigation efforts. Using company-owned internal HSE risk management processes offers advantages: •It ensures impact assessments are embedded in daily operations, not just for reporting. •Internal methods are better tailored to the company's specific context and risks. •It reduces administrative burden of maintaining different methods purely for disclosure purposes. To prioritize significant matters in own operations and value chain for future reporting years, we propose rewording paragraph 35 of the amended ESRS 1 draft: "Mitigation and prevention measures can be considered in the materiality assessment when there is reasonable and supportable information to demonstrate that they reduce the severity and/or likelihood of a potential impact." In this context: •Measures: Established safeguards (equipment, hardware, procedures, programs). •Actions: New or strengthen safeguards, consistent with definitions in the amended ESRS Annex II. We recommend removing Appendix C from the ESRS 1 draft, as its added detail and examples introduce unnecessary complexity and may obscure, rather than clarify, the DMA approach			
Survey	Unione Energie per la Mobilità Unem	Business association (other than association of financial institution)	Italy	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Unione Energie per la Mobilità Unem	Business association (other than association of financial institution)	Italy	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Unione Energie per la Mobilità Unem	Business association (other than association of financial institution)	Italy	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Unione Energie per la Mobilità Unem	Business association (other than association of financial institution)	Italy	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	Unione Energie per la Mobilità Unem	Business association (other than association of financial institution)	Italy	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We strongly support the provisions outlined in ESRS 1, paragraph 92, which recognize the practical limitations of data availability in joint operations where the undertaking lacks operational control. Allowing the exclusion of such operations from the scope of environmental metric calculations is a pragmatic and necessary relief that enhances the feasibility and integrity of sustainability reporting and avoids duplicative reporting. In addition, we endorse the flexibility provided under ESRS 1, paragraph 91, which permits the use of metrics based on a partial scope of calculation. This approach acknowledges the evolving nature of data systems and reporting capabilities. Crucially, it encourages transparency by requiring undertakings to disclose the limitations of their current data coverage and to outline concrete actions aimed at improving completeness in future reporting periods.			
Survey	Unione Energie per la Mobilità Unem	Business association (other than association of financial institution)	Italy	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	We agree with option 2. We believe qualitative disclosures are more decision-useful for users, for these reasons: - Speculative Nature of Forward-Looking Data: Unlike historical data, projections rely on uncertain assumptions about climate, technology and regulation. Quantitative figures may give a false sense of precision, potentially misleading users. - Lack of Comparability: Without standardized methods, companies use different models and assumptions, making quantitative data inconsistent and potentially biased. Qualitative disclosures better highlight strategies, processes, and resilience. - Operational Burden: Requiring specific metrics imposes a heavy burden, especially on companies with complex operations or limited resources. Additionally, imposing such requirements risks diverting valuable resources away from actively managing sustainability risks and opportunities and slowing implementation and preparation efforts for CSRD reporting. Applying anticipated financial effect disclosures to private subsidiaries, especially those of foreign multinational companies, imposes significant compliance burdens without delivering appropriate benefits to stakeholders or the broader market. Private subsidiaries typically do not raise capital independently in public markets and have no direct engagement with external investors. The typical rationale for sustainability disclosure—addressing information asymmetries between a company and its investors—does not apply in this context. All relevant sustainability risks and opportunities are already captured and reported at the consolidated group level. As such, requiring reporting at the subsidiary level provides no new insight to capital markets and seeks to address a problem that doesn't exist. Private subsidiaries typically roll up into the consolidated sustainability disclosures of their listed parent companies, which may already adhere to equivalent reporting frameworks (ISSB, TCFD, SEC) or can address the information needs of direct investors by other means than a public statutory financial disclosure. We recommend to exempt private subsidiaries from standalone financial effect disclosures.			
Survey	Unione Energie per la Mobilità Unem	Business association (other than association of financial institution)	Italy	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	We acknowledge EFRAG has reduced disclosure requirements for anticipated financial effects. However, the remaining requirements in Amended ESRS E1 (Paragraphs 40 and 41) still present challenges. Allowing preparers to meet these requirements through qualitative disclosures (i.e., Option 2) would reduce costs and alleviate concerns around the disclosure of more granular data that currently goes beyond what is required in the financial statements (e.g., percentage of assets at material physical risk).			
Survey	Unione Energie per la Mobilità Unem	Business association (other than association of financial institution)	Italy	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Unione Energie per la Mobilità Unem	Business association (other than association of financial institution)	Italy	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Unione Energie per la Mobilità Unem	Business association (other than association of financial institution)	Italy	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Unione Energie per la Mobilità Unem	Business association (other than association of financial institution)	Italy	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	EFRAG positions this new datapoint on secondary microplastics connected to the downstream value chain as a clarification of existing ESRS E2 Set 1 requirements. However, this interpretation is legally flawed and conflicts with the EC's simplification mandate: - Does not provide clarity and proportionality for undertakings subject to reporting: The existing requirement pertains to emissions, generation, and use within the undertaking's own operations (facilities under financial or operational control). The new datapoint, however, extends the scope to the downstream value chain rather than just being a clarification. - Disclosures would not be scientifically and technically supportable: EFRAG acknowledges the absence of a robust calculation methodology for secondary microplastics (i.e., those generated unintentionally through degradation or wear under highly context-dependent circumstances). Hence, the proposed disclosure is qualitative and narrative-based, adding complexity without offering actionable insights. - Risks duplication or fragmentation across EU sustainability rules: The amended draft adopts language from REACH Annex XVII (Entry 78) but diverges in scope and interpretation, creating confusion and potential misalignment in regulatory compliance. Of note, the amended definition for microplastics is significantly broader than microplastics (i.e. synthetic polymer microparticles) rendering it an inappropriate definition. - Does not enhance the reliability and auditability of sustainability reporting: Materiality assessments require traceability, measurability, and risk characterization. No existing risk-based framework allows undertakings to evaluate how their activities, or actors in a company's value chain, may contribute to downstream potential harms from secondary microplastics. We recommend that the proposed disclosure requirement on secondary microplastics in paragraph 16(d) of the amended ESRS E2 be removed from the final technical advice to the Commission, alongside removal of definitions related to synthetic polymer microparticles and secondary microplastics in Annex II. They are inconsistent with both the legal limits of Set 1 and the EC's mandate to streamline and clarify ESRS reporting obligations			
Survey	Unione Energie per la Mobilità Unem	Business association (other than association of financial institution)	Italy	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	We do not agree. The transposition of the concept of fair presentation into ESRS raises significant concerns. ESRS introduces impact materiality, encompassing environmental and social dimensions beyond financial relevance. Applying a fair presentation standard in this context risks disproportionate legal, assurance, and reputational exposure for preparers. Sustainability data is often forward-looking, qualitative, and judgement-based, lacking the evidentiary rigor of financial data. The absence of established practices and experience for impact materiality makes it difficult to define what constitutes a "complete and faithful" representation, increasing uncertainty and inconsistency. Embedding fair presentation as a legal requirement may inadvertently trigger regulatory enforcement and audit complexity—without demonstrable improvements in reporting quality. Assurance can already be effectively conducted using existing standards. Enforcement should focus on the qualitative characteristics already embedded in ESRS—relevance, comparability, verifiability, and understandability.			
Survey	Unione Energie per la Mobilità Unem	Business association (other than association of financial institution)	Italy	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	Unione Energie per la Mobilità Unem	Business association (other than association of financial institution)	Italy	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Unione Energie per la Mobilità Unem	Business association (other than association of financial institution)	Italy	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Unione Energie per la Mobilità Unem	Business association (other than association of financial institution)	Italy	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Unione Energie per la Mobilità Unem	Business association (other than association of financial institution)	Italy	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Unione Energie per la Mobilità Unem	Business association (other than association of financial institution)	Italy	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	While gender pay gap reporting has played a role in highlighting workplace disparities, its current mandatory structure often leads to oversimplified narratives, misinterpretation of data, and administrative strain. A more constructive approach would be to transition toward voluntary, context-sensitive reporting, allowing organizations to share gender-related insights in ways that reflect their unique workforce composition, industry characteristics, strategic priorities and materiality assessment. Flexibility would empower companies to focus on meaningful internal equity initiatives without being constrained by rigid, one-size-fits-all metrics; or even hold off on reporting when this is not an issue in their industry or company. Voluntary reporting also fosters transparency through choice, encouraging organizations to disclose progress when it aligns with their values and stakeholder expectations.			
Survey	Unione Energie per la Mobilità Unem	Business association (other than association of financial institution)	Italy	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Zentralverband des Deutschen Handwerks - German Confederation of Skilled Crafts and Small Businesses	Business association (other than association of financial institution)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	The streamlining of information to evaluate materiality is a first step. But for a really impactful simplification of the DMA and the ESRS it is essential to focus solely on the ESG factors explicitly mentioned in the CSRD. E.g., social reporting standards should be based exclusively on the 24 social and human rights factors specified in Art. 29b para 2 lit. b) of CSRD. The social sub-topics listed in the ESRS ED, such as privacy, adequate housing, water, and sanitation, have no explicit basis in the CSRD. Thus, them being part of the ESRS and DMA is at least questionable and contradicting simplification efforts.			
Survey	Zentralverband des Deutschen Handwerks - German Confederation of Skilled Crafts and Small Businesses	Business association (other than association of financial institution)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Partially: The deletion of "may" disclosures contributes to the simplification efforts and further harmonization of the reports. But by introducing new obligations and definitions that complicate reporting like for example, the requirement of the "top 10 countries" breakdown in social disclosures additional, often unclear concepts across the standards are introduced. The changes expand the scope and granularity of disclosures in certain areas. This is evident in removal of the term "severe" for human rights incidents in social standards. This change could force companies to report on a wide range of incidents, rather than focusing on the most critical cases, which contradicts the simplification goal.			
Survey	Zentralverband des Deutschen Handwerks - German Confederation of Skilled Crafts and Small Businesses	Business association (other than association of financial institution)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	While guidance can be useful for the reporting enterprises. Solely moving data from the Delegated Act to the Non-Mandatory Illustrative Guidance does not result in real simplification. The goal should be to have standards that require as little external guidance as possible by being simple enough themselves.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Zentralverband des Deutschen Handwerks - German Confederation of Skilled Crafts and Small Businesses	Business association (other than association of financial institution)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Partially: Strengthening the use of estimates instead of direct data regarding the supply chain is to be welcomed. Giving them the same priority is a first step. Especially, for micro and small enterprises the overall cost-benefit-relation of direct data compared to estimates remains questionable. Thus, estimates should be prioritized. Also scope 3 GHG emissions should rely more on estimates or similar data instead of approaching every enterprise in the value chain individually.			
Survey	Zentralverband des Deutschen Handwerks - German Confederation of Skilled Crafts and Small Businesses	Business association (other than association of financial institution)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	It is not justifiable to add datapoints when the task is simplification. There will not be another large scale review of the ESRS, so EFRAG has to deliver a standards that delivers its promises now.			
Survey	Zentralverband des Deutschen Handwerks - German Confederation of Skilled Crafts and Small Businesses	Business association (other than association of financial institution)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	Same as 23			
Survey	Zentralverband des Deutschen Handwerks - German Confederation of Skilled Crafts and Small Businesses	Business association (other than association of financial institution)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	S1-7 It should be noted that there are sectors in which collective agreements do not exist because there is no representation for social dialogue on the employee side. In such cases, companies should not be disadvantaged if they are unable to offer a collective agreement through no fault of their own. We therefore propose that a corresponding response option will be included in the standard. S1-9 Some EU Member States, such as Germany, have a statutory minimum wage. Companies subject to such national regulations should be able to indicate this in their reporting in order to demonstrate that they pay adequate wages. The current draft does not yet provide for a corresponding response option and should be amended accordingly. S1-15 The formula proposed in the draft for calculating the gender pay gap only covers the unadjusted gender pay gap. However, this does not take into account significant factors such as the extent of employment (full-time/part-time), level of education, position or professional experience and is therefore of very limited value. In addition, collecting this indicator would involve considerable bureaucratic effort for companies. We therefore propose that this data point be deleted without replacement.			
Survey	Zentralverband des Deutschen Handwerks - German Confederation of Skilled Crafts and Small Businesses	Business association (other than association of financial institution)	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	16/29b If companies were required to disclose specific payment amounts to individual associations, there would be a risk that conclusions relevant to competition could be drawn from this. There are very different models for calculating membership fees in the association landscape, for example based on total payroll or company turnover. Disclosing specific contribution amounts to individual organisations could enable competitors who are members of the same association to derive sensitive information about other companies. We therefore propose that only the type of recipient should be disclosed, but not specific organisations or contribution amounts.			
Survey	Global Child Forum	NGO	Sweden	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Global Child Forum welcomes the retention of the double materiality approach in the amended ESRS. We appreciate that the definition of affected stakeholders includes "persons in vulnerable situations," which encompass children (AR10). However, children's rights are not explicitly referenced in the materiality framework or stakeholder definitions. Our benchmark data shows that most companies fail to consider children as stakeholders, do not consult with them or their representatives, and omit children from their materiality assessments. This invisibility risks underreporting of severe impacts on children, which are often lifelong. Recommendation: 1) Explicitly include children (under 18) as stakeholder groups in ESRS 1. This recommendation is linked to paragraph 3.31 – Impact Materiality Assessment: which states that impacts are to take precedence if severity is high even though likelihood is low. This rule of prioritization is important when it comes to children's rights, as impacts on children tend to be severe in the sense that that they are more vulnerable and thus more likely to come to harm from practices that might not harm adults in the same way. The consequences of any negative impact will also most likely stay with children for the rest of their lives, indicating a severe harm across their lifetime. If reporting companies don't include children as stakeholders in their information gathering for the materiality assessment, these severe impacts may be overlooked. This would also be in line with the UN Guiding Principles on Business & Human Rights - Principle 3, which explicitly mentions children. 2) Provide illustrative examples of impacts on children (e.g., child labour, education, health, safety) to guide preparers in identifying material issues. 3) Not to allow any further simplification, which would misalign the ESRS with international standards and companies' practice, thus creating different approaches to DMA that would make comparability among sustainability reports challenging.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Global Child Forum	NGO	Sweden	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Global Child Forum	NGO	Sweden	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	Global Child Forum supports giving companies greater flexibility to present a clear and cohesive account of their most significant sustainability topics. We believe this approach is preferable to a more rigid framework, which could hinder companies from accurately reflecting their operational context, make reports harder to understand, and lead auditors to maintain overly strict assurance practices.			
Survey	Global Child Forum	NGO	Sweden	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Structure and Stakeholder-Specific Disclosures in Social Standards: We support the retention of the four-part structure of the social standards, which helps distinguish impacts across stakeholder groups. However, we strongly oppose the deletion of requirements to disclose whether stakeholders are in vulnerable situations, such as children and young workers. (ESRS S1 DR related to ESRS 2 SBM-3, AR 8; ESRS S2 DR related to ESRS 2 SBM-3, AR 8; ESRS S3 DR related to ESRS 2 SBM-3, 9(a); ESRS S4, DR related to ESRS 2 SBM-3, 10(a)). This change undermines the ability to assess differentiated impacts and risks obscuring material issues. For example, in the digital environment, children face unique risks from data-driven business models, including exposure to harmful content and misuse of personal data. Absence of this information from sustainability reports would impact investors' ability to assess the undertaking's sustainability performance. Recommendation: Reinstate the deleted Disclosure Requirements (DRs) and Application Requirements (ARs) that reference vulnerable stakeholder characteristics across ESRS S1–S4.			
Survey	Global Child Forum	NGO	Sweden	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Global Child Forum	NGO	Sweden	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Global Child Forum	NGO	Sweden	22.S1	Comments on deleted datapoints in ESRS S1	I partially agree and partially disagree	ESRS S1 new para 2: the UN Convention on the Rights of the Child should be added to align with the text of the CSRD (Recital 49). ESRS S1 14(b): information on whether child labour is widespread or systematic in the context where companies operates and the operations that are at significant risk of incidents of child labour is important information to help companies identify and manage their material impacts. Such information is necessary already at the DMA stage. This information is also relevant for investors and users to assess the performance of the undertaking. ESRS S1 new para 34(d): parental leave is an equally important datapoint to achieve both gender equality and children's rights. Evidence shows that longer periods of paid parental leave (for both mothers and fathers) improve child health and lower poverty. ESRS S1 old para. 93(b): the datapoint on the percentage of entitled employees that took family related leave with a gender breakdown is essential to understand the real effectiveness of companies' policies as it can indicate whether there are barriers to employees in taking advantage of existing work-life balance policies. ESRS S1-1 old AR13: the description of existing policies on child labour is essential information for both investors and other users. In addition, when it comes to children's rights this is something that most companies already disclose. These datapoints are essential for identifying material impacts and enabling investors and other users to assess corporate performance on children's rights.			
Survey	Global Child Forum	NGO	Sweden	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The proposed methodology for reporting on adequate wages is flawed because it undermines the objective, introduces discriminatory and inconsistent standards, places an unrealistic burden on companies, and compromises the comparability and usefulness of disclosures. The methodology for reporting on 'adequate wages' should measure actual wages against an adequate/living wage for all employees, not only those within the EU. In particular, for employees outside the EU, the methodology should allow employees' actual wages to be measured: a. against the local legal minimum wage only when this is set in line with the ILO principles on estimating living wages; or b. against living wage estimates that are set in line with ILO principles on estimating living wages. Companies should be able to rely on local legal minimum wages or living wage estimates when the authorities or organisations that set them provide public evidence of their alignment with the ILO principles for estimating living wages. This will avoid companies' having to make this assessment themselves.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Global Child Forum	NGO	Sweden	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We welcome that the definition of child labour in the ESRS Glossary remains unchanged. It is consistent with the international child rights legal framework, including the UN Convention on the Rights of the Child and ILO Conventions.			
Survey	Fair Trade Advocacy Office	NGO	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	Chapter 3 is a clear step forward. Section 3.1 is notably improved: swapping the "significance" criterion for the "understandability" of impacts better reflects the CSRD and international due diligence standards. It also spells out how materiality of information interacts with the qualitative characteristics in Chapter 2 and with aggregation/disaggregation rules (e.g., para 52 on "not obscuring"). That said, the chapter often blurs 'topics' with 'impacts, risks and opportunities' (IROs). Para 22 suggests presenting information "either at the topical level or at [IRO] level," which creates a false choice. Topics are broad themes; IROs are entity-specific. The CSRD—and frameworks such as IFRS, TCFD, and TNFD—centre on IROs. Overweighting topics invites generic disclosure. Please keep the analytical focus on IROs, while explaining that, depending on context, IROs can be articulated at a general level (often mapping to topics) and that management information may be aggregated accordingly. The same clarification should be made for entity-specific disclosures in para 23 (and para 10 in Chapter 1).			
Survey	Fair Trade Advocacy Office	NGO	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Chapter 3 rightly tackles how prevention, mitigation and remedy factor into materiality, but the guidance could be written more simply. For example, Para 34 uses heavy wording to convey a straightforward point: assess actual impacts as they occurred in the reporting period; any remediation done afterwards does not change their materiality. This can be plainly stated. We also welcome—and emphasise—the clarification that potential impacts requiring significant, ongoing prevention or mitigation should be assessed on a gross basis (i.e., before management effects). Without this, companies would struggle to explain how they manage such issues. To make this workable in practice, please link this section to the "materiality of information" filters. That cross-reference can help companies distinguish what counts as significant prevention or mitigation from routine compliance or common practice. Offering criteria or examples (e.g., scale, cost, duration, deviation from baseline practice) would improve consistency.			
Survey	Fair Trade Advocacy Office	NGO	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Fair Trade Advocacy Office	NGO	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We welcome the removal of overlaps between cross-cutting and topical standards and the stronger emphasis on general disclosure requirements. Many PAT provisions in topical standards functioned more as guidance or examples than as true datapoints, so streamlining is helpful. We also value the retention of the five-part environmental and four-part social architectures; we have in our previous feedback emphasised the importance of retaining all E and S metrics. One gap remains as there is no requirement in the S standards to disclose relevant, entity-specific metrics. With S2, S3 and S4 containing no metrics—and sectoral standards with such metrics not moving forward—the burden necessarily shifts to entity-specific disclosure. Making that shift explicit will set clear expectations for preparers and users. In line with the Danish Institute for Human Rights' advice, we suggest amending SX-4 (targets) to reference metrics directly. This would align topical standards with the cross-cutting framework, recognise that companies already track and publish social metrics tied to impact management and progress and improve comparability and accountability by linking targets to measurable indicators.			
Survey	Fair Trade Advocacy Office	NGO	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	As also specified further below in response to question 28 on adequate wages, there is a lack of conceptual clarity. EFRAG should specify that an "adequate wage" within the EU should be construed as a "living wage". This would create policy coherence between the CSDDD and CSRD, as the CSDDD includes living wages in its annex as a protected right.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fair Trade Advocacy Office	NGO	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	We're concerned the new reliefs could dilute core disclosures without a path to full compliance. "Undue cost or effort" is too broad. It has no requirement for progressive improvement or a deadline, and it can be applied not only to entity-specific metrics but also to ESRS-mandated own-operations data (e.g., workforce KPIs, pollution, water consumption, impacts in biodiversity-sensitive areas). That risks hollowing out decision-useful metrics. Recommendations: 1) Limit the relief to genuinely entity-specific metrics. 2) Require a dated plan to build data systems, plus annual progress reporting and 3) For own-operations metrics, allow only exceptional, short, time-bound relief with clear justification. Joint operations without operational control – includes an indefinite, unconditional exemption which is not warranted. In many cases, companies can secure data over time via financial control, contractual rights, governance leverage, or supply-chain clauses. Recommendations: 1) Replace the blanket exemption with a "best efforts + timeline" obligation. 2) Require proportionate estimates and a clear deadline for collecting primary data.			
Survey	Fair Trade Advocacy Office	NGO	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	These combined reliefs should clearly require the undertaking to improve the coverage and quality of the data needed to meet ESRS requirements. For the metrics concerning own operations and/or metrics standardised directly in the ESRS, this should be subject to clear time limitation. For other metrics, improvements over the years should be also explicitly required, subject to undue cost and effort relief.			
Survey	Fair Trade Advocacy Office	NGO	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Fair Trade Advocacy Office	NGO	Belgium	22.S2	Comments on deleted datapoints in ESRS S2	I agree	In previous S2-4, the previous AR 32 covered the important point of the negative impacts of decisions to terminate business relationships. The CSDDD in Articles 10 and 11, including the Omnibus proposal, already requires companies to assess whether the impact of disengaging from business partners will be more serious than if they decide not to disengage. Therefore, companies already conduct this assessment and gather such data. Requiring disclose would therefore not be added burden. SOMO (2024) documented that in the apparel sector in China, almost 80% of brands disclose responsible exit policies, which means that disclosing along these lines is already standard practice in some sectors.			
Survey	Fair Trade Advocacy Office	NGO	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree with these changes, noting that the suggested changes do not add a new burden. We particularly agree with the ESRS G1 on business conduct on training of procurement teams and confirmed incidents being included as "shall" points. Whether or not these individual datapoints are to be disclosed is correctly subject to materiality of the information filter applied by the undertaking.			
Survey	Fair Trade Advocacy Office	NGO	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree with these changes, noting that the suggested changes do not add a new burden.			
Survey	Fair Trade Advocacy Office	NGO	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	Yes—ESRS already rest on materiality and, as such, are subject to a fair-presentation regime. Making that principle explicit is useful: it clarifies that preparers must exercise informed judgment and discretion, while applying appropriate safeguards against bias, omission, or cherry-picking. Clear articulation of fair presentation sets expectations for how companies balance relevance and reliability, how they justify boundary and scoping choices, and how they document the reasoning behind them. In short, the explicit statement improves clarity and supports consistent, decision-useful reporting.			
Survey	Fair Trade Advocacy Office	NGO	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fair Trade Advocacy Office	NGO	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	While we welcome the explicit reference to living wages in S1-9 and its alignment with the ILO's 2024 position and the CSDDD, three issues require correction: 1. Hierarchy outside the EU. The draft directs companies to use local legal minimum wages as the baseline for "adequate" wages, turning to living-wage estimates only if no minimum exists. Minimums are typically far below living wages. This approach is discriminatory and risks violating fundamental rights. Recommendation: allow (and preferably require) measurement against living-wage estimates aligned with ILO principles for all non-EU employees. 2. Wrong reference point. The draft cites ILO wage-setting principles. The ILOin 2024 clarified that living wages are calculated in accordance with its principles of estimating the living wage, while achievement occurs through wage-setting processes. S1-9 is about estimation and disclosure, not wage-setting. Recommendation: in (b)(i) replace "takes into account the ILO wage-setting principles" with "takes into account the ILO's principles of estimating the living wage." 3. Feasibility. Asking companies to judge whether legal minima or benchmarks accord with ILO principles is impractical. Recommendation: require use of recognized living-wage benchmarks from the outset to reduce burden and increase comparability. Progress disclosure. Reaching living wages takes time. A binary "paid/not paid" count does not incentivise action. Require disclosure of the living-wage gap (entity- and key-geography level), methodology, and time-bound plans. This yields comparable, decision-useful data that companies already assess. For context, Fashion Revolution's 2023 Index finds ~1% of brands pay a living wage, while Clean Clothes Campaign reports ~85% have living-wage commitments. Focusing on the gap disclosure is more meaningful and more realistic. These changes would align S1-9 with ILO 2024 and the CSDDD, avoid discrimination, and deliver reliable, comparable disclosures that accelerate convergence to living wages.			
Survey	Fair Trade Advocacy Office	NGO	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	We support the Disclosure Requirement's objective of illuminating contractual payment terms and performance, particularly late payments to SMEs. However, the current metric set is insufficient to achieve this aim. The datapoint on average days to pay (formerly §33(a)) should be reinstated. Its removal does not materially reduce reporting burden: undertakings must already capture invoice and payment dates to calculate the percentage of payments aligned with standard terms (§20(a)). In addition, many companies already track payment cycles, for example through participation in Multi-Stakeholder Initiatives such as the Common Framework of Responsible Purchasing Practices, which does not support terms exceeding 60 days. Average payment delay provides decision-useful insight for capital markets. Persistent late payment propagates through supply chains and is associated with labour-rights risks (e.g., wage arrears, forced overtime, and precarious subcontracting). Investors require a reliable indicator to assess whether capital allocation supports improvements in purchasing practices. By contrast, the metric number of legal proceedings for late payments has limited relevance. Litigation is uncommon, particularly among vulnerable suppliers who may fear commercial reprisals. Evaluations of the Late Payments Directive indicate that buyers frequently circumvent enforcement, and approximately 81% of SMEs report that interest and compensation are never paid; counting proceedings therefore understates the issue. The DR should require average days to pay invoices, which would align the metrics with the stated objective, maintain proportionality of effort, and deliver comparable, decision-useful information for preparers, investors, and SMEs.			
Survey	Fair Trade Advocacy Office	NGO	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Fair Trade Advocacy Office	NGO	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fair Trade Advocacy Office	NGO	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fair Trade Advocacy Office	NGO	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fair Trade Advocacy Office	NGO	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fair Trade Advocacy Office	NGO	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fair Trade Advocacy Office	NGO	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fair Trade Advocacy Office	NGO	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Fair Trade Advocacy Office	NGO	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Fair Trade Advocacy Office	NGO	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fair Trade Advocacy Office	NGO	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fair Trade Advocacy Office	NGO	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fair Trade Advocacy Office	NGO	Belgium	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Fair Trade Advocacy Office	NGO	Belgium	35.S2-3.	Do you agree with the amendments of this chapter?	I disagree	The previous AR 32 covered the important point of the negative impacts of decisions to terminate business relationships. The CSDDD in Articles 10 and 11, including the Omnibus proposal, already requires companies to assess whether the impact of disengaging from business partners will be more serious than if they decide not to disengage. Therefore, companies already conduct this assessment and gather such data. Requiring disclose would therefore not be added burden. SOMO (2024) documented that in the apparel sector in China, almost 80% of brands disclose responsible exit policies, which means that disclosing along these lines is already standard practice in some sectors. We understand the goal to enhance clarity and remove voluntary datapoints into the NMIG. Therefore, we recommend keeping an Application Requirement for paragraph 18 that specifies how to do so for situations related to business termination. Alternatively, paragraph 18 itself can specify: "a) key actions taken, planned or underway, to prevent, mitigate and remediate material negative impacts on value chain workers, including its approach in decisions to terminate business relationships and in situations [...]".	S2	Disclosure Requirement S2-3 - Actions and resources related to value chain workers	
Survey	UIL	Trade union	Italy	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Double materiality is essential and must remain at the heart of the ESRS framework and European Union sustainability regime for corporate reporting to be credible and useful. The principle of "materiality of information" is concerning since it introduces a further filter for companies to not report information. For example, it represents a step backwards from ID-177, which says that most S1 metrics must be reported if S1 Own Workforce is material. It is essential to maintain the principle of fair presentation in the reporting standards. It is positive that the revision of the AR 16 list of topics has maintained all of the sub-subtopics for S1 + S2. These are based on the list of social topics in the CSRD and should all be maintained. The emphasis on aggregation (as opposed to disaggregation) is concerning, as disaggregated information (both site-specific and country-specific) is key to understanding the distribution of IROs.			
Survey	UIL	Trade union	Italy	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	It is important that companies report not just their net impact – the gross impact should be reported, and the recommended text preserves this principle.			
Survey	UIL	Trade union	Italy	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The proposed changes are helpful. However, para 113 is difficult to understand: "113. If the description of the material impacts, risks and opportunities prepared in accordance with [Draft] Amended ESRS 2 IRO-2 is not presented alongside the respective policies, actions and targets, the undertaking shall make explicit which policies, actions and targets relate to which material impacts, risks, or opportunities, in accordance with paragraph 22." Para 22 addresses the issue of appropriate aggregation or disaggregation of information on material impacts, risks and opportunities and their management, without setting any rules regarding the location of such disclosures depending (or not) on the level of aggregation.			
Survey	UIL	Trade union	Italy	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The Exposure Draft removes duplications between the cross-cutting and topical standards. The preservation of the 4-part architecture in the social standards is important to respect the distinctiveness of different affected stakeholder groups. However, we have two critical concerns. First, the original DR in environmental standards concerning screening of sites in materiality assessment were replaced by an application requirement to ESRS 2 IRO-1. This in effect makes transparency on this aspect optional. Consideration of local context is a key element of an appropriate materiality assessment. This should be both recognised in Chapter 3 of ESRS 1, and in ESRS 2 IRO-1, which should include an explicit datapoint on how the undertaking screened its locations and value chains. We welcome that E standards provide a clearer reference on the importance of disaggregation of disclosures, but this can only be done well if locations are properly screened. Second, we strongly recommend adding an explicit reference to the disclosure of relevant, entity-specific metrics directly in S standards. The fact that S2, S3 and S4 do not include any metrics should not imply that entity-specific metrics for S topics should not be disclosed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UIL	Trade union	Italy	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The "may" (voluntary) data points should not be eliminated. In many cases they are "shall" in GRI standards, so it is important to keep them to align with GRI standards. Also, many of them were originally proposed as mandatory by EFRAG to the EC. The first wave of reports show that many companies have reported some "may" data points. Retaining them would help ensure standardization/comparability between company reports. Almost all of the datapoints for non-employee workers are voluntary, thus most datapoints for this vulnerable group of workers has been lost. Also, important datapoints on full time versus part time workers has been eliminated.			
Survey	UIL	Trade union	Italy	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	It is concerning that mandatory guidance in the Set 1 ESRS has been downgraded to "non-mandatory". Mandatory guidance is key to ensuring comparability and completeness of sustainability reporting. At a minimum, Non-mandatory Implementation Guidance (NMIG) should be included in the Delegated Act, and ideally called Mandatory Implementation Guidance. A major point of concern is that ID-177, which provided guidance that most S1 metrics should be reported if S1 Own Workforce is material, has now been downgraded into NMIG. Instead, EFRAG should preserve and promote the guidance that most S1 metrics shall be reported.			
Survey	UIL	Trade union	Italy	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	As a whole the reliefs go too far, overshooting the balance between cost/effort and transparency. There is a danger of enabling green/social washing. The relief for "undue cost or effort" is too vague thus leaving too much room for interpretation. The relief for direct data for value chain reporting is too extensive, as direct data is key for transparency. The relief for reporting on operations which are not "significant drivers of IROs" also opens up too much leeway for interpretation.			
Survey	UIL	Trade union	Italy	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	These combined reliefs overshoot the balance between transparency and cost/effort and risk enabling green/social washing. At a minimum, there should be a time limit introduced for these reliefs on value chain metrics.			
Survey	UIL	Trade union	Italy	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ability to estimate financial effects is critical for the undertaking's ability to integrate sustainability into its business strategy considerations, planning and risk management. It is also key for the determination of financial materiality, including in terms of overreporting topics as financially material. Reporting on financial effects is crucial to achieving the objective of putting sustainability reporting on the same level as financial reporting and integrating both. The European Union has recognised the value of a double materiality approach to corporate reporting which requires disclosure of both material environmental and social impacts, risks and opportunities as well financially material data, It is important to keep the requirement on businesses to analyse and understand the financial effects of their business model. This will ensure investors have access to credible data as well as providing the underpinning for future business planning.			
Survey	UIL	Trade union	Italy	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	ESRS reliefs should not go beyond those set in IFRS. The principle of fair presentation needs to be protected to provide transparency on all material IROs. As noted in the response to question 15, it is also important to consider interoperability with GRI when considering changes to the ESRS, rather than only considering ISSB's standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UIL	Trade union	Italy	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	UIL	Trade union	Italy	22.S1	Comments on deleted datapoints in ESRS S1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The reduction in the number of mandatory and voluntary datapoints goes far beyond striking an acceptable balance. As mentioned above, the voluntary datapoints should be maintained to provide alignment with GRI, which is currently in the process of strengthening its labor standards, as well as guidance and standardization for companies reporting more than just the mandatory datapoints. An explicit quantitative goal of 50%+ reductions was never set by the European Commission for EFRAG. A number of S1 datapoint metrics have been eliminated which should be reinstated: •S1-5 Employees: gender breakdown for zero-hour employees •S1-8 Diversity: age distribution; •S1-10 Social protection: reinstatement of retirement •S1-12: Training and development: gender breakdowns, •S1-13 Health and safety: fatalities from ill-health for non-employees and other workers on site; •S1-14 Work-life balance: employees that took family related leave;			
Survey	UIL	Trade union	Italy	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Adding a datapoint on training of the procurement team is needed to support the implementation of human rights in the supply chain. The addition of a datapoint on confirmed incidents of bribery is needed to improve transparency on the effectiveness of bribery/corruption policies and measures.			
Survey	UIL	Trade union	Italy	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Agree that the following mandatory datapoint should be added: ESRS 2 General disclosures – BP 1 the undertaking shall state that the general requirements of ESRS 1 have been applied for the preparation of its sustainability statement			
Survey	UIL	Trade union	Italy	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	The "fair presentation" principle is essential to reduce the risk of green/social washing, as it emphasizes the full disclosure of all material impacts, risks and opportunities and their management. It is not understandable why this principle is under attack, as it is included as one of the general principles of the Accounting Directive.			
Survey	UIL	Trade union	Italy	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	It is essential that financial institutions disclose absolute targets to assess how their strategies align with the economy-wide transition to net zero. Absolute targets are relevant for users of sustainability statements and for understanding the real-world climate impact of financed activities. While intensity measures provide insights into efficiency, they can mask rising absolute emissions in growing portfolios or sectors. Granting an exemption would also undermine fairness in a sector-agnostic standard. Other industries could equally argue for exceptions based on their own difficulties, reducing comparability across sectors. Moreover, absolute financed emissions are already recognised in existing standards and regulations: the SBTi financial sector net-zero standard, the UNEP FI/NZBA recommendations, and EU SFDR all require or encourage absolute emissions disclosure. Exempting banks would risk misalignment and reduce the usefulness of reported data for stakeholders, including asset owners who depend on it for their own disclosures.			
Survey	UIL	Trade union	Italy	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The "top 10" threshold for reporting country-level data on employment, collective bargaining and social dialogue is a major improvement over the current 10% employment threshold. An analysis of the first sustainability statements from Wave 1 companies shows that the current 10% threshold results in country-level disclosures on as little as 21% of total employees. More country-level information is needed to understand the distribution of impacts across countries, as well as whether employment thresholds for specific labour rights have been exceeded. The new threshold does not require additional effort/cost by companies, since they must gather country-level data anyways to calculate the global figures. Furthermore, it does not result in extra datapoints, since the information currently is (and can be under the revised ESRS) reported as one table.			
Survey	UIL	Trade union	Italy	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	An analysis of the first year ESRS reports shows that most companies are simply reporting that they pay minimum wages, whereas the intention (as outlined in the ESRS Basis for Conclusions) is that companies should be enabled to disclose commitments to paying a wage "sufficient to support themselves and their families in dignity" as well as the extent to which they do this. This shows that the methodology for non-EU countries needs to be changed. Furthermore, the new ILO agreement on a methodology for living wages needs to be taken into account. While the proposed new methodology takes a step forward in both regards, two key changes are needed: •The methodology for reporting on 'adequate wages' should measure actual wages against an adequate/living wage for all employees, not only those within the EU. In particular, for employees outside the EU, the methodology should allow employees' actual wages to be measured: oA) against the local legal minimum wage only when this is set in line with the ILO principles on estimating living wages; or oB) against living wage estimates that are set in line with ILO principles on estimating living wages. •Companies should be able to rely on local legal minimum wages or living wage estimates when the authorities or organisations that set them provide public evidence of their alignment with the ILO principles for estimating living wages. Furthermore, the transitional provision for the EU needs to be reinstated, as not all Member States have transposed the Adequate Minimum Wage Directive.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UIL	Trade union	Italy	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	The new, simplified framework makes it easier for companies to report on these SFDR-related matters in a way that corresponds to how their policies are set. For users, this consolidation makes it easier to locate the relevant information. However, the SFDR datapoints are very helpful and should only selectively be amended.			
Survey	UIL	Trade union	Italy	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	The unadjusted gender pay gap should be kept as mandatory, since the methodology for calculating it is clear. The adjusted pay gap figure as voluntary. In practice many companies are reporting both figures, which is useful for improved transparency. However, since the methodology for calculating the adjusted figure is not standardized, the unadjusted should be kept mandatory.			
Survey	UIL	Trade union	Italy	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	As detailed above, cumulative impact of the various reliefs is concerning.			
Survey	UIL	Trade union	Italy	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The improved language on DMA is welcomed, including on the engagement with workers' representatives.			
Survey	UIL	Trade union	Italy	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The proposed "top 10" threshold for the reporting of country-level information for employee headcount, collective bargaining and social dialogue is a significant improvement over the current 10% employment threshold. Country-level information needs to be reported in more detail, and on other metrics as well, in order to have more transparency on the distribution of impacts across countries. In the metrics, voluntary datapoints need to be reinstated as well as the datapoints on gender breakdowns, workforce age distribution, etc. detailed above need to be reinstated. The proposed new methodology for adequate wages outside of the EU also needs attention, and the transition language for EU member states needs to be reinstated, since the Adequate Minimum Wage Directive has not been implemented in some Member States. We would also like to reiterate our longstanding demand for including franchise workers in the S1 definition of own workers, as well as the need for sector-specific standards to supplement the Set 1 sector-agnostic standards. An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	UIL	Trade union	Italy	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We are concerned that the loss of many specific datapoints related to workers in the value chain will mean that disclosures about material impacts, risks and opportunities become more generic and have less information about the specific stakeholder groups because specifications about the level of granularity have been deleted. Many of the points that are being deleted from ESRS S2 had originally been included because they reflected effective practice in relation to improving supply chain labour rights, for example, AR 6 awareness of the impacts on value chain workers from an undertaking's strategy or business model, AR 20 illustrating how the perspectives of value chain workers have informed specific decisions or activities of the undertaking and AR 25 which looks at retaliation and whether workers can use grievance mechanisms confidentially. An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	UIL	Trade union	Italy	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UIL	Trade union	Italy	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	UIL	Trade union	Italy	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The definition of own workforce should be expanded to include franchise workers. The term "non-employees" should be supplemented with the phrase "non-employee workers" or "non-employee workers in own workforce".			
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The amendments offer a more flexible framework that supports concise and relevant reporting. We particularly welcome the shortening of the MDRs/GDRs and the simplification of SBM disclosures. The new structure and streamlined content provide better readability. Thus, we assume that reporting will improve, too. Regarding ESRS G1, the revised layout improves the structure and hence, the readability of the ESRS.			
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Overall, the removal of redundancies with topical disclosures has made the requirements clearer and more manageable, while still ensuring the relevance and comparability of the information disclosed. We appreciate the move of general disclosures in topic-specific standards to ESRS 2.; and the streamlining of ARs and location under DRs. However, regarding GOV-4, para. 15, we find that information on the significant risks and corresponding measures is lacking. This is particularly noteworthy because AR 6 also refers to individual risk factors. In SBM-1 para. 18, we can imagine that the currently missing information (as examples) on what is to be described/reported will lead to very different results and thus poorer comparability.			
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Generally, the amendments have improved the clarity and accessibility of the mandatory content, making the standards easier to apply in practice. We appreciate the effort to remove data points phrased as "may disclose," as this change should sharpen the standards and minimize confusion. However, we note that the ARs still impose additional obligations through the term "shall," and these are not always limited to methodological guidance. In many cases, such provisions would be more appropriately incorporated into the main Disclosure Requirements. Several paragraphs also begin with "shall consider," creating ambiguity for preparers: it is difficult to demonstrate or audit mere "consideration," and the expected outcome is unclear. Additionally, there are still "may"-disclosures in the new draft which have the opposite effect of the intended effect of the amendment, e.g., AR 25 for ESRS 2.28d or ESRS 2 AR 27 for para. 30. In summary, it can be said that while we welcome the changes, there is still room for simplification as the standards remain complex.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1; E1	Comment addressing all NMIG guidelines: The NMIG guidelines serve as a useful tool to illustrate the application of the standards. It helps preparers understand the intent behind the requirements and supports consistent implementation without adding unnecessary complexity. We agree with EFRAG's recommendation to exclude the NMIG from the Delegated Act. Including it would go against the goal of simplification by effectively bringing back voluntary data points in a different form, which could place unnecessary pressure on preparers to address and possibly explain disclosures that are not mandatory. Comment addressing ESRS E1 NMIG 3: We have a remark concerning ESRS E1 NMIG 3, paragraph 22: References are still made to policies related to both climate change mitigation and climate change adaptation. By contrast, in the Exposure Draft under E1-4 (Policies related to climate change), the reference is limited to climate change in general, without distinguishing between subtopics. This discrepancy could potentially create confusion in reporting (if the NMIG guidelines are used as guidance by preparers of ESRS reports). We would therefore rec-ommend clarifying in the NMIG that the examples can relate to both mitigation and ad-aptation, while emphasizing that mandatory reporting only focuses on climate change policies as a whole.			
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Regarding ESRS 1.91, we recommend providing more detailed guidance on what undue costs or effort means. Regarding the reliefs for metrics to report partial scope, we see the possibility of impairment of the data quality and comparability. Therefore, we suggest introducing a time limit regarding this relief.			
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We understand that this question refers to the flexibility introduced by ESRS 1.91. We recommend clarifying that, when data availability is limited, value chain metrics may be fully or partially estimated, rather than only "partially estimated." This would better reflect the realities faced by preparers and ensure alignment with ISSB standards. However, this approach may create practical challenges and, particularly if applied without a time limit, could allow companies to deliberately omit information under this concept. Additional guidance would therefore be necessary to clarify what this concept entails in concrete terms and how undue cost or effort should be measured and determined.			
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I would like to skip this question and provide my feedback in Part 3				
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Generally, we think that interoperability of ESRS with ISSB standards is an important aspect. In our opinion, the amended ESRS prioritize "simplification" over "alignment" yielding a weakened interoperability with ISSB standards. Further alignment efforts may be needed to ensure consistency across frameworks. In more detail, we observe that the degree of alignment depends on the chosen option for anticipated financial effects. Further, we are concerned about the restricted approach adopted for GHG emission boundaries under AR 19 and AR 20. The shift to financial consolidation limits the flexibility that the GHG Protocol explicitly offers — namely, allowing undertakings to choose between financial control, operational control, or equity share boundaries. This clearly undermines interoperability objectives and introduces confusion for undertakings applying multiple frameworks. ESRS E1 AR 19 for para. 32 includes the requirement that undertakings shall separately disclose its Scope 1 and Scope 2 GHG emissions based on the operational control (consolidation) boundary if the information reported in paragraph 32(a)(b) for the reporting undertaking (equivalent to the financial control organizational boundary) fails to convey a fair presentation of the emissions de-riving from operated assets that are outside the reporting undertaking. This requirement will lead to additional complexity and burden for the reporting in certain undertakings. In addition, we are concerned that if a Transition Plan was developed based on the operational control boundary, but reporting is subsequently required under the financial control boundary, this may create inconsistencies in baselines and target pathways. Therefore, we expect full alignment with the GHG Protocol.			
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	Generally, we support the aim of the reduction of data points and helps reducing the reporting burden while preserving the core objective of structured and comparable sustainability reporting. However, due to the way in which the reduction was achieved, we see a significantly lower effect on the actual reporting effort. It is important to emphasize that a 57% reduction in mandatory data points does not automatically result in a corresponding decrease in the length of reports or the overall reporting burden. There are improvements, but overall, the standards remain very complex and extensive. We appreciate the emphasis on prioritizing quantitative data points over detailed narrative disclosures, as well as the clear differentiation between mandatory and voluntary requirements. Nevertheless, we note that certain sections of the ESRS text remain ambiguous or predominantly descriptive.			
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	In general, we are against including additional mandatory datapoints. Any revised standards should focus on simplification, and reclassifying existing "may" disclosures as "shall" obligations would run counter to the mandate issued by the European Commission. However, we believe that most exceptions are well-justified and appropriately scoped to avoid unnecessary complexity while maintaining the integrity of the reporting framework. Regarding ESRS G1.10c, we recognize the idea to consolidate previous scattered data-points on training in one generic provision, but this approach creates further ambiguities. The proposed wording seems to retain as much as possible the original phrasing, thus creating many distinctive DPs in section 10c: •"Training on business conduct in general (formerly 10g), •Percentage of functions/roles most at risk within the undertaking in respect of corrup-tion and bribery trained (formerly 21b), •Board members covered (formerly 21b), and •Members of the "procurement team" covered" While the wording is clear for the first item, it appears not entirely clear whether data should concern the mentioned groups being trained on business conduct in general, or on anti-corruption and bribery specifically. Furthermore, if these requirements are considered as one DP, for undertakings that previously have assessed the present DR G1-2 as non-material, it remains unclear whether including that information will become mandatory. Additionally, the term 'procurement team' is unclear. Therefore, we suggest designing DPs in relation to training so that their requirements are clear and that the scope of required disclosures conforms to materiality principles, particularly concerning supplier-relations. In addition, the disclosure of percentage of functions/roles most at risk within the undertaking in respect of corruption and bribery trained does not add value. How companies define functions differs in practice; therefore, the datapoint is not comparable. The first part of ESRS G1.10c already provides a good overview of the relevant training measures.			
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Generally, we are opposed to the inclusion of additional mandatory datapoints in EFRAG's ongoing effort to streamline the ESRS. However, the rationale for some of these exceptions is sound, and they contribute to a more practical and focused application of the standards. Regarding the DP in ESRS 2 General disclosures – BP 1, we welcome the new disclosure requirement under ESRS that a general statement of compliance with ESRS be provided and that only deviations from certain principles need to be disclosed. In some cases, sustainability reports have meticulously addressed every ESRS 2 disclosure requirement, even when it was not applicable (e.g., because there was no deviation from the time horizons). In our view, this helps to reduce unnecessary and excessive disclosures. However, we fear that the data collection for the DP on E2-4 is not feasible in practical application in the downstream value chain. This datapoint should therefore be removed.			
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The revised threshold improves the usability of the metrics and reduces unnecessary complexity, making the disclosures more practical for preparers. The revised version provides more meaningful information, especially for undertakings with sites in a large number of countries. The indicator is therefore less dependent on the distribution of the workforce.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	The proposed amendments simplify the methodology (it is more straightforward on what is to report and how to proceed) and make it more applicable across diverse jurisdictions, improving consistency in wage-related disclosures. The general direction of the disclosure requirement remains the same. Subject to the results of the ongoing field test, we recommend that the disclosure of non-EU adequate wage information initially be made voluntary or introduced in phases. This approach would provide sufficient time to assess practical implementation			
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	The complete deletion of AR 26 is not comprehensible, as it provides valuable guidance on reporting measurable targets related to biodiversity and ecosystems. In case EFRAG decides to remove AR 26, we recommend that this guidance be included in the NMIG instead.			
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	35.ESRS1_3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We think that a clear clarification, differentiation, and definition for actual and potential impacts as well as a clear definition of negative human rights impact (including examples) is needed. We miss information in ESRS regarding initial consolidation and deconsolidation and the respective handling of comparative information, targets etc. in the first and following years. Further, we suggest ensuring sufficient information on IRO by clarifying undue cost and effort. Finally, we suggest clarifying practical considerations, in particular on the top-down approach (assumed material or not, assessment at topical level incorporates IROs).	ESRS1	3. Double materiality as the basis for sustainability reporting	
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	35.ESRS1_3.3.1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We welcome that explicit reference is now made to the gross and net approaches within the DMA. However, we would like to emphasize here that the information included (see, among other things, ESRS 1, Appendix C) does not lead to improved comprehensibility and is very complex and time-consuming in practical application.	ESRS1	3.3.1 Impact materiality assessment	
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	35.ESRS1_3.5.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We highly appreciate the efforts for simplification. However, in our view, even more ambitious simplifications should be made. Some examples: In line with EFRAG's stated objective of eliminating voluntary datapoints from the core standards, we recommend that Appendix A be transferred to the Non-Mandatory Implementation Guidance (NMIG). Appendix A should be regarded strictly as a supporting instrument for the DMA process and must not be interpreted as a substitute for an undertaking's own materiality determination. Furthermore, DMA-related disclosure requirements frequently involve technical specifications which may neither be meaningful nor relevant for users. In addition, regarding Appendix A, deleting the sub-sub topics deprives companies of an important aid in identifying possible IROs; Sub-sub topics could be used for guidance only therefore we suggest to disclose the former ESRS 1.AR16 in the NMIG). We regret that EFRAG has not amended ESRS 2 IRO-1 to provide for less prescriptive disclosure obligations, and we reiterate our call for further simplification in this respect.	ESRS1	3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	35.ESRS2_SBM-3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	ESRS 2.23: Acknowledging that AFRAC is composed of a diverse range of stakeholders, multiple dimensions need to be considered, which ultimately means there is no uniform answer to this question. Pro Option 1: The disclosure of quantitative anticipated financial effects, together with financial re-porting, provides an overall picture of the risk and opportunity landscape and enables connectivity between financial and sustainability reporting. Additionally, it would maintain interoperability with IFRS S2. Nevertheless, more guidance should be available on the presentation of the anticipated financial effects and the required materiality threshold. Further, we encourage a relief for omission of confidential/sensitive information. Option 2 would result in undue loss of information important to investors and would fail to provide the incentive to build more mature methodologies and reporting practices. Further, Appendix B in ESRS 1 QC requires that information is clear and concise. Boilerplate information, which is not specific to the undertaking, shall be avoided. Further, if quantitative information is optional, the qualitative descriptions might not ensure the complete, neutral, and accurate depiction of material topics. Pro Option 2: We have concerns about Option 1, as it involves significant estimation uncertainty, a higher risk of litigation, and a lack of standardized methods and comparable data needed for consistent disclosures. These disclosures are especially challenging because they are forward-looking and sensitive in nature (especially financial effects related to opportunities). Therefore, we support Option 2, as it is more balanced and practical. It recognizes the difficulties and legal risks of reporting forward-looking financial information. Additionally, the determination of quantitative financial effects requires high effort and there is no established method available yet, which might impair the comparability and reliability of the disclosed information.	ESRS2	SBM-3 - Interaction of material impacts risks and opportunities with strategy and business model, and financial effects	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria	35.E1-11.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Acknowledging that AFRAC is composed of a diverse range of stakeholders, multiple dimensions need to be considered, which ultimately means there is no uniform answer to this question. We recognize and appreciate the steps taken to simplify the disclosure requirements for anticipated financial effects. With regards to E1-40-42, some members of AFRAC, however, are of the opinion that the amendments do not achieve sufficient reductions or simplifications. They see room for further simplifications to better balance the effort required for reporting with the needs of users. EFRAG acknowledges under Q19 that the two options regarding anticipated financial effects in ESRS 2 apply across all topics. If Option 2 were adopted as the regulatory baseline, the current disclosure requirements according to E1-11 would no longer be aligned with the overall disclosure architecture, as the standard in its current form presumes quantitative outputs. Therefore, the requirements under E1-11 should be limited to qualitative disclosures, if option 2 is implemented. This reduction to qualitative disclosures would also address concerns requiring more granular financial data than currently mandated under IFRS.	E1	Disclosure Requirement E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	
Survey	Stellenbosch University Business School	Academia	South Africa	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The use of the terminology "top down" versus "bottom up" in materiality determination may be confusing, as some may associate this with top down data generation & analysis (incl modelling) versus bottom up data collection. At stake here is not so much the "level of reporting". The annual report is an overall organisation level report, while there is a separate role of lower level for example site level disclosures and communications (e.g. with local communities). So overall organisation level (entity) performance is the focus. And rather than top down or bottom up, what you are describing is either a deductive vs inductive approach or a set menu vs open menu approach. If the ESRS lists core topics to report on as a mandatory requirement across all sectors, that would have been a set menu approach. But the voluntary requirement leaves more scope for an a la carte (open menu, considering industry context) approach. You can be forgiven for being more mandatory at topic (core subject as per ISO 26000) level, but allowing more flexibility at sub-topic level. The elimination of sub-sub-topic level is understandable in the effort to avoid excessive detail across the board.			
Survey	Stellenbosch University Business School	Academia	South Africa	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Materiality determination considers the actual or potential significance of a topic in an industry. Even if a reporting entity has effective measures in place to mitigate risk and deal with a material issue, it has to be reported on as a way of ensuring & confirming that the enterprise continues to effectively deal with the matter. In a given year the issue may not be topical (in the news), yet it remains a potentially very sensitive topic for the industry / reporting entity. Therefore the "gross" approach is justified. What is rather at stake here (as opposed to reporting on a topic or not), is the level of detail provided in the reporting. The IIRC referred to conciseness while the GRI refers to this question as "level of coverage" required. If a topic is effectively dealt with in a particular year, the company can afford to be more concise and report lower level of coverage.			
Survey	Stellenbosch University Business School	Academia	South Africa	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The EU requirements will continue to struggle here, due to the mistaken assumption that all stakeholders (general purpose) can be effectively addressed in One Report. Experience has shown the value of a standalone Sustainability Report (SR as per GRI) that provides greater detail of information to non-financial stakeholders, and the value of an Integrated Report as synthesis between the AR and SR. Connectivity of information between all disclosures (and reports) is a must yes. But level of conciseness will always be related to the primary user targeted. The AR will only be effective (decision-useful) if it sticks to financial stakeholders as primary target audience (presenting more holistic, integrated information o providers of financial capital), and the separate SR (not simply AR annexes) can only be effective if it targets priority non-financial stakeholders in an integrated manner that connects sustainability context and entity specific performance (pre-financial).			
Survey	Stellenbosch University Business School	Academia	South Africa	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Unclear why an entity will NOT have policies, actions and targets (PAT) related to a highly material topic (involving significant IROs). Unless it can be clearly explained how that material topic is effectively addressed through broader PATs defined in terms of a management system terminology (e.g. under the enterprise risk management system).			
Survey	Stellenbosch University Business School	Academia	South Africa	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Stellenbosch University Business School	Academia	South Africa	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1	As regards the reference to impacts and dependencies, being sources of risks or opportunities: the guidance would have been more clear if overall consistent reference was made to not only IROs but Impacts, Dependencies, Risks & Opportunities (IDROs). This would cover the fact that some R&Os result not from own entity impacts but also from dependencies (source relations) on broader contextual resources (e.g. the market, society or ecosystem). Overall, the Non-Mandatory illustrative guidance will remain useful in immediate future. But guidance has to evolve, considering new developments, and this is best left to other voluntary standards initiatives like the GRI and the work of consultancies / advisory institutions / research bodies.			
Survey	Stellenbosch University Business School	Academia	South Africa	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Responsible investors will certainly ask more more specific information, for example OPEX or CAPEX related to climate mitigation / adaptation. But the more important here is not so much "undue cost" - as if you seek to save reporters costs. Rather, it is a matter of misplaced effort. In some case endless caculations to produce detailed metrics or financial figures may be uncalled for, and more strategic qualitative information may be more decision-useful (with a longer term focus). It is a challenge also for reporting entities to know where and what proxy indicators may be sufficient and strategic.			
Survey	Stellenbosch University Business School	Academia	South Africa	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	Key is being transparent on shortcomings and steps planned for ongoing improvement (we are here now but expect to be there by year 1, 2, ...n).			
Survey	Stellenbosch University Business School	Academia	South Africa	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The IFRS relief is flexible enough. At stake here is not only the omission of quantitative (financial) information, but also the nature of the qualitative information provided. The qualitative narrative one would expect to refer to likely financial impact areas (financial value driver / performance areas) without being able to provide exact financial figures. This is what investors would expect in a company engagement.			
Survey	Stellenbosch University Business School	Academia	South Africa	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Stellenbosch University Business School	Academia	South Africa	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Stellenbosch University Business School	Academia	South Africa	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Stellenbosch University Business School	Academia	South Africa	22.G1	Comments on deleted datapoints in ESRS G1	I agree	The select focus of G1 is very broad brush. While seeking not to duplicate requirements of e.g. OECD guidance on corporate governance, one would expect the ESRS to reflect a consolidation rather than simply not addressing various key action areas / indicators of quality corporate governance.			
Survey	Stellenbosch University Business School	Academia	South Africa	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Stellenbosch University Business School	Academia	South Africa	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Stellenbosch University Business School	Academia	South Africa	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	A compliance driven approach incl box ticking should be avoided. Fairness will always involve subjective judgement and a matter of degree in material focus and level of coverage. This is where SR plays a complementary role in addressing fairness (more holistic view) from the point of view of non-financial stakeholders.			
Survey	Stellenbosch University Business School	Academia	South Africa	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Mindful that high climate impact sectors need transitional finance, the responsible investor also needs to know in how far a financial institution while making progress in intensity may be progressing (trend over time) to an unacceptable absolute level of exposure to high climate impact entities / industries.			
Survey	Stellenbosch University Business School	Academia	South Africa	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Stellenbosch University Business School	Academia	South Africa	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree				
Survey	Stellenbosch University Business School	Academia	South Africa	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Stellenbosch University Business School	Academia	South Africa	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Stellenbosch University Business School	Academia	South Africa	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Stellenbosch University Business School	Academia	South Africa	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	KPMG IFRG Limited	Auditor	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We welcome the increased flexibility introduced through permitting a top-down approach to the DMA and support this direction. We support the introduction of a clear materiality filter for all disclosures and acknowledge the alignment of definitions with IFRS S1 through the addition of paragraph 21 in ESRS 1. However, we note that the language in sub-paragraph (b) may give rise to inconsistent interpretations and could lead to extensive and overly granular reporting requirements. If paragraph 21(b) is maintained, clarification is needed on the difference between the concepts "necessary to understand" and "reasonably be expected to influence". Additionally, without a clearer definition of "users of general purpose sustainability statements" very granular information could inadvertently become material as the user group would potentially be very broad. Further, we observe that the interconnection between impacts and dependencies, and the related risks and opportunities lacks clarity. As the relevant requirements are currently dispersed throughout the text, the relationship is not always clear. For example, requirements and guidance relating to dependencies are contained in chapters 1.2, 3.3.2 and 3.5. of ESRS 1 and chapter 3 of the NMIG. We recommend strengthening the notion of how a company's dependencies on resources and relationships and its impacts on those resources and relationships give rise to sustainability-related risks and opportunities, aligning language with the ISSB standards to enhance the interoperability and clarity of the requirements. Overall, we support the direction of increased simplification and flexibility, but recommend that clarity, consistency and interoperability remain at the forefront to support high-quality, comparable sustainability reporting.			
Survey	KPMG IFRG Limited	Auditor	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We acknowledge the intent to clarify the guidelines but caution that introducing excessive granularity may not best serve the evolving field of impact reporting. To avoid unintended consequences, we recommend elevating these proposals to high-level principles, supported by implementation guidance as practice evolves. The results from the ongoing field testing should also inform any amendments. A notable concern is the differing treatment of one-off versus ongoing actions. Under the current draft, risks addressed by completed actions (e.g. building a wall) are assessed after mitigation, while those requiring ongoing actions (e.g. continuous monitoring) are assessed before mitigation. This approach can create a reporting bias making static solutions seem more attractive in reporting, even if ongoing actions are more effective in practice. There is also ambiguity regarding the reporting of one-time material events, such as greenhouse gas emissions that, once released into the atmosphere, continue to have long-term environmental impacts. The guidelines lack clarity on how these should be considered in the DMA, which may lead to inconsistent practices. If the provisions on remediation, mitigation, and prevention remain, we urge EFRAG to clarify the requirements. For example, ESRS 1.35 states that negative impacts should be assessed without considering mitigation or prevention actions if a company needs to maintain significant ongoing efforts to keep the potential impact below the materiality threshold. However, it is not always clear when these conditions apply, which could lead to varying interpretations. Finally, we observe that the guidance currently applies these considerations only to impacts. We recommend introducing principles-based guidance also in relation to risks to ensure consistent application across the double materiality spectrum. Such principles should be developed in collaboration with the ISSB to ensure interoperability.			
Survey	KPMG IFRG Limited	Auditor	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We welcome the increased flexibility for companies to present their sustainability information and believe this will result in more concise and clearer reporting.			
Survey	KPMG IFRG Limited	Auditor	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We welcome the revised architecture, specifically the introduction of General Disclosure Requirements (GDR), which we believe will provide a more pragmatic approach to reporting. The revised standards help minimise duplication and unnecessary detail by allowing for cross-referencing and aggregated disclosures. Furthermore, they enable reporting at a level that is most practical and relevant to the specific topic and entity. With regards to prescriptiveness of the requirements, we note that although the standards are more principles-based, there are still areas where further improvements are possible. See, for example, comments on consideration of remediation, mitigation and prevention actions in the materiality assessment in question 12. In ESRS 2, the clarification to avoid standardised or 'boilerplate' disclosures is a positive step toward enhancing information quality and reducing reporting fatigue. At this stage it is inherently challenging to assess the consequences of these revisions in the absence of real-world experience with their application. As such, while the amendments seem to support clearer and more relevant reporting, we also encourage EFRAG to engage in field testing to assess the practical impact of these proposed changes on reporting entities. Additional guidance or refinements may become necessary once reporting entities have had the opportunity to implement the revised standards in practice.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	KPMG IFRG Limited	Auditor	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We recognise the amendments made to enhance clarity and consistency in the revised standards; however, some aspects warrant further attention. While the move toward more concise requirements is welcome, excessive cross-referencing in the standards—particularly where references are circular (e.g. ESRS 1 AR 7), seemingly incorrect (ESRS 1.87 and ESRS 1.44), or lead to 'phantom references' (e.g. ESRS 1 AR26) — make the standards challenging to navigate. We urge EFRAG to undertake a thorough editorial review to address these issues. Ambiguous terms such as "when necessary" or "significant" introduce uncertainty regarding requirements, presenting challenges for both preparers and assurance providers. Clearer definitions and practical examples would promote uniform understanding and implementation. Additionally, the respective roles of Disclosure Requirements (DRs), Application Requirements (ARs), and implementation guidance should be more distinctly defined. Some ARs currently serve as examples rather than actionable requirements, while others simply refer the reader further to an appendix (e.g. ESRS 1 AR9), adding little substantive guidance. We also note that some ARs contain language that could be subject to interpretation. For example, ESRS 1 AR 11 comprises both a "may" requirement and "shall" requirements from the CSRD. This causes uncertainty about the respective roles of the DRs, ARs and NMIG and can impair clarity of the standards.			
Survey	KPMG IFRG Limited	Auditor	United Kingdom	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The NMIG's legal status remains unsettled with uncertainty as to whether it will form part of the Delegated Act or be issued independently. We recommend that the NMIG be issued independently of the standards but highlight that it is essential to follow due process in its preparation. This will help ensure that the guidance provided maintains a quality equal to that of the standards themselves. We emphasise the importance of the NMIG containing only illustrative guidance. Phrases such as "the undertaking is expected to…" may be misinterpreted as mandatory requirements or interpretation guidance rather than illustrative guidance. We recommend clarifying such language to avoid confusion among preparers and assurance providers. The document includes detailed tables mapping sub-topics to disclosure requirements (DRs) from ESRS E1–E5, S1–S4, and G1. While these mappings are helpful, their depth and specificity could be mistaken for prescriptive obligations. We suggest a clearer explanation to reinforce their illustrative intent. Finally, some examples within the document reference specific quantitative metrics, percentages, or breakdowns (such as training coverage, emissions intensity, or pay ratios). Without explicit clarification, these could inadvertently be perceived as benchmarks or minimum standards. We recommend making their illustrative nature more prominent.			
Survey	KPMG IFRG Limited	Auditor	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We welcome the introduction of the "undue cost or effort" provision, which supports proportionality and enhances alignment with ISSB standards. Nevertheless, we remain concerned that certain ESRS 1 paragraphs (notably 47 and 89) may lead to inconsistent interpretations. We recommend aligning the language in paragraph 47 with IFRS S1 B6 and incorporating IFRS S1 B8-B10 in full, promoting global consistency and comparability. On value chain disclosures (ESRS 1, para 62), we support practical relief where direct data gathering leads to undue cost or effort but note that overreliance on estimates could compromise the quality and comparability of disclosures. Additionally, as scope 3 GHG emissions is the only required value chain metric, EFRAG may wish to leverage relevant IFRS S2 guidance (IFRS S2 B38-B57) in the NMIG. We support the proposed relief for acquisitions and disposals but highlight the potential for significant omissions when subsidiaries are acquired or disposed of near the start or end of the reporting period, respectively. As the proposed relief does not apply to restatement of comparative or base year data, its practical effectiveness may also be diminished. Moreover, the approach differs from the measurement period concept in IFRS 3, risking misalignment between financial and sustainability reporting. To promote connectivity, we recommend that EFRAG consider introducing further disclosure or application requirements where discrepancies arise due to the application of this relief. Overall, we support targeted burden relief where justified, but stress the importance of useful, reliable, and comparable sustainability information to uphold reporting quality and accountability.			
Survey	KPMG IFRG Limited	Auditor	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We acknowledge the intention to provide relief for lack of data quality on metrics under chapter 7.4 of ESRS. However, excessive relief could diminish the usefulness and comparability of reported information and we therefore question the need for an additional open-ended data quality relief in addition to the undue cost or effort provision. Such relief could also create practical challenges for assurance providers in assessing whether the omission of information is justified and in providing assurance on partially estimated metrics. Accordingly, we recommend that any additional relief related to data quality be clearly justified, restricted to a defined timeframe, and accompanied by suitable application guidance to avoid arbitrary or indefinite omissions.			
Survey	KPMG IFRG Limited	Auditor	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We support Option 1. Allowing the omission of quantitative information under defined conditions offers a pragmatic compromise between ensuring comprehensive disclosures and recognising practical limitations. Furthermore, adopting Option 1 would enhance consistency with ISSB requirements. We suggest that the language be further harmonised with ISSB terminology to improve clarity and promote global comparability. We believe that option 2 would undermine interoperability and make essential investor information optional.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	KPMG IFRG Limited	Auditor	United Kingdom	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	Disclosures regarding anticipated financial effects are primarily intended for investors and achieving global comparability is therefore especially desirable. Accordingly, we encourage EFRAG to align these disclosures with the ISSB standards. While we acknowledge the provision allowing for disclosure within a range, further enhancements are needed to facilitate interoperability. For example, differences in the treatment of mitigation when reporting monetary amounts or the percentage of assets exposed to significant physical risk would be likely to result in inconsistent reporting outcomes under the different frameworks, which may affect comparability. Further, we remain concerned that the revised requirements, particularly the inclusion of loan collaterals (E1.41(c)), may introduce unnecessary complexity—especially for entities lacking centralised data collection systems. We suggest relocating such details to illustrative guidance (i.e. NMIG). As with the other revised standards, several terms require clarification. For example, the phrase "leverages on the process" in paragraphs 40(e)/41(g) of ESRS E1 lacks clear definition, creating potential challenges for consistent interpretation and auditability. We recommend either clarifying or removing such requirements. Finally, the use of "aligned" in paragraph 42 in reference to business activities and climate-related opportunities appears unduly restrictive and may be difficult to substantiate or audit without further guidance. The current language also does not sufficiently address how potential adverse impacts should be reported in relation to opportunities. We encourage providing a clearer definition of "aligned" and addressing the treatment of adverse impacts. Overall, while we support the efforts already made towards simplification, further revisions are needed to ensure clarity, practicality, and global comparability in disclosures.			
Survey	KPMG IFRG Limited	Auditor	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We view interoperability not as a compromise between simplification and alignment, but as a means to achieve both: greater interoperability leads to simpler, less burdensome reporting for preparers and strengthens comparability in sustainability disclosures. While we acknowledge improved alignment with the ISSB Standards, areas remain where further improvement can be achieved. Continued collaboration with ISSB is essential to resolve existing differences and prevent new inconsistencies, as listed below: 1. For disclosure requirements where the reporting outcomes are expected to be consistent under both frameworks, we urge EFRAG and ISSB to work together to fully harmonise language and definitions. Consistent definitions—such as for "reasonable and supportable information available at the reporting date without undue cost or effort," (see Q17) and "materiality of information" (see Q11), and the disclosure requirements relating to identification of financially material information—would reduce complexity and enhance comparability. 2. We recommend that entities be required to define their organisational boundaries for GHG emissions reporting in accordance with the Greenhouse Gas Protocol (GHGP), consistent with IFRS S2. The current proposal requires companies to include additional disclosures or apply exemptions in certain situations. We believe that allowing companies to apply either the operational control approach or the financial control approach without modifications would better achieve the simplification objective. 3. Some ESRS requirements differ from ISSB standards not just in terminology but also in reporting outcomes. Greater alignment would benefit reporters and users. Notable areas requiring attention include: - flexibility in time horizon requirements, - reliefs for acquisitions/disposals during the year (see Q17), - guidance on remediation, mitigation and prevention actions in DMA (see Q12), - GHG reporting for joint operations, and - value chain disclosures for leased assets by the lessor. Ultimately, maximising interoperability will reduce reporting burden and support more comparable sustainability disclosures across companies.			
Survey	KPMG IFRG Limited	Auditor	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We welcome the clarification that ESRS is presumed to result in a sustainability statement that is fairly presented. We agree that this emphasis, alongside the increased focus on materiality, will help shift reporting away from a "checklist mentality" towards more meaningful and coherent sustainability narratives. However, we caution that the introduction of the fair presentation principle itself does not necessarily lead to a reduction of reportable information. Under a fair presentation framework an entity is required to provide supplementary information when necessary to fulfil its reporting objectives. We note that fair presentation is a distinct concept and should not be conflated with materiality. Materiality applies regardless of whether a fair presentation or compliance framework is used, and the omission of immaterial information is permitted under both. It is essential that preparers and users clearly understand the meaning of fair presentation in this context; further guidance may be needed to support consistent interpretation and implementation. In this regard, we highlight that valuable guidance is available in educational materials, such as Accountancy Europe's paper "Sustainability statements based on ESRS: 'compliance' or 'fair presentation'?", published on 24 September 2025, which could be leveraged by EFRAG to support consistent interpretation and implementation, for example via the NMIG. Ultimately, reinforcing the fair presentation requirement, while maintaining a robust materiality filter, will support more relevant disclosures. This will help ensure that sustainability reporting under ESRS remains decision-useful and effective.			
Survey	KPMG IFRG Limited	Auditor	United Kingdom	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	KPMG IFRG Limited	Auditor	United Kingdom	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	We welcome the initiative to simplify the approach to calculating adequate wages outside the EU. Nonetheless, given the variability in how statutory minimum wages are determined, these may not always reflect an 'adequate wage' standard. To enhance transparency and ensure the disclosure requirement's objective is met, we recommend that EFRAG require companies to disclose the specific methodology used, particularly when a statutory minimum wage is applied as the benchmark for adequacy.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	KPMG IFRG Limited	Auditor	United Kingdom	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We agree that AR 26 should be reviewed. We acknowledge that the requirements in E4-4 have been largely removed, and that the purpose of AR 26 is to provide methodological guidance on what biodiversity and ecosystems-related targets can cover. We support the inclusion of methodological guidance, either in application requirements or illustrative guidance. We recommend that reference is made to established market practices and guidance, especially where methodologies from the Science Based Targets Network (SBTN) exist for freshwater, land, and ocean targets. Science-based targets, as defined by the SBTN, are measurable, actionable, and time-bound objectives grounded in the best available science. Companies should be encouraged to apply leading external frameworks—such as the SBTN guidance for land and biodiversity, the Kunming-Montreal Global Biodiversity Framework (GBF) targets, and the Taskforce on Nature-related Financial Disclosures (TNFD) target-setting guidance. Further consistency across environmental topics could be achieved by aligning guidance for freshwater and ocean target-setting between E4 and E3.			
Survey	KPMG IFRG Limited	Auditor	United Kingdom	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	While simplification of reporting requirements can reduce administrative burden, the adjusted gender pay gap metric can provide essential context for understanding pay equity, especially for companies with operations in multiple jurisdictions. Its removal could undermine the comparability of disclosures and limit stakeholders' ability to assess progress toward gender pay equity on a consistent and meaningful basis. We therefore recommend maintaining the voluntary datapoint as part of the application requirements. Furthermore, inconsistencies in the guidance for calculating the gender pay gap and total remuneration ratio in ESRS S1-15 should be addressed; AR 33 for the gender pay gap requires "all male and female employees' gross hourly pay level," while AR 36b for the total remuneration ratio prompts companies to consider base salary, benefits in cash and kind and the fair value of long-term incentives. It is unclear why there are differences between the two definitions and if it is intended that different forms of compensation are included within each. We recommend that EFRAG clarifies this point and if the amount is intended to be different between these two metrics, state this and clarify what is to be included for each metric.			
Survey	trade union vida	Trade union	Austria	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Double materiality is essential and must remain at the heart of the ESRS framework and European Union sustainability regime for corporate reporting to be credible and useful. The principle of "materiality of information" is concerning since it introduces a further filter for companies to not report information. For example, it represents a step backwards from ID-177, which says that most S1 metrics must be reported if S1 Own Workforce is material. It is essential to maintain the principle of fair presentation in the reporting standards. It is positive that the revision of the AR 16 list of topics has maintained all of the sub-subtopics for S1 + S2. These are based on the list of social topics in the CSRD and should all be maintained. The emphasis on aggregation (as opposed to disaggregation) is concerning, as disaggregated information (both site-specific and country-specific) is key to understanding the distribution of IROs.			
Survey	trade union vida	Trade union	Austria	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	It is important that companies report not just their net impact – the gross impact should be reported, and the recommended text preserves this principle.			
Survey	trade union vida	Trade union	Austria	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The proposed changes are helpful. However, para 113 is difficult to understand: "113. If the description of the material impacts, risks and opportunities prepared in accordance with [Draft] Amended ESRS 2 IRO-2 is not presented alongside the respective policies, actions and targets, the undertaking shall make explicit which policies, actions and targets relate to which material impacts, risks, or opportunities, in accordance with paragraph 22." Para 22 addresses the issue of appropriate aggregation or disaggregation of information on material impacts, risks and opportunities and their management, without setting any rules regarding the location of such disclosures depending (or not) on the level of aggregation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	trade union vida	Trade union	Austria	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The Exposure Draft removes duplications between the cross-cutting and topical standards. The preservation of the 4-part architecture in the social standards is important to respect the distinctiveness of different affected stakeholder groups. However, we have two critical concerns. First, the original DR in environmental standards concerning screening of sites in materiality assessment were replaced by an application requirement to ESRS 2 IRO-1. This in effect makes transparency on this aspect optional. Consideration of local context is a key element of an appropriate materiality assessment. This should be both recognised in Chapter 3 of ESRS 1, and in ESRS 2 IRO-1, which should include an explicit datapoint on how the undertaking screened its locations and value chains. We welcome that E standards provide a clearer reference on the importance of disaggregation of disclosures, but this can only be done well if locations are properly screened. Second, we strongly recommend adding an explicit reference to the disclosure of relevant, entity-specific metrics directly in S standards. The fact that S2, S3 and S4 do not include any metrics should not imply that entity-specific metrics for S topics should not be disclosed.			
Survey	trade union vida	Trade union	Austria	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The "may" (voluntary) data points should not be eliminated. In many cases they are "shall" in GRI standards, so it is important to keep them to align with GRI standards. Also, many of them were originally proposed as mandatory by EFRAG to the EC. The first wave of reports show that many companies have reported some "may" data points. Retaining them would help ensure standardization/comparability between company reports. Almost all of the datapoints for non-employee workers are voluntary, thus most datapoints for this vulnerable group of workers has been lost. Also, important datapoints on full time versus part time workers has been eliminated.			
Survey	trade union vida	Trade union	Austria	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	It is concerning that mandatory guidance in the Set 1 ESRS has been downgraded to "non-mandatory". Mandatory guidance is key to ensuring comparability and completeness of sustainability reporting. At a minimum, Non-mandatory Implementation Guidance (NMIG) should be included in the Delegated Act, and ideally called Mandatory Implementation Guidance. A major point of concern is that ID-177, which provided guidance that most S1 metrics should be reported if S1 Own Workforce is material, has now been downgraded into NMIG. Instead, EFRAG should preserve and promote the guidance that most S1 metrics shall be reported.			
Survey	trade union vida	Trade union	Austria	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	As a whole the reliefs go too far, overshooting the balance between cost/effort and transparency. There is a danger of enabling green/social washing. The relief for "undue cost or effort" is too vague thus leaving too much room for interpretation. The relief for direct data for value chain reporting is too extensive, as direct data is key for transparency. The relief for reporting on operations which are not "significant drivers of IROs" also opens up too much leeway for interpretation.			
Survey	trade union vida	Trade union	Austria	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	These combined reliefs overshoot the balance between transparency and cost/effort and risk enabling green/social washing. At a minimum, there should be a time limit introduced for these reliefs on value chain metrics.			
Survey	trade union vida	Trade union	Austria	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ability to estimate financial effects is critical for the undertaking's ability to integrate sustainability into its business strategy considerations, planning and risk management. It is also key for the determination of financial materiality, including in terms of overreporting topics as financially material. Reporting on financial effects is crucial to achieving the objective of putting sustainability reporting on the same level as financial reporting and integrating both. The European Union has recognised the value of a double materiality approach to corporate reporting which requires disclosure of both material environmental and social impacts, risks and opportunities as well financially material data, It is important to keep the requirement on businesses to analyse and understand the financial effects of their business model. This will ensure investors have access to credible data as well as providing the underpinning for future business planning.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	trade union vida	Trade union	Austria	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	ESRS reliefs should not go beyond those set in IFRS. The principle of fair presentation needs to be protected to provide transparency on all material IROs. As noted in the response to question 15, it is also important to consider interoperability with GRI when considering changes to the ESRS, rather than only considering ISSB's standards.			
Survey	trade union vida	Trade union	Austria	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	trade union vida	Trade union	Austria	22.S1	Comments on deleted datapoints in ESRS S1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The reduction in the number of mandatory and voluntary datapoints goes far beyond striking an acceptable balance. As mentioned above, the voluntary datapoints should be maintained to provide alignment with GRI, which is currently in the process of strengthening its labor standards, as well as guidance and standardization for companies reporting more than just the mandatory datapoints. An explicit quantitative goal of 50%+ reductions was never set by the European Commission for EFRAG. A number of S1 datapoint metrics have been eliminated which should be reinstated: •S1-5 Employees: gender breakdown for zero-hour employees •S1-8 Diversity: age distribution; •S1-10 Social protection: reinstatement of retirement •S1-12: Training and development: gender breakdowns, •S1-13 Health and safety: fatalities from ill-health for non-employees and other workers on site; •S1-14 Work-life balance: employees that took family related leave;			
Survey	trade union vida	Trade union	Austria	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Adding a datapoint on training of the procurement team is needed to support the implementation of human rights in the supply chain. The addition of a datapoint on confirmed incidents of bribery is needed to improve transparency on the effectiveness of bribery/corruption policies and measures.			
Survey	trade union vida	Trade union	Austria	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Agree that the following mandatory datapoint should be added: ESRS 2 General disclosures – BP 1 the undertaking shall state that the general requirements of ESRS 1 have been applied for the preparation of its sustainability statement			
Survey	trade union vida	Trade union	Austria	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	The "fair presentation" principle is essential to reduce the risk of green/social washing, as it emphasizes the full disclosure of all material impacts, risks and opportunities and their management. It is not understandable why this principle is under attack, as it is included as one of the general principles of the Accounting Directive.			
Survey	trade union vida	Trade union	Austria	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	It is essential that financial institutions disclose absolute targets to assess how their strategies align with the economy-wide transition to net zero. Absolute targets are relevant for users of sustainability statements and for understanding the real-world climate impact of financed activities. While intensity measures provide insights into efficiency, they can mask rising absolute emissions in growing portfolios or sectors. Granting an exemption would also undermine fairness in a sector-agnostic standard. Other industries could equally argue for exceptions based on their own difficulties, reducing comparability across sectors. Moreover, absolute financed emissions are already recognised in existing standards and regulations: the SBTi financial sector net-zero standard, the UNEP FI/NZBA recommendations, and EU SFDR all require or encourage absolute emissions disclosure. Exempting banks would risk misalignment and reduce the usefulness of reported data for stakeholders, including asset owners who depend on it for their own disclosures.			
Survey	trade union vida	Trade union	Austria	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The "top 10" threshold for reporting country-level data on employment, collective bargaining and social dialogue is a major improvement over the current 10% employment threshold. An analysis of the first sustainability statements from Wave 1 companies shows that the current 10% threshold results in country-level disclosures on as little as 21% of total employees. More country-level information is needed to understand the distribution of impacts across countries, as well as whether employment thresholds for specific labour rights have been exceeded. The new threshold does not require additional effort/cost by companies, since they must gather country-level data anyways to calculate the global figures. Furthermore, it does not result in extra datapoints, since the information currently is (and can be under the revised ESRS) reported as one table.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	trade union vida	Trade union	Austria	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	An analysis of the first year ESRS reports shows that most companies are simply reporting that they pay minimum wages, whereas the intention (as outlined in the ESRS Basis for Conclusions) is that companies should be enabled to disclose commitments to paying a wage "sufficient to support themselves and their families in dignity" as well as the extent to which they do this. This shows that the methodology for non-EU countries needs to be changed. Furthermore, the new ILO agreement on a methodology for living wages needs to be taken into account. While the proposed new methodology takes a step forward in both regards, two key changes are needed: •The methodology for reporting on 'adequate wages' should measure actual wages against an adequate/living wage for all employees, not only those within the EU. In particular, for employees outside the EU, the methodology should allow employees' actual wages to be measured: oA) against the local legal minimum wage only when this is set in line with the ILO principles on estimating living wages; or oB) against living wage estimates that are set in line with ILO principles on estimating living wages. •Companies should be able to rely on local legal minimum wages or living wage estimates when the authorities or organisations that set them provide public evidence of their alignment with the ILO principles for estimating living wages. Furthermore, the transitional provision for the EU needs to be reinstated, as not all Member States have transposed the Adequate Minimum Wage Directive.			
Survey	trade union vida	Trade union	Austria	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	The new, simplified framework makes it easier for companies to report on these SFDR-related matters in a way that corresponds to how their policies are set. For users, this consolidation makes it easier to locate the relevant information. However, the SFDR datapoints are very helpful and should only selectively be amended.			
Survey	trade union vida	Trade union	Austria	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	The unadjusted gender pay gap should be kept as mandatory, since the methodology for calculating it is clear. The adjusted pay gap figure as voluntary. In practice many companies are reporting both figures, which is useful for improved transparency. However, since the methodology for calculating the adjusted figure is not standardized, the unadjusted should be kept mandatory.			
Survey	trade union vida	Trade union	Austria	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS 1: As detailed above, cumulative impact of the various reliefs is concerning.			
Survey	trade union vida	Trade union	Austria	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS 2: The improved language on DMA is welcomed, including on the engagement with workers' representatives.			
Survey	trade union vida	Trade union	Austria	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS S1: The proposed "top 10" threshold for the reporting of country-level information for employee headcount, collective bargaining and social dialogue is a significant improvement over the current 10% employment threshold. Country-level information needs to be reported in more detail, and on other metrics as well, in order to have more transparency on the distribution of impacts across countries. In the metrics, voluntary datapoints need to be reinstated as well as the datapoints on gender breakdowns, workforce age distribution, etc. detailed above need to be reinstated. The proposed new methodology for adequate wages outside of the EU also needs attention, and the transition language for EU member states needs to be reinstated, since the Adequate Minimum Wage Directive has not been implemented in some Member States. We would also like to reiterate our longstanding demand for including franchise workers in the S1 definition of own workers, as well as the need for sector-specific standards to supplement the Set 1 sector-agnostic standards. ESRS S1, S2, S3, S4: An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	trade union vida	Trade union	Austria	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS S2: We are concerned that the loss of many specific datapoints related to workers in the value chain will mean that disclosures about material impacts, risks and opportunities become more generic and have less information about the specific stakeholder groups because specifications about the level of granularity have been deleted. Many of the points that are being deleted from ESRS S2 had originally been included because they reflected effective practice in relation to improving supply chain labour rights, for example, AR 6 awareness of the impacts on value chain workers from an undertaking's strategy or business model, AR 20 illustrating how the perspectives of value chain workers have informed specific decisions or activities of the undertaking and AR 25 which looks at retaliation and whether workers can use grievance mechanisms confidentially. ESRS S1, S2, S3, S4: An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	trade union vida	Trade union	Austria	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS S1, S2, S3, S4: An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	trade union vida	Trade union	Austria	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS S1, S2, S3, S4: An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	trade union vida	Trade union	Austria	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The definition of own workforce should be expanded to include franchise workers. The term "non-employees" should be supplemented with the phrase "non-employee workers" or "non-employee workers in own workforce".			
Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	In our opinion, the proposed amendments to the DMA process simplify the process and reduce burden for reporting companies. In the previous version, there was too much focus on e process and too little on outcome. The amendments achieve a much better balance. However, there are some areas where we still feel clarification and improvement are needed: 1.Scope of Simplification: We expect clarification about whether the proposed simplifications apply only to documentation or also to the analysis and evidence required. It is not entirely clear if the analytical work remains unchanged while documentation efforts are reduced. For example, if an entity has not assessed the necessary time horizons and aspects of severity, it could be challenging to demonstrate how all material IROs have been identified, in compliance with the concepts of fair presentation and materiality of information. We would also recommend providing more guidance for regarding materiality thresholds. 2.Materiality and Decision-Usefulness: Emphasis on the materiality principle is welcomed, but there is a need to harmonize terminology (e.g., "key," "significant," "material") to ensure consistent application. The concept of "decision-usefulness" should be added, and ESRS 1 AR 18 should be deleted to support the double materiality assessment. 3.Clarification of Impacts: Clear definitions, including the difference between actual and potential impacts, including negative human rights impacts, are needed. Examples would be appreciated. 4.Definition of Evidence and Undue Cost or Effort: Definitions for "reasonable and supportable evidence" and "undue cost or effort" are recommended to provide clarity. 5.Concerns and Guardrails: Concerns include the definition of material information, the term "top-down assessment," and the inclusion of non-material information. There is a need for guardrails to ensure only relevant information is included.			
Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The new guidelines for considering remediation, mitigation, and prevention actions in the DMA provide helpful clarification. However, several concerns remain. Concrete examples and clearer definitions are necessary, particularly regarding "significant ongoing mitigation and/or prevention policies or actions." The guidelines lack clarity as to why significant ongoing mitigation measures should be only considered in future years. The distinction between gross and net considerations based on the reporting year seems illogical. Additional guidance on what constitutes "significant ongoing action" is necessary. A decision tree or flowchart could aid understanding here. The guidelines do not adequately cover risks and opportunities, and the complexity of Appendix C is problematic, especially regarding future reporting. The term "significant" is not defined, and there is no guideline for potential positive impacts. Overall, while the guidelines contribute to more relevant and comparable reporting, they require further refinement to address these open points.			
Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We support the changes that have been proposed to improve the interaction between ESRS 2 and the topical standards. We believe these changes meet the stated objective of simplifying the standards and will alleviate many of the difficulties encountered by wave 1 reporters in the first year of application of ESRS v1.			
Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We agree with EFRAG's recommendation that the European Commission should not include this content in the Delegated Act. However, we would like to highlight that in the context of fair presentation, the NMIG will serve as a resource for additional entity-specific disclosures.			
Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	While we welcome the introduction of an 'undue cost or effort' relief, we disagree with allowing an undertaking to report partial metrics for an unlimited amount of time. We believe this provision should be removed because it could result in greenwashing, material information being obscured, or metrics reported that do not meet the qualitative characteristics of information. We also believe the reporting of a partial metric is inconsistent with the concept of the reporting boundary. This would impair comparability and decision-making. If removal of the partial metric relief is not an option, we recommend limiting the partial metric relief as a phase-in provision to a maximum of two consecutive years. This would provide preparers with sufficient time to implement data collection for the entire group, while preventing misuse and enabling stakeholders to use complete and comparable data for their decision-making. Since the concept of 'undue cost or effort' has been proposed as a new concept, we strongly recommend providing guidance and illustrative examples on what constitutes undue cost or effort. Although this concept is familiar to IFRS preparers, we expect its practical relevance in an ESRS context to be negligible. In situations where an entity is unable to use reliable direct or estimated data without undue cost or effort, we believe that an entity should be required to provide additional qualitative disclosures. For example, qualitative information about the actions an entity has taken to improve data availability and quality, and the progress made during the reporting period. We believe this information should be required in all cases where the 'undue cost or effort' relief has been applied. We emphasize that our comments do not go beyond the EFRAG simplification mandate and refer to existing ESRS reporting principles of transparency, traceability and arbitrariness.			

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Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We prefer option 1, because it would allow reporters to provide a comprehensive view of the risk and opportunity landscape by disclosing quantitative anticipated financial effects alongside financial reporting. Option 1 also strengthens the connection between sustainability and financial reporting, promoting mature methodologies and reporting practices. Nevertheless, the wording of Option 1 should be aligned with IFRS S1 34-40.			
Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	In principle, there is agreement on the need for alignment with the ISSB wording, and that unnecessary deviations should be avoided. The main challenge lies in the different wording between ISSB and ESRS, which is intended to be substantially the same. For a concrete example, please refer to Q19.			
Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	While we support enhanced interoperability with the ISSB's Standards IFRS S1 and S2, we have some concerns. We would like to highlight the differences in judgement whether fair presentation is given without the application of the operational control boundary for GHG emissions under AR 19 and AR 20, which shifts to financial control approach. This undermines interoperability and confuses undertakings using multiple frameworks. We recommend full alignment with the GHG Protocol. Additionally, the degree of alignment with ISSB depends on the chosen option for anticipated financial effects. We would like to add that there are certain areas where the ISSB standards provide further context or information. For example, IFRS S1 provides further guidance related to 'fair presentation'. We believe that this guidance would be helpful to preparers who are seeking to understand the implications of a fair presentation framework.			
Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We acknowledge that the materiality analysis and the concept of information materiality ensure that only significant issues are reported. This limits the impact of introducing additional principles. While the explicit adoption of fair presentation may enhance user understanding and clarify preparers' responsibilities, its effectiveness depends on clearer guidance. If ESRS is intended to be a fair presentation framework, it is important to describe this concept explicitly in the standards. The proposed amendments seek to reduce reporting burden, and we believe careful assessment and clear argumentation as to whether and how fair presentation contributes to that objective is key. We therefore recommend that EFRAG provides a more detailed explanation of what "fair presentation" entails, especially regarding entity-specific disclosures and management's responsibility to ensure a fair presentation. It should also clarify the relationship between "fair presentation" and "faithful representation," as these are not interchangeable concepts. To support consistent and high-quality reporting, we suggest incorporating language from IFRS S1 paragraphs 11–16, particularly paragraph 15(b), which states that fair presentation may require disclosures beyond the standards (entity-specific disclosures). In summary, our concerns include the effort required for fair presentation, potential deviations from ESRS requirements, and alignment with ISSB standards.			
Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We would like to highlight that the commentary period was extremely short, which did not allow us to address every single point of critique in full granularity. Nevertheless, we would like to raise a few selected issues as examples. Please note that this is by no means an exhaustive list, and further refinement of individual data points will certainly be necessary. •ESRS 1: Information is missing in relation to initial consolidation and deconsolidation, particularly in relation to the handling of comparative information, targets, and other disclosures in the first and subsequent years. •ESRS 1: Clear guidance is lacking on how to present changes in the scope of consolidation (e.g., comparative information, targets) beyond the first year. Currently, paragraph 84(b) only provides guidance for the initial year. •S1, 34(d): We recommend replacing the term "maternal leave" with "parental leave" to ensure gender inclusivity and avoid potential misunderstandings. •G1 – Political Influence and Lobbying: Given the overarching nature of these data points and their relevance to material IROs across all chapters of the sustainability report, we strongly advise relocating these disclosure requirements to ESRS 2 (Governance section), ideally following the section on management roles and responsibilities. This would be consistent with the recent amendments made to human rights-related topics. •S1, 3: We recommend including metrics on Gender Pay Gap and Remuneration Ratio (S1-15) in the list of mandatory disclosure requirements outlined in paragraph 3.			

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Survey	Austrian Chamber of Tax Advisers and Public Accountants (KSW, Kammer der Steuerberater:innen und Wirtschaftprüfer:innen	Auditor	Austria	35.E1-6.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We partially agree with the amendments, and would like to express our view on the need for an exemption for financial institutions from the disclosure of absolute greenhouse gas (GHG) emission reduction targets only for Scope 3.15. Given that in this case emissions are fully determined by third parties, defining absolute targets is less meaningful, and may even be counterproductive in terms of achieving actual decarbonization and transition in the financed sectors. Intensity targets are the most relevant indicator for tracking progress towards portfolio decarbonization. Adding absolute decarbonization values would undermine the concept of science-based target setting for financial exposures in high-GHG-intensity sectors1. Intensity metrics allow financial institutions to support the financing of greenhouse gas-intensive sectors (i.e. those sectors that require the most capital for a green transition) while ensuring that capital flows are aligned with the respective climate targets. By disclosing absolute values, these values become a relevant KPI to guide decision-making, incentivizing financial institutions to limit or phase-out transition financing in high-emission sectors. However, it is important to note that such exemptions should not be applied to sectors that are being phased out (i.e. fossil fuels such as coal, oil and gas)2. For Scope 1, Scope 2 and Scope 3.1–3.14, an additional disclosure of resulting absolute emission reduction targets is essential. Intensity targets alone may mask rising overall emissions, while absolute values ensure transparency, comparability, and a level playing field with other sectors. Complex estimates are a challenge across industries, not only for financial institutions. 1.SBTi-FI-ST V2, 2024 p.15f. https://files.sciencebasedtargets.org/production/files/Financial-Institutions-Near-Term-Criteria.pdf?dm=1734357672&_gl=1*1bwutob*_gcl_au*Nzg0NDUzNTUzLjE3NTgyMDcyMDI.*_ga*OTg4NzM1MjcuMTc1ODIwNzIwMw..*_ga_22VNHNTFT3*czE3NTgyMDcyMDMkbzEkZzAkdDE3NTgyMDcyMTEkajUyJGwwJGgxOTg1ODA3OTcx 2.SBTi-FI-NZ, 2025 p. 33f. Financial-Institutions-Net-Zero-Standard.pdf / https://urldefense.com/v3/__https:/files.sciencebasedtargets.org/production/files/Financial-Institutions-Net-Zero-Standard.pdf?dm=1756997162&_gl=1*minzmi*_gcl_au*Nzg0NDUzNTUzLjE3NTgyMDcyMDI.*_ga*OTg4NzM1MjcuMTc1ODIwNzIwMw..*_ga_22VNHNTFT3*czE3NTgyMDcyMDMkbzEkZzAkdDE3NTgyMDcyMTEkajUyJGwwJGgxOTg1ODA3OTcx__;KioqKioqKg!!E1R1dd1bLLODlQ4!AOcRTb0WDTqfpPSC_yi5EZC2zkm_kSA8oo4-UcdQQh8dm-S5vEIx8aRi_7x2l7MvZ87ua3HIxW_4ZZFe1v-PvkI0LU3zkgbguqMS	E1	Disclosure Requirement E1-6 - Targets related to climate change	
Survey	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	European Renewable Gas Registry	Other - please specify (required)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				
Survey	European Renewable Gas Registry	Other - please specify (required)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	It is good that a net approach is also permitted for impacts under certain conditions. It is not good that this specific wording is missing for risks and opportunities. We understand that the BfC indicates that a net assessment is acceptable as long as this is the method used in risk management. It would be desirable for this flexibility to be specifically mentioned in the ESRS so that it does not lead to problems in auditing.			
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We disagree with ESRS 2.43 f. Detailed feedback in section 3.			
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	All paragraphs should be deleted due to extremely high effort and non existing methodologies			
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	All datapoint related to SFDR PAIs should be mandatory for all undertakings.			
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See section 3			
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See section 3			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	It should be clarified that climate scenario analysis is not mandatory for every undertaking Otherwise, auditors will demand this from companies, even though the BfC contains a statement on optionality.			
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Kirchhoff Consult	Consultant (including software vendor)	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The proposed changes to the DMA are insufficient and remains vague. An adequate evaluation system, including information on thresholds and how to deal with issues that are close to the threshold, is still lacking. There remain few concrete guidelines for comparability.			
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Appendix C states "if the potential impact was material within the reporting year, but prevention or mitigation action has been taken before the reporting date such that the impact no longer exists." However, there is no added value for the user regarding this information. If the impact does in fact no longer exist, then the mitigation action was taken beforehand. Thus, it is not necessary to report the potential impact. This could also contradict paragraph 34, according to which "when assessing the materiality of actual negative impacts—those that occurred during the reporting year or in prior years—the severity of the impact shall be evaluated considering the outcomes of any mitigation or prevention measures implemented before the impact occurred."			
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The option to include an executive summary with detailed information in the appendices increases audit reliability. In some instances, our members have already assumed this regarding the current ESRS. The amended ESRS risk implying that only explicitly stated presentation options are permitted. Flexibility would be preferred.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The minimum disclosure requirements are not sufficiently simplified and continue to limit reporting options. As PATs are essential to the CSRS, most of the report is effectively unchanged. Rather, EFRAG should further simplify through reclassifying some of the minimum disclosure requirements as application requirements.			
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Overall, the NMIG explanation are generally helpful for understanding the disclosure requirements and the underlying rationale. Simply shifting data points to the NMIG, however, does not represent a real simplification, as these are likely to become the de facto binding standard for the purposes of auditing or verification in order to ensure comparability. Additionally, the guidelines could be interpreted by auditors as a "checklist," which could limit the adjustability to company specific content.			
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	Relief due to insufficient data quality in reported metrics (ESRS 1, paragraph 92)			
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	All material sustainability risks can and must be reported in the risk report of the financial statements. Separate reporting in the non-financial section is redundant.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	Overall, the requirements for consolidated companies should be simplified, especially E1 (climate transition plans). The mandatory disclosures for E1 are still quite substantial. While the processing of E1 data may have improved slightly in some areas, we expect that this will hardly be noticeable in practical term. Clearer (and more comprehensible) wording is needed. Furthermore, the addition of the aspect of 'financial and investment planning' represents an unreasonable additional burden. ESRS E1 - 40.(d): Evaluating the monetary amount and percentage of revenue at material physical risk after considering climate change adaptation actions is more logical. Evaluating risks before adaptation actions leads to unnecessary alarm and can misrepresent the company's actual vulnerability. It also undermines the value of proactive climate resilience strategies. ESRS E1 - 41. (d): All reporting should follow accounting recognition criteria, across financial and non-financial reporting. ESRS E1 - 42: In our view, users do not benefit from this information.			
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Setting absolute targets for financial institutions may create the wrong incentives. Every investment (particularly in green technologies) inevitably leads to additional emissions. This runs counter to the core objective of the Green Deal of redirecting financial flows toward sustainable activities. Instead, reporting mandatory absolute greenhouse gas emissions as a simple metric (which is not a target) ensures the necessary transparency.			
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	This topic is too complex to assess. Our members cannot rely on the results of the proposed field test.			
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	SFDR requirements do not need to be covered in a general regulatory approach, as investors can and already do address their individual requirements to their investees bilaterally.			
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	In our view, companies with significant environmental impacts should be informed about the current state of scientific knowledge. This is not a regulatory task.			
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree				
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Verband kommunaler Unternehmen e.V.	Business association (other than association of financial institution)	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		In general, the VKU welcomes the simplification of the DPs. However, we would like to note that the German translation could be improved. We also would welcome continuous revisions in the future. Additionally, it is important that the taxonomy, CSRD, CSDDD and ESRS are all consistent, bearing in mind the ongoing omnibus legislative procedure. This would avoid additional duplication of reporting on individual data points.			
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	More guidance could be provided on setting thresholds and rating criterias. This seems over simplified and provide to much flexibility. There should be guidance on how to report topics where information is only material for parts of the company.			
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The understandability has been greatly improved. The only thing that obscures readability is the fact that ARs are separate from the paragraphs. That information could be part of the paragraphs instead. This affects understandability greatly.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	undue cost or effort is a good writing, but should be paired with a reminder that value chain information shall give help give a fair representation of the undertaking. In the construction sector, most IROs are found in the value chain, in the form of subcontractors doing the actual construction work.			
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	There should be a time limit OR a requirement to develop and follow sector guidelines, for future comaparability. This can be emphazized by auditors, to follow sector guidelines.			
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Yes, it is hard to calculate and commercially sensitive, but also very relevant.			
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	It will drive some costs, but fair representation is fundamental.			
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to ii)) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	As methodologies evolve, it is very hard to set targets. To include some guidance or suggest following sector initiatives would make it clearer. Otherwise, comparability may be very low.			
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	A quantitative metric should be used.			
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	More guidance on conducting the DMA and especially calculation financial effects would be helpful.			
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Overall a good balance. For AR22 however there should be a reference to another methodology than the LEAP approach, which is 277 pages long. Something easier to work with would ease a DMA for smaller companies.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	The wording is vary vague on what the sustainability matter really means. There should be at least a handful examples on what a typical IRO is and what financial effects can occur. That would greatly increase the understandability of non-sustainability proffessionals of understanding the DMA.			
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	The wording is vary vague on what the sustainability matter really means. There should be at least a handful examples on what a typical IRO is and what financial effects can occur. That would greatly increase the understandability of non-sustainability proffessionals of understanding the DMA.			
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	The wording is vary vague on what the sustainability matter really means. There should be at least a handful examples on what a typical IRO is and what financial effects can occur. That would greatly increase the understandability of non-sustainability proffessionals of understanding the DMA.			
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	The wording is vary vague on what the sustainability matter really means. There should be at least a handful examples on what a typical IRO is and what financial effects can occur. That would greatly increase the understandability of non-sustainability proffessionals of understanding the DMA.			
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	The wording is vary vague on what the sustainability matter really means. There should be at least a handful examples on what a typical IRO is and what financial effects can occur. That would greatly increase the understandability of non-sustainability proffessionals of understanding the DMA.			
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	The wording is vary vague on what the sustainability matter really means. There should be at least a handful examples on what a typical IRO is and what financial effects can occur. That would greatly increase the understandability of non-sustainability proffessionals of understanding the DMA.			
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	The wording is vary vague on what the sustainability matter really means. There should be at least a handful examples on what a typical IRO is and what financial effects can occur. That would greatly increase the understandability of non-sustainability proffessionals of understanding the DMA.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	The wording is vary vague on what the sustainability matter really means. There should be at least a handful examples on what a typical IRO is and what financial effects can occur. That would greatly increase the understandability of non-sustainability professionals of understanding the DMA.			
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	The wording is vary vague on what the sustainability matter really means. There should be at least a handful examples on what a typical IRO is and what financial effects can occur. That would greatly increase the understandability of non-sustainability professionals of understanding the DMA. Better explain what corporate culture consists of.			
Survey	ABT Bolagen	Preparer (non-financial preparing a sustainability report)	Sweden	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fairtrade International	NGO	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	Chapter 3 represents meaningful progress. Section 3.1 shows clear refinement: replacing the "significance" criterion with the "understandability" of impacts aligns more closely with the CSRD and with international due diligence frameworks. However, the chapter still tends to conflate 'topics' with 'impacts, risks, and opportunities' (IROs). Paragraph 22 proposes presenting disclosures "either at the topical level or at [IRO] level," which risks creating an artificial dichotomy. Topics are overarching themes, while IROs are specific to the entity. The CSRD—as well as frameworks like IFRS, TCFD, and TNFD—are fundamentally centred on IROs. Giving undue weight to topics encourages disclosure that is too generic. The emphasis should remain on IROs, with the recognition that, depending on context, IROs may be framed at a broader level (often corresponding to topics) and that management may aggregate information accordingly. The same clarification is needed for entity-specific disclosures in paragraph 23 (and also paragraph 10 of Chapter 1).			
Survey	Fairtrade International	NGO	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Chapter 3 rightly tackles how prevention, mitigation and remedy factor into materiality, but the guidance could be written more simply. For example, Para 34 uses heavy wording to convey a straightforward point: assess actual impacts as they occurred in the reporting period; any remediation done afterwards does not change their materiality. This can be plainly stated. As an exception, potential impacts should be assessed on a gross basis—i.e., without factoring in the effect of mitigation measures—where those impacts demand significant ongoing management. This approach ensures that companies report such impacts as material even when they are actively being addressed, thereby providing transparency on both the impacts that would have occurred in the absence of management and the measures implemented to mitigate them. To make this operational in practice, this section should be explicitly linked to the "materiality of information" filters. Such a cross-reference would help companies differentiate between prevention or mitigation measures that are significant and those that reflect routine compliance or standard practice. Providing criteria or illustrative examples—such as scale, cost, duration, or deviation from baseline practice—would further support consistent application.			
Survey	Fairtrade International	NGO	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fairtrade International	NGO	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We welcome the streamlining achieved by reducing overlaps between cross-cutting and topical standards and by reinforcing the role of general disclosure requirements. In practice, many PAT provisions within topical standards have served more as illustrative guidance than as genuine datapoints, so their consolidation is a positive step. We also support the continued use of the five-part environmental and four-part social structures; in earlier feedback we stressed the importance of maintaining comprehensive E and S metrics. That said, an important gap remains: the S standards do not currently require disclosure of relevant, entity-specific metrics. With S2, S3, and S4 lacking such metrics—and sectoral standards containing them no longer advancing—the responsibility necessarily shifts toward entity-specific disclosure. Making this shift explicit would establish clearer expectations for both preparers and users. Consistent with the Danish Institute for Human Rights' recommendations, we suggest amending SX-4 (targets) to explicitly reference metrics. This adjustment would better align topical standards with the cross-cutting framework, acknowledge that companies already monitor and report social metrics linked to impact management and progress, and strengthen comparability and accountability by directly connecting targets with measurable indicators.			
Survey	Fairtrade International	NGO	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	As also specified further below in response to question 28 on adequate wages, there is a lack of conceptual clarity. EFRAG should specify that an "adequate wage" within the EU should be construed as a "living wage". This would create policy coherence between the CSDDD and CSRD, as the CSDDD includes living wages in its annex as a protected right.			
Survey	Fairtrade International	NGO	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	We are concerned that the new reliefs risk diluting core disclosures without providing a pathway to full compliance. The exemption based on "undue cost or effort" is framed too broadly: it does not require progressive improvement or set a deadline, and it can apply not only to entity-specific metrics but also to mandatory own-operations data such as workforce KPIs, pollution, water use, or impacts in biodiversity-sensitive areas. This could undermine the availability of decision-useful metrics. Recommendations: Restrict the relief strictly to genuinely entity-specific metrics. Require companies to set a dated plan for developing the necessary data systems, alongside annual progress reporting. For own-operations metrics, allow relief only in exceptional cases, and ensure it is time-bound with clear justification.			
Survey	Fairtrade International	NGO	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	These combined reliefs should clearly require the undertaking to improve the coverage and quality of the data needed to meet ESRS requirements. For the metrics concerning own operations and/or metrics standardised directly in the ESRS, this should be subject to clear time limitation. For other metrics, improvements over the years should be also explicitly required, subject to undue cost and effort relief.			
Survey	Fairtrade International	NGO	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Fairtrade International	NGO	Germany	22.S2	Comments on deleted datapoints in ESRS S2	I partially agree and partially disagree	The previous AR 32 addressed the important issue of negative impacts resulting from decisions to terminate business relationships. Under the CSDDD, Articles 10 and 11—including the Omnibus proposal—companies are already required to evaluate whether the impact of disengaging from business partners would be more severe than if they continued the relationship. As a result, companies already carry out this assessment and collect the relevant data. Requiring disclosure in this context would therefore not impose an additional burden. Research by SOMO (2024) shows that in the apparel sector in China, nearly 80% of brands report having responsible exit policies, indicating that such disclosure is already common practice in some industries. Recognizing the aim of enhancing clarity and moving voluntary datapoints into the NMIG, we recommend retaining an Application Requirement specifying how to disclose this information in cases related to business termination. Moreover, some of the deletions (33, 35, AR 4) can reduce companies' transparency because they are not required to evaluate of their purchasing practices and business models impact on workers.			
Survey	Fairtrade International	NGO	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree with these changes, noting that the suggested changes do not add a new burden. We particularly agree with the ESRS G1 on business conduct on training of procurement teams and confirmed incidents being included as "shall" points. Whether or not these individual datapoints are to be disclosed is correctly subject to materiality of the information filter applied by the undertaking.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fairtrade International	NGO	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree with these changes, noting that the suggested changes do not add a new burden.			
Survey	Fairtrade International	NGO	Germany	25.	Emphasis on ESRS being a “fair presentation” reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	ESRS already operate under a materiality-based, fair-presentation regime, and making this principle explicit is valuable. It clarifies that preparers must exercise informed judgment while applying safeguards against bias, omission, or selective reporting. Clearly articulating fair presentation sets expectations for how companies balance relevance and reliability, justify boundary and scoping decisions, and document their reasoning. In sum, an explicit statement enhances clarity and promotes consistent, decision-useful reporting.			
Survey	Fairtrade International	NGO	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking’s employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Fairtrade International	NGO	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	While we welcome the explicit reference to living wages in S1-9 and its alignment with the ILO's 2024 position and the CSDDD, three issues require correction: 1.Hierarchy outside the EU. The draft directs companies to use local legal minimum wages as the baseline for "adequate" wages, turning to living-wage estimates only if no minimum exists. Minimums are typically far below living wages. This approach is discriminatory and risks violating fundamental rights. Recommendation: allow (and preferably require) measurement against living-wage estimates aligned with ILO principles for all non-EU employees. 2.Wrong reference point. The draft cites ILO wage-setting principles. The ILOin 2024 clarified that living wages are calculated in accordance with its principles of estimating the living wage, while achievement occurs through wage-setting processes. S1-9 is about estimation and disclosure, not wage-setting. Recommendation: in (b)(i) replace "takes into account the ILO wage-setting principles" with "takes into account the ILO's principles of estimating the living wage." 3.Feasibility. Asking companies to judge whether legal minima or benchmarks accord with ILO principles is impractical. Recommendation: require use of recognized living-wage benchmarks from the outset to reduce burden and increase comparability. Progress disclosure. Reaching living wages takes time. A binary "paid/not paid" count does not incentivise action. Require disclosure of the living-wage gap (entity- and key-geography level), methodology, and time-bound plans. This yields comparable, decision-useful data that companies already assess. For context, Fashion Revolution's 2023 Index finds ~1% of brands pay a living wage, while Clean Clothes Campaign reports ~85% have living-wage commitments. Focusing on the gap disclosure is more meaningful and more realistic. These changes would align S1-9 with ILO 2024 and the CSDDD, avoid discrimination, and deliver reliable, comparable disclosures that accelerate convergence to living wages.			
Survey	Fairtrade International	NGO	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	We support the Disclosure Requirement's goal of shedding light on contractual payment terms and performance, particularly regarding late payments to SMEs. However, the current metrics are insufficient to achieve this objective. The datapoint on average days to pay (formerly §33(a)) should be reinstated. Its removal does not significantly reduce reporting burden, as undertakings already capture invoice and payment dates to calculate the percentage of payments aligned with standard terms. Many companies already monitor payment cycles—for example, through participation in Multi-Stakeholder Initiatives such as the Common Framework of Responsible Purchasing Practices, which limits payment terms to 60 days. Average payment delay provides decision-useful insight for capital markets, as persistent late payments cascade through supply chains and are linked to labour-rights risks, including wage arrears, forced overtime, and precarious subcontracting. Investors need a reliable indicator to evaluate whether capital allocation supports improvements in purchasing practices. By contrast, tracking the number of legal proceedings for late payments has limited relevance. Litigation is rare, particularly among vulnerable suppliers who may fear commercial retaliation. Evaluations of the Late Payments Directive show that buyers often circumvent enforcement, with roughly 81% of SMEs reporting that interest and compensation are never paid. Counting proceedings therefore understates the scale of the problem. Requiring average days to pay invoices would better align the metrics with the DR's objective, maintain proportionality of effort, and provide comparable, decision-useful information for preparers, investors, and SMEs.			
Survey	Fairtrade International	NGO	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of ‘“compatibility with 1.5 degrees’” for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fairtrade International	NGO	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fairtrade International	NGO	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fairtrade International	NGO	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fairtrade International	NGO	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fairtrade International	NGO	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fairtrade International	NGO	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fairtrade International	NGO	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Fairtrade International	NGO	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fairtrade International	NGO	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fairtrade International	NGO	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
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Survey	Fairtrade International	NGO	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	1. DMA: In general, a positive shift towards reporting meaningful and material to the company information. Separating the process from the outcome will improve readability and help focus on specific information. However: - While the new focus on strategic context provides welcome flexibility, it may come at the cost of less quantitative and specific data, making it more challenging for users to track a company's progress on specific sustainability goals over time and to perform cross-company comparisons - The introduction of the "fair presentation" principle together with multiple reliefs such as "Undue Cost and Effort" raises concerns. There is a risk that this principle could lead to omission of important information and increase responsibilities of auditors, potentially creating an open-ended obligation to determine what constitutes a "fair" depiction of sustainability matters. - While the reduction of overlaps and duplication is a positive step, the proposed flexibility to report disclosures at the IRO or topic level could lead to less structured and less comparable reports, making it more challenging for users to locate relevant information and compare it across different companies - Deletion of former topical specifications related to screening site locations for material impacts (pollution, water, biodiversity, circular economy) and its replacement with the single overarching AR in ESRS 2 can lead to loss of granular location-specific insights. Moreover, TNFD requires by site disclosure and in the future, it is likely that IFRS might do the same. 2. Although still extensive, the Chapter 3 Double materiality as the basis for sustainability reporting outlines key principles and provides essential guidance. Overall, the inclusion of additional examples enhances both clarity and readability. The table format for ARs is highly appreciated.			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	While concepts like prevention, mitigation, and remediation are well-understood in due diligence, the ESRS draft creates a challenge by requiring different reporting rules for actual and potential impacts. This can lead to confusion and subjectivity in how companies measure and report on the effectiveness of their actions. The primary issue is that the option to report on a "net" basis for potential impacts can mask a company's true sustainability performance. This approach, while potentially aligning with internal risk management, can lead to a misleading picture for stakeholders. For example, a company with a high-risk operation that has implemented a single, one-off mitigation measure (like a containment wall) might report it as a non-material impact. In contrast, a more proactive company that uses continuous mitigation systems (like constant monitoring) may have to report on a "gross" basis, making its risk appear more significant even if it's safer in reality. This discrepancy can create a reporting environment where less-proactive companies appear to have lower risk than those with robust, ongoing management systems. To address this, we recommend that ESRS 1 indicate clearer principles and more explicit guidance on how companies can apply a "gross" or "net" approach, ensuring a consistent and accurate representation of their sustainability performance without creating unnecessary burdens.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The proposed amendments streamline reporting by reducing repetition and offering companies flexibility in communicating sustainability information, while still maintaining standardized disclosure requirements for material topics. However, this overall drive for streamlining reporting could lead to oversimplification of complex sustainability issues. Crucial details regarding risks, plans on implementing missing material actions, or methodological approaches for metric calculation might be omitted. Flexibility should not compromise transparency or accountability.			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The simplification can help ease the reporting burden, particularly for smaller entities or those with limited resources. The shift toward more flexible application requirements also allows companies to tailor disclosures more closely to their operational realities. However, the removal of certain mandatory datapoints, especially around PATs, could lead to a loss of critical information and undermine transparency. Some granular disclosures offered users insight into governance maturity and risk mitigation practices and, under the new principles-based approach, such disclosures may be generalized or omitted entirely, weakening the ability of users to assess the credibility and effectiveness of corporate commitments. The deletion of Appendix C from ESRS 2 further compounds this issue. Its removal may lead to inconsistent interpretations and fragmented reporting. This risks reducing comparability across sustainability reports and undermines the usability of the framework. Furthermore, while aiming to improve the alignment, the amendments introduce new obstacles to interoperability with the ISSB's IFRS S1 and S2 standards. While ESRS has moved toward a less prescriptive model, IFRS S1 continues to require detailed qualitative disclosures on governance structures, strategic decision-making, and risk management processes. The reduction of narrative requirements in ESRS may create gaps that dual-reporting entities must fill separately to meet ISSB expectations. This could result in duplicative efforts and increased complexity for companies. An example of this divergence can be seen in the treatment of GHG intensity metrics. IFRS S2 mandates disclosure of GHG emissions intensity ratios across all seven cross-industry metrics, including emissions per unit of revenue. In contrast, the amended ESRS E1 has removed this metric from the mandatory disclosures.			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	The elimination of "may disclose" provisions from the main body of the standards resolves complexity, helping preparers and users better distinguish between required and optional disclosures. This clearer delineation supports more consistent interpretation and application across entities. Relocating all "shall disclose" data points into the main body of the standards, and placing mandatory application requirements directly beneath their corresponding Disclosure Requirements, is a positive structural change. It enhances navigability and reduces the risk of overlooking key instructions that were previously embedded in less visible sections.			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Moving some mandatory content from the Delegated Act to the NMIG, as proposed by EFRAG, indeed would help reduce ambiguity. The NMIG is a valuable resource for high-quality narrative disclosure, and even as optional guidance, it aids companies in structuring their responses, resulting in clearer and more relevant information. The primary benefit of this approach is that it makes the mandatory core of the ESRS far less intimidating, which is crucial for wider adoption and higher-quality compliance. By simplifying it, more companies can effectively engage with the standards, leading to a broader base of sustainability data across the market. Furthermore, the NMIG acts as a crucial educational tool, preserving valuable, detailed guidance that would have otherwise been lost. However, there is the risk of creating a divergence in reporting practices and disclosure quality. Well-resourced entities may likely to leverage the NMIG to generate comprehensive and granular reports, whereas others may adhere strictly to the minimum requirements of the mandatory standard. This divergence may compromise the consistency and comparability of data across the market. Furthermore, the equivocal and non-binding character of the guidance could engender inconsistent application.			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	While trying to reduce the reporting efforts, several of these reliefs risk undermining the reliability, comparability, and timeliness of sustainability disclosures. Companies may interpret these reliefs too broadly, potentially omitting material information that is essential for stakeholder decision-making. The absence of any time limit for the relief for lack of data quality poses a risk of its abuse. The increased reliance on estimates and partial data, may lead to inconsistent methodologies and diluted accountability. Such reliefs could paradoxically lead to a decrease in the availability of primary data. Without the incentive for companies to generate this data, the overall maturity of reporting is unlikely to improve. This situation risks creating a dependency on secondary data in the future. We recommend a temporary waiver, lasting 1-3 years and aligning with phase-in requirements, for reliefs related to lack of data quality, undue cost or effort, and focus on secondary supply chain data. Companies should still be encouraged to generate direct data over time. Moreover, these reliefs have a mixed impact on the alignment with IFRS S1 and S2. This will be commented on in question 21 as per the instructions.			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	To address concerns about potential misuse of data quality relief, we recommend establishing clear limitations and ensuring transparency regarding site exclusion. While this relief can be beneficial when reliable direct or estimated data are unavailable, a reporting scope should be specified, and any operational sites excluded from the calculation should be clearly indicated. This is essential to ensure the quality of information and prevent the potential misuse of this flexibility.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	No major comments, however, option 1 is preferred to align with IFRS Sustainability standards. Moreover, if all quantitative information is made voluntary, comparable information will be unavailable.			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Although efforts are being made to increase alignment, some measures negatively impact it. Specifically, it concerns additional ESRS-specific reliefs such as extending the concept of "undue cost and efforts" to all metrics, allowing reporting on partial scope, and exclusion of non-material activities from metric calculations if they are not expected to drive impacts, risks, and opportunities (IROs). Additionally, revised ESRS standards allow acquired subsidiaries to be included only from the next reporting period and disposed entities to be excluded from the start of the period, differing from IFRS Standards' immediate inclusion/ exclusion approach. Finally, ESRS simplifications hinder interoperability with ISSB by removing the preference for direct data in value chain metric calculations and eliminating common data points (e.g., the disclosure on gross GHG emissions intensity in ESRS E1 Climate Change). Therefore, more collaborative efforts are expected between EFRAG and ISSB in future phases to advance and not lose interoperability.			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	While simplification efforts improve the usability of the standards, the reduction in mandatory data points risks losing specific and granular information. This is particularly evident in the following areas: - Policies, Actions, and Targets (PATs): The consolidation of granular narrative requirements under ESRS 2 means that generic, high-level PAT disclosures may not adequately explain how companies manage specific material issues like water stewardship (ESRS E3) or impacts on value chain workers (ESRS S2). The removal of requirements for disclosing mechanisms to identify and report unlawful behavior under G1 also compromises governance transparency.			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	The removal of certain mandatory datapoints negatively affects the interoperability with ISSB's IFRS S2 standard. For instance, this includes the removal of IRO-1 integration into risk management, removal of Gross GHG Emissions Intensity and datapoints related to the integration of climate-related considerations into executive remuneration.			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	22.E2.	Comments on deleted datapoints in ESRS E2	I partially agree and partially disagree	Site-specific Impact Screening: The deletion of specifications for screening site locations for material impacts at topical level (e.g., pollution) results in the loss of granular, location-specific insights. Environmental impacts are often localized, and aggregated data can obscure severe impacts at specific sites. Removing mandatory site-level analysis could diminish the relevance of reporting on topics like water stress in specific basins or pollution affecting particular communities.			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	22.E3.	Comments on deleted datapoints in ESRS E3	I partially agree and partially disagree	Site-specific Impact Screening: The deletion of specifications for screening site locations for material impacts at topical level (e.g., water) results in the loss of granular, location-specific insights. Environmental impacts are often localized, and aggregated data can obscure severe impacts at specific sites. Removing mandatory site-level analysis could diminish the relevance of reporting on topics like water stress in specific basins or pollution affecting particular communities.			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	22.E4.	Comments on deleted datapoints in ESRS E4	I partially agree and partially disagree	Site-specific Impact Screening: The deletion of specifications for screening site locations for material impacts at topical level (e.g., biodiversity) results in the loss of granular, location-specific insights. Environmental impacts are often localized, and aggregated data can obscure severe impacts at specific sites. Removing mandatory site-level analysis could diminish the relevance of reporting on topics like water stress in specific basins or pollution affecting particular communities.			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	22.S1	Comments on deleted datapoints in ESRS S1	I partially agree and partially disagree	Non-employee Data Points: The removal of data points related to non-employees (contractors, freelancers, temporary agency workers) reduces transparency into the working conditions and potential impacts on this often vulnerable segment of the workforce, who may lack the protections and benefits of direct employees.			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	The proposed amendments appear rational, striking a balance between transparency and interoperability with other standards such as SFDR, without imposing additional burdens.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	The proposed amendments seem rational as they address stakeholder needs and align with the latest regulatory developments, such as the Eco-design for Sustainable Product Regulation and the Critical Raw Materials Act.			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	The addition of a fair presentation framework marks generally a positive development, bringing alignment with IFRS standards (e.g., GHG Emissions Boundary definition). However, it poses risks of subjectivity, lack of comparability, and a heightened risk of greenwashing. It will increase responsibility for auditors and could potentially complicate a creation of a common European sustainability audit standard.			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	For a clear understanding of financial institutions' strategic implications, both absolute and intensity figures are important. Permanent reliefs risk diminishing the incentive to improve data availability and quality, which are essential for managing climate issues and achieving transition objectives. Furthermore, under the Sustainable Finance Disclosure Regulation (SFDR) Principal Adverse Indicator (PAI) 1, financial institutions (including banks, asset managers, and insurance companies) are already mandated to report absolute emissions for Scope 1, 2, and 3 (individually and in aggregate) at both product and entity levels. Granting an exemption would complicate SFDR PAI1 reporting and create an uneven playing field for other sectors required to report.			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The revised threshold, now focusing on the top 10 largest countries by employee headcount, simplifies the reporting process by providing a clearer and more direct criterion. This approach enhances consistency across disclosures by guiding companies to prioritize reporting for countries where their employee presence is most significant. While some entities might see an increase in the number of countries reported, the overall benefit lies in improved clarity, which is crucial for achieving greater comparability and transparency in sustainability reporting.			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	A mismatch exists between the objective of disclosing gaps between actual and adequate wages and the proposed methodology for non-EU countries as the adequate wage benchmarks for the EU companies could match a lower national or sub-national minimum wage for the non-EU companies. The methodology asks whether the statutory minimum wage takes into account the ILO wage setting principles under AR 22 b) i). These principles are not relevant to the estimation of living wages. We recommend reviewing Amended AR 22 b i) by: - Referring explicitly to the conclusions of the Meeting of Experts on wage policies, including living wages, instead of the ILO principles. - Removing the second point which refers to the use of Statutory Minimum wage as legal minimum wages are usually substantially below accepted levels of adequate wage or living wage, creating different standards for wage requirements between EU- and non-EU employees, and making the reported information on no-EU employees irrelevant for decision-makers and financial institution. Furthermore, official norms on wages may not be periodically reviewed as per ILO principles, or not adequately adjusted, which will require preparers to conduct additional due diligence for each country where this data point may be used, leading to more bureaucracy and subjective judgement calls to define what are "accepted" adjustments. Additionally, we suggest enhancing the AR by adding examples of/references to IDH recognised Living Wage methodologies. As we acknowledge that the access to these databases is not free, we recommend in parallel to make available a free of charge living wage database, in a practical format for data extraction and consolidation.			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	The focus on more relevant indicators in the revised ESRS version marks a positive change, particularly as the previous iteration included multiple optional SFDR Principal Adverse Indicators (PAIs), which constituted a significant part of the mandatory data points. However, a few specific concerns have emerged: - Merging human rights policy commitments could result in a loss of detailed information, particularly concerning distinctions between an organization's own workforce and affected communities. - The removal of the mandatory GHG Intensity metric negatively impacts interoperability with IFRS. Suggest to make sure that the new amendments don't compromise disclosure of important information and negatively affect interoperability with IFRS standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	We suggest reviewing the AR and providing updated guidance for this topic. The field of corporate biodiversity is advancing rapidly, and it is crucial that this guidance reflects the latest scientific consensus and leading international frameworks. A revised AR should highlight the following points: - The revised guidance should explicitly reference any relevant global frameworks for corporate target-setting endorsed by ESRS, such as GBF, SBTN, UNEP FI, PRI or others. It should be clearly stated that ESRS has not developed additional guidance for target-setting, and that while some dedicated guidance does exist for some aspects (i.e. land, freshwater), guidance on specific niche topics is limited and ongoing (i.e. marine biodiversity; invasive species). - Provide an overview of key methodological considerations for the target-setting process and transparent disclosures on biodiversity. For example, emphasize the importance of location analysis when prioritizing the different scales for target-setting. Introduce concept of landscape-level targets (if not otherwise mentioned), clarify scenarios where certain industries may prioritize value chain targets versus landscape-level targets. Highlight the importance of prioritizing targets in landscapes with high-priority ecosystems, key activities or raw material suppliers. Regarding disclosures, encourage companies to disclose how targets align to SMART frameworks, guidance used, any ecological thresholds or methodologies used for measurement, etc. - Emphasize the unique role of financial institutions: given the significant role and interest by FIs in protecting biodiversity, it is useful to distinguish the target-setting approach from other sectors. For example, they must focus on addressing financed impacts through portfolio alignment, engagement with high-impact clients, and the mobilization of capital towards nature-positive activities. - Highlight, in line with current practice, that biodiversity offsets should not be included in target-setting. Encourage companies to disclose whether offsets were included in any targets.			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	This decision demonstrates a clear commitment to simplification and legal alignment. By retaining only the unadjusted gender pay gap, ESRS S1-15 directly aligns with the EU Pay Transparency Directive (EU 2023/970), which mandates disclosure of the global unadjusted figure. This approach also supports the architectural principle of streamlining standards by removing all voluntary "may disclose" data points. Importantly, removing the voluntary data point does not prevent companies from disclosing adjusted figures. Organizations that find such data material can still include it in their own reporting using NMIG as reference.			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Points of concern requiring further improvement: - fair representation - undue cost of effort - reliefs for metrics without time limit and ambiguity - complexity assessing remediation, mitigation and prevention			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Points of concern requiring further improvement: - Disclosure of reasons for not having PATs or plans to implement them is no longer required			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Points to highlight: - once developed, clarification of the meaning of 'compatibility with 1.5 degrees" for the Transition Plans disclosure should be added - collaborate with ISSB to preserve and not to lose the interoperability between the standards			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Point to highlight: - The new disaggregation/aggregation principle at DMA raises concerns due to the absence of site-specific disclosures in E2, E3, and E4. This concern arises from the potential loss of important local-level information, particularly as other international frameworks like TNFD may require such detailed reporting (and IFRS might follow suit). The general principle for location-specific considerations in ESRS 1 and 2 applies emphasizing appropriate aggregation or disaggregation, but the granular, mandatory site-specific disclosures were moved or deleted from topical standards			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Point to highlight: - The new disaggregation/aggregation principle at DMA raises concerns due to the absence of site-specific disclosures in E2, E3, and E4. This concern arises from the potential loss of important local-level information, particularly as other international frameworks like TNFD may require such detailed reporting (and IFRS might follow suit). The general principle for location-specific considerations in ESRS 1 and 2 applies emphasizing appropriate aggregation or disaggregation, but the granular, mandatory site-specific disclosures were moved or deleted from topical standards			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Point to highlight: - The new disaggregation/aggregation principle at DMA raises concerns due to the absence of site-specific disclosures in E2, E3, and E4. This concern arises from the potential loss of important local-level information, particularly as other international frameworks like TNFD may require such detailed reporting (and IFRS might follow suit). The general principle for location-specific considerations in ESRS 1 and 2 applies emphasizing appropriate aggregation or disaggregation, but the granular, mandatory site-specific disclosures were moved or deleted from topical standards			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Points to highlight: - Deletion of SBM-3 from S1-S4 and substantial removal of granular disclosures could be leading to more generic information - Merging Human rights policy commitments from the four Social Standards (S1-S4) into a "human rights policy" could result in a loss of detailed information, particularly concerning distinctions between an organization's own workforce and affected communities			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	The same points to highlight as for S1 and: - EFRAG is currently not addressing specific value chain reporting requirements for financial institutions, pending ongoing discussions in CSRS and CSDDD Level 1 regulations. This may lead to uncertainty for these entities until further guidance is issued - Shift of focus from the primary supply chain data might undermine the quality of disclosed information . Especially taken into account that for the first three years of reporting, undertakings may limit upstream and downstream value chain information to data already available in-house or publicly available information			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Points to highlight: - Removal of SBM-3 might result particularly in less specific information being available for individual stakeholder groups, such as affected communities (S3) and consumers/end-users (S4), because specific granularity requirements for the materiality assessment have been removed - While primarily an environmental concern, the absence of site-specific disclosures might also affect S3 as the ability to link impacts to specific geographic locations or ecosystems is crucial for a meaningful understanding of risks and impacts on affected communities			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Points to highlight: - Removal of SBM-3 might result particularly in less specific information being available for individual stakeholder groups, such as affected communities (S3) and consumers/end-users (S4), because specific granularity requirements for the materiality assessment have been removed			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Positive point: - "confirmed incidents" of corruption and bribery metric was added Points to highlight: - the removal of many granular narrative requirements from mandatory content could lead to more generic and less detailed disclosures related to business conduct			
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EcoVadis	User (analyst, data provider, rating agency, etc.)	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Although subject to ongoing developments at the legislative level (Level 1, amending the CSRD), we still want to highlight our concern related to several phase-in reliefs, extending reporting delays for ESRS S2, S3, S4, E1, and E4 standards. Many companies, particularly those with fewer than 750 employees on their balance sheet dates, will benefit from these delayed reporting requirements. While this provides a reprieve, it could slow down the overall progress of sustainability reporting and result in reports lacking relevant information in the next 1-3 years. In particular, this concerns the relief to omit total GHG emissions for the first year of preparation.			
Survey	NG Nordic AS	Preparer (non-financial preparing a sustainability report)	Norway	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	The proposed amendments have sufficiently simplified the DMA process. We welcome the option of implementing either a bottom-up or top-down approach and also the fact that disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, in order to avoid excessive detail and provide for better readability and conciseness.			
Survey	NG Nordic AS	Preparer (non-financial preparing a sustainability report)	Norway	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We share the view with the above mentioned statement within which EFRAG SRB members consider the added guidelines excessively complex and would welcome even more simplified and straightforward guidance.			
Survey	NG Nordic AS	Preparer (non-financial preparing a sustainability report)	Norway	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We welcome the flexibility to support more concise reporting through the possibility of including an executive summary in the beginning of the sustainability reporting and the use of appendices to separate more detailed information from key messages.)			
Survey	NG Nordic AS	Preparer (non-financial preparing a sustainability report)	Norway	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We welcome the improved ability to disclose information at a higher aggregation level than the material impacts, risks and opportunities.)			
Survey	NG Nordic AS	Preparer (non-financial preparing a sustainability report)	Norway	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We welcome the clarified structure and the reorganization of the content of the requirements. However, we believe that there is still much room to improve the language of the Standards for better understandability, clarity and simplicity. We would welcome Standards that use less jargon and are more accessible and concise.			
Survey	NG Nordic AS	Preparer (non-financial preparing a sustainability report)	Norway	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We agree that the Non-Mandatory Illustrative Guidance' ('NMIG') serves as a useful support material for reporting non-mandatory datapoints.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	NG Nordic AS	Preparer (non-financial preparing a sustainability report)	Norway	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	We welcome the proposed burden relief measures, especially relief for lack of data quality and the possibility for undertakings to use direct data or estimates depending on practicability. However, the relief "undue cost or effort" seems to very much open to interpretation, meaning that a possible definition of what constitutes an "undue cost or effort" might be needed.			
Survey	NG Nordic AS	Preparer (non-financial preparing a sustainability report)	Norway	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	As stated in comment above, need clear definition of "undue cost or effort".			
Survey	NG Nordic AS	Preparer (non-financial preparing a sustainability report)	Norway	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	We agree with Option 2, which limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis.			
Survey	NG Nordic AS	Preparer (non-financial preparing a sustainability report)	Norway	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	We welcome the fact that disclosure requirements on Anticipated Financial Effects have been significantly reduced. However, we would still appreciate further simplification and clarification on these topics.			
Survey	NG Nordic AS	Preparer (non-financial preparing a sustainability report)	Norway	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	NG Nordic AS	Preparer (non-financial preparing a sustainability report)	Norway	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	NG Nordic AS	Preparer (non-financial preparing a sustainability report)	Norway	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	We agree with all the new mandatory datapoints, except for E5-5. As a waste management company, we believe that traceability of waste shipments and ensuring that waste is treated in a sustainable and environmentally responsible manner, is extremely important. Since the environmental (and social) impact of waste shipments depends on their final destination, the ESRS should be aligned with policies like the EU's Waste Shipment Regulation aiming to ensure that waste is only sent to authorized waste treatment facilities, especially for exports outside the EU/EEA. Thus, companies that have identified E5 as a material topic should be able to ensure that the final destination of waste is known, or at the very least disclose how they will improve knowledge of their waste flows.			
Survey	NG Nordic AS	Preparer (non-financial preparing a sustainability report)	Norway	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	NG Nordic AS	Preparer (non-financial preparing a sustainability report)	Norway	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	We agree with the threshold changes to disaggregate the metrics to the ten largest countries with at least 50 employees.			
Survey	NG Nordic AS	Preparer (non-financial preparing a sustainability report)	Norway	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	We agree with the conclusion to maintain the global unadjusted pay gap and delete the voluntary datapoint on adjusted gender pay gap by employee ratio.			
Survey	NG Nordic AS	Preparer (non-financial preparing a sustainability report)	Norway	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We agree with the simplification and conciseness of reporting at sub-topic level when only a sub-topic is material. Need clarification on some points: If a company has no transition plan (paragraph 15) is the "shall" removed from the DRs stated in 14a, b, c (i.e. does a company not have to disclose paragraph 14a, b, c)? We would welcome better guidance on methodology around quantifying financial-related risks. Also, more simplification on disclosures around quantified financial impacts and transition plan investments, balancing transparency with business sensitive or confidential data. Related to this, the text under AR 2 in ESRS E1 is not clear on what still should be disclosed: While this information helps demonstrate the coherence and credibility of the transition plan, there is no expectation that the undertaking disclose all internal information used to manage the plan. Paragraph 44(c): define "significant" emissions- this can differ as GHG emissions could be significant for a target or significant for overall atmospheric GHGs. Paragraph 42 (69 amended) - question the value of this considering the similarity to EU Taxonomy.			
Survey	NG Nordic AS	Preparer (non-financial preparing a sustainability report)	Norway	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	We strongly believe that the ESRS requirements for reporting waste should be aligned or mapped with the Recovery and Disposal Operations codes outlined in Annex I and Annex II of the Waste Framework Directive (WFD) (Directive 2008/98/EC). Currently it is unclear and open to too much interpretation on whether waste that is thermally treated, either at waste-to-energy plants or high-temperature incineration plants which recover energy and generate electricity and district heating, should be reported as "other recovery operations" or "thermal-based disposal/incineration"). We suggest the following changes to the section 37-38 in the Disclosure Requirement E5-5 – Resource outflows: c) the percentage and/or total weight diverted from disposal, with a breakdown between hazardous waste and non-hazardous waste, and a breakdown by the following recovery operation types: i. preparations for reuse; ii. recycling; and iii. other recovery operations; (This type should be split into material recovery and energy recovery. The option energy recovery should include recovery code R1 (Use principally as a fuel or other means to generate energy) as outlined in the Annex II of the Waste Framework Directive (Directive 2008/98/EC).) (d) the percentage and/or total weight directed to disposal with a breakdown between hazardous waste and non-hazardous waste, and a breakdown by the following disposal operation types: i. thermal-based disposal; (We believe that this type should be reverted back to incineration, and it should only include disposal codes D10 (Incineration on land) and D11 (Incineration at sea) as outlined in Annex I of the Waste Framework Directive (Directive 2008/98/EC)). ii. landfill; and iii. other disposal operations)			
Survey	NG Nordic AS	Preparer (non-financial preparing a sustainability report)	Norway	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We do welcome the proposed ESRS simplifications, since they represent a step towards more pragmatic and accessible reporting. However, as has also been highlighted in the EFRAG online event with a focus on preparers, we also believe that further clarification on ambiguous terms and appendices is still necessary. Ultimately, for a framework of this scale to succeed, it must be both robust and adaptable to accommodate the realities of companies with extensive value chains. All in all, we welcome the ESRS standards and remain a strong advocate of increased transparency and harmonized sustainability reporting. In addition to further simplifications, we would also welcome a "Mandatory Illustrative Guidance" or similar support material, which would act as a support and guidance for Preparers on how to implement the mandatory disclosure and reporting requirement as outlined in the Delegated Act. This Guidance could include simple and straightforward explanations of reporting requirements, how to report' guidelines (methodology) as well as best practice examples on how these have been or could be implemented.			
Survey	Sygris	Consultant (including software vendor)	Spain	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Overall, Sygris welcomes the amendments of EFRAG and strongly appreciates the efforts to simplify the Double Materiality process. The revised ESRS 1 materially clarifies the DMA: either a top-down or bottom-up approach, elevates materiality of information as a general filter, and allows disclosures at either topical or IRO level.These are meaningful improvements.Yet, further refinement would strengthen both usability and comparability.It could be advantageous to consider the following aspects: • Practical orientation: Since the DMA flowchart has moved out of ESRS 1 into NMIG, the Standard would benefit from one or two short, normative examples in ESRS 1 itself showing when to report at topic vs. IRO level, and how to aggregate related IROs without obscuring material information. The current NMIG flow and examples are helpful but non-binding; signposting them more explicitly in ESRS 1 would aid consistent application. • Aggregation/disaggregation: The new emphasis on aggregating at the "right level" and avoiding long site lists is welcome; please add a clear presumption against enumerating sites unless site-level variation is itself material, plus a short decision tree in NMIG to operationalise this. • Primary inputs and data quality: ESRS 2 now requires disclosing metric units, calculation methods, data types/sources and-where proxies are used-plans to improve quality. Consider making explicit in ESRS 1 that identifying "primary inputs" for key metrics (e.g., by topic) is good practice; this would enhance traceability while staying within the materiality filter. • Interoperability and reliefs: The clarifications about value-chain estimation, undue cost or effort, and the "value-chain cap" meaningfully reduce burden; please consolidate these references into a single cross-referenced paragraph in ESRS 1 to prevent scattered interpretations during assurance. Also continue tightening language alignment with IFRS S1/S2 so DMA judgments read consistently across frameworks.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Sygris	Consultant (including software vendor)	Spain	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Sygris finds the new guidance in ESRS 1 (34–36 and Appendix C) useful and believes that it clarifies how to consider remediation, mitigation and prevention. This should improve consistency in judgments and comparability across reports. However, to avoid excessive reporting and ambiguity, two aspects can be highlighted 1. Potential impacts assessed on a "gross" basis when "significant ongoing actions" are required. This principle is understandable (strong controls shouldn't make a topic vanish), but it risks perpetual reporting in highly regulated sectors. Please define "significant ongoing actions" with objective indicators (e.g., frequency, cost/intensity, dependence on human controls vs. engineered safeguards) and set a rebuttable presumption that, where controls are embedded, independently verified, and demonstrably effective over multiple periods, a net assessment may be applied with clear disclosure. 2. "Fully remediated" actual impacts. Provide objective criteria (e.g., cessation, remedy to affected stakeholders, no residual severity/likelihood above threshold) and confirm that in subsequent periods only a concise cross-reference is needed rather than a full narrative. To operationalise and support assurance, require a short standardised table for each material impact assessment that captures: impact type (actual/potential); period of occurrence; assessment basis (gross/net) with rationale; action type (remediation/mitigation/prevention); action status (ongoing/completed); data basis (primary/estimate/proxy) and coverage. This "report once, reference many" table could be cross-referenced from ESRS 2 and the topical standards to avoid duplication. Further, (a) include sectoral NMIG examples illustrating both gross and net cases; (b) align terminology with IFRS S1/S2 and GRI to keep interoperability; (c) clarify interaction with reliefs (e.g., undue cost/effort) and with value-chain estimation and quality tiers; and (d) set a post-implementation review to test whether the gross approach for potential impacts is creating noise relative to decision usefulness.			
Survey	Sygris	Consultant (including software vendor)	Spain	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The package meaningfully improves readability and connectivity. However, an optional executive summary, clearer use of appendices, and a stronger "connected information" principle can further reduce duplication and guide readers in navigating from strategy to metrics. A few guardrails would also help ensure the improvements work in practice. First, it would be useful to encourage a genuinely concise, decision-useful front section (ideally 1–2 pages) that covers: (i) the undertaking's most material impacts, risks and opportunities; (ii) the strategy/transition response; (iii) targets and progress; and (iv) a compact KPI panel (e.g., emissions, water, workforce, conduct). If cross-references are used, require precise anchors to strengthen traceability for assurance and allow readers to locate disclosures quickly. Second, regarding "report once, reference many," it should be clear that each mandatory datapoint has a single authoritative location, with cross-references elsewhere (including ESRS 2) rather than repetition. A short, required "map of disclosures" (an index listing where each ESRS requirement is addressed) would materially reduce fragmentation and help users connect statements with other corporate reports. Third, appendices are the right place for granular methods, boundary decisions, site lists, and long disaggregation tables, provided the main body retains key conclusions and headline figures. A presumption against enumerating facilities or subsidiaries should apply unless variance at that level is material; otherwise, details should be summarised and relegated to appendices. Fourth, to align with corporate reporting, preparers should state up front how scope, consolidation boundary, and reporting period reconcile with financial statements and risk management disclosures. Where definitions differ, a one-line explanation should be required. Finally, Sygris considers that standardised structures shrink narrative bloat and improve assurance while preserving flexibility (e.g., targets table, progress table, actions/remediation table).			
Survey	Sygris	Consultant (including software vendor)	Spain	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Sygris agrees with the architectural re-balance between ESRS 2 and the topical standards. However, two risks were identified to preserve comparability: First, PAT moved from prescriptive datapoints to AR. Flexibility is helpful, but comparability can fray if PAT disclosures become narrative heavy. Establish a minimal, standard PAT summary table -required when a topic is material- covering: (i) policy in place (Y/N) and scope; (ii) key actions with status (planned/ongoing/completed) and coverage; (iii) target(s) with metric, baseline year, baseline value, current value, and target year; (iv) resourcing/capex linkage where material; and (v) cross-reference to the relevant IRO(s). Second, deletion of topical specifications to GOV/SBM/IRO (save a few exceptions) may create gaps for first-time adopters. To avoid re-inflating narrative, provide concise NMIG exemplars per topic that show "report once, reference many," and require precise cross-references from ESRS 2 to topical DRs so each datapoint has a single authoritative location. Further refinements to balance effort and usefulness: • Aggregation: Permitting disclosure at a higher aggregation level than individual IROs is pragmatic, but require an explicit statement of heterogeneity (e.g., where outliers exist) and a pointer to more granular information in an appendix when aggregation could mask material variation. • "No PAT" signalling: Keeping the indication of which material topics are not covered by PAT is valuable. Add a short "reason/trigger" field (e.g., threshold, dependency, regulatory timing) to prevent boilerplate and promote accountability without reintroducing timelines. • Interoperability: Align headings and field names with IFRS S1/S2 (governance, risk management, metrics & targets) and maintain a mapping note so users can reconcile disclosures across frameworks.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Sygris	Consultant (including software vendor)	Spain	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Sygris sympathises with the amendments to move the Standards toward clearer, more navigable reporting-shorter ESRS 2, stronger "connected information," and permission to use executive summaries and appendices. To lock in understandability and real-world accessibility, a few targeted additions would make a marked difference. · A plain-language layer. For every Disclosure Requirement (and each counted datapoint), provide a short, non-legal "user label" and a one-sentence purpose statement alongside the formal text. This reduces misinterpretation and helps preparers keep disclosures decision-useful, not verbose. · Naming discipline. Require concise, unique short names for datapoints and avoid near-synonyms across standards (e.g., "adequate wages" vs. "living wage"). Add a controlled glossary flagging terms with potential ambiguity (e.g., "fully remediated," "significant ongoing actions," "proxy data"), with cross-references to examples in NMIG. · "Report once, reference many." Mandate a short disclosure map (an index listing where each ESRS requirement is addressed and cross-linked). This curbs repetition, improves assurance traceability, and connects the sustainability statements to the financial report and risk disclosures. · Accessibility in digital form. Publish an official, machine-readable list of datapoints (with IDs, plain-language labels, units, and "when material" logic), plus maintained mappings to IFRS S1/S2, GRI, and SFDR-PAI. This improves comparability and reduces inconsistent interpretations across jurisdictions. · Consistency of quantitative focus. Continue prioritising quantitative fields over narrative where feasible (e.g., targets tables with baseline, scope, coverage, and progress). Where narrative is essential, provide concise prompts and exemplars to avoid boilerplate. · Reliefs and data quality. Standardise a small table to disclose when "undue cost or effort," estimates, or proxies are used, with coverage and improvement plans. Clear, repeatable structures enhance readability without re-inflating volume.			
Survey	Sygris	Consultant (including software vendor)	Spain	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	1. Status and assurance clarity. Reiterate prominently-in ESRS 1 and at the start of each NMIG module-that NMIG is non-authoritative and deviation from an example is not a non-compliance, provided the relevant "shall" requirements are met. Encourage assurance providers to reference NMIG as an aid, not a checklist, to avoid "normative creep." 2. Scope discipline. NMIG should house (a) concise examples of acceptable structures (e.g., targets tables, actions/remediation summaries, gross vs. net materiality illustrations); (b) brief decision aids for aggregation/disaggregation and use of estimates/proxies; and (c) optional sector sketches where risks are distinctive. Avoid relocating essential definitions or mandatory fields into NMIG; if something is consistently needed for comparability, place it in the Standard (or AR), not in guidance. 3. Maintenance and accessibility. Each NMIG item should clearly show when it was last updated, what has changed, and keep older versions available for reference. This way, preparers and assurance providers can quickly see if something has been modified without guessing. To make it practical, NMIG should be published not only as a PDF but also in simple, structured formats (like tables and spreadsheets) so that companies can easily use the templates and examples in their systems. When NMIG refers to other frameworks (IFRS S1/S2, GRI, SFDR PAIs), the links shpuld be kept current, with short notes explaining where definitions or approaches differ. In terms of content, priority NMIG items that would measurably improve comparability and reduce narrative volume include: (i) a one-page "report once, reference many" map example; (ii) a minimal PAT summary table (policy yes/no, actions with status and coverage, target(s) with baseline/metric/target year, and cross-reference to the relevant IROs); (iii) examples of when site-level detail is decision-useful versus summarized; and (iv) standardised disclosures for reliefs (undue cost/effort) and data quality tiers (primary/estimate/proxy, with coverage).			
Survey	Sygris	Consultant (including software vendor)	Spain	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	We acknowledge EFRAG's intention to reduce burden, but we do not agree that the reliefs, as currently designed, achieve the right balance. While the measures introduced may ease first-year implementation, they leave critical gaps in transparency, comparability, and interoperability with IFRS S1 and S2. Unless these issues are addressed, the reliefs risk creating uncertainty for preparers and reducing the decision-usefulness of the disclosures. Our key concerns are: · Interoperability gaps: No official concordance exists between ESRS and IFRS S1/S2 at datapoint level. Without clear mapping, including notes on scope, boundaries, time basis, and restatement rules, preparers face parallel obligations and users face inconsistent outputs. · "Undue cost or effort": The relief is too open-ended. Without objective criteria (e.g., disproportionate cost relative to decision-usefulness, legal barriers, data unavailability), senior management approval, and a sunset plan, it risks becoming a loophole rather than a safeguard. · Relief disclosures: The absence of a standardised format reduces comparability. A concise table should be required whenever relief is applied, covering scope, method, uncertainty, and planned improvements. · Data-quality tiers: Removing the preference for direct data without codifying a tiering system weakens reliability. Disclosing the data mix and committing to improvements over time is essential for comparability. · Acquisitions/disposals: We disagree with requiring high-level disclosures in the acquisition year. Timing strongly affects relevance, and due diligence already identifies major risks. Deferral to the following year ensures information is both reliable and comparable. In our view, the reliefs in their current form lower burden but fail to uphold the transparency, comparability, and interoperability required to achieve policy objectives.			
Survey	Sygris	Consultant (including software vendor)	Spain	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We believe that the partial-scope relief is a practical step that acknowledges real data-quality constraints-especially in value chains-and it rightly preserves the obligation to disclose while requiring transparency about actions to expand coverage. That balance is sound. Nonetheless, we recommend standardising what must be disclosed when invoking the relief: (i) the percentage of coverage achieved by metric/scope (own operations vs. specific Scope 3 categories), (ii) the data type used for each portion (direct, estimate, proxy) with a short reliability rationale, (iii) the specific barriers to fuller coverage, and (iv) a time-bound improvement plan with interim milestones (e.g., next 1–3 reporting cycles). Two interactions merit clarification. First, tie the improvement plan to the "reasonable and supportable information available without undue cost or effort" principle, so reporters aren't pushed into costly data chases that yield low decision-usefulness. Second, , align wording with the Basis for Conclusions: acknowledge that no fixed time limit is set, but require year-on-year progress disclosure (coverage %, key actions completed) and recognise the removal of the former "primary data first" hierarchy-now replaced by practicability and reliability-so estimates are acceptable where justified. This will improve comparability, interoperability, and auditability without undermining flexibility.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Sygris	Consultant (including software vendor)	Spain	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Sygris agrees that Option 1 strikes the right balance in the short term. It maintains decision-useful discipline while acknowledging genuine estimation hurdles. Requiring qualitative context and permitting omission of quantitative figures only when measurement is infeasible or when uncertainty would mislead is an appropriate center of gravity. We also support the explicit exclusion of a "skills/capabilities" excuse, which rightly places responsibility on governance and planning rather than resourcing narratives. To avoid open-ended under-quantification, we initially support the idea of a standardized disclosure package whenever quantitative information is omitted, covering: (i) affected financial statement elements; (ii) scope coverage; (iii) reason for non-measurement; (iv) methods considered and why they were rejected; and (v) a time-bounded improvement plan. Safe-harbour language should also apply to forward-looking estimates to encourage good-faith quantification. That said, we recognize that over the medium to long term this framework could become rigid and bureaucratic. Imposing a full standardized package or improvement milestones in every case may generate little value where uncertainties are structural or estimates are inherently unreliable. More flexibility should be allowed in such cases, limiting disclosure to a clear qualitative explanation of the challenges and the financial areas most affected, without forcing unrealistic commitments or detailed accounts of rejected methodologies. Further refinements include encouraging aggregation or ranges when confidentiality is at stake, permitting sensitivity ranges or scenario-based bands (as in climate DR E1-11) where point estimates are unreliable, and introducing a simple "estimation status" taxonomy (separable/estimable; estimable as range; not separable) for consistency with IFRS S1/S2. This approach preserves short-term discipline while ensuring that, in the long run, disclosures remain decision-useful rather than mechanical or low-value.			
Survey	Sygris	Consultant (including software vendor)	Spain	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	The remaining scope of E1-11 is clearer than before and focuses on investor-relevant inputs (assets/revenue at risk, methods, horizons). Re-framing the objective and linking it to current financial effects in ESRS 2 is helpful, and the shift of some content into AR/NMIG reduces clutter. However, paragraphs 40–42 still feel heavy for many reporters. For physical risk, naming "location of key assets" is decision-useful but should be bounded (e.g., materiality thresholds, sensitive-site aggregation) to avoid long site lists and confidentiality issues; otherwise it may produce noise rather than signal. For transition risk, the real-estate collateral breakdown appears bank-centric; it should apply only where such exposures are material, with explicit sectoral proportionality. Sygris supports Option 1's relief when quantitative estimation is not separately identifiable or involves prohibitive uncertainty, paired with transparent qualitative effects and methodology-this is pragmatic and aligns with IFRS S1/S2 intent while keeping discipline. Where Option 2 (qualitative-only) is used, safeguards should ensure it does not become a default; qualitative narratives should still point to affected financial-statement line items and time horizons. Two further tweaks would improve feasibility without eroding usefulness: • Clarify aggregation: permit reporting at topic/IRO level using the same granularity at which risks are managed, to avoid duplication with ESRS 2 resilience and to enable "report once, reference many." • Expand NMIG examples (especially for potential liabilities) so preparers and assurers converge on consistent practices. Phasing and "undue cost or effort" reliefs should be explicitly cross-referenced alongside E1-11 to make the path to quantification predictable (year 1 omission; up to three years qualitative if quantification is impracticable).			
Survey	Sygris	Consultant (including software vendor)	Spain	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	The balance is not yet optimal. Introducing reliefs that go beyond IFRS S1/S2 inevitably creates new gaps, and the removal of several ISSB-aligned "shall" datapoints risks undermining one-to-one mappings. Divergences on Scope 3 omission (and the pending decision on opportunity-sensitivity relief) add further asymmetry. Individually these choices may be justified; collectively they chip away at practical interoperability for users who must reconcile ESRS and IFRS reads of the same business. We recommend four adjustments: 1. Publish and maintain an official, machine-readable, field-level mapping (ESRS ↔ IFRS S1/S2, with references to GRI and SFDR/PAI), updated alongside any future amendments and with clear change logs. 2. Where ISSB-aligned datapoints are removed, provide an explicit replacement route (standard table in ESRS, AR/NMIG template, or sanctioned cross-reference) so equivalence is preserved. 3. For boundary alignment, require a brief quantitative bridge explaining material differences between financial control and operational control where both are presented. 4. For any ESRS-specific relief, include a short, standardised "interoperability note" stating whether an equivalent IFRS disclosure would be satisfied, partially satisfied (with conditions), or not satisfied, and why. Directionally, the package moves the needle toward global consistency. With stronger, maintained mappings and tighter governance around ESRS-only reliefs, the balance between simplification and interoperability would land in a clearly "agree" zone.			
Survey	Sygris	Consultant (including software vendor)	Spain	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Sygris	Consultant (including software vendor)	Spain	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	1. Board oversight & remuneration linkage. The log notes deletion of disclosures about management remuneration tied to sustainability, limiting coverage to members of the administrative, management and supervisory bodies. This creates a gap versus IFRS S1/S2 and weakens clarity on incentive alignment. A minimal datapoint should be restored: whether variable pay for the CEO/executive team includes sustainability targets and how performance is tracked. 2. How the board is informed (ex-GOV-2). The consolidation into GOV-1 trimmed details on who informs the board and how often. A concise datapoint on frequency, channels, and committee ownership would preserve accountability without reviving narrative sprawl. 3. Cross-referencing ("report once, reference many"). The prior requirement to list items incorporated by reference was deleted as overlapping with para 28(d). Please ensure a clear mechanism remains-preferably a single index-to avoid duplication across the statement.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Sygris	Consultant (including software vendor)	Spain	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	1. We disagree on which datapoints were cut. Gross GHG emissions intensity. This datapoint is deleted (users "can derive"), but intensity is one of the few normalizing metrics that allows cross-company comparison without deep model-building by users. Keeping a single, simple, mandatory intensity indicator (e.g., per net revenue and/or per unit of production where relevant) would materially improve comparability with minimal burden. 2. Total GHG emissions. The standalone "total" datapoint has been removed on the basis it can be derived from Scope 1, 2, 3. In practice, explicit "Total" rows prevent omission/aggregation errors and anchor assurance. We recommend retaining a standardized "Total gross GHG" line in the summary emissions table when climate is material, even if it is computationally redundant. Additionally, moving narrative "may disclose" material to AR/NMIG is welcome, but key signposting should remain mandatory in E1 to avoid ambiguity: a) the basis and units for activity energy data that roll up into emissions; b) clear labels for Scope 2 market- vs location-based figures; and c) a compact, standard layout for targets, progress, and base year (already simplified in the new drafting conventions, but should remain visible as "shall" where climate is material).			
Survey	Sygris	Consultant (including software vendor)	Spain	22.E2.	Comments on deleted datapoints in ESRS E2	I partially agree and partially disagree	· E2-3 target qualifiers (former para 23, items a–d) moved to NMIG. Moving the list of sub-areas out of the main text reduces prescription, but it also blurs at-a-glance comparability across reporters. At minimum, keep a compact "tick-box" datapoint stating which sub-areas a target covers, while leaving detailed narrative in NMIG. · Ecological thresholds deleted from E2 and treated as cross-cutting in ESRS 2. Sensible for consistency, but E2 should include an explicit cross-reference to ESRS 2 GDR-T so preparers don't miss it in pollution-specific target setting. · E-PRTR threshold reference removed from the main DR and replaced by AR linking to the Industrial Emissions Portal (IEP) Regulation Annex II. Alignment with current law is welcome and reduces duplication; however, a simple mandatory flag-whether any reported pollutant exceeded IEP Annex II thresholds in-period-would preserve decision-useful signal without re-introducing burden. · Contextual location indicators (AQI, DEGURBA) moved to NMIG. Reasonable for reduction, but NMIG should provide a standard table (optional) to keep presentations consistent when these are material. · Deletion of E2-specific IRO mapping (former AR 4–7) in favor of ESRS 2. This avoids repetition; add an explicit signpost in E2's objective/DR intros to "report once, reference many" via ESRS 2 to prevent accidental gaps. · Minor editorial deletion ("indoor and outdoor" pollution). Support-measurement practicality and clarity improved.			
Survey	Sygris	Consultant (including software vendor)	Spain	22.E3.	Comments on deleted datapoints in ESRS E3	I partially agree and partially disagree	· Minimal structure for targets. Several narrative qualifiers around targets/actions were deleted or shifted to NMIG. Keep the standard lean, but reinstate a compact, mandatory target schema (metric, base year, target year, organisational boundary, whether it covers areas at water risk). This preserves comparability without bringin back the heavy narrative · Location granularity with thresholds. Site-by-site lists were rightly deleted to prevent noise but require a threshold-based location disclosure (e.g., top sites accounting for ≥70–80% of total withdrawal/consumption or any site >10% of total) and a clear flag where metrics relate to high-water-stress areas. Discharge/return pathways flags. Detailed descriptions of projects (e.g., reinjection to aquifers, reuse schemes) moved to NMIG. Add a binary/checkbox line-item for material discharge pathways (to surface water, to groundwater/reinjection, to third parties for reuse) so readers can compare undertakings without wading through narratives. · Explicit cross-references. With ecological thresholds and risk-identification detail deleted from E3, add clear signposts in E3 objectives/DR intros pointing to the relevant ESRS 2 paragraphs and NMIG examples. That operationalises "report once, reference many" and reduces accidental omissions.			
Survey	Sygris	Consultant (including software vendor)	Spain	22.E4.	Comments on deleted datapoints in ESRS E4	I partially agree and partially disagree	Nonetheless, Sygris might disagree in: 1. Site exposure to sensitive areas. Long site lists were rightly cut, but a minimal thresholded disclosure could remain mandatory: number and total area of sites in/near protected areas or KBAs, plus the share of total footprint these represent. This preserves visibility of exposure without reviving page-long annexes. 2. Mitigation hierarchy application. Detailed narrative on avoidance/minimisation/restoration offsets moved out. Keep a compact tick-box datapoint for which hierarchy steps were applied to material projects in-period, and whether any biodiversity offsets are in use. The yes/no signal is highly comparable and aligns with EU policy expectations. 3. Target schema. With target qualifiers trimmed, include a standard target scaffold (metric, base year, target year, boundary, covers high biodiversity-value areas: yes/no). This keeps targets from becoming incomparable narratives.			
Survey	Sygris	Consultant (including software vendor)	Spain	22.E5.	Comments on deleted datapoints in ESRS E5	I partially agree and partially disagree	· Data-quality flag removed. The prior requirement to state whether data are measured vs. estimated (and the key assumptions) appears deleted in places (e.g., waste). Please reinstate a single, mandatory flag per metric (measured / modelled / proxy) with a brief assumptions line. It's minimal burden and critical for interpretation and assurance. · Outflows granularity compressed. Merging parts of "resource outflows" simplified structure, but at the risk of losing clarity on products & packaging versus waste. Maintain the current split and require a compact schema for products: durability, repairability/spare-parts availability, % recyclable content, and % recycled content. Keep details in AR/NMIG, but keep the schema as shall when E5 is material.			
Survey	Sygris	Consultant (including software vendor)	Spain	22.S1	Comments on deleted datapoints in ESRS S1	I partially agree and partially disagree	· Workforce composition: total headcount and FTE, with simple breakdowns (employee vs. non-employee where relevant to impacts, permanent vs. temporary, full- vs. part-time). This is foundational context for all S1 metrics. · Health & Safety: fatalities, recordable injury rate, and lost-time injury rate. Three indicators, no sprawling narratives, are sufficient for trend and benchmarking. · Training: average training hours per employee (one metric), replacing multiple qualitative prompts. · Pay and fairness: a gender pay gap indicator (median pay gap) with simple employee-category breakdowns; add a de-minimis threshold (e.g., suppress categories with < 5 employees to protect privacy). Introduce a compact internal pay dispersion ratio (highest/lowest FTE-adjusted) to illuminate outliers without long essays. · Adequate wages: keep a single data point stating coverage vs. an adequate-wage benchmark; outside the EU, require a short method flag (source used, e.g., national living wage, ILO-aligned proxy) to preserve cross-reader interpretability without multiplying indicators. We support removing: lengthy narrative descriptions of policy content; exhaustive lists of initiatives; repetitive text on grievance mechanisms; and overly detailed demographic breakdowns that increase confidentiality risks without adding meaningful insight.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Sygris	Consultant (including software vendor)	Spain	22.S2	Comments on deleted datapoints in ESRS S2	I partially agree and partially disagree	1. Keep a clear backbone of DRs, not narratives. The remaining S2 DRs already give users comparable anchors; no need to bring back the deleted narrative prompts. 2. Lean hard on the horizontal reliefs for value-chain data. ESRS 1 now lets undertakings use reasonable, supportable information without undue cost or effort — including for value-chain scope and metrics — and introduces a formal "value-chain cap." These reliefs are the right mechanism to lower effort while preserving transparency, so S2 doesn't need extra carve-outs.			
Survey	Sygris	Consultant (including software vendor)	Spain	22.S3	Comments on deleted datapoints in ESRS S3	I partially agree and partially disagree	1. We support the overall reduction, but recommend restoring (or explicitly retaining) a minimal backbone of S3 datapoints that every undertaking reports when S3 is material:Grievance mechanism performance: number of community grievances received, % assessed as admissible, median/average days to resolution, and % resulting in remedy. This turns process into performance without pages of narrative. 2. Significant community incidents: count and severity of incidents affecting communities (including security-related human-rights incidents linked to company or contracted security), with a short status field (closed/open) and corrective action flag. 3. Land acquisition/resettlement: number of projects involving involuntary resettlement or economic displacement, households affected, and % compensated/restored to standard—reported only when applicable, with an Indigenous Peoples/FPIC flag where relevant. 4. Community health & safety outcomes: offsite fatalities and serious injuries attributable to company operations (distinct from workforce H&S), plus a brief indicator of major community health events linked to operations (e.g., spills, releases). 5. High-risk site coverage: % of high-risk sites with (a) a recent impact assessment and (b) a documented engagement plan. One percentage each—no narrative expansion. Support the deletions of: granular demographic cross-tabs that risk re-identification; repetitive descriptions of engagement methodologies; and duplicative environmental impact detail already captured under E-standards.			
Survey	Sygris	Consultant (including software vendor)	Spain	22.S4	Comments on deleted datapoints in ESRS S4	I partially agree and partially disagree	The deletions that strip back long narratives about consumer policies, marketing philosophies, and educational campaigns are a net win. Where we'd caution is ensuring S4 still retains a lean backbone of quantitative dataso stakeholders can see performance at a glance. Keep the overall reduction, but lock in a minimal set reported whenever S4 is material: 1. Product/service safety incidents: number of recordable consumer safety incidents, severity (serious injury/fatality), recalls/withdrawals issued, and % of corrective actions completed. 2. Consumer complaints & remedy: complaints received (and rate per 1,000 customers/users), median days to resolution, and % resulting in remedy. 3. Data protection incidents affecting consumers: number of reportable breaches and consumers affected, with a remediation status flag. 4. Marketing & fairness compliance: number of substantiated cases of misleading marketing or unfair contract terms, with sanctions and remediation completed. 5. Accessibility & inclusion (where relevant): % of core products/services meeting documented accessibility criteria or affordability programs' coverage. Support the deletions of: expansive policy descriptions; repetitive engagement text; and environmental footprint details already required in E-standards—apply "report once, reference many" by linking to E1–E5 rather than re-reporting in S4.			
Survey	Sygris	Consultant (including software vendor)	Spain	22.G1	Comments on deleted datapoints in ESRS G1	I partially agree and partially disagree	Where we believe deletions are beneficial and should stand: detailed policy content; training hours by micro-category; granular donation breakdowns that risk privacy/immaterial noise; repetitive board-oversight narrative already covered under ESRS 2; and overlapping privacy/security text better housed in topical S- or E-standards ("report once, reference many").			
Survey	Sygris	Consultant (including software vendor)	Spain	23.	Six datapoints exceptionally moved from “may” to “shall” In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, “may disclose” datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Turning a tiny set of high-signal items from "may" into "shall" is a smart trade: fewer words, clearer numbers, better comparability. It fits the "less is more" mandate because these six don't expand scope—they crystallize what was already implicit in the objectives and replace sprawling prose with compact facts. Example — ESRS G1 (para 14) confirmed incidents. Strongly support. Counting the number and nature of confirmed corruption/bribery incidents gives users a crisp risk signal without naming individuals or interfering with legal due process. It also lines up with existing practice (e.g., GRI 205-3 style counts) and with SFDR users' needs. This is the kind of mandatory datapoint that shortens reports while improving quality. Guardrails to keep burden low and quality high (apply to all six): · Subject to materiality and explicitly allow "zero" reporting where relevant—no narrative required when there's nothing to report. · One-line schema only: metric definition, period, boundary. If estimation is involved, a simple flag (measured/estimated) suffices—no methodology essay. · Avoid double counting across group/subsidiaries and clarify whether counts are at entity or group level; optional country split only when decision-useful. · Tie "confirmed" to a clear trigger (e.g., concluded internal investigation or final legal decision) to keep assurance clean. · Interoperability note in the AR/NMIG for each datapoint (pointer to nearest GRI/IFRS/SFDR field) so implementers don't reinvent mappings. This doesn't break simplification because six precise, quantitative datapoints amid a double-digit percentage reduction in total "shall" items is a net burden decrease. The exceptions remove ambiguity, reduce narrative detours, and strengthen comparability for investors and supervisors.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Sygris	Consultant (including software vendor)	Spain	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The "four new datapoints" carve-out is defensible in principle and small relative to the overall pruning. EFRAG's rationale—that these do not add new obligations but clarify existing objectives—tracks with the simplification mandate. Two of the four are strong adds in our view. · E5-4 (critical/strategic raw materials) improves alignment with current EU law (Eco-design/Sustainable Products; Critical Raw Materials Act) and brings high-signal visibility to dependency risk without sprawling narrative. Keep it. · E5-5 (waste with unknown final destination) enables complete mass-balance disclosure while avoiding forced "fantasy precision." That's clear, decision-useful, and proportionate. Sygris agrees with the ESRS 2 BP-1 change. Replacing scattered basis-for-preparation prompts with a single "state when principles were applied or diverged" instruction reduces duplication and sharpens accountability (time horizons, changes in preparation, etc.). This is simplification by consolidation, not expansion. Our reservation is E2-4 (secondary microplastics). The environmental relevance is clear, and EFRAG is moving material previously in AR into a discrete qualitative datapoint for clarity—fair enough. Still, methods to quantify secondary microplastics remain immature; the BfC explicitly anticipates qualitative or estimation-based disclosures for now. To keep "less is more," I recommend guardrails: retain the datapoint as qualitative only; anchor definitions to REACH; cap required granularity at product family/value-chain segment (no site-level lists); and encourage narrative concision. That preserves signal while avoiding a new reporting rabbit hole.			
Survey	Sygris	Consultant (including software vendor)	Spain	25.	Emphasis on ESRS being a “fair presentation” reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	The "four new datapoints" carve-out is defensible in principle and modest compared to the overall pruning. EFRAG's rationale—that these do not introduce new obligations but clarify existing objectives—fits with the simplification mandate. Two of the four represent clear improvements. E5-4 (critical/strategic raw materials): Enhances alignment with current EU law (Eco-design/Sustainable Products Regulation; Critical Raw Materials Act) and provides high-value visibility on dependency risk without encouraging sprawling narratives. This should be retained. E5-5 (waste with unknown final destination): Supports complete mass-balance disclosures while avoiding forced "fantasy precision." The result is proportionate, decision-useful, and straightforward. Sygris also agrees with the amendment to ESRS 2 BP-1. Replacing scattered basis-of-preparation prompts with a single instruction to "state when principles were applied or diverged" reduces duplication and sharpens accountability on time horizons, changes in preparation, and other key aspects. This is genuine simplification through consolidation, not expansion. Our reservation concerns E2-4 (secondary microplastics). Its environmental relevance is clear, and moving content from AR into a discrete qualitative datapoint improves clarity. However, methodologies to quantify secondary microplastics remain immature; the Basis for Conclusions itself anticipates qualitative or estimation-based disclosures at this stage. To keep with the "less is more" principle, several guardrails are necessary: Limit the datapoint to qualitative disclosures only. Anchor definitions to REACH for consistency. Cap granularity at product family or value-chain segment level, avoiding site-level lists. Encourage concise narrative reporting. These refinements would preserve the signal while preventing the datapoint from turning into a disproportionate reporting burden.			
Survey	Sygris	Consultant (including software vendor)	Spain	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 (“when only setting intensity targets”), to disclose also the associated absolute values” (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking’s progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Intensity-only targets risk obscuring increases in absolute emissions when balance sheets expand or shift toward higher-emitting sectors. To assess transition credibility, investors need clarity on both efficiency and total footprint. A sector-specific exemption would undermine comparability and create an uneven playing field. Absolute disclosure does not have to generate reporting fatigue. It can be streamlined into three concise elements: (i) a single portfolio-level baseline of financed emissions, with sector splits only where material and coverage percentages clearly stated; (ii) an implied absolute pathway derived from intensity targets, based on two standard volume assumptions—constant exposure and a simple management case; and (iii) a brief attribution bridge showing how much change stems from intensity improvement versus volume growth. Together, these provide transparency without requiring bespoke models or excessive narratives. To keep burden proportionate, accepted methods such as PCAF should be permitted with partial coverage flagged, ranges allowed where portfolio churn makes point estimates unreliable, and "undue cost or effort" relief applied for hard-to-measure segments with a short improvement plan. Sensitive counterparty lists should not be required. This balanced approach preserves the critical signal—whether total financed emissions are plausibly falling—while avoiding unnecessary complexity. By adopting the same lean framework consistently, banks, insurers, and asset managers can deliver foresight to investors with fewer datapoints but higher information density.			
Survey	Sygris	Consultant (including software vendor)	Spain	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking’s employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	From Sygris we consider EFRAG's decision to revise the disclosure threshold a constructive step toward greater simplicity, objectivity, and comparability. The shift to a "top 10 countries (with >50 employees)" rule avoids the inconsistencies of the previous dual threshold (50 employees and 10%), which often produced fragmented or incomplete information. Since headcount by country is generally accessible, preparing S1-5 (employee characteristics) and S1-7 (collective bargaining/social dialogue in the EEA) under this uniform criterion appears operationally feasible. Nevertheless, certain challenges remain, particularly in balancing breadth with relevance. For diversified groups, moving from three or four countries to a mandatory top ten may result in extensive tables with limited added value, while also raising privacy concerns for small subgroups in S1-5. To achieve a more balanced outcome, the following safeguards should be considered: · Coverage cap: Require disclosure for the top ten countries, or permit filers to stop once 80% of global employees are included (for S1-5). Apply the same principle within the EEA for S1-7. · Privacy de minimis: Allow suppression or aggregation of cells with fewer than five employees, accompanied by a brief note explaining the threshold applied. · One standard table: Establish a uniform structure with rows as countries and columns as S1-5 attributes and S1-7 indicators. Consistency reduces the reporting burden and enhances comparability. · Consistent basis: Specify that country allocation relies on average FTE for the year (or a clearly defined year-end headcount), using the employing entity's jurisdiction for remote workers. · Transitional relief: During the first year, permit reporting for the top five countries (or 60% coverage), provided there is a clear plan to meet the full threshold in subsequent years.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Sygris	Consultant (including software vendor)	Spain	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	It is positive that EFRAG has sought to align the non-EU methodology with the ILO's 2024 language, as this creates a common vocabulary and steers disclosures toward adequacy rather than mere legality. This is a meaningful advance. Nonetheless, certain gaps remain that could undermine comparability and even encourage under-reporting in cases where statutory minima fall significantly below an adequate wage. To address these shortcomings, several refinements should be considered: · Best available data principle: The hierarchy should prioritize credible living-wage benchmarks instead of treating them as a last resort. Where recognized datasets exist (e.g., national social-partner benchmarks, Anker-type estimates, or peer-reviewed equivalents), undertakings should use them over statutory minima known to be inadequate. If multiple credible sources are available, the one with broader coverage, more recent data, or a higher adequacy threshold should be selected, with disclosure of the criterion applied. · Standardized method flag: To balance transparency with conciseness, each country should be reported through one compact table including: o Method used: statutory minimum / sectoral minimum / recognized living-wage benchmark / modeled proxy. o Coverage: % of employees for whom the method applies. o Outcome: % of employees at or above the adequate-wage threshold (FTE-normalized). This avoids narrative reporting while ensuring comparability. · Normalization and safeguards: Prevent inconsistencies by requiring reporting in local currency with euro translation and disclosure of the exchange-rate basis. Normalize to FTE and standard hours, and specify the reference month/year of the benchmark. Allow banded estimates for small populations and apply a privacy de minimis by suppressing cells with fewer than five employees. Finally, to manage burden, the country selection rule already applied elsewhere (e.g., top countries by headcount) should be used, together with a one-year transitional relief and an "undue cost or effort" explanation that outlines a plan to improve data quality.			
Survey	Sygris	Consultant (including software vendor)	Spain	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	We at Sygris welcome EFRAG's decision to preserve the SFDR linkage while pruning low-value items, as this strikes a balanced approach between relevance and efficiency. The proposed consolidations—for instance, embedding human-rights policy into ESRS 2 GDR P or merging severe-case indicators—reduce duplication and limit checklist sprawl. Likewise, removing or deriving a limited number of environmental PAIs aligns with the "less is more" objective, provided that "derivable" indicators are genuinely operational and not aspirational. To ensure the framework remains both useful and proportionate, we recommend the following adjustments: Machine-readable PAI bridge: For each SFDR PAI, a bridge should specify (i) whether it is Direct, Derived, or Not covered; (ii) the exact ESRS datapoint IDs/fields applied; (iii) unit, scope, period, and formula when "Derived"; and (iv) known limitations such as partial value-chain coverage. The bridge should be versioned and include a concise changelog, enabling filers and investors to avoid rebuilding mappings with each revision. Materiality safeguard: It should be explicit that alignment with Appendix A/B does not override materiality. Where PAIs are typically immaterial due to sectoral or geographical factors, undertakings should be allowed to report zero without narrative, beyond a one-line rationale in the materiality register. Minimal schemas for high-signal PAIs: For those PAIs most relied upon by investors (e.g., GHG emissions, hazardous waste, serious human-rights incidents), a concise schema should be maintained, including metric, boundary, period, and a measured vs. estimated flag. All additional presentation variants or contextual details should be deferred to NMIG to avoid indicator proliferation. Finally, two clarifications would ease implementation: (i) for PAIs labeled "derivable," worked examples should be provided to ensure consistent pipelines; and (ii) for social PAIs, definitions of days lost and incident severity should be confirmed as aligned with EU-OSH/ILO conventions.			
Survey	Sygris	Consultant (including software vendor)	Spain	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We believe EFRAG's decision to keep AR 26 concise and non-mandatory, while updating it to reflect science-based practice, strikes the right balance between clarity and the "less is more" principle. With most disclosure specifications under E4-4 removed, a sharpened AR 26 can guide target-setting without creating new datapoints. To keep AR 26 lean yet outcome-oriented, several upgrades would be useful. Target taxonomy: Provide one line per target type, allowing undertakings to select what is material: (i) pressure (e.g., habitat conversion avoided, nutrient loads reduced); (ii) state/condition (e.g., habitat condition index, ecological integrity uplift); and (iii) response/coverage (e.g., hectares restored, % of high-risk sites under a plan). Each target should link to the pathway identified under E4-1/E4-2. Minimal template: Use a single table with: target name; baseline; unit; geography (country–basin–ecosystem, except high-risk sites); scope (own operations, upstream, downstream); method (field data or proxies); verification; time horizon; and reference to frameworks (e.g., TNFD LEAP, SBTN). Avoid long narratives. Science-based alignment: Encourage use of SBTN where feasible, but accept credible proxies until methods mature. Recognized metrics (e.g., national schemes) or remote-sensing proxies should be allowed, with a simple confidence flag. Prioritization guardrails: Require targets only for priority locations and pressures. Permit aggregation for low-risk areas, reserving site-level targets for critical habitats, KBAs, protected areas, or Indigenous lands with FPIC. Compact indicators: Allow a short list, such as hectares protected; % of priority sites with no-net-loss/net-gain plans; % of sourcing volume conversion-free; change in habitat scores; or number of critical-habitat incidents (with % remediated). Burden relief: Apply de-minimis suppression for very small sites and allow an "undue cost or effort" note with a time-bound plan. This approach keeps AR26 practical and comparable: one lean table, a concise taxonomy, and clear links to frameworks—guidance strong enough to steer action yet light enough to avoid fatigue.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Sygris	Consultant (including software vendor)	Spain	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	We welcome EFRAG's decision to drop the adjusted (model-based) gender pay gap, as this avoids heavy methodologies, low comparability, and audit disputes—an important step toward reducing reporting fatigue. Retaining a single global unadjusted figure, aligned with the Pay Transparency Directive, preserves the core signal. However, relying solely on a global average risks under-informing users, as structural segregation across countries or job groups may remain hidden. Reports can still remain lean while surfacing meaningful insights through a limited, low-burden add-on that avoids regression models. We therefore recommend the following lean improvements: Limited disaggregation of the unadjusted gap (not adjusted): Report by country only where a country represents ≥10% of headcount or ≥250 employees (whichever applies). Report by employee category only where at least 5 employees are included. Cap disclosure at the top 5 countries and top 6 categories by headcount to prevent excessive tables. Apply a strict privacy threshold, suppressing any cells with fewer than 5 employees. Comparability anchor: Add one internal pay dispersion ratio (FTE-adjusted), such as highest paid:median (or P95:P50 if preferred). This is easy to compute and highlights tail dynamics without narrative burden. Tiny trend flag: Display year-over-year change (percentage points) for the global unadjusted gap. Where the gap exceeds a simple materiality screen (e.g., >5 pp in any reported country or category), include a short note of ≤100 words on drivers or actions. Standardized template in NMIG: Implement a one-page, machine-readable schema covering the global figure, limited disaggregations, and the dispersion ratio. This ensures comparability without reintroducing optional indicators. These refinements keep gender pay gap reporting both practical and informative—lean enough to avoid new reporting fatigue, yet strong enough to highlight meaningful patterns.			
Survey	Sygris	Consultant (including software vendor)	Spain	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	Streamlining G1 and relocating narrative "payment practices" disclosures into PAT with an SME note is a sensible step that cuts noise and enhances clarity. The danger, however, lies in overlooking a highly measurable, high-impact issue: late payment to SMEs. This is more than etiquette—it is a liquidity risk pushed down the supply chain. Without a handful of simple, comparable metrics, transparency on this critical point fades. At Sygris, we therefore support keeping the simplification while introducing one lean, outcomes-focused table under G1-2/6 when procurement is material and tier-1 SME spend is significant. The table should include four core metrics and two flags—no narratives: Percentage of SME invoice value paid within agreed terms (reporting year). Median days-to-pay for SMEs, shown alongside the non-SME median for context. Percentage of SME invoices >30 days overdue (annual average or year-end snapshot, clearly stated). Share of tier-1 spend with SMEs (% of total). Two yes/no flags: (i) participation in a prompt-payment code/commitment; (ii) availability of early-payment/SCF options for SMEs (plus % of SME spend eligible). To safeguard comparability while keeping the burden low: Use the EU definition of SME for EU suppliers; outside the EU, apply a clear proxy and flag the method used. Limit scope to tier-1 only, with optional coverage notes for high-risk categories. Apply a privacy de-minimis rule (suppress counts < 5). Fix the accounting basis (accrual vs. cash) and require a single reference point (FY medians; payment within contractual terms). Provide one-year transitional relief and allow an "undue cost or effort" note with a plan to improve. Everything else should remain in PAT: policy commitments, dispute channels, and liquidity-support measures—always under a "report once, reference many" principle.			
Survey	Sygris	Consultant (including software vendor)	Spain	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The streamlined structure, illustrative (non-mandatory) topic list, and emphasis on materiality reduce noise and help avoid checklist reporting. Nonetheless, the aggregation/disaggregation guidance could still trigger overly long site lists and micro-granularity in some sectors. To preserve decision-usefulness while curbing burden: (i) reaffirm the "decision-useful level" principle with practical thresholds (e.g., aggregate to country/region when site enumeration exceeds a sensible limit, disclose top-N hotspots, and summarise the remainder), and (ii) require light transparency fields when estimates or proxies are used (source, coverage %, short uncertainty note). Finally, operationalise horizontal reliefs (e.g., "undue cost or effort") with a simple flag + short justification + time-bound improvement plan. I acknowledge that certain key items remain unchanged pending Level-1 decisions (value chain for FIs, phasing-in, confidentiality, consolidation exemptions, and E1 transition-plan 1.5°C wording). Overall: solid step, with minor guardrails needed to prevent burden creep.			
Survey	Sygris	Consultant (including software vendor)	Spain	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The package delivers visible simplification, particularly on value-chain coverage, but Sygris partially agrees and partially disagrees with the current draft. While the phased approach, lighter transparency fields, and reduced duplication represent progress, key gaps remain that limit comparability and weaken governance accountability. Effectiveness will depend on ensuring clear, minimal fields for estimate transparency and prioritisation, while addressing missing elements on board oversight, remuneration linkage, and cross-referencing.			
Survey	Sygris	Consultant (including software vendor)	Spain	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The dedicated energy sub-topic and removal of niche disclosures are welcome. To further cut burden without losing information value: keep mandatory metrics to widely used indicators and move method-specific requirements to illustrative guidance. Make "primary inputs" explicit for traceability: collect energy/fuels by fuel type, standardise units (e.g., MWh), and enable bottom-up aggregation. Require light data-quality fields where estimates are used (source, coverage %, short uncertainty note). Provide a compact template for transition-plan metrics (assumptions, levers, capex/opex link) while recognising that the "compatibility with 1.5°C" phrasing is unchanged pending Level-1 developments. I partially agree: good simplification, but guard against re-complexity via niche metrics and ensure estimate transparency.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Sygris	Consultant (including software vendor)	Spain	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Simplification is visible, but comparability depends on tight basics. Keep mandatory tables lean: emissions by compartment (air, water, soil), by substance class/material group, and by unit/threshold with clear references. Avoid site-by-site enumeration unless a hotspot is material; otherwise aggregate to country/region and highlight top contributors. Where screening models are used, disclose data source, coverage %, and a short uncertainty note. Place specialised methodologies (facility-specific models, niche indices) into non-mandatory guidance. I partially agree: the direction is right; the standard should emphasise a common, minimal table structure and resist re-introducing complexity via bespoke lists.			
Survey	Sygris	Consultant (including software vendor)	Spain	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The move toward basin-level decision-usefulness is sensible. To stay concise: a single mandatory table covering withdrawals, consumption, and discharges by source (surface/ground/third-party), stress level (where applicable), and quality category is sufficient; reserve detailed parameter lists for guidance. Avoid exhaustive site lists; aggregate and provide top-N drivers plus narrative on mitigation where impacts are concentrated. Encourage consistent use of standard units and clear boundaries (operational control vs equity share), but keep method choices illustrative rather than prescriptive. I partially agree: simplification achieved, with a few structural nudges to prevent reporting fatigue.			
Survey	Sygris	Consultant (including software vendor)	Spain	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Pruning target-setting AR reduces clutter, but risks fragmentation in practice. Keep the core DR focused (targets, baseline, timeframe, metrics), and include one short illustrative template naming common biodiversity target types (pressure, state, response) and pointing to recognised frameworks—all non-binding. Limit mandatory metrics to a small set (e.g., area and quality of sensitive habitats affected, mitigation hierarchy performance, restoration progress) and require location precision only for material sites. I partially agree: retain simplicity while providing just enough scaffolding to keep targets comparable.			
Survey	Sygris	Consultant (including software vendor)	Spain	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The simplification effort is evident. To balance effort and insight: centre on material resource inflows/outflows, waste by treatment route, and a clear definition of recycled content and recovery rates. Keep product-level LCA and specialised circularity indicators as non-mandatory illustrations unless material and widely adopted. Where estimates are used for value-chain materials, disclose source/coverage/uncertainty in a lightweight way. I partially agree: the core is adequate; resist expanding mandatory indicators beyond a concise spine.			
Survey	Sygris	Consultant (including software vendor)	Spain	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Progress on clarity is appreciated. Two adjustments would materially improve interpretability: 1. Gender pay gap: retain the global unadjusted figure and add a lean adjusted view by employee category and country, with a privacy guardrail (omit categories with < 5 employees). Add an internal pay-dispersion ratio (highest-to-lowest, FTE-adjusted) for context. 2. Adequate wages (non-EU): require method tagging (benchmark used, source citation, brief comparability note). Also encourage lightweight data-quality fields for coverage and estimates in workforce metrics. I partially agree: strong base, with targeted additions that aid fairness and comparability without reopening indicator sprawl.			
Survey	Sygris	Consultant (including software vendor)	Spain	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Value-chain coverage remains challenging. To make this workable and informative: adopt a phased approach prioritising salient risks; require light transparency on data source (primary/estimate/proxy), coverage %, and uncertainty. Encourage sampling strategies in guidance rather than mandating exhaustive mapping. Promote cross-reference to ESRS 2 for governance/process text to avoid repetition. I partially agree: simplification is visible; success hinges on clear, minimal fields for estimate transparency and prioritisation.			
Survey	Sygris	Consultant (including software vendor)	Spain	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Keep the focus on material impacts to affected communities, with concise indicators where feasible (e.g., number of high-severity incidents, remediation status, engagement reach). Avoid duplicating narrative about policies already covered elsewhere—cross-reference instead. Encourage geographic aggregation with hotspot highlights; long community lists add noise. I partially agree: the balance is close; the key is resisting duplication and centring on outcomes.			
Survey	Sygris	Consultant (including software vendor)	Spain	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Streamlining is welcome. Prioritise a short set of consumer/end-user metrics: safety incidents/severity, data-protection incidents, accessibility/usability indicators where material, and remediation outcomes. Avoid overlap with sectoral product rules; where those exist, allow cross-reference. Keep narrative focused on interpreting the numbers. I partially agree: good simplification; maintain a concise KPI set.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Sygris	Consultant (including software vendor)	Spain	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Simplification is helpful, but removing detailed "payment practices" can reduce visibility on SME support. Add a mini-table (median days payable, % invoices paid within terms, % invoices to SMEs paid within terms). Keep anti-corruption reporting concise (training coverage, incidents, remedial actions) and rely on cross-references for policy text. Other corporate governance offences—such as money laundering—should likewise be covered, given their comparable impact on reputation, financial stability, and stakeholder trust. I partially agree: a tiny, standard payment-practices table preserves CSRD aims without reviving heavy disclosures.			
Survey	Sygris	Consultant (including software vendor)	Spain	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	The amended Glossary improves consistency. Please pair each term with a plain-language explanation and a short "usage note" where terms often get confused (scope boundaries, value-chain coverage, recycled content, etc.). Add cross-references to IFRS/GRI terms where alignment is intended, and keep the Glossary versioned so changes track to amendment cycles. I agree: these tweaks solidify readability and implementation without adding reporting burden.			
Survey	Sygris	Consultant (including software vendor)	Spain	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		1) Versioning & deprecation. a clear deprecation policy should be published for datapoints, specifyingwhat isfrozen, what issunset, and from when. Each cycle should provide redlines and a machine-readable changelog so users can track exactly what has changed. 2) Core tables "spine." a short set of common, cross-standard tables should be frozen (e.g., totals + one intensity; targets/baselines; incidents/remediation). All other content should remain in AR/NMIG. This preserves comparability while keeping reports short. 3) Digital tagging readiness. each datapoint should include plain-language labels, typical units, and validation rules (sign, scope, time basis). Add an official, versioned ESRS,IFRS S1/S2,GRI andSFDR PAI at datapoint level is essential to avoid inconsistent private mappings. 4) Estimate transparency, everywhere. When estimates or proxies are applied , three light fields should be added: data source (primary/estimate/proxy), coverage (%), and a shortuncertainty note. This ensures decision-useful without expanding indicator counts. 5) Aggregation without noise. disclosures should remain at the most decision-useful level. If site lists grow long, aggregate to country/region and show top-N hotspots, accompanied bya short note on the remainder. 6) Restatements & errors. a uniform restatement note format (what changed, why, magnitude, periods affected) would support audit trails and year-on-year coherence. 7) Glossary usability. For high-friction terms (value chain, adequate wage, recycled content, transition plan), plain-language explanations and "usage notes" should be provided, with cross-references to adjacent terms where confusion often arises. 8) Keep "less is more" as a guardrail. Before adding or reintroducing any datapoint, it should be demonstrated that the change improves comparability or decision-usefulness, not merely completeness.			
Survey	Transport & Environment (T&E)	NGO	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	T&E believes that the proposed amendments simplify the double materiality assessment process, now overall presented in a simpler and clearer way. Impact and financial materiality are well explained and defined. However, the interaction between topics to be reported and material impacts, risks and opportunities is not adequately delineated. Particularly paragraph 22 "the information shall be presented either at topical level or at impacts, risks and opportunities level, depending on what provides the most relevant information, such as reflecting their nature or the way they are managed" is pretty confusing. The reporting of topics is related to the relevance of impacts, risks and opportunities.			
Survey	Transport & Environment (T&E)	NGO	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Transport & Environment (T&E)	NGO	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Transport & Environment (T&E)	NGO	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Transport & Environment (T&E)	NGO	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	T&E supports the proposed changes and the removal of the 'may disclose' requirements that caused confusion for preparers so far. However, we believe that the useful examples they contained should be reincorporated into the standards themselves as "examples."			
Survey	Transport & Environment (T&E)	NGO	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree				
Survey	Transport & Environment (T&E)	NGO	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	These newly introduced reliefs are very generic and without being subject to specific conditions for use can become problematic. The clause can potentially become an excuse to omit critical data, weakening the transparency and comparability of sustainability information. Companies may selectively report positive aspects while omitting more material or controversial issues under the guise of "undue cost or effort," masking real impacts. If adopted, these reliefs should be subject to more strict conditions, including time limitation.			
Survey	Transport & Environment (T&E)	NGO	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The estimation and reporting of anticipated financial effects can be challenging, but also possess a lot of relevance because it allows to connect non-financial sustainability issues with financial performance and risk management. Investors, banks and insurers want to understand how sustainability IROs affect a company's future financial position.			
Survey	Transport & Environment (T&E)	NGO	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Transport & Environment (T&E)	NGO	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	After working 3 years on the development of the EFRAG sector specific standards and analysing the existing other international standards on the matter, we came to the conclusion that SASB for multiple reasons (it is a US based standard and its ambition is pretty limited) does not constitute an adequate reference for sector-specific disclosures and reporting. T&E believes that this warning should be clearly underlined next to the reference as a source of possible disclosure when reporting sectoral information.			
Survey	Transport & Environment (T&E)	NGO	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Transport & Environment (T&E)	NGO	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	Generic comment: T&E believes that, after the simplification exercise, the ESRS contain the minimum amount of data points to ensure adequate disclosure of sustainability information and interoperability with other existing international standards. We also would like to stress that further reduction in the content of the requirements, combined with the reduction in the scope of application of the Directive would cause major issues on availability of sustainability data across the chain of information.			
Survey	Transport & Environment (T&E)	NGO	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Transport & Environment (T&E)	NGO	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Transport & Environment (T&E)	NGO	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Transport & Environment (T&E)	NGO	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	T&E disagrees that financial institutions should be exempted from disclosing climate absolute GHG emission value targets when they have only set intensity targets. In fact, absolute targets are considered more robust for overall climate goals, ensuring that actual total emissions decrease.			
Survey	Transport & Environment (T&E)	NGO	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Transport & Environment (T&E)	NGO	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Transport & Environment (T&E)	NGO	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	As stated above, T&E is overall concerned with the multiple reliefs that have been introduced and which will be the implications of their implementation.			
Survey	Transport & Environment (T&E)	NGO	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Transport & Environment (T&E)	NGO	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	More detailed comments provided in the next section			
Survey	Transport & Environment (T&E)	NGO	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Transport & Environment (T&E)	NGO	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Transport & Environment (T&E)	NGO	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Transport & Environment (T&E)	NGO	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Transport & Environment (T&E)	NGO	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Transport & Environment (T&E)	NGO	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Transport & Environment (T&E)	NGO	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Transport & Environment (T&E)	NGO	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Transport & Environment (T&E)	NGO	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Transport & Environment (T&E)	NGO	Belgium	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Transport & Environment (T&E)	NGO	Belgium	3S.E1-7.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Compared to before, there is no distinction between different renewable sources. This creates a risk that unsustainable biogenic sources could be reported just as renewable, which could weaken the ability to distinguish truly renewables from other sources.	E1	Disclosure Requirement E1-7 - Energy consumption and mix	
Survey	EFAMA	Association of financial institutions	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Generally, EFAMA considers clarifications on the double materiality assessment as positive. However, some aspects of this approach may risk reducing the scope of reported information, particularly for complex value chains. We would welcome additional guidance to safeguard the robustness of DMA. In addition, the new guidance promotes a top-down approach, focusing on strategy and sectoral impacts, easing the burden of exhaustive bottom-up scoring. While we welcome this more pragmatic approach, its broad scope risks unfocused reporting. Companies should document their DMA process and scan non-material topics to avoid blind spots. Disclosing at the IRO level may reduce comparability across companies. Clear guidance and examples comparing IRO and topical-level disclosures would help preparers make informed choices. We recommend that this principle be reflected in the European Commission's targeted assurance guidelines by 2026. As highlighted in the Basis for Conclusions, materiality assessment should remain with the reporting entity, while assurance providers review the process's robustness. As EFRAG does not define auditors' roles, coordination with EU legislators is needed for clarity. Finally, value chain amendments should better link due diligence with reporting. Companies must disclose (i) the rationale for chosen value-chain boundaries, (ii) coverage of value chain information per material topic, and (iii) brief data-quality grading for key metrics. Where actions don't extend to the value chain, constraints, leverage plans, and timelines should be explained to ensure transparency and meaningful stakeholder engagement.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EFAMA	Association of financial institutions	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	EFAMA considers EFRAG's proposal on the new guidelines for a hybrid approach excessively complex and urges a consistent approach to reporting actual and potential impacts. A majority of our membership suggests that gross is more preferable than net. However, both options present benefits and drawbacks. Prioritising assessment and reporting before remediation is essential, enabling investors to evaluate both the effectiveness of remediation actions and the actual reduction of adverse impacts. The gross presentation clearly highlights the risks that have occurred over the year and the internal mechanisms implemented to address them. Moreover, it improves comparability among firms, helping distinguish between those with no impacts and those that actively mitigate them. Without gross approach, we risk blurring these differences. This approach enhances year-on-year comparability of reporting in ESG performance, underscoring the need to differentiate between firms with no impacts and those that have mitigated them after facing challenges, which is only visible under a gross approach. Nonetheless, some members suggest that the net impact approach is more useful as it reflects the actual impact situation, taking mitigation actions into account. From this perspective, a gross presentation would lead to a more theoretical and impractical approach to disclosure, leading to excessive reporting on mature topics, particularly in highly regulated areas. We are also concerned that the term "supportable evidence" in ESRS 1 (paragraph 35) creates ambiguity due to its vague definition and its reliance on accountants' interpretation during DMA and annual reports. Clarifying whether reported impacts stem from previous periods – even if remediated – would greatly benefit investors. For instance, if a company reports 12 health and safety impacts, it's unclear whether these are new or unresolved from earlier reports. Finally, EFAMA recommends removing Appendix C and clearly defining the "gross" approach to ensure consistency and comparability across undertakings.			
Survey	EFAMA	Association of financial institutions	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	EFAMA supports the proposed amendments to improve the readability, conciseness, and connectivity of the ESRS standards. As users of this sustainability information, we acknowledge the burdensome and nonessential nature of duplicating information in companies' annual reports, especially in the areas of policies/actions and targets. Additionally, in line with our position, we welcome the reduction of duplicative indicators, the provision of clarifications on connected information, and the use of appendices for detailed metrics, all of which aim to facilitate the readability of reports for users. The implementation of these changes should ensure that there is no inconsistency, lack of traceability, or fragmentation of critical data points. Therefore, we suggest keeping all mandatory data points clearly identifiable and tagged, regardless of where they are reported. EFRAG must ensure the ability to structure sustainability statements when relocating more technical or quantitative disclosures into appendices. The appendices should not become repositories of fragmented data that lose their narrative or contextual meaning when extracted.			
Survey	EFAMA	Association of financial institutions	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	EFAMA acknowledges EFRAG's intention to streamline the ESRS architecture. We consider ESRS 2 (general disclosure requirements) as a "safeguard" disclosure requirement against materiality-driven omissions, ensuring that cross-cutting governance, strategy, and impact-related information is available even when topical standards are deemed non-material. In line with our response to the public survey, we also welcome the elimination of voluntary disclosure and moving ARs directly under the respective DR to which they correspond. Nonetheless, we do not support eliminating the requirement to disclose information on whether the undertaking plans to implement a PAT for material topics and timelines, as removing this essential information on how companies intend to address identified sustainability risks and opportunities. Transparency requires explanation when PAT is absent, particularly for material negative impacts and risks. This could lead to weaker comparability for investors, as it may allow companies to state "no PAT" at the topic level without explaining where gaps remain and how they intend to address them. We urge the introduction of an "explain if not" approach, where undertaking should disclose why PAT has not been developed for material risks and negative impacts, distinguishing these from opportunities where PAT may be less critical. This maintains accountability without excessive prescription, ensuring that the absence of PAT represents a deliberate strategic choice rather than an oversight. Transparency in risk management decisions is essential for maintaining stakeholder confidence and ensuring comparability between undertakings			
Survey	EFAMA	Association of financial institutions	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We agree that the proposed amendments improve understandability, clarity, and accessibility. In addition, the restructuring of disclosure requirements (DRs) and application requirements (ARs) into clearly delineated sections enhances usability. The removal of "sub-subtopics" and the consistent use of "topics" and "sub-topics" simplifies navigation and interpretation. The more precise articulation of double materiality – particularly the distinction between impact and financial materiality – supports more consistent application across sectors. To ensure that these improvements are effective and auditable in practice, we recommend two targeted changes: 1.Stamp the assurance scope on AR. Open ESRS 1 with a single explicit sentence that ARs attached to a DR are mandatory and within the assurance scope. Blocking them as "Mandatory application requirements" will ensure that preparers, assurers, and users interpret ARs consistently. 2.Introduce stable IDs for every mandatory datapoint and AR. Assign durable identifiers, for example, E.1-6 M1 for a datapoint and E.1-6 AR1 for its application requirement, and require their use in cross-references and digital tagging. Stable IDs will make the standards easier to navigate, reduce the risk of mistagging, and facilitate high-quality digital reporting and tool support. With these proposed adjustments, the separation between mandatory and non-mandatory content will be clear at a glance, consistently interpreted across entities and assurers, and straightforward to implement in systems and tags. We therefore agree with the proposal, subject to the above-mentioned adjustments. As mentioned above, we welcome the elimination of voluntary datapoints. However, their complete removal risks discouraging the voluntary reporting of relevant qualitative and contextual information, particularly for emerging or evolving sustainability. We therefore recommend their reclassification in a structured optional disclosure rather than their elimination under the Non-Mandatory Illustrative Guidance.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EFAMA	Association of financial institutions	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	EFAMA acknowledges that the Non-Mandatory Illustrative Guidance (NMIG) could support companies by clarifying reporting practices and providing practical examples. This can enhance consistency and ultimately improve the decision-usefulness of information that asset managers depend on. However, the current legal status of the NMIGs remains uncertain, with it unclear whether they will be included in the delegated act by the European Commission, according to the recommendation by EFRAG. We agree with the recommendation, as including it in a legally binding regulation would risk creating ambiguity about the status and potentially trigger additional compliance efforts, undermining the simplification objectives. This risks overinterpretation stemming from these NMIG, either by stakeholders or by auditors. We are also concerned that this new category may contradict the simplification objective. We suggest that EFRAG take a more prescriptive approach to methodology to enhance comparability, rather than relying on optional guidance. Additionally, there is a lack of clarity regarding the practicality of these elements. We request clarification on the intended final use of this guidance, its legal status, and a clear statement that these are non-mandatory standards. In case the European Commission decides to include the NMIGs in the Delegated Act, we suggest introducing them as an annex with clear introductory language stating that the content provides guidance and examples only. The annex introduction should explicitly clarify that undertakings are not required to justify non-compliance with these illustrative elements, distinguishing them clearly from mandatory disclosure requirements. Additionally, we highly recommend combining all guidance. Throughout 2024, various forms of guidance (e.g., Q&As, Implementation Guidance) have been issued to support firms in preparing their sustainability reports. Our preference is to combine all forms of guidance ('combined guidance') to make it easier for reporting companies to seek support in their implementation, referring them to a single document rather than multiple documents.			
Survey	EFAMA	Association of financial institutions	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We acknowledge that the introduction of a horizontal undue cost or effort relief seems pragmatic. Nonetheless, we believe that there is a risk that companies will widely invoke this claim, especially in value-chain metrics. From an investor perspective, broad or repeated use could fragment datasets and erode cross-issuer comparability. Any relief should be bound by clear safeguards, including a disclosure of why the relief applies, a disclosure of the scope left out, and a clear identification of any material gaps. Without such safeguards, decision usefulness and portfolio-level aggregation may suffer. We note that the use of estimates could be helpful for preparers; however, investors need estimates that are insurable, transparent, and comparable. Given the current level 1 negotiations, however, further reduction to the scope of the CSRD and changes to the value chain cap threshold may result in permanently unavailable data. Allowing estimates and partial scopes must be accompanied by robust disclosure of estimation methodology, scope boundaries, and improvement plans. Thus, we would like to emphasize the importance of stringent criteria regarding estimation methodology and transparent reporting on the estimation methodology, as well as uncertainty ranges/sensitivities, and data coverage percentages. This will help preserve decision-usefulness and comparability for investment decisions. Finally, regarding the financial effects and the balance between interoperability and burden relief, we provide our responses to dedicated questions 19 and 20.			
Survey	EFAMA	Association of financial institutions	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	EFAMA suggests that investee companies strike a balance between identifying and uncovering available information without undue cost or effort to conduct their assessments and report on their metrics. We emphasize the importance of companies using this as a learning curve, which requires continuous improvement over time. We are concerned that the repeated use of narrow scopes could weaken the trend and peer comparability and complicate assurance. To preserve readability, any reliance on reliefs should be accompanied by clear guardrails, for example, explicit rationales for invoking the relief as well as the decision criteria applied, scope transparency, time-bound improvement plans, and method transparency. As the Basis for Conclusion suggests, the objective is to ensure interoperability with the IFRS S1 reliefs, thereby enhancing interoperability between the two standards.			
Survey	EFAMA	Association of financial institutions	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	EFAMA supports Option 1, which presents a "comply or explain" approach, requiring undertakings to be transparent about their progress and priorities. This will foster more mature reporting practices, rather than allowing a default to less comprehensive qualitative disclosures. The disclosure of anticipated financial effects is the most critical element in sustainability reporting, as the only way asset managers can adequately assess the materiality of sustainability risks and opportunities is if they can connect them to financial disclosures. Option 1 also ensures interoperability with other international standards, particularly the IFRS Sustainability Disclosure Standards, with which large undertakings within the CSRD scope are familiar. Nonetheless, we acknowledge that climate-related disclosures are more mature than those related to social and governance topics, and therefore, quantitative information may not be available in the short term. To safeguard proportional and sufficient disclosures, we propose reintroducing phase-in requirements that match those of the ESRS 1 and have been in place since its implementation. This ensures that companies can comply with qualitative information in the first three years of reporting since the implementation of ESRS 1 obligations, and thereafter, they would need to report on quantitative information. It is crucial, however, that EFRAG further specifies the applicable conditions and safeguards on the use of the relief regarding quantitative information to ensure transparency. Given the availability of climate risk metrics is essential, the effects of both options should be assessed, as preparers often raise undue costs and burdens as a reason for not providing this information. Companies should provide a clear rationale for invoking any such relief, specify the methodology and uncertainties associated with the assumptions applied, and outline concrete improvement plans, comparable to the "best-effort" obligation under the SFDR.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EFAMA	Association of financial institutions	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	EFAMA welcomes the amendments introduced to maintain the criteria aligned with the primary data requested by banks, as that information is also considered useful for other financial institutions. In addition, we note that the proposed changes also align with the IFRS S2, contributing to enhancing interoperability with the ISSB standards. Nonetheless, we recognize the practical challenges undertakings could face due to evolving methodologies and data availability. To ensure these disclosures are both feasible and effective, EFAMA strongly advocates for the consistent application of the "comply or explain" principle. This approach will require undertakings to disclose the necessary quantitative information by default. If they are unable to do so, they should be required to provide a clear and substantive explanation of the omission. In itself, this explanation would be an essential piece of information, offering insight into a company's risk management maturity and data infrastructure. The application of the "comply and explain" principle will increase adoption rates by providing necessary flexibility in the short term, while simultaneously fostering greater transparency. As collecting and reporting methodologies mature, the ambition of achieving full quantitative disclosure is maintained, safeguarding that the reporting framework remains both deliverable for preparers and decision-useful for users.			
Survey	EFAMA	Association of financial institutions	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	EFAMA welcomes the amendments, including the IFRS reliefs and the proposed language used, that aim to increase interoperability with other international standards. We support retaining a maximum degree of interoperability between ESRS and IFRS without diluting the principle of double materiality. We also note that EFRAG's suggestion to reference IFRS industry-based guidance and SASB standards as a source of possible disclosure when reporting entity-specific sector information is very positive and helpful for users. Accordingly, to ensure future-proof interoperability and reduce burdens for firms reporting in line with both standards, we suggest that for sustainability topics covered by IFRS standards, firms should have the option to report either in accordance with ESRS or ISSB. This choice should apply to strictly selected topics where IFRS standards exist (currently only climate E1-S2, but potentially to biodiversity and other issues in the future). Nevertheless, we are concerned that some reliefs introduced in the draft exposure may negatively impact interoperability, particularly those that extend beyond the reliefs described in the ISSB standards. In particular, we object to the reliefs on climate-related disclosures in E1, as they may result in placing the ESRS standards below the global baseline. We strongly suggest ensuring further alignment between the ESRS E1 climate standard and IFRS S2 to avoid an unnecessary reporting burden on undertakings that must disclose under the CSRD and ISSB.			
Survey	EFAMA	Association of financial institutions	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	EFAMA	Association of financial institutions	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	We acknowledge and appreciate EFRAG's intention to reduce the reporting burden by streamlining mandatory datapoints and eliminating all voluntary ones. The 57% reduction in "shall disclose" datapoints can support greater proportionality and usability for preparers, particularly during first-time application. However, from the perspective of FMPs, the deletion of specific datapoints may compromise the consistency, comparability, and usability of reported sustainability information. It is also important to highlight that not all datapoints are equal. Therefore, it should be acknowledged that whilst that 'number' of datapoints has significantly decreased, they wouldn't necessarily translate to an equal/equivalent reduction in burden. In particular, we are concerned that the systematic removal of detailed narrative datapoints within Policies, Actions, and Targets (PAT) sections may weaken the forward-looking and strategic dimension of disclosures, which is essential for assessing issuers' transition plans, governance quality, and alignment with climate/nature-related financial risks, and create gaps in datapoint availability. We recommend that EFRAG maintain a minimum core set of strategic and forward-looking PAT datapoints as mandatory—especially when they align with international frameworks — and reintroduce or relocate select datapoints into appendices or sector annexes to ensure long-term usability, even if not mandatory under all circumstances.			
Survey	EFAMA	Association of financial institutions	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	EFAMA acknowledges the justification and proportionality in EFRAG's suggestion to exceptionally move these disclosures from "may" to "shall", provided they remain subject to the double materiality assessment. Whilst the disclosure of a transition plan for biodiversity and ecosystems is definitely decision-useful given that nature and climate are interrelated (i.e., climate change exacerbates the impact of nature loss and vice versa), we are concerned that moving this datapoint from 'may' to 'shall' will lead to duplication given transition plan disclosure requirements in ESRS E1. The focus on climate and nature in transition plans, whilst understandable, overlooks just transition considerations related to impact on the workforce (own and/or value chain workforce), communities, and consumers and/or end-users. Our preference is for details on what can be included in a credible transition plan to be incorporated in relevant guidance on transition planning rather than hardcoding these within ESRS. We also recognize the added value in reporting confirmed incidents of corruption and bribery under the G1 standard, in cases where the topic is deemed material by the reporting entity.			
Survey	EFAMA	Association of financial institutions	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	EFAMA welcomes the introduction of new mandatory datapoints made by EFRAG. They are all considered relevant to investors due to the explicit elements that are critical for assessing a company's sustainability performance and risk exposure. From a user's perspective, those datapoints will improve the comparability, transparency, and decision-usefulness of the sustainability reports without introducing undue burden, given their direct link to existing disclosure objectives.			

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Survey	EFAMA	Association of financial institutions	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	The fair presentation could prevent checklist-style reporting and promote disclosures that are more relevant and decision-useful for investors. However, further clarification is needed to prevent divergent interpretations. Clear guidance is required on how assurance providers will apply this principle and whether its inclusion affects ongoing simplification efforts. Specifically, we note that auditors may interpret "fair presentation" as "true and fair view", which applies only under reasonable assurance. In line with paragraph 51 of the Basis of Conclusion, it should be made sufficiently clear that it is the reporting company's role to assess materiality, while the assurance providers execute only a review of the process. Furthermore, we request that European guidelines be established for auditors to facilitate exchanges and improve audit controls. Since EFRAG indicates that it is not its role to specify the auditor's role and mandate, we urge that the matter be coordinated with the European legislators. We further wish to see clarification on: -The definition of fair presentation as a filter to take into consideration the strategic specificities of the business model and activities of the undertaking; -The hierarchy between the use of reliefs and the requirement of fair presentation: confirm that applying a relief does not contradict the principle of fair presentation. In particular, the absence of quantified anticipated financial effects should not undermine fair presentation. For example, undertakings should be able to use reliefs for commercially sensitive information to protect their competitiveness without being required by auditors to disclose it under the fair presentation clause. -The audit procedures are expected to ensure compliance with this principle. If clearly defined, the approach also fosters interoperability with other international sustainability reporting practices, ensuring greater consistency with financial reporting frameworks. Strengthening connectivity between financial and non-financial reporting is essential to enhance the usefulness of sustainability-related information.			
Survey	EFAMA	Association of financial institutions	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	EFAMA proposes that financial institutions should be allowed to use intensity-based targets in place of absolute reduction targets, provided they continue to disclose absolute financed emissions together with contextual information, including the potential trend in absolute values. For investors, intensity targets are generally more meaningful than absolute targets when it comes to setting and monitoring objectives. Absolute targets are less relevant for financial analysis, as they can be distorted by portfolio growth or contraction rather than reflecting genuine improvements in financed emissions. Moreover, introducing a strict obligation on absolute targets only in Europe would risk undermining international comparability, particularly since European investors are already subject to key performance indicator disclosure requirements under other regulations such as the SFDR. Ensuring interoperability with global practices is crucial to maintaining a level playing field and avoiding unnecessary fragmentation.			
Survey	EFAMA	Association of financial institutions	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	We agree with the proposed modifications by EFRAG.			
Survey	EFAMA	Association of financial institutions	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	For investors to determine whether companies pay their employees an adequate wage, it is essential to provide information on the methodology used to calculate these wages. In the absence of this information, investors cannot assess the robustness of figures or compare them across peers and time. It is positive that key elements, such as collective bargaining and the periodic revision of minimum wages, are explicitly included. However, we share the concerns flagged by SRB members. Among our key issues is the lack of clarity for considering a wage "adequate," thus, we would welcome referencing the ILO's definition of a living wage. As currently phrased, it would be sufficient if employees' wages meet the national minimum wage. Nevertheless, in many countries outside the EU, the minimum wage is far from adequate to meet basic needs, resulting in a significant gap between the minimum wage and a living wage. Additionally, the hierarchy of the listed elements is also problematic. A living wage estimate should be ranked higher than the publication of a minimum wage. We therefore recommend reversing the order; if a living wage estimate is not available, a minimum wage can be disclosed instead. As it currently stands, an undertaking that can report 100% of employees' earnings at least the minimum wage and labels this as adequate could be perceived as performing better than a company that can report a living wage for 80% of its employees. As such, this information can be misleading and sends the wrong incentives to companies.			
Survey	EFAMA	Association of financial institutions	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	EFAMA suggests that the consolidation of datapoints and the removal of overlaps can improve readability and reduce duplication for reporting entities, provided that investor use-cases under SFDR remain fully supported. In light of the upcoming SFDR revision, the revision of Annex I PAIs is also under consideration. It is crucial that sustainability-related disclosures under the SFDR rely on available reported data from undertakings under the CSRD. In the meantime, EFRAG should ensure that it retains within the ESRS all datapoints corresponding to the 14 mandatory PAIs. These indicators are essential for the functioning of the SFDR and must remain fully available to users of sustainability disclosures.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EFAMA	Association of financial institutions	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We understand the proposed simplification, given that biodiversity remains a relatively immature topic at this stage. We are therefore aligned with the proposed modifications. However, to ensure improvement on the topic of biodiversity, we believe this issue should be revisited in the coming years, and we request the inclusion of a review clause. The purpose of this clause would be to confirm that the topic is currently insufficiently mature to provide the necessary data, while ensuring that these thematic indicators will be revisited in a few years (3 to 5 years) once progress has been made. This would also encourage companies to adopt a long-term perspective on the issue.			
Survey	EFAMA	Association of financial institutions	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	EFAMA's approach to the simplification of the ESRS is grounded in the "decision-usefulness" principle, enabling users, including asset managers, to assess and make informed decisions based on the availability of sustainability information. We understand that the mandatory unadjusted metric has been introduced to align with the SFDR PAI requirements. With the implementation of the EU Pay Transparency Directive, information will become much more broadly available through company-level gender pay reporting. KPIs mandated by the Pay Transparency Directive should also be used for sustainability reporting purposes under the ESRS. The Directive also requires a joint pay assessment (Article 10) when gaps exceed 5%, using objective, gender-neutral criteria to explain and address disparities. In cases of significant pay gaps (above the defined threshold), we would welcome corresponding disclosures under the ESRS, provided that remuneration has been identified as a material sustainability topic for the company. Disaggregating pay gap data by both gender and socio-professional categories enhances its relevance and usefulness for investors, while the associated administrative burden remains limited in practice. This approach would increase the value of the information for end users without imposing disproportionate costs on reporting entities. We further note that the transposition of EFRAG should reiterate to the European Commission the importance of the EU Pay Transparency Directive being incorporated into national legislation by 7 June 2026, as this is essential to ensure consistent availability of this information across Member States.			
Survey	EFAMA	Association of financial institutions	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	EFAMA is not supportive of the proposed changes, given that the procurement practices of large undertakings and the management of suppliers could be more transparent. Stringent practices may lead to a higher likelihood of negative impacts. We recommend clarity on payment practices, particularly when orders with strict deadlines require workers to work overtime.			
Survey	EFAMA	Association of financial institutions	Belgium	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	EFAMA reiterates its position that Assets under Management (AuMs) should be explicitly excluded from the scope of the CSRD. As clients' investments are not of an asset manager's balance sheet, it would be inappropriate to treat them as part of its value chain. In the absence of clarification, flexibility should be granted to AMs on whether and how to include information on AuMs in their CSRD reports, in order to avoid lengthy discussions with the auditors. In particular, some requirements have not been amended in the proposed revised ESRS, as we understand, they are subject to Level 1 changes, including the value chain for FI. Therefore, EFAMA does not interpret any changes that might indicate reference to the value chain for FI as such, including ESRS 1 paragraph 38 and ESRS 2 paragraph 68. The proposed amendment also does not foresee clarifications on the "comparability with 1.5 degrees" for the Transition Plans disclosures. Therefore, we highly recommend additional clarifications, for example, regarding the base year (reference point) for measuring the greenhouse gas emissions reduction and setting climate targets. Guidance on the comparability between disclosures, where the implementation year among different companies differs, as the CO2 data improves over time, would be helpful and would establish an accepted way of working for external auditors to ensure reliable information. By way of guidance, we propose that EFRAG develop a standard model report that includes the minimum reporting requirements per ESRS, such as a structure, a table of contents with tables and/or graphs, and explanatory notes. For financial accountability reports, including annual accounts, the use of standard model reports has been common practice for years. Applying a similar approach to sustainability reporting based on ESRS would provide clarity for both preparers and auditors regarding what and how information should be reported.			
Survey	EFAMA	Association of financial institutions	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Please provide here any other comments on the 12 EDs or on the Glossary [max 300 words] We recommend retaining datapoints that enable robust SDG mapping for investors. In particular, ESRS E1-3 (Actions and resources in relation to climate policies) and ESRS S2-4 (Taking action on material impacts on value-chain workers) are frequently utilized within asset manager SDG frameworks to evidence stewardship activities, real economy outcomes, and progress over time. Removing or diluting these datapoints would reduce decision-useful information for clients and regulators, breaking continuity with existing investor reporting practices.			
Survey	BNP PARIBAS BANK POLSKA S.A.	Bank	Poland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The expression "fair/faithful presentation" might be difficult to prooveprove in front of auditors, The principle of disproportionate cost or effort applies to the collection of data for reporting purposes. I expect there will be a lot of discussions with the auditor if we say that we estimated something, because collecting data was too time-consuming/labour-intensive. It would be useful to clarify this principle._ The simplification of "anticipated financial effects "_is not clear to me " This may derive from situations that do not yet lead to the recognition of assets/liabilities, or income/expenses, in financial statements, in accordance with the accounting recognition criteria. It might lead to differences between financial reporting and sustainability reporting.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BNP PARIBAS BANK POLSKA S.A.	Bank	Poland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The appendix C is not fully clear to me.			
Survey	BNP PARIBAS BANK POLSKA S.A.	Bank	Poland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	In my opinion this is a good direction of standardization towards IFRS S1/S2, it is worth monitoring and documenting which simplifications may negatively affect interoperability.			
Survey	BNP PARIBAS BANK POLSKA S.A.	Bank	Poland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree				
Survey	BNP PARIBAS BANK POLSKA S.A.	Bank	Poland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	In my opinion the language of new ESRS is still not fully clear. There is a lot of legal expressions. There is needed using "simple language principles" in order to achieve bigger accessibility of the document and more smaller companies could use the reporting standard on non-mandatory terms. Shifting AR to the relevant DR was a good step			
Survey	BNP PARIBAS BANK POLSKA S.A.	Bank	Poland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	NMIG has many advantages, but it also can bring some risks: NMIG may be perceived as a "hidden obligation", especially by auditors and regulators. If NMIG is not liked to materiality mechanism, some companies may ignore it – while others will treat it like mandatory checklist, increasing complexity instead of simplifying			
Survey	BNP PARIBAS BANK POLSKA S.A.	Bank	Poland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	My main concerns are regarding the "undue cost or effort", there is lack of a clear objective definition for "disproportionality". What is a standard cost for a large multinational corporation may represent a significant burden for SME. The lack of specific criteria (e.g. financial thresholds, number of working hours) means that each company will have to assess independently whether a given cost is "proportional". This could lead to highly varied approaches to the same issue. This will cause problems for auditors and problems with comparability of reporting. It may also cause risk of abuses and "selective reporting" This principle provides companies with opportunity to omit certain, uncomfortable disclosures.			
Survey	BNP PARIBAS BANK POLSKA S.A.	Bank	Poland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	as above.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BNP PARIBAS BANK POLSKA S.A.	Bank	Poland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	In general, I am in favour of harmonizing reporting with IFRS S1/S2			
Survey	BNP PARIBAS BANK POLSKA S.A.	Bank	Poland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	BNP PARIBAS BANK POLSKA S.A.	Bank	Poland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	BNP PARIBAS BANK POLSKA S.A.	Bank	Poland	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	There is a need for continued monitoring of the practical effects of the reductions, particularly with regard to the risk of losing comparability of data between companies and sectors, ensuring that key information for EU goals (e.g. climate transformation, biodiversity, human rights) is not overly simplified.			
Survey	BNP PARIBAS BANK POLSKA S.A.	Bank	Poland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	BNP PARIBAS BANK POLSKA S.A.	Bank	Poland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	I want to highlight the importance of ensuring that the "fair presentation" rule is applied in a proportionate and practical way. Without clear guidance, there is a risk that auditors could interpret it as a de facto requirement to disclose information that was intentionally excluded based on DMA. Therefore it would be useful for EFRAG to provide further clarification and examples illustrating how the rule should interact with materiality filter.			
Survey	BNP PARIBAS BANK POLSKA S.A.	Bank	Poland	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	There should exist an indication how to calculate emission intensity for banks – in 2024 reporting each bank had its own method for calculating intensity and results were not comparable. Even the bank has shown the absolute numbers of emission, there was not fully clear which income positions were included to count the intensity. It has no bigger sense excluding absolute numbers without the detailed methodology to report the intensity for banks.			
Survey	BNP PARIBAS BANK POLSKA S.A.	Bank	Poland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	BNP PARIBAS BANK POLSKA S.A.	Bank	Poland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	In some industries, where the disparities between the number of employed women and men (e.g. banking) cause the unadjusted GPG to be a completely unreliable indicator and only the adjusted indicator has informational value.			
Survey	BNP PARIBAS BANK POLSKA S.A.	Bank	Poland	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	My organization does not disclose this DR (not material) but in my opinion clear disclosure of payment delay indicators for SMEs supports transparency and is necessary.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fabasoft AG	Preparer (non-financial preparing a sustainability report)	Austria	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Henkel partially agrees with the proposed amendments. Several changes, such as the clarification of the DMA approach, the relationship between impacts, risks, and opportunities, and the emphasis on ESRS as a fair presentation framework are constructive and align with our current practices. We also welcome the allowance to include non-material topics, provided material information is not obscured, though further guidance would be helpful. Additionally, clarifications around aggregation and disaggregation levels are noted. However, certain amendments raise concerns. The increased emphasis on materiality as a general filter (par. 21(a)) may lead to additional compliance efforts and extended auditor discussions especially on what is considered as "necessary for users …to understand". We expect this to result in an expansion of the information to be provided and would strongly recommend maintaining the focus on "decision usefulness" rather than mere stakeholder interest "to understand".			
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We generally welcome the attempt to provide more clarity and focus on real world impacts rather than hypothetical impacts. However, we have some concerns regarding the feasibility and comparability of the proposed approach. Therefore, we recommend starting from a gross perspective grounded in industry practices, standards, or regulatory requirements in and across countries, supported by clearer definitions, providing an objective baseline and ensuring consistent application across sectors. For instance, at Henkel, we apply a gross evaluation approach to IROs, disregarding company-specific mitigation or remediation, in line with EFRAG IG1 FAQ 23. At the same time, we treat sector and industry standards as given, to ensure that the assessment is anchored in real-world baseline conditions.			
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We agree that the proposed amendments provide a more appropriate level of flexibility to support relevant and concise reporting and to improve connectivity with corporate reporting. The reduction of data points and redundancies, along with a more condensed and logical structure, directly enhances readability. The option to include an executive summary and to use appendices for detailed information is a practical improvement, allowing key messages to be presented clearly while still giving users access to comprehensive data. The flexibility to include non-material information where relevant, for instance for rating agencies, is also useful. That said, the full benefits of this flexibility will only be concretized if clear expectations from assurance providers on how these changes affect their assurance demands are established early.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	The restructuring improves clarity and avoids repetitions/duplications caused by similar disclosure requirements in ESRS 2 and topical chapters.			
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We agree that the amendments improve clarity and accessibility. Eliminating all "may disclose" datapoints is particularly positive, as it creates a clear separation between what is mandatory and what is voluntary or guidance. This separation is also important to manage auditor expectations on reporting obligations. From a preparer's perspective, having application requirements placed directly below the relevant Disclosure Requirement is helpful, as it clearly connects the "what" and the "how" in one place. Overall, the changes meaningfully improve understandability and usability. While these changes improve structure and readability, the overall scope of reporting obligations remains largely the same. Therefore, the simplification mainly facilitates orientation within the standards rather than easing the reporting burden itself. In addition, we would recommend eliminating all the unclear terms like "shall consider" "may present", "may implement", "may include" and other ambiguous terms that still are in the text. These should be avoided in order not to create confusion and avoid misunderstandings with the auditors.			
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We consider the voluntary status of NMIG appropriate, as long as it remains clear that it is only guidance and not subject to auditor testing or treated as mandatory content. In that capacity, it can be useful for preparers as optional support material without creating additional compliance burdens.			
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	While the proposed ESRS amendments introduce meaningful improvements, such as the "undue cost or effort" relief and clarifications on implementation issues, we believe the overall balance between burden reduction and transparency could be further refined. We support measures that enhance flexibility, including the exclusion of non-significant activities and joint operations from certain metrics or the possibility of allowing undertakings to include (exclude) an acquisition (divestment) starting from the subsequent (from the beginning of the) current reporting period. However, financial effects disclosures remain problematic due to sensitivity, uncertainty, and lack of integration with business systems. All data points related to the quantification of anticipated financial effects should be deleted. In our view, further adjustments are needed to ensure the amendments deliver effective relief.			
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We agree with the proposed relief for lack of data quality on metrics, as it offers a practical solution by allowing partial disclosures with improvement plans, supporting flexibility without compromising transparency. Forcing the collection of weak data does not contribute to high-quality reporting or comparability.			
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	We support Option 2, as it provides a more realistic and proportionate approach by requiring qualitative disclosures. We do not support Option 1 due to the high uncertainty. The main concern is that such disclosures would in any case not be comparable, as methodologies for determining the anticipated financial effects would need to be based on a number of (interdependent) assumptions about the future which by definition lead to a broad range of outputs (scenarios). We do not believe that speculative information about potential future developments and broad ranges of outcomes can be considered decision-making useful information for any stakeholder. Hence, all data points related to the quantification of anticipated financial effects should be deleted.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	ESRS E1 - 40. (a) The materiality of potential physical climate risks is typically based on forecasts about how climate risks in terms of certain climate hazards might evolve in the future to all locations of own production sites, R&D and administration offices. Hence, deriving the potential anticipated physical climate risks affecting all (production, R&D and Admin.) sites worldwide requires the application of likelihoods and assumptions about the severity of those impacts in terms of asset damages and days of production / sales lost. The result is then derived by adding up all potential risks & likelihood combinations of all sites. We do not consider the outcome of this exercise as meaningful and useful information for external stakeholders. ESRS E1 - 40. (b): The location of key assets may involve unnecessary granularity on the reported information. ESRS E1 - 40. (c) See answer to 40. (a). Accordingly, we consider the percentage of assets at material physical risks addressed by climate change adaptation actions has no decision-making useful information since any number depends on various the assumptions taken and likelihoods applied. ESRS E1 - 40. (d) See answer to 40. (a). Accordingly, we consider the percentage of revenue at material physical risks as no decision-making useful information since any number depends on the assumptions taken and likelihoods applied. The complexity arises from the high uncertainty of climate projections, the difficulty in quantifying future physical damages, and the challenge in accurately modeling how risks will evolve over time. ESRS E1 - 40. (e): Since we do not support the disclosure of quantitative information, we also do not support this disclosure requirement. Based on the above line of argumentation we also disagree with the remaining disclosure requirements listed above.			
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Henkel partially agrees that the proposed amendments improve interoperability and support simplification objectives, particularly through the emphasis on fair presentation and materiality; however, we see room for improvement in clarifying the fair presentation principle and refining the definition of materiality (e.g. users) to avoid overly broad or unclear disclosure requirements. In addition, interoperability should not be understood as a one-way street, meaning that ESRS fully adopts IFRS S1 & S2 wordings and regulations. Instead, the ISSB should listen carefully to the responses of prepares of sustainability statements in Europe. This is especially true regarding the quantification of anticipated financial effects which should be completely deleted from the IFRS as well.			
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	Henkel partially agrees with the proposed reduction in datapoints. However, as many requirements have merely been merged or aggregated into a single disclosure requirement, the actual reduction in reporting requirements is lower than the reduction in the number of data points may suggest. Based on a detailed analysis of our current report, most of the disclosure requirements would remain for us and we expect a net reduction of only 10-15%. However, we do acknowledge the reduction efforts, particularly in MDRs/GDRs and the avoidance of duplications between ESRS 2 and topical chapters.			
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Henkel agrees that some of these datapoints can be mandatory as they enhance clarity and align with existing disclosure objectives as well as additional rating and ranking requirements, e.g. total water discharges. However, we see concerns regarding the mandatory disclosure of a transition plan for ESRS E4. Making E4 Biodiversity transition plans mandatory is not supporting its development but rather hindering development and innovation in this field. In addition, highlighting the training of procurement team within ESRS G1 is unnecessary detail and focus of one employee group. The addition shall be deleted. We also do not agree to introduce a mandatory metric on incidents of corruption and bribery. This would be highly sensitive information, create complications and would require an impossible definition to make this datapoint comparable and meaningful.			
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	In general, we do not support the introduction of new data points. This is especially true for E5-4 Percentage of total weight that are critical and strategic raw materials. Reporting on "critical and strategic raw materials" is not about ESG/sustainability reporting, besides the difficulties in aligning the term "critical" with auditors. Reporting should not be used as vehicle for data collection related to the EU's geo-strategic interests.			
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	Henkel agrees that explicitly adopting the fair presentation principle can enhance the effectiveness of the materiality filter and support more relevant reporting. But further clarification is needed to fully define fair presentation in the ESRS context to ensure consistent application across preparers and avoid elevated audit costs.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	From our perspective 10% is a reasonable significance threshold.			
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	Henkel agrees. The amended methodology for the calculation of non-EU adequate wages gives further guidance and increases comparability.			
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	We welcome the merge of the human rights policy requirements in the different social topical chapters, into the general human rights policy disclosure required by ESRS 2. This helps reduce repetition. In addition, the reference to the human rights due diligence process according to, e.g. OECD Due Diligence guidance for responsible business conduct should be considered because these guidelines cover explicitly the element of policies.			
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Guidance in setting biodiversity- and ecosystems-related targets is valuable. We have internally defined targets and therefore appreciate the flexibility to define ourselves what this target should cover. Our recommendation is to include guidance in setting biodiversity- and ecosystems-related targets in the non-mandatory implementation guidance (NMIG).			
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	We agree on keeping a disclosure on the gender pay gap. However, information on the unadjusted pay gap is not informative. This is because the formula does not consider the tasks and responsibilities of the employees at all and therefore, one cannot derive any statement on equal pay for work of equal value. To be able to make a meaningful statement, the cost of living in the different countries and the comparability of responsibilities should at least be considered.			
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	Standard payment terms vary by country and region. It is impossible for companies to track whether payments align with these terms. Since it is a significant effort for companies to calculate these KPIs, we suggest removing G1-6. We support removing the "average time to pay an invoice" data point and questioning the relevance and practicality of the remaining "standard payment terms" data point. This metric lacks clarity, especially in international contexts where no legal standard exists. It does not provide useful information for assessing supplier relationships. The percentage of payments made under "standard terms" is difficult to interpret and does not allow one to draw conclusions about the actual impacts on suppliers. The categorization of suppliers (e.g., SMEs) remains problematic. In general, financial systems of companies do not track suppliers by size class. Implementing such a classification would require disproportionate effort.			
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We are critical of the inclusion of Substances of Concern (SoCs) in the ESRS. These substances often overlap with existing categories such as Substances of Very High Concern (SVHC), leading to double counting and inconsistent data. Without a clear hazard category hierarchy, reporting on SoCs adds unnecessary complexity without delivering additional value. For example, orange oil is skin sensitizing and a chronic hazard to the aquatic environment category. For the sake of simplification and consistency, SoCs should not be included as a general requirement for all stakeholders.			
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

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Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Overall, we have a positive impression of the revision. The exposure drafts reflect the broad stakeholder input from the first round of feedback. We welcome the reduction of data points and redundancies. The standards have a more condensed, logical structure with reduced granularity. We particularly appreciate the flexibility to add an executive summary and use of appendices. At the same time, however, the simplification does not lead to a substantial reduction of report length or internal efforts. Potential reduction of report length is estimated at only about ~15%. This is the case as many deletions relate to voluntary data points or changes not material to our company. Also, reduction in data points has been achieved by consolidating requirements from different data points into a single one, which helps with readability but does not reduce the reporting efforts. Finally, there is still a high number of data points which require prepares to explain the "how" instead of focusing on the results of the actions taken. We recommend to delete those.			
Survey	ecoDa	Other	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We see as positive simplifications in the DMA and the IRO (impact, risk and opportunities) the fact that: - The companies can limit themselves to information that is available without undue cost or effort, thereby allowing for a pragmatic approach - The introduction of a materiality aspect for the scoring/quantification of IROs: activities may be excluded from metric calculations if, due to their nature, they are not expected to be a significant driver of the impacts, risks and opportunities However, we believe that the whole process of DMA (including the IROs) could be even further simplified, for example by simplifying the engagement with all stakeholders, e.g., by allowing to take into consideration the opinions of stakeholders indirectly (e.g., through publicly available information about their strategy, position papers, etc) to facilitate the process.			
Survey	ecoDa	Other	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	ecoDa	Other	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We agree that the readability and conciseness are improved, however it could be improved even further, e.g., by further reducing (or removing entirely) the qualitative datapoints required in ESRS 2, such as GOV-1,2,3,4,5 (role of management and supervisory bodies, due diligence, risk management, etc.) and SBM 1,2,3 (description of strategy, business model and value chain; stakeholders etc.). This information is typically already included in other sections of integrated annual reports, and it would allow to simplify even further the ESRS.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ecoDa	Other	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	While the simplifications are welcome, ESRS 2 could be further simplified (see answer from question above).			
Survey	ecoDa	Other	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	ecoDa	Other	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	Keeping the interoperability with the ISSB's S1 and S2 is of particular importance.			
Survey	ecoDa	Other	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	ecoDa	Other	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We believe option 1 will provide the possibility for the market to develop the best methodology for quantitative information (convergence of practice over time). Also, omission of quantitative information should be allowed if deemed confidential (however this should not be taken as a way to not measure the quantitative information, and the undertaking should confirm that it is measured and not disclosed for confidentiality reasons).			
Survey	ecoDa	Other	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ecoDa	Other	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Keeping the interoperability with the ISSB's S1 and S2 is of particular importance.			
Survey	ecoDa	Other	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	ecoDa	Other	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	We welcome the simplifications, but would have advocated for an even further simplification, especially of the qualitative datapoints (from ESRS 2 mainly, but also other sections) to be made optional, as they are often covered by other sections of the integrated annual reports in many case (general governance description, general description of business).			
Survey	ecoDa	Other	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	ecoDa	Other	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	ecoDa	Other	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	ecoDa	Other	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Unless an industry-wide indicator is found that would eliminate the impact of the increase of the portfolio size (eg. pro forma information using previous year perimeter).			
Survey	ecoDa	Other	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	We would recommend making the reporting of breakdowns at the country level voluntary, for simplification purposes. An alternative could be to have a regional disclosure (eg. by larger geographies with similar characteristics).			
Survey	ecoDa	Other	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	Noting that a targeted field test is a good practice for complex issues such as this one.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ecoDa	Other	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	ESRS2 should incorporate (if material) the SFRD PAI indicators specifically mentioned in the amendment, as they are the most critical indicators that financial institutions need to pay attention to. This ensures consistency of definitions and facilitates data gathering from financial institutions.			
Survey	ecoDa	Other	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	The use of a science-based framework such as SBTN is critical. EFRAG should publish the criteria for a framework to be considered eligible (independence, science-based, etc).			
Survey	ecoDa	Other	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	ecoDa	Other	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	Yes, with the amended version there is enough room for expressing behaviour towards SME suppliers.			
Survey	ecoDa	Other	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The basis for preparation could have been further simplified, by removing many qualitative indicators (e.g., by further reducing (or removing entirely) the qualitative datapoints required in ESRS 2, such as GOV-1,2,3,4,5 (role of management and supervisory bodies, due diligence, risk management, etc.) and SBM 1,2,3 (description of strategy, business model and value chain; stakeholders etc.). This information is typically already included in other sections of integrated annual reports, and it would allow to simplify even further the ESRS. We suggest to make voluntary the disclosures related to the resilience analysis, when this resilience analysis is covered as part of the double materiality assessment and the definition of the IROs (ESRS E1-3). We also suggest making voluntary the disclosures about the measurement of the effectiveness of the social actions, as the methods for measuring effectiveness in these topics are not disseminated on a wider basis, and without scientifically-based methods (with the help of economists, sociologists, behavioral economists, etc), it is often difficult or impossible to measure the effectiveness of such actions (e.g., the effectiveness of a training or an awareness raising campaign cannot be effectively and pragmatically measured). It would also help further simplify the ESRS (ESRS S-1).			
Survey	ISEAL	NGO	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	ISEAL welcomes the simplification of the DMA process and the reinforced focus on materiality. We encourage EFRAG to explicitly recognise the value of credible voluntary sustainability systems (VSS), such as those compliant with the ISEAL Code of Good Practice for Sustainability Systems (ISEAL Code)https://isealalliance.org/what-we-do/credible-practice/iseal-code-good-practice-sustainability-systems, in supporting robust materiality assessments and sustainability reporting assurance. VSS bring sector-specific, consensus-driven definitions of sustainability performance, which can help companies identify and prioritise material impacts, risks, and opportunities. We recommend that ESRS guidance encourage companies to reference credible VSS in their DMA, leveraging their multi-stakeholder processes and field-level data to enhance the relevance and credibility of materiality determinations. Referencing existing definitions of sustainability performance can save companies time and resources and build increased trust and understanding in their materiality determinations. Technical note: The ISEAL Code defines multi-stakeholder consensus building processes that lead to market-relevant sustainability performance levels in the sectors where the sustainability system operates. These multi-stakeholder definitions of sustainability are very relevant to materiality determination. ISEAL Code clause 6.9: Balanced decision-making about the standard The scheme owner ensures that there is a governance body responsible for making decisions on the content of the standard and that this body: 1. is open to all stakeholders 2. constitutes a balanced and diverse group of stakeholders, including those that are directly affected by implementation of the scheme or by the sector the scheme seeks to impact			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ISEAL	NGO	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	ISEAL welcomes clarification and field-testing of remediation, mitigation, and prevention actions in the Double Materiality Assessment. We recommend ESRS guidance explicitly recognise credible VSS, with their field-level verification and assurance procedures, which can provide robust assured data on these actions. This will help ensure that reported actions are aligned, comparable, and credible. Relevant clauses from ISEAL Code on data, assurance, remediation, and dispute revolution: Data and assurance: 7.1 Assurance model: The (sustainability) scheme owner establishes an assurance structure and assessment models consistent with: 1. the scope of the scheme and the risks inherent to its scope (e.g., sector, geography, part of value chain, types of chain of custody, etc.) 2. intended impacts and strategies of the scheme (1.1) 3. strategies for how the scheme intends to create value for clients 4. types of claims allowed by the scheme (8.1.3) The scheme owner documents a rationale for its choice of structure and assessment models, based on the above characteristics. It also has a process in place for checking consistency with relevant regulatory requirements. Remediation and dispute resolution: 3.5 Dispute resolution: "The scheme owner has a documented dispute resolution system that is open and accessible to all stakeholders and that facilitates and supports the impartial handling and remediation of complaints and grievances about clients, members, implementing partners, and the scheme itself." Explanation: Clause 3.5 defines schemes' minimum responsibility to develop a dispute resolution system for grievances to be raised and addressed. 3.7 Role in remediation: "The scheme owner determines what role it intends to play, if any, in the remediation of adverse impacts on human rights or environmental issues identified through implementation of its scheme, e.g., through auditing or monitoring." Explanation: Clause 3.7 requires schemes to define roles in remediation, including enabling or facilitating access to remedy and/or substantive remedy.			
Survey	ISEAL	NGO	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	ISEAL supports efforts to improve the clarity and connectivity of sustainability statements. We recommend that ESRS further encourage the use of credible VSS as sources of assured, decision-useful data that can be integrated into sustainability statements. VSS can help companies streamline reporting by providing reliable, externally validated information, reducing the need for duplicative data collection and enhancing the comparability and trustworthiness of disclosures.			
Survey	ISEAL	NGO	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	ISEAL supports the move to a more principles-based and less prescriptive approach. We recommend that ESRS include explicit reference to credible VSS as sources of sector-specific requirements and data, especially in topical standards. This will help companies align their disclosures with both regulatory and market expectations, and support the use of assured, consensus-driven sustainability performance definitions.			
Survey	ISEAL	NGO	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	ISEAL agrees that clarity and accessibility are essential. We suggest ESRS provide clear guidance on how companies can use data and claims from credible VSS to meet disclosure requirements. The ISEAL Code and ISEAL Credibility Principles (https://isealalliance.org/what-we-do/credible-practice/iseal-credibility-principles) and other ISEAL credibility tools （https://isealalliance.org/what-we-do/credible-practice/other-credibility-resources) like the ISEAL Benchmarking Guide (https://isealalliance.org/what-we-do/credible-practice/good-practices-credible-benchmarking) offer an internationally recognised basis for assessing the reliability and impact of sustainability systems, which can support both preparers and assurance providers in applying ESRS requirements. The ISEAL Credibility Principles The ISEAL Credibility Principles set out the core values of reliable and effective sustainability systems. Aligning the principles can help companies identify partners for achieving sustainability objectives and improve sustainability and impact over time. The ISEAL Credibility Principles can also support policy makers to design sustainability policy and regulations. Relevant principles include: Reliability: A credible sustainability system provides trustworthy assessments of users' performance. A credible sustainability system designs its tools so that these can be consistently implemented and assessed. It ensures assessments of users' sustainability performance are competent and accurate, and that these assessments support any claims it allows users to make. Sustainability impacts: A credible sustainability system makes a difference where it matters. A credible sustainability system has a clear purpose to drive positive social, environmental, and economic impacts and to eliminate or remediate negative impacts. It defines and clearly communicates its scope, its specific sustainability objectives, and its strategies for achieving these objectives (its theory of change). The system focuses on the significant sustainability impacts in its scope. It seeks to address the root causes of sustainability issues and deliver wider or systemic impacts. It reflects current scientific evidence and international norms when relevant. It is adapted to local or sector-specific conditions where this helps improve impact.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ISEAL	NGO	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	ISEAL welcomes burden reliefs, especially for SMEs. We recommend that ESRS explicitly recognise the role of credible VSS in reducing reporting burdens. By sourcing products and services certified to credible VSS, companies—especially SMEs—can rely on the VSS's assurance mechanisms and data, reducing the need for costly, duplicative verification. Policymakers should incentivise or recognise the use of credible VSS to meet ESRS requirements efficiently and credibly. See the technical notes above about relevant sections of the ISEAL Code and Credibility Principles.			
Survey	ISEAL	NGO	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	ISEAL supports interoperability and alignment with global standards. We encourage EFRAG to ensure that ESRS remains open to referencing credible VSS, which are often recognised in other frameworks (e.g., SASB, GRI), especially in considering sectoral guidance. Such alignment can facilitate consistent, comparable reporting and enable companies to leverage existing VSS data and assurance processes across multiple reporting regimes.			
Survey	ISEAL	NGO	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	ISEAL	NGO	United Kingdom	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	ISEAL supports the reduction of unnecessary datapoints, provided that the core information needed for effective sustainability management and stakeholder decision-making is preserved. We recommend that ESRS maintain flexibility for companies to use credible VSS data to fulfil reporting requirements, ensuring that simplification does not come at the expense of data quality or sector relevance.			
Survey	ISEAL	NGO	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	ISEAL agrees that a fair presentation approach is appropriate. We recommend that ESRS clarify how companies can use credible VSS data and claims to support fair presentation, particularly where VSS provide sector-specific, assured information that aligns with ESRS objectives. This will ensure that reported information is both relevant and reliable.			
Survey	ISEAL	NGO	United Kingdom	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	ISEAL encourages EFRAG to recognise the value of credible VSS linked to the Global Living Wage Coalition (GLWC) (https://www.globallivingwage.org/) work on definitions and methodology for providing wage data and approaches, especially in non-EU contexts where data availability and comparability are challenging. GLWC provides a ready-to-implement answer to EFRAG's specific problem. VSS often have established, multi-stakeholder processes for defining and verifying living wage benchmarks, which can support companies in meeting ESRS wage disclosure requirements. VSS offer more than just data; they provide a field-tested, multi-stakeholder-vetted methodology for defining and verifying living wage benchmarks. By referencing these methodologies, EFRAG can provide a credible, practical solution to a complex data point, ensuring both transparency and comparability. There may be a willingness on the part of VSS to field test.			
Survey	ISEAL	NGO	United Kingdom	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		ISEAL recommends that EFRAG explicitly recognise credible voluntary sustainability systems (VSS), such as those aligned with the ISEAL Code of Good Practice, as valid sources of data, assurance, and definitions for sustainability performance, materiality, and impact. This recognition will support robust, efficient, and credible reporting, especially for SMEs and in complex value chains. We also encourage ongoing engagement with ISEAL and the VSS community to ensure ESRS remains practical, credible, and aligned with good practices in sustainability assurance and data quality.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Keep the may disclose. giving guidance that it is possible and that you stand out is important			
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E5	We put a lot of effort to have clear disclosures under E5. If we loose the disclosure of composition of the material and also the ratio of hazardous substances and understanding between recycled content, reused materials etc, the whole chapter is loosing its purpose. All efforts to set-up a clear chain of reporting within a value chain is getting lost and we come back to a situation where the manufacturer putting a product to the market will loose a lot of time and money to gather information he is not even sure to get in a trustful manner. This is counterporductive to other regulations like ESPR/DPP, CPR, Toy safety, Green Claims, Critical raw material acts, Textiles, where circularity is at the heart. One solution is to offer comprehensive guidance on using indirect dislosure system like the Product circularity data sheet system laid down in ISO 59040:2025			

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Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	Yes you reduce the immediate cost of reporting. But without the relevant data you are creating new burdens afterwards because the information is not collected in a comprehensive manner throughout the value chain. This is window dressing and a step back in promoting circularity under other programs like ESPR/DPP our CRMA. A possible solution is an indirect system where you gather the information fully and does the disclosure only through true/false statements like described under ISO59040:2025 Product Circularity Data Sheet			
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	undue cost effort? how do you measure this. the hidden costs of not collecting the information is worse and put on the responsibility of the end user which is inacceptable.			
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	22.E5.	Comments on deleted datapoints in ESRS E5	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	KEEP mandatory: E5 - composition/resource inflows E5 - hazardous substances breakdown of waste E5 - quantitative disclosure of product reliability, durability and upgradeability E5 - quantitative indicators on resource recovery and secondary raw material use			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Better to maintain the water elements as mandatory			
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	For example a finance institute could run a large data center with high emissions			
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-54) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	We are loosing the initial idea for promoting circular economy which is so important now for the European sovereignty			
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Ministry of the Economy of Luxembourg	Public authority	Luxembourg	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Paragraph 35 puts a lot of weight on the definition of "significant " ongoing mitigation and/or prevention actions thus risking a discussion on the acceptability threshold rather than the impact itself.			
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	The inclusion of ARs directly after the relevant requirements is of great help to improve the understanding of the requirements. We did not feel that may and non-voluntary requirements in the previous version of the ESRS was unclear but we acknowledge that deleting them will make which requirements need to be met crystal-clear.			
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	It is of the outmost importance to clarify the status of the NMIG to be able to assess its usefulness properly. However, if it should only be considered as support/reference material with no further obligations in regards to the content on the report, NMIG can indeed become a useful tool.			
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	The reliefs regarding "approved" data quality and types of data will be of great help as in many cases data consistency is still lacking or in some cases data may still not be available for the specific operation.			
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We do agree on the necessity to provide a time limit for the relief. Although, this should take into consideration that certain types of information may take quite long to get to an acceptable level. However, one question arising from this relief is how much of the reporting may rely on partial datasets. It is already stated that i is not allowed to use this relief for the climate calculations, but there seems not be any further limits which may, in combination with not having any time limits for the application of the relief, in companies lacking enough driving force to close tha GAP-on their datasets.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	While Option 1 provides a more comprehensive reporting on the financial effects, it can end up being unnecessarily rigid and be more difficult to meet for some companies which do not possess enough resources. Option 2 on the other hand, provides less driving force to provide a thorough reporting and can fall short from the expectation of certain type of stakeholders (i.e. financiers).			
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	Requirements are mostly manageable. However, we would like to point out that the location of key assets may be considered sensitive information and thus difficult to provided (i.e. due to national security reasons etc.).			
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	22.E1.	Comments on deleted datapoints in ESRS E1	I agree	The consolidation of IRO requirements under ESRS 2, instedad for repeating them in the standard, may clarify that it is not necessary to repeat the content under each standard but it does not reduce the acutal amount of work (without acting on the rerquired content to address the requirement).			
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	22.E2.	Comments on deleted datapoints in ESRS E2	I agree	The consolidation of IRO requirements under ESRS 2, instedad for repeating them in the standard, may clarify that it is not necessary to repeat the content under each standard but it does not reduce the acutal amount of work (without acting on the rerquired content to address the requirement).			
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	22.E3.	Comments on deleted datapoints in ESRS E3	I agree	The consolidation of IRO requirements under ESRS 2, instedad for repeating them in the standard, may clarify that it is not necessary to repeat the content under each standard but it does not reduce the acutal amount of work (without acting on the rerquired content to address the requirement).			
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	22.E4.	Comments on deleted datapoints in ESRS E4	I agree	The consolidation of IRO requirements under ESRS 2, instedad for repeating them in the standard, may clarify that it is not necessary to repeat the content under each standard but it does not reduce the acutal amount of work (without acting on the rerquired content to address the requirement).			
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	22.E5.	Comments on deleted datapoints in ESRS E5	I agree	The consolidation of IRO requirements under ESRS 2, instedad for repeating them in the standard, may clarify that it is not necessary to repeat the content under each standard but it does not reduce the acutal amount of work (without acting on the rerquired content to address the requirement).			
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	22.S1	Comments on deleted datapoints in ESRS S1	I agree	The consolidation of IRO requirements under ESRS 2, instedad for repeating them in the standard, may clarify that it is not necessary to repeat the content under each standard but it does not reduce the acutal amount of work (without acting on the rerquired content to address the requirement).			
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	22.S2	Comments on deleted datapoints in ESRS S2	I agree	The consolidation of IRO requirements under ESRS 2, instedad for repeating them in the standard, may clarify that it is not necessary to repeat the content under each standard but it does not reduce the acutal amount of work (without acting on the rerquired content to address the requirement).			
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	22.S3	Comments on deleted datapoints in ESRS S3	I agree	The consolidation of IRO requirements under ESRS 2, instedad for repeating them in the standard, may clarify that it is not necessary to repeat the content under each standard but it does not reduce the acutal amount of work (without acting on the rerquired content to address the requirement).			
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	22.S4	Comments on deleted datapoints in ESRS S4	I agree	The consolidation of IRO requirements under ESRS 2, instedad for repeating them in the standard, may clarify that it is not necessary to repeat the content under each standard but it does not reduce the acutal amount of work (without acting on the rerquired content to address the requirement).			
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	22.G1	Comments on deleted datapoints in ESRS G1	I agree	The consolidation of IRO requirements under ESRS 2, instedad for repeating them in the standard, may clarify that it is not necessary to repeat the content under each standard but it does not reduce the acutal amount of work (without acting on the rerquired content to address the requirement).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Adding the requirement to disclose information on a biodiversity transition plan if one is in place does not, as it stands, create any real driving force for companies to put together one (those that do not have it yet). From that point of view may this requirement be somewhat superfluous.			
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	Somwehat agreeing by those SRB members that believe that "fair presentation" is not a simplification. However, I believe that with the right supporting material (i.e. guidance on how to assess and decide upon where do draw the borders for the reporting) the reporting should not be more time and resource consuming. Clarity and standarisation will allow to achieve the efficiency gains sought.			
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Absolute targets give a picture of the magnitude and even though they may not be the most accurate metric for certain undertaking, they complement intersity targets well. Certain undertaking will not be able to aim for zero-emissions as their business models may not allow for it, but having a picture of what can be achieved (as an absolute value in this case) is still valuable.			
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	Undertakings should already follow the information required in S1 in one way or another and thus it should not require such a big additional effort. An undertaking's own workforce is the most crucial part of it, as there would not be any work done without it, thus the information regarding the own workforce be complete not matter if that means having to disaggregate the data into several lines.			
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Setting financial control as the primary boundary for the GHG emission calculations, while leaving operational control as an optional additional requirement, will create an additional burden for those undertaking that have operational control as it's main reporting boundary due to the nature of the operations. Having to report both at the same time will create confusion among stakeholders that are not that well-informed which may impact the usability of both metrics.			
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The clarifications made regarding SVHCs are highly appreciated. However, we believe that referring to "subtances in mixtures" is a term that can lead to misunderstanding. As an example, it can be understood that SVHC built in in products and materials are not subject to the requirement as they are not a mixture in itself.			
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Trafikförvaltningen, Region Stockholm	Preparer (non-financial preparing a sustainability report)	Sweden	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	German Social Insurance European Representation (DSV)	Association of financial institutions	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	When implementing disclosure requirements on health and safety metrics (S1-13), it is important to recognise that reporting on occupational diseases – referred to as "work-related ill health" – offers little informative value for assessing a company's sustainability performance. Many occupational diseases emerge only after long latency periods and are assessed across a worker's entire career exposure history rather than a single employer's current practices. Including such cases in sustainability reporting risks creating a misleading picture that does not reflect actual causes of illness. The data sources listed in AR 29 have significant limitations. Employee reports are often too subjective. Company doctors examine only current employees and are not bound by the official list of occupational diseases. Compensation agencies, such as accident insurance institutions in Germany, include all recognised occupational diseases where the last harmful exposure occurred within the company, which also regularly covers former employees. Because the scope of individuals considered differs widely depending on the source, the resulting figures lack consistency and comparability. These methodological shortcomings undermine reliability of such data, making mandatory disclosure problematic. For these reasons, S1-13 should exclude reporting of figures on work-related ill health. The reporting of occupational diseases under S1-13 also runs counter to the objective of the sustainability omnibus, which is to provide decision-useful information while reducing unnecessary bureaucracy. Requiring companies to disclose occupational disease cases introduces additional administrative burden without enhancing transparency or comparability, since these data do not serve as reliable indicators of present-day health and safety management. We note that the wording in S1-13 No. 40 is inconsistent. Only 40(d) specifies that reporting on work-related ill health is subject to legal restrictions on data collection. This important clarification is missing in 40(b)(ii) and 40(e) and should be added to ensure consistency if EFRAG decides not to modify S1-13 No. 40.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Royal Hollway University of London	Academia	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	This draft is clearly better than the original.			
Survey	Royal Hollway University of London	Academia	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	Royal Hollway University of London	Academia	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree				
Survey	Royal Hollway University of London	Academia	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	They are improvements, but that was not the Question.			
Survey	Royal Hollway University of London	Academia	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	This is an improvement.			
Survey	Royal Hollway University of London	Academia	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Royal Hollway University of London	Academia	United Kingdom	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Please see Excel sheet.			
Survey	Invest Europe	Association of financial institutions	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We support the acknowledgment that qualitative assessments may be sufficient in many cases, the clarification that impacts are a source of risks and opportunities alongside dependencies, and the confirmation that companies only need to refresh conclusions based on relevant changes and judgement. The statement that the current amendments do not trigger a mandatory reassessment for 2024 reporters is particularly welcome for those who have already invested significant time and resources in preparing their first CSRD report. One area that remains unclear and unresolved, as was already the case prior to the Sustainability Omnibus, is the treatment of value chain information, particularly for private equity and venture capital (PE/VC) fund managers and investors. It remains ambiguous whether value chain disclosures triggered by "investments" apply to all types of investments, regardless of control, intent, structure, or reporting capabilities, or only where a clear causal link exists. PE/VC investor-investee relationships differ fundamentally from supplier-customer models. These investors often have limited or no operational control over investees, yet may be expected to assess and report on their value chains: this is not aligned with the undue-cost-principle. This lack of clarity risks creating bottlenecks in assurance. This is especially relevant for PE/VC firms who invest in many companies not in CSRD scope, particularly under the potentially revised thresholds. The risk of duplicative disclosures is also high, as multiple investors could report on the same value chain entities, leading to double-counting of impacts, risks, and opportunities. We recommend a clearer definition and guidance of "value chain" that distinguishes between real-economy supply chains and investment chains, and that focuses reporting on entities within CSRD scope. We also reiterate our call to clarify the concept of entity-specific disclosures. If retained, structured guidance with examples should be provided to ensure consistent, meaningful application.			
Survey	Invest Europe	Association of financial institutions	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The intention to clarify how to account for remediation, mitigation, and prevention actions is a welcome step. However, the new guidance remains difficult to apply in practice and risks leading to inconsistencies in assurance. For actual impacts, assessing materiality based on the situation "before" the impact can be challenging, especially if the timing and effectiveness of actions are not clear-cut. This will likely result in diverging interpretations between companies and assurance providers. For potential impacts, assessing materiality without considering the effect of significant "ongoing" actions introduces similar judgment challenges, as the distinction between when an action reduces impact structurally versus when it merely controls it for now is often a matter of judgment. This will be interpreted differently by preparers and auditors, especially in sectors with high baseline standards (e.g., PE/VC) where continuous risk control is the norm. More fundamentally, the current approach risks treating a topic as immaterial and therefore non-reportable, simply because it is well-managed, despite its relevance. Investors want transparency on these issues – not only when impacts and risks materialize, but also when strong systems are in place to manage them – because the existence of strong controls is decision-useful information. We agree that materiality must be subject to business judgment and reflect an undertaking's context - not every topic warrants reporting. However, we recommend clarifying that materiality assessments must consider not just residual impacts but also the significance of a topic to investors. Where the impact is low due to prevention/mitigation actions but relevant to investors, this should be disclosed transparently, not excluded. This does not mean treating all well-managed topics as material, but rather encouraging transparency on the management of significant ones, where appropriate. This nuance would help align reporting with investor expectations without compromising the flexibility or proportionality that preparers need.			
Survey	Invest Europe	Association of financial institutions	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Invest Europe	Association of financial institutions	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Invest Europe	Association of financial institutions	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Invest Europe	Association of financial institutions	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We recognize the Non-Mandatory Illustrative Guidance (NMIG) could be a tool to support implementation for less experienced reporters. However, its use – even outside the Delegated Act – presents risks that outweigh the potential benefits. While the NMIG is presented as non-binding, its content includes deleted datapoints. This makes it highly likely to be perceived as a de facto checklist, not just by preparers, but also by assurance providers. This could lead to confusion, over-reporting, and unintended compliance burdens. If a requirement has been removed from the ESRS, it should not reappear under a different label. Truly voluntary guidance should look and feel fundamentally different, educational in tone and clearly separate. The NMIG does not achieve this. It risks creating soft law pressure, particularly in the early years of CSRD implementation when boundaries between support and obligation are still being established. In our view, it would be preferable not to publish the NMIG. Rather than repackaging deleted datapoints as guidance, efforts should focus on producing targeted, high-value guidelines, such as, for example, on the DMA in an investment context — where there is real implementation uncertainty and audit risk. One exception is the mapping of sub-topics to disclosure requirements (NMIG, page 7). This is a valuable tool that supports preparers in understanding the structure of the ESRS. To ensure consistency in topic scoping, disclosure coverage, and assurance preparation, this mapping should be retained within the ESRS appendices themselves, even with the current caveats (e.g., the absence of a one-to-one relationship for all metrics, and the potential for interdependencies across topics like just transition).			
Survey	Invest Europe	Association of financial institutions	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	We particularly welcome the introduction of the "undue cost or effort" relief, as it reinforces the principle of business judgment. Granting preparers greater regulatory discretion in assessing materiality and data availability will help address defensive over-reporting, while allowing for more meaningful disclosures.			
Survey	Invest Europe	Association of financial institutions	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	In the PE/VC context, these reliefs are especially important - requiring complete and high-quality data in all instances would impose disproportionate burdens and lead to speculative or unreliable disclosures. We also agree that no fixed time limit should apply, as improvements in data coverage are often outside the preparer's direct control.			
Survey	Invest Europe	Association of financial institutions	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Option 1 strikes a more appropriate balance between information needs and the practical limitations currently faced by preparers, especially as the calculation of forward-looking financial effects remains highly complex. Most importantly, option 1 is aligned with the relief mechanism under IFRS S1/S2. Maintaining this interoperability will ensure that companies subject to both CSRD and IFRS-based reporting do not duplicate disclosures or navigate conflicting expectations.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Invest Europe	Association of financial institutions	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	We support the intent to simplify "anticipated financial effects", especially through the removal of the acute/chronic split and the streamlined datapoints. At the same time, we are concerned about the removal of explicit time horizon references (short, medium, and long term), which creates a misalignment with IFRS S2 (paragraphs 16(c)–(d)). IFRS expects entities to disclose how their financial position, performance, and cash flows are expected to evolve over time, including through capital expenditure, divestments, and financing strategies. Without these time-based anchors, ESRS disclosures risk hindering interoperability for companies subject to both CSRD and global frameworks. Moreover, the addition of forward-looking information on potential liabilities that do not yet meet accounting recognition criteria goes beyond IFRS S2, which does not explicitly mandate disclosure of such liabilities, and may require further clarification to ensure consistent interpretation and assurance. We recommend reintroducing time horizon framing (short, medium, and long term) to align with IFRS S2 and improve the clarity and comparability of anticipated financial effects disclosures.			
Survey	Invest Europe	Association of financial institutions	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	It is encouraging to see efforts aimed at greater interoperability with IFRS S1 and S2. However, full interoperability and equivalence is not yet achieved, and to meet the goal of interoperability, further alignment is needed – as pointed out in other answers within this consultation (namely questions 20 and 26). In this regard, also EFRAG acknowledges in its Basis for Conclusions that "further joint work on interoperability is necessary in the next phase." We fully support this intention, particularly given upcoming IFRS amendments. We recommend that companies be allowed to substitute disclosures across frameworks where appropriate, including: -reporting under IFRS S1 should allow omission of overlapping financial materiality disclosures under ESRS 1 and 2. -reporting under IFRS S2 should allow omission of financial materiality disclosures under ESRS E1.			
Survey	Invest Europe	Association of financial institutions	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Invest Europe	Association of financial institutions	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We have no specific comments on the six identified exceptions. However, we recommend aligning the treatment of transition plans under ESRS E1 (Climate) with that of ESRS E4 (Biodiversity), where disclosure is only required if a transition plan is publicly available. This approach ensures consistency across standards and avoids creating disclosure expectations where no formal plan exists.			
Survey	Invest Europe	Association of financial institutions	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Invest Europe	Association of financial institutions	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	Just like the "undue cost or effort" relief, this clarification reinforces the role of preparer judgment and helps shift the focus away from compliance-driven box-ticking. By enabling companies to apply professional judgment in determining what is relevant, it reduces pressure to report immaterial datapoints simply for legal certainty, and ultimately help improve alignment between preparers and auditors.			
Survey	Invest Europe	Association of financial institutions	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	There is growing pressure on PE/VC fund managers and investors to integrate climate ambition/considerations into investment decision-making, and align portfolios with the objectives of the Paris Agreement, all while ensuring financial performance. However, this must be done in a way that reflects the nature of the PE/VC industry: they do not directly emit, but enable emissions (and reductions) through capital allocation. For PE/VC, intensity targets are more meaningful than absolute targets. These targets show how efficiently capital is allocated over time - even as portfolio companies grow or change. They allow to demonstrate climate ambition in a way that reflects how the industry operates: raising capital into funds, investing in portfolio companies and exiting within a fixed cycle, meaning that decisions made at the fund level directly determine outcomes across those companies. Requiring the translation of intensity targets into associated absolute emissions values for those targets would require estimations of the future size and composition of portfolios, how big each company will become, what sectors the fund will be exposed to, and how those companies will decarbonize. In PE/VC, where funds have fixed lifespans and investment cycles, companies grow rapidly and portfolios shift constantly, this would not lead to meaningful or decision-useful information. Intensity targets also involve assumptions about the future, but they are less speculative and more controllable. This makes them more reliable for the PE/VC business model. In fact, the TCFD, IFRS S2, and SBTi acknowledge the use of absolute or intensity-based targets. Transparency can still be ensured by adopting approaches such as that in SBTi: intensity targets modeled using an approved 1.5°C sector pathway applicable to companies' business activities. In this context, absolute targets for financial institutions could be kept as a voluntary data point.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Invest Europe	Association of financial institutions	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Invest Europe	Association of financial institutions	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	Invest Europe	Association of financial institutions	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	We have concerns that while SFDR PAI indicators are retained in the amended ESRS, they are often reflected only indirectly – meaning they must be inferred from other datapoints rather than reported in a clear, one-to-one manner – undermining their usability for investors. As a result, investors must invest significant time and resources to locate relevant datapoints. For example, disclosures that were previously aligned with specific PAI indicators (such as total GHG emissions or exposure to fossil fuel activities) now often appear in a more flexible form, requiring investors to reconstruct or recalculate the data to meet their own SFDR reporting obligations. We recommend that the relevant PAI datapoints be more clearly included within the ESRS disclosures, to support alignment between company-reported data and investor disclosures. Moreover, the ESRS revisions are advancing ahead of the upcoming SFDR review (expected to start in Q4 2025), which will determine the future structure and scope of PAIs and how they will interact with corporate disclosures. The sequencing risks creating additional confusion, ambiguity, and a transparency gap between company reporting and investor obligations. We recommend closer coordination between EFRAG and the European Commission on the interaction between the ESRS and the SFDR review. If the revised ESRS is adopted before the SFDR reform is finalized, then the ESRS should remain open to targeted updates once the future PAI structure is confirmed. This would prevent locking in misalignment and ensure that simplification for companies does not result in greater complexity for PE/VC fund managers and investors down the line.			
Survey	Invest Europe	Association of financial institutions	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Invest Europe	Association of financial institutions	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	This approach ensures continued alignment with the SFDR PAIs, which require disclosure of the unadjusted gender pay gap (Table 1, indicator 12), which is defined as the difference between average gross hourly earnings of male and female paid employees, expressed as a percentage of average gross hourly earnings of male employees. Ensuring alignment with the existing regulatory framework (SFDR) avoids the introduction of confusion for PE/VC fund managers and investors.			
Survey	Invest Europe	Association of financial institutions	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Invest Europe	Association of financial institutions	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We are broadly supportive of the direction the ESRS amendments are taking, the changes show real progress on simplification, interoperability, and usability, and we recognize the effort that has gone into getting here. That said, we want to stress one important point: PE/VC simply do not operate like corporates, and this difference really matters when it comes to reporting. PE/VC fund managers work through capital allocation into portfolio companies, without direct operational control, and within fund cycles and lifespans that are very different from a corporate's ongoing business model. If these differences are not acknowledged consistently, there is a real risk that requirements push PE/VC firms to produce disclosures that are burdensome, speculative, or duplicative – without giving investors and other stakeholders the clear, meaningful, decision-useful information they actually need. We acknowledge that EFRAG has tried to address this in certain areas, but the issue remains broader, and it needs to be kept in view across the board. That was true before the Sustainability Omnibus, and it remains true now. We encourage EFRAG to integrate this distinction systematically as adjustments are considered.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Value Balancing Alliance	Business association (other than association of financial institution)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree				
Survey	Value Balancing Alliance	Business association (other than association of financial institution)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree				
Survey	Value Balancing Alliance	Business association (other than association of financial institution)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Value Balancing Alliance	Business association (other than association of financial institution)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree				
Survey	Value Balancing Alliance	Business association (other than association of financial institution)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Value Balancing Alliance	Business association (other than association of financial institution)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	Disclosing anticipated financial effects is critically important to connect sustainability-related risks and opportunities to the core of corporate decision-making (financial planning, controlling, risk management) and provides relevant information to investors for capital allocation and financing innovation and transition of business models. In specific: First, it provides investors, lenders, and other finance insitutions with essential information to assess a company's sustainability-related risks and opportunities and integrate them into capital allocation and cost of capital - supporting the broader objectives of the EU Green Deal and sustainable finance. Second, transparent reporting of financial effects enhances comparability across companies and sectors in the language everyone understands. It is vital for market participants to benchmark performance, understand transition pathways, and evaluate the credibility of sustainability strategies. Without robust financial effect disclosures, substantial information is missing. Third, requiring companies to consider and disclose the financial implications of material sustainability issues drives internal awareness and integration of sustainability into core business processes including financial planning and risk management and respective control systems leading to higher-quality reporting. Fourth, maintaining mandatory disclosure of financial effects ensures interoperability with the ISSB's IFRS S1 and S2 standards, which also require companies to disclose material financial impacts of sustainability-related risks and opportunities. This alignment is crucial for multinational companies and global investors, as it reduces duplication, facilitates cross-border comparability, and a consistent global sustainability reporting system. To remain decision-useful for preparers and users, the overall direction should drive quantitative disclosure wherever feasible. The ESRS or guidance documents should more explicitly encourage the use of impact accounting as referenced in CSRD (44) as method to derive financial effects reflecting the double-materiality. This mature and tested approach is ready to serve as tool to measure financial effects.			
Survey	Value Balancing Alliance	Business association (other than association of financial institution)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Disclosing anticipated financial effects is critically important to connect sustainability-related risks and opportunities to the core of corporate decision-making (financial planning, controlling, risk management) and provides relevant information to investors for capital allocation and financing innovation and transition of business models. In specific: First, it provides investors, lenders, and other finance insitutions with essential information to assess a company's sustainability-related risks and opportunities and integrate them into capital allocation and cost of capital - supporting the broader objectives of the EU Green Deal and sustainable finance. Second, transparent reporting of financial effects enhances comparability across companies and sectors in the language everyone understands. It is vital for market participants to benchmark performance, understand transition pathways, and evaluate the credibility of sustainability strategies. Without robust financial effect disclosures, substantial information is missing. Third, requiring companies to consider and disclose the financial implications of material sustainability issues drives internal awareness and integration of sustainability into core business processes including financial planning and risk management and respective control systems leading to higher-quality reporting. Fourth, maintaining mandatory disclosure of financial effects ensures interoperability with the ISSB's IFRS S1 and S2 standards, which also require companies to disclose material financial impacts of sustainability-related risks and opportunities. This alignment is crucial for multinational companies and global investors, as it reduces duplication, facilitates cross-border comparability, and a consistent global sustainability reporting system. To remain decision-useful for preparers and users, the overall direction should drive quantitative disclosure wherever feasible. The ESRS or guidance documents should more explicitly encourage the use of impact accounting as referenced in CSRD (44) as method to derive financial effects reflecting the double-materiality. This mature and tested approach is ready to serve as tool to measure financial effects.			
Survey	Value Balancing Alliance	Business association (other than association of financial institution)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Maintaining mandatory disclosure of financial effects ensures interoperability with the ISSB's IFRS S1 and S2 standards, which also require companies to disclose material financial impacts of sustainability-related risks and opportunities. This alignment is crucial for multinational companies and global investors, as it reduces duplication, facilitates cross-border comparability, and a consistent global sustainability reporting system.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ASCENDIA EOOD	Consultant (including software vendor)	Bulgaria	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	No sub-topic to datapoint mapping. ESRS 1 requires, once a topic or sub-topic is material, applying ESRS 2 GDR-P/A/M/T and the relevant topical DRs/datapoints (49–50; ESRS 1, p.14), but it does not provide a mapping from sub-topics to datapoints. This will drive divergent auditor interpretations and inconsistent burden on preparers. We welcome the simplification in Chapter 3, notably the top-down option for DMA (48 and AR 17; ESRS 1, p.13) which can materially reduce complexity, and the explicit information materiality filter (21; ESRS 1, p.8) that now governs all disclosures. We also support the rule that when only a sub-topic is material, undertakings report only that sub-topic (AR 21 for 50; ESRS 1, p.14), and the clearer instruction on aggregation/disaggregation (51–52; ESRS 1, p.14–15). However, we partially disagree that robustness is fully achieved: Suggestion: Publish non-binding crosswalks per topical ESRS labelling DRs as sub-topic-specific versus cross-cutting (PAT, resilience, financial effects). Require undertakings to include a one-page DR index (location and rationale) under IRO-2 (ESRS 2, 28(d),(f); p.14). Topics outside Appendix A. Chapter 3 allows entity-specific topics where topical ESRS do not cover the issue "or not sufficiently" (23 referencing 10; ESRS 1, p.9–10 and p.14). Without guidance on how to select analogous datapoints by reference to existing topical ESRS, outcomes will vary. Suggestion: Add an explicit principle: when using an entity-specific topic, select datapoints by analogy to the closest topical ESRS, disclose the basis of selection under IRO-2, and present PAT at the level the issue is managed (ESRS 2, 29–32; p.15). Finally, to preserve comparability while retaining flexibility, EFRAG could issue NMIG examples showing end-to-end DMA decisions (topic to sub-topic to DRs/datapoints to GDR-P/A/M/T) with site, basin, or country disaggregation where it changes decisions (51–52; ESRS 1, p.14–15).			
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	Agree that the exposure draft provides more clarity on the scoring methodology for the IROs, particularly with regards to providing a more standardized approach to when and how to consider the effects of mitigation, prevention and remediation actions, and would welcome this additional clarity in the Double Materiality Assessment, with regards to actual negative impacts (ESRS 1, p.10, 34) and potential negative impacts (ESRS 1, p.10, 35). ESRS 1 also clarifies the non-netting of positive and negative impacts (p.10, 36) and links due diligence to DMA (p.16, 54–57), with application guidance that "actions" include the implemented aspects of policies, and that significant planned or implemented remediation actions for material potential impacts should be reported under GDR-A (p.11, AR 12–13). From a practical standpoint, at a high level, this approach can align well with other existing risk assessment frameworks which consider inherent risk separately from the mitigation actions being taken. On how to report actions, ESRS 2 GDR-A explicitly frames disclosures around actions to prevent, mitigate and remediate material impacts, risks and opportunities, with scope, timeframe and resources (p.17, 36–38). Application requirements (i) define key actions, including those supporting remedy, (ii) allow aggregation or cross-referencing, and (iii) suggest using the mitigation hierarchy for environmental actions (p.17, AR 31–33; AR 34–36). For comparability, ESRS 2 GDR-M requires metrics that track the effectiveness of actions (p.18, 39–41), and IRO-2 makes undertakings list the disclosure requirements included and where they are located (p.14, 27–28), aiding transparency across reporters. Remaining judgment areas, such as what counts as "significant ongoing" mitigation, could benefit from NMIG examples, but overall the amendments materially clarify how implemented actions are treated in DMA and how to report them consistently.			
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We welcome these changes, to enhance interpretability of sustainability statements. With the existing framework it is sometimes difficult to identify the most relevant and important information, and readability of some reports is low.			
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We welcome the simplification of the datapoints and the reduction in the number of 'shall' datapoints, which in some sections were excessive. However, I do not agree with the 'no behaviour mandated' clause, and think that companies should be required to disclose reasons for not having certain datapoints, and plans and a timeline to implement them. Without this requirement the standards focus excessively on reporting without emphasising the importance of companies' evolving strategies and action, and on companies taking accountability.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We welcome the clarification of mandatory datapoints, as the burden on both auditors and companies was previously high due to lack of clarity. I agree with simplification of the mandatory datapoints and agree that the Non-Mandatory Illustrative Guidance is a useful concept for voluntary datapoints, particularly for companies with a high level of maturity, as well as Wave 1 companies that already reported on much of this information.			
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	We agree with the amendments, however it should be ensured that corporates making use of the reliefs will document and show their auditors sufficient, reasonable effort to collect the data.			
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	Risk of open-ended partial scope. There is no time limit on the relief. Without additional transparency, prolonged partial coverage could impair faithful representation. I suggest requiring a coverage ratio per affected metric (share of boundary included vs. excluded), an explanation of materiality of the excluded share, and a time-bound improvement plan reviewed annually (aligning with ¶19 on fair presentation and ESRS 2 ¶41(a),(c) on methodology, data sources, proxies and planned actions). Disagree with not having a time limit in place, suggestion that this should be limited to the first 1-3 years of reporting.			
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Option 1 best balances flexibility with investor-useful information and aligns the ESRS architecture with established practice. It keeps quantitative disclosures as the default for anticipated financial effects, but builds in targeted relief when (i) effects are not separately identifiable or (ii) measurement uncertainty is so high that numbers wouldn't be useful—while still requiring qualitative explanation and, where possible, combined quantitative effects. This relief is anchored in reasonable and supportable information without undue cost or effort (ESRS 1, p.20, ¶87–¶89), and it allows use of ranges when quantifying (ESRS 2, p.12, AR 18). Two improvements would strengthen comparability and assurance without undermining the relief: 1)Minimum transparency package when omitting quantification: require (a) the sign and direction of effects, (b) the time horizon, (c) the financial statement line items likely affected, and (d) a coverage ratio (share of material IROs/topics included vs. excluded), plus the reason for non-quantification per Option 1(c). (ESRS 2, p.11, ¶23(c)). 2)Method anchor and progress: require a short bridge to plans and funding (investment/disposal plans; funding sources) when discussing anticipated effects (ESRS 2, p.12, AR 16), and allow/encourage ranges with key assumptions and uncertainties (ESRS 1, p.19, ¶85(b)–(c); ESRS 2, p.12, AR 18). Finally, Option 1 avoids an undue loss of information inherent in Option 2 (qualitative-only), while still accommodating confidentiality via existing sensitive information provisions where needed (ESRS 1, p.22, ¶98–¶101). Phase-ins already provide ramp-up time (Appendix D, ESRS 1, p.33–34). On balance, Option 1, with the transparency tweaks above, delivers decision-useful, comparable reporting without imposing impracticable burdens.			
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	Banking-style items for non-financials. ¶41(c) (loan-collateral real estate by energy-efficiency class) is decision-useful for lenders but often not applicable to non-financial corporates; Suggestion: make ¶41(c) explicitly "if applicable" ¶41(d) (potential transition liabilities not yet recognised) can be highly uncertain and commercially sensitive Suggestion: anchor ¶41(d) to Option 1 relief—permit omission of separate quantification with a required qualitative package and, where feasible, combined quantification per ESRS 2 ¶23(c) and AR 17–AR 18. Further phasing-in disclosures on anticipated financial effects weakens transparency, comparability and the ESRS' double-materiality intent as well as interoperability with the IFRS. Information required to understand links to financial statements.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	ESRS provides broader "undue cost and effort" relief than ISSB, including permission to report partial-scope metrics when reliable input data are unavailable and to exclude non-material activities from metric calculations. It also removes the previous hierarchy that required firms to collect direct value-chain data before using estimates; companies may now use either direct data or estimates based on what is "reliable and practical." That change reduces alignment with ISSB expectations on data sourcing. In addition, ESRS introduces a relief to delay the inclusion or exclusion of subsidiaries to the subsequent/beginning period (with added transparency for major deals). This A&D-specific timing relief is not an ISSB relief and adds another interoperability wrinkle. At a minimum, the requirements of ESRS should equal the minimum required for IFRS. We do not think ESRS should include additional reliefs beyond IFRS reliefs, because that creates extra complexity for dual reporters and could weaken ESRS's position as the "gold standard" for sustainability reporting. The amended clause on the operational vs. financial consolidation approach (ESRS E1 AR19) could reduce comparability, leave preparers without clear guidance, and complicate application. Our suggestion is either to mandate one approach for all preparers (as in IFRS) or to align with the GHG Protocol, allowing an election with an explanation of the rationale. If the choice remains open, apply a clear definition of which companies must use which approach; the phrase "only for entities with complex ownership structure" is too vague and could create uncertainty for preparers and auditors.			
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree that the datapoints moved from "may" to "shall" are justified and provide enhanced interoperability with other existing frameworks. We welcome the requirement to replace qualitative information with a mandatory quantitative datapoint for Corruption and Bribery - Incidents, to encourage transparency in Governance reporting, and since this information is useful for the users of the Sustainability Statement.			
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree that the new datapoints are justified and provide enhanced interoperability with other existing frameworks like Eco-design for Sustainable Product Regulation and Critical Raw Materials Act.			
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	Unless enforcement / application is clear, the increased flexibility could lead to corporates excluding important topics and reduce comparability, e.g. some reporting at IRO others at topical level.			
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Lack of alignment with Paris / Net zero pathways, risk of rising absolute emissions, limited comparability, reduces accountability.			
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	Agree with alignment with ILO's 2024 guidance, benchmark is better than purely minimum wage comparison but it gives too much flexibility to use legal minimum wages which outside of EU will produce wage benchmarks far below what is needed for decent standard of living. Using legal minimum wage results in discrimination against non-EU / low-income countries, sometimes living wage estimate does not exist and may create implementation burden.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	Agree with the principle of removing the datapoints related to the Principal Adverse Indicators that were not relevant in practice, especially given that these "EU datapoints" were extensive, and based on some optional PAIs. On review of the tables in Appendix 4 of the Basis for Conclusions, we agree with the deletion of datapoints where the information can be found elsewhere or the indicator can be derived for the purpose of SFDR.			
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	At a minimum, AR 26 should be maintained in its current form, and we agree with the methodology stipulated in the new ESRS E4-4. We would welcome further alignment with relevant content from science-based frameworks like SBTN, but not at the expense of negative impacts on timeframes or delays. The amended draft being reduced could send a message that biodiversity is not important or relevant compared to other topic. We suggest careful review of wording and requirements to ensure preparers do not unduly overlook information related to biodiversity. We also suggest that this standard is reviewed regularly to stay in alignment with science-based frameworks, especially in light of the Planetary Boundaries.			
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	E1-6 – Targets related to climate change (ESRS E1-34) – Partially agree and partially disagree It is insightful to maintain relative targets expressed in percentages, as these reflect actual reductions. By contrast, absolute targets may obscure the fact that the target value is influenced by methodological adjustments. E1-6 – Targets related to climate change (ESRS E1-34) – Disagree The deletion of temporal target requirements (2030, 2050, and 5-year intervals) is not justified by base year flexibility. Base year choice does not affect the need for clear temporal milestones, which are essential for transparency, comparability, and accountability. Minimum temporal references should be reinstated. E1-6 - Climate-related risks and scenario analysis - Partially agree and partially disagree For improved alignment between ESRS E1 and other standards (and reports already published), suggestion to include the physical and transition risks tables currently included in the NMIGs in the actual body of the draft, as an AR, or an explicit reference to the NMIG for clearer guidance on definitions and classification of risks for preparers not already familiar with other frameworks like the TCFD.			
Survey	Sphera Solutions, Inc.	Consultant (including software vendor)	United States	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Pacific Institute	NGO	South Africa	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	Pacific Institute	NGO	South Africa	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	I agree overall, the previous version was very long and repetitive and I congratulate the effort to simplify throughout the documents. Having to refer back to references will reduce the risk of having contradictory statements in the documents, but it will not necessarily cut down the reader's time in terms of sensemaking.			
Survey	Pacific Institute	NGO	South Africa	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	I think this point is sufficiently covered for this review. Ahead of the next review, it would be beneficial to also look at other non-mandated frameworks that act as best practice and that could either be aligned to or that could be referenced as credible material to use. SBTN is already mentioned, and this is good. Other frameworks, like the water-specific Net Positive Water Impact (NPWI) guideline (https://ceowatermandate.org/resilience/net-positive-water-impact/) would be another example, or WASH4Work (https://wash4work.org/) guidelines. Both provide best-practice guidelines in the water stewardship space. Water-related methodologies could also be considered for reference: the Volumetric Water Benefit Accounting framework (https://www.wri.org/research/volumetric-water-benefit-accounting-vwba-method-implementing-and-valuing-water-stewardship) and the freshly published Water Quality Benefit Accounting Framework (https://www.wri.org/research/water-quality-benefit-accounting). A Biodiversity Benefit Accounting Framework is currently under development https://ceowatermandate.org/biodiversity/			
Survey	Pacific Institute	NGO	South Africa	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Working through S1 and S2 previously was repetitive. Merging them is simpler.			
Survey	Pacific Institute	NGO	South Africa	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	I am specifically delighted about the mandatory disclosure of water withdrawal. This aligns well with water stewardship frameworks like NPWI and SBTN.			
Survey	Pacific Institute	NGO	South Africa	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	Please note that a Biodiversity Benefit Accounting framework is currently under development https://ceowatermandate.org/biodiversity/			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Pacific Institute	NGO	South Africa	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Please look at new pdf document in your table on page 91. In the table on the new format, please look under E4. Aquatic ecosystems is not mentioned there and needs to be included, because it is still included in the E4 document.			
Survey	Pacific Institute	NGO	South Africa	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	clicked in error			
Survey	Pacific Institute	NGO	South Africa	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	I remain confused about the distribution of some topics across the standards. One example is brine and concentrate from reuse and recycling of water. Do the savings of these processes get recorded solely under E3, or also in part under E5? And where does brine get dealt with? Under E2 or E5? More clarity would be welcomed. Specific load is now omitted, diverging the standard more from water quality guidelines in, e.g. NPWI, the water footprint network and the Water Quality Benefit Accounting guidelines.			
Survey	Pacific Institute	NGO	South Africa	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	I welcome the separation of water and marine.			
Survey	Pacific Institute	NGO	South Africa	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	clicked in error			
Survey	ETUC	Trade union	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Double materiality is essential and must remain at the heart of the ESRS framework and European Union sustainability regime for corporate reporting to be credible and useful. The principle of "materiality of information" is concerning since it introduces a further filter for companies to not report information. For example, it represents a step backwards from ID-177, which says that most S1 metrics must be reported if S1 Own Workforce is material. It is essential to maintain the principle of fair presentation in the reporting standards. It is positive that the revision of the AR 16 list of topics has maintained all of the sub-subtopics for S1 + S2. These are based on the list of social topics in the CSRD and should all be maintained. The emphasis on aggregation (as opposed to disaggregation) is concerning, as disaggregated information (both site-specific and country-specific) is key to understanding the distribution of IROs.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ETUC	Trade union	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	It is important that companies report not just their net impact – the gross impact should be reported, and the recommended text preserves this principle.			
Survey	ETUC	Trade union	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The proposed changes are helpful. However, para 113 is difficult to understand: "113. If the description of the material impacts, risks and opportunities prepared in accordance with [Draft] Amended ESRS 2 IRO-2 is not presented alongside the respective policies, actions and targets, the undertaking shall make explicit which policies, actions and targets relate to which material impacts, risks, or opportunities, in accordance with paragraph 22." Para 22 addresses the issue of appropriate aggregation or disaggregation of information on material impacts, risks and opportunities and their management, without setting any rules regarding the location of such disclosures depending (or not) on the level of aggregation.			
Survey	ETUC	Trade union	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The Exposure Draft removes duplications between the cross-cutting and topical standards. The preservation of the 4-part architecture in the social standards is important to respect the distinctiveness of different affected stakeholder groups. However, we have two critical concerns. First, the original DR in environmental standards concerning screening of sites in materiality assessment were replaced by an application requirement to ESRS 2 IRO-1. This in effect makes transparency on this aspect optional. Consideration of local context is a key element of an appropriate materiality assessment. This should be both recognised in Chapter 3 of ESRS 1, and in ESRS 2 IRO-1, which should include an explicit datapoint on how the undertaking screened its locations and value chains. We welcome that E standards provide a clearer reference on the importance of disaggregation of disclosures, but this can only be done well if locations are properly screened. Second, we strongly recommend adding an explicit reference to the disclosure of relevant, entity-specific metrics directly in S standards. The fact that S2, S3 and S4 do not include any metrics should not imply that entity-specific metrics for S topics should not be disclosed.			
Survey	ETUC	Trade union	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The "may" (voluntary) data points should not be eliminated. In many cases they are "shall" in GRI standards, so it is important to keep them to align with GRI standards. Also, many of them were originally proposed as mandatory by EFRAG to the EC. The first wave of reports show that many companies have reported some "may" data points. Retaining them would help ensure standardization/comparability between company reports. Almost all of the datapoints for non-employee workers are voluntary, thus most datapoints for this vulnerable group of workers has been lost. Also, important datapoints on full time versus part time workers has been eliminated.			
Survey	ETUC	Trade union	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	It is concerning that mandatory guidance in the Set 1 ESRS has been downgraded to "non-mandatory". Mandatory guidance is key to ensuring comparability and completeness of sustainability reporting. At a minimum, Non-mandatory Implementation Guidance (NMIG) should be included in the Delegated Act, and ideally called Mandatory Implementation Guidance. A major point of concern is that ID-177, which provided guidance that most S1 metrics should be reported if S1 Own Workforce is material, has now been downgraded into NMIG. Instead, EFRAG should preserve and promote the guidance that most S1 metrics shall be reported.			
Survey	ETUC	Trade union	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	As a whole the reliefs go too far, overshooting the balance between cost/effort and transparency. There is a danger of enabling green/social washing. The relief for "undue cost or effort" is too vague thus leaving too much room for interpretation. The relief for direct data for value chain reporting is too extensive, as direct data is key for transparency. The relief for reporting on operations which are not "significant drivers of IROs" also opens up too much leeway for interpretation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ETUC	Trade union	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	These combined reliefs overshoot the balance between transparency and cost/effort and risk enabling green/social washing. At a minimum, there should be a time limit introduced for these reliefs on value chain metrics.			
Survey	ETUC	Trade union	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ability to estimate financial effects is critical for the undertaking's ability to integrate sustainability into its business strategy considerations, planning and risk management. It is also key for the determination of financial materiality, including in terms of overreporting topics as financially material. Reporting on financial effects is crucial to achieving the objective of putting sustainability reporting on the same level as financial reporting and integrating both. The European Union has recognised the value of a double materiality approach to corporate reporting which requires disclosure of both material environmental and social impacts, risks and opportunities as well financially material data, It is important to keep the requirement on businesses to analyse and understand the financial effects of their business model. This will ensure investors have access to credible data as well as providing the underpinning for future business planning.			
Survey	ETUC	Trade union	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	ESRS reliefs should not go beyond those set in IFRS. The principle of fair presentation needs to be protected to provide transparency on all material IROs. As noted in the response to question 15, it is also important to consider interoperability with GRI when considering changes to the ESRS, rather than only considering ISSB's standards.			
Survey	ETUC	Trade union	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	ETUC	Trade union	Belgium	22.S1	Comments on deleted datapoints in ESRS S1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The reduction in the number of mandatory and voluntary datapoints goes far beyond striking an acceptable balance. As mentioned above, the voluntary datapoints should be maintained to provide alignment with GRI, which is currently in the process of strengthening its labor standards, as well as guidance and standardization for companies reporting more than just the mandatory datapoints. An explicit quantitative goal of 50%+ reductions was never set by the European Commission for EFRAG. A number of S1 datapoint metrics have been eliminated which should be reinstated: •S1-5 Employees: gender breakdown for zero-hour employees •S1-8 Diversity: age distribution; •S1-10 Social protection: reinstatement of retirement •S1-12: Training and development: gender breakdowns, •S1-13 Health and safety: fatalities from ill-health for non-employees and other workers on site; •S1-14 Work-life balance: employees that took family related leave;			
Survey	ETUC	Trade union	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Adding a datapoint on training of the procurement team is needed to support the implementation of human rights in the supply chain. The addition of a datapoint on confirmed incidents of bribery is needed to improve transparency on the effectiveness of bribery/corruption policies and measures.			
Survey	ETUC	Trade union	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Agree that the following mandatory datapoint should be added: ESRS 2 General disclosures – BP 1 the undertaking shall state that the general requirements of ESRS 1 have been applied for the preparation of its sustainability statement			
Survey	ETUC	Trade union	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	The "fair presentation" principle is essential to reduce the risk of green/social washing, as it emphasizes the full disclosure of all material impacts, risks and opportunities and their management. It is not understandable why this principle is under attack, as it is included as one of the general principles of the Accounting Directive.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ETUC	Trade union	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	It is essential that financial institutions disclose absolute targets to assess how their strategies align with the economy-wide transition to net zero. Absolute targets are relevant for users of sustainability statements and for understanding the real-world climate impact of financed activities. While intensity measures provide insights into efficiency, they can mask rising absolute emissions in growing portfolios or sectors. Granting an exemption would also undermine fairness in a sector-agnostic standard. Other industries could equally argue for exceptions based on their own difficulties, reducing comparability across sectors. Moreover, absolute financed emissions are already recognised in existing standards and regulations: the SBTi financial sector net-zero standard, the UNEP FI/NZBA recommendations, and EU SFDR all require or encourage absolute emissions disclosure. Exempting banks would risk misalignment and reduce the usefulness of reported data for stakeholders, including asset owners who depend on it for their own disclosures.			
Survey	ETUC	Trade union	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The "top 10" threshold for reporting country-level data on employment, collective bargaining and social dialogue is a major improvement over the current 10% employment threshold. An analysis of the first sustainability statements from Wave 1 companies shows that the current 10% threshold results in country-level disclosures on as little as 21% of total employees. More country-level information is needed to understand the distribution of impacts across countries, as well as whether employment thresholds for specific labour rights have been exceeded. The new threshold does not require additional effort/cost by companies, since they must gather country-level data anyways to calculate the global figures. Furthermore, it does not result in extra datapoints, since the information currently is (and can be under the revised ESRS) reported as one table.			
Survey	ETUC	Trade union	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	An analysis of the first year ESRS reports shows that most companies are simply reporting that they pay minimum wages, whereas the intention (as outlined in the ESRS Basis for Conclusions) is that companies should be enabled to disclose commitments to paying a wage "sufficient to support themselves and their families in dignity" as well as the extent to which they do this. This shows that the methodology for non-EU countries needs to be changed. Furthermore, the new ILO agreement on a methodology for living wages needs to be taken into account. The proposed new methodology takes a step forward in both regards.			
Survey	ETUC	Trade union	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	The new, simplified framework makes it easier for companies to report on these SFDR-related matters in a way that corresponds to how their policies are set. For users, this consolidation makes it easier to locate the relevant information. However, the SFDR datapoints are very helpful and should only selectively be amended.			
Survey	ETUC	Trade union	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	The unadjusted gender pay gap should be kept as mandatory, since the methodology for calculating it is clear. The adjusted pay gap figure as voluntary. In practice many companies are reporting both figures, which is useful for improved transparency. However, since the methodology for calculating the adjusted figure is not standardized, the unadjusted should be kept mandatory.			
Survey	ETUC	Trade union	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	As detailed above, cumulative impact of the various reliefs is concerning.			
Survey	ETUC	Trade union	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The improved language on DMA is welcomed, including on the engagement with workers' representatives.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ETUC	Trade union	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The proposed "top 10" threshold for the reporting of country-level information for employee headcount, collective bargaining and social dialogue is a significant improvement over the current 10% employment threshold. Country-level information needs to be reported in more detail, and on other metrics as well, in order to have more transparency on the distribution of impacts across countries. In the metrics, voluntary datapoints need to be reinstated as well as the datapoints on gender breakdowns, workforce age distribution, etc. detailed above need to be reinstated. The proposed new methodology for adequate wages outside of the EU also needs attention, and the transition language for EU member states needs to be reinstated, since the Adequate Minimum Wage Directive has not been implemented in some Member States. We would also like to reiterate our longstanding demand for including franchise workers in the S1 definition of own workers, as well as the need for sector-specific standards to supplement the Set 1 sector-agnostic standards.			
Survey	ETUC	Trade union	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We are concerned that the loss of many specific datapoints related to workers in the value chain will mean that disclosures about material impacts, risks and opportunities become more generic and have less information about the specific stakeholder groups because specifications about the level of granularity have been deleted. Many of the points that are being deleted from ESRS S2 had originally been included because they reflected effective practice in relation to improving supply chain labour rights, for example, AR 6 awareness of the impacts on value chain workers from an undertaking's strategy or business model, AR 20 illustrating how the perspectives of value chain workers have informed specific decisions or activities of the undertaking and AR 25 which looks at retaliation and whether workers can use grievance mechanisms confidentially. An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	ETUC	Trade union	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	ETUC	Trade union	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	ETUC	Trade union	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The definition of own workforce should be expanded to include franchise workers. The term "non-employees" should be supplemented with the phrase "non-employee workers" or "non-employee workers in own workforce".			
Survey	VDMA	Business association (other than association of financial institution)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	- ESRS 1 29: does this mean that an issue can be assessed as not material in the following year and therefore no longer needs to be reported? How can this be argued to the auditor or where is the consistency of the report? - There is still confusion regarding ESRS 1 46/47 vs. ESRS 1 26: What does it mean that not every IRO has to be assessed? ESRS 1 26 states that you should start with the identification of impacts and assess them. In ESRS 1 46/47: top-down is sufficient. Only in AR 17 for para 48(a) are the two options + clarify possible paths, sections previously confusing - ESRS 1 44: does this make sense? Or are these not dependencies - if I take measures that avoid a risk but have a negative impact on something else? - ESRS 1 AR 11 for para 33: what does "appropriate level" mean? - ESRS 1 70: Is this not a double designation: once for the reporting entity and once for the lessor. - A definition of the scale of likelihood or generally pre-defined scales would be helpful. There still seems to be room for interpretation which will result in discussions with auditors. Clearer definition of when an information is "necessary" needed. - Unclear how to examine the new S-Subtopics with the former sub-sub-topics in brackets. - Who is the relevant user of a report? This should be defined. Who can decide what's material? The power of the user to determine materiality in any case is not the right approach! It's the company, who has the main knowledge! - DMA- sub-sub topics. Not sure, if the deletion is really helpful. Flexibility in case of DMA-analyses on topic-level, sub-topic-level or sub-sub-topic level would be a better approach.			
Survey	VDMA	Business association (other than association of financial institution)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The discussion with the auditors about is one of the main concerns for preparers. Supportable evidence must be defined more clearly, or a list of examples must be provided: detailing numerous possible supporting documents that are accepted (e.g., internal protocol notes should also be sufficient). A description in the ESRS listing possible references such as "for example" or a "white list" or similar would be preferable. The concept and intention behind the "gross vs. net" issue remain to a certain extent unclear. In our opinion companies should assess net impacts and not gross impacts. At the same time, clear rules are required to differentiate between preventive, detective, and remedial measures that are allowed to be considered for a net assessment vs. which not. The currently proposed rules appear more complex than necessary and entail too many different cases. In application, this will lead to high efforts and new interpretation ambiguities in auditing processes. We propose a simplified approach that sticks with a net perspective.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	VDMA	Business association (other than association of financial institution)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	Concerning ESRS-G: The proposed Amendments – in general – provide a more concise reporting, especially by summarizing and restructuring data points in the sub-chapters (e.g. G1-2 as qualitative reporting, G1-4 for quantitative reporting). Approaches seem to support the avoidance of repetition across sections (we noticed) and a focus on the most relevant information within the sustainability statement. It makes it possible to incorporate additional information we classify as useful for our expected readers (e. g. topics from older reports) and to make use of a readerfriendly structure.			
Survey	VDMA	Business association (other than association of financial institution)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	Elimination of topical specifications to GOV, SBM and IRO seems to make sense in order to avoid double reporting within the statement and fragmentation of topics in the report. The balance between prescriptiveness and flexibility supports efficient preparation and relevant reporting.			
Survey	VDMA	Business association (other than association of financial institution)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Besides some helpful documents ... like: - FAQs, - a template that shows the changes between ESRS Set 1 and ESRS revised - a template for the DMA - linked to the DRs and to the data points.... ... it is curcial that the new revised ESRS are clear enough for themselves and must not be accompanied by additional explanatory documents. --> The approach must be: One standard - one understandable document! -ESRS 1 84c: seems not that easy to manage, when acquiring a company and having to adjust our base year from e.g. 2019; data from the new company may not be available - an vice versa: the problem also arises when a subsidiary is sold during the financial year. Why is it still necessary to collect data for reporting purposes? The sold subsidiary no longer has any influence on the orientation and impact of the company. -- ESRS 1 87: What does "undue cost or effort" mean - how is it defined? -- ESRS 1 98: Why an option for member states? -- ESRS 1 118: Why only in the same language? We have to prepare the financial statements in German, but as an international company we may have published documents only in English. Why is it not permitted to refer to these? -- It is still unclear what is meant by "policies" - a definition would be helpful. Is it really just "policy" in the narrower sense or also a strategy that may only be documented internally? -- Clarification needed: how to comply with 1.5°C goal of Paris Agreement -- ESRS S1-15: across the board? Or differentiation on positions/levels, as otherwise not comparable -ESRS S1 AR 14 para 25: what is meant by „significant driver" -> how to define?			
Survey	VDMA	Business association (other than association of financial institution)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Overall, we appreciate the previously introduced reliefs and acknowledge their positive impact. However, we have some reservations regarding the newly proposed relief for acquisitions and disposals. We recommend removing paragraph 73 of ESRS 1 and retaining only paragraph 72. Rationale: Paragraph 73 introduces an additional differentiation for major acquisitions and disposals, which unnecessarily complicates the application of the relief. In contrast, paragraph 72 alone offers a clear and practical simplification that would be genuinely helpful for preparers.			
Survey	VDMA	Business association (other than association of financial institution)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We generally support the newly proposed relief for lack of data quality as outlined in ESRS 1, paragraph 91. Regarding the relief proposed in paragraph 92, which allows companies to exclude joint operations over which they do not have operational control from the scope of environmental metrics reported under ESRS E2, E3, E4, and E5: We suggest extending this relief to include relevant metrics under ESRS S1 and potentially also ESRS E1. This would promote consistency across reporting requirements and further reduce complexity in cases where operational control is limited. The reason for excluding these two standards from the relief is not apparent to us.			
Survey	VDMA	Business association (other than association of financial institution)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	It is important that the ESRS distinguish between the diefferent circumstances of the preparers, for example: PIEs and Non-PIEs or the need of some to be aligned with IFRS and others don't have to. This might be of interest for public companies and their shareholders, or for companies that want to be aligned with IFRS. However we don't see any necessity to disclose this for family businesses no matter of what business size. Even more, these figures would be highly uncertain. There ist no standardised methodology. So the data is not comparable and therefore the benefit to integrate this into reporting is more than questionable. Our proposal would be either to delete this requirement or better: make it voluntary, which means: transform it into a may-disclosure. So, for preparers, who want or must disclose to this issue, because they want to be aligned with IFRS or they are a PIE and do have requests from their financial stakeholders, they may disclose it and should be allowed to choose between Option 1 and Option 2.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	VDMA	Business association (other than association of financial institution)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	see answer to Question 19: The information on current financial effects required under [Draft] Amended ESRS 2 SBM-3, paragraphs 23 and 24 should be sufficient. These figures would be highly uncertain. Therefore I still opt for completely deleting this. Aside from that, it might be difficult to provide meaningful data for all sites of a Group. Many of these data points might not be available at the moment and the calculation will take a lot of effort and time.			
Survey	VDMA	Business association (other than association of financial institution)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	We do welcome the further interoperability between IFRS and ESRS. But let us emphasize once again at this point that it is surprising why Europe is undertaking the enormous effort and expense of developing its own European standards (ESRS) instead of adopting the international sustainability reporting standards. However, we acknowledge that separate standards do make sense, if they meet the different needs of different preparers (PIEs, NON-PIEs, etc.). See our answer to question 19. Conversely, it would also be important that companies, reporting in accordance with IFRS ISSB standards, receive appropriate recognition for these topics (i.e., ESRS 2 and E1), meaning that they would no longer have to report separately in accordance with ESRS 2 and E1, but would be allowed to use (copy and paste) these chapters 1:1 from their IFRS/ISSB reporting and that this will be accepted by the auditor!			
Survey	VDMA	Business association (other than association of financial institution)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	VDMA	Business association (other than association of financial institution)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	Overall, we welcome the reduction in reporting burden and believe that the retained information continues to support the objectives of the EU Green Deal. However, we would like to highlight several concerns regarding the actual extent of the simplification. Although the Exposure Drafts represent a substantial reduction compared to Set 1, EFRAG's estimate of a 57% reduction may present an overly optimistic picture. Key reasons include: - Reclassification of mandatory data points: Many previously mandatory ("shall") disclosures have been shifted to Application Requirements (AR) or Non-Mandatory Implementation Guidance (NMIG). Since companies will still be audited against these, the preparation effort remains high. This is more true to AR than NMIG, but our experience shows that auditors also use existing guidance documents in audits (e.g. MAIG) - Unaccounted changes in ESRS 1: ESRS 1 does not contain data points and is therefore excluded from the reduction calculation. Nevertheless, it includes the highest number of new and amended paragraphs across all standards. Even if these changes aim to reduce burden, they often require additional effort—such as adapting the DMA process or applying new principles like "fair representation." - High volume of structural changes: While the total number of data points has decreased, the number of new, amended, merged, or relocated paragraphs is substantial, resulting in significant implementation efforts. - Residual content in deleted paragraphs: For approximately half of the deleted paragraphs, content has been retained in some form (e.g., "moved to," "covered in," "combined with," "core message preserved," ...), which continues to require attention and resources.			
Survey	VDMA	Business association (other than association of financial institution)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	This does not reflect the announced reduction and simplification by the EU Commission. So please stick with "may".			
Survey	VDMA	Business association (other than association of financial institution)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	This does not reflect the announced reduction and simplification by the EU Commission. More over it leads to double reporting obligations and burden. So far the relevant delegated acts for example under ESPR are not finalised, it remain uncertain, which kind of data is requested. We suggest deleting the data points or at most integrating them into may datapoints.			
Survey	VDMA	Business association (other than association of financial institution)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	Non PIEs are not yet fully familar with this approach of "fair presentation", and I expect it to lead to discussions and interpretation with the auditors. This principle should maybe be further elaborated to prevent from room for interpretation.			
Survey	VDMA	Business association (other than association of financial institution)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	some companies fall into the category of 'some cases' mentioned above. Specifically, this change would result in an increase in the number of reported countries from previously two to now ten and a correspondingly increased reporting (preparation) burden. Further, this change would apply to more than one disclosure requirement (e.g. ‚characteristics of the employees', or ‚collective bargaining coverage'.) Another problem is that the indicator would now have to be collected again, which means a lot of effort for companies that have already collected the old indicators. It would be more important to address the requirement from a strategic perspective. Instead of working with a rigid limit, a risk-based approach should be an option.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	VDMA	Business association (other than association of financial institution)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	That is not manageable without helb from consulting firms. And even with their help not comparable... Why can't the EU provide a country overview table for living wages? Or why is it not allowed to refer to the more transparent and available concept of minimum wages? Conclusion: An EU reference list of acceptable living wages by country is needed or the data point must stick to minimum wages.			
Survey	VDMA	Business association (other than association of financial institution)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	Leads to a lower comparability since a global percentage is not very meaningful in industries with specific gaps in accusation. At least the function/role of the employee should be taken into account			
Survey	VDMA	Business association (other than association of financial institution)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	We do not support to include SMEs separately in the disclosure of standard payment terms in number of days by main category of suppliers (new paragraph 20 a), since a)the definition of SMEs depend on different national legislation and includes several parameters in "and" combination b)we are compliant with the national legal requirements concerning payment terms for SMEs -Even if the reporting on a policy concerning the prevention of late payments is not required anymore, the standard payment terms (especially with regard to SMEs) still need to be reported -The Disclosure Requirements regarding the standard payment terms and the percentage aligned with these terms still require the reporting company to provide transparency on payment practices -The average time a company takes to pay an invoice would have provided a more detailed picture of the payment practices of the company; however, the average time is mainly depending on the usual payment cycles (e.g. weekly / bi-weekly) of the respective company			
Survey	VDMA	Business association (other than association of financial institution)	Germany	33.E_5.	ESRS ES:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	E2-5 – AR 7 a) for paras. 18, 19, 20: What should the implementation look like in reality? Substances can fall under several hazard classes defined in CLP. How can double counting be avoided? ESRS ES-4: Defintion of key materials (15 a) is not necessarily a simplification, since it has to be aligned with auditors and implemented in the IT infrastructure ESRS ES-5 The requirements demand information on expected durability, repairability, and the share of recyclable materials. A critical issue is that the reference for using established assessment systems (such as those from the ESPR or PPWR) has been removed. Without standardized and regulatory-anchored methodologies for measuring these criteria, there is no reliable basis for reporting. This inevitably leads to company-specific, subjective assessments that are not comparable across different companies. As a result, the informative value of the data is significantly weakened. Recommendation: The disclosure requirement should be explicitly linked to the development and application of the relevant standards under ESPR and PPWR. Until these standards are finalized, objective and comparable reporting is not feasible. The new requirement (17d) to disclose the share of recycled materials in key products raises questions about scope and added value. This KPI essentially captures the same information already reported through the accounting of resource inflow (in ESRS E5-4, 15(d)). The share of recycled materials used in production is logically reflected in the finished products. Therefore, separate data collection and disclosure for resource outflow is redundant. Disclosure for individual product streams (key products) requires complex tracking and allocation, which involves a significant administrative burden. This effort is disproportionate to the informational gain. Recommendation: requirement (17d) should be removed to avoid duplicate reporting. The meaningful information about use of recycled materials is already sufficiently covered by DR resource inflow. what´s the definition of key products?			
Survey	VDMA	Business association (other than association of financial institution)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	S1-DR10 Social Protection This disclosure requirement requires international companies to collect data about the legal situation in all countries where they have employment. What is understood by e. g. maternity protection and parental leave is assessed very differently depending on the country and region. It cannot be ruled out that, for this reason, the legal situation for social security is assessed differently by various reporting companies in each country. To ensure the comparability of the data, information on the legal situation in each country worldwide should be made centrally available to companies. On this basis, companies should then report whether they compensate for insufficient social security in a country where they have employees through their own accompanying measures. S1-DR15 Remuneration Metrics 44b) In international companies, the annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees is significantly influenced by the distribution of the workforce around the world. In European companies, top managers and CEOs who might be those "highest paid individuals" in many cases tend to be located in Europe whereas e.g. production lines might be located in low cost countries. Even if the workers in those countries might be paid a fair wage, and even if the "highest paid individual" might receive just an average remuneration, this ratio might indicate a severe disproportion although the remuneration for all employees is adequate. In a company with employment exclusively in Europe, however, the same figure might be an indicator for an improper high remuneration of the top earner. So this KPI is not comparable for different companies and should be omitted.			
Survey	VDMA	Business association (other than association of financial institution)	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The sustainability report must serve as a tool to capture and track over time the data that is truly relevant for steering and that have a real impact on the sustainable orientation of the company. The goal is to be able to develop and produce innovations for a sustainable future. In our view, the revised standard still misses this objective, as it remains too closely aligned with the excessive data requirements of the financial sector. Which ESG data is genuinely relevant for banks' risk management, and which data is still included under the motto 'the more, the better'? The current exposure draft falls short in this regard. It also does not sufficiently account for the necessary flexibility in light of different corporate needs (PIEs vs. non-PIEs). A distinction of this kind - or at least a 'may' option for certain disclosure requirements or data points - would be urgently needed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Groentenfruit Huis	Business association (other than association of financial institution)	Netherlands	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	Groentenfruit Huis	Business association (other than association of financial institution)	Netherlands	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Groentenfruit Huis	Business association (other than association of financial institution)	Netherlands	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Groentenfruit Huis	Business association (other than association of financial institution)	Netherlands	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	It would be even more helpful to divide the objectives of the DR from the shall disclose points.			
Survey	Groentenfruit Huis	Business association (other than association of financial institution)	Netherlands	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	I think these are good changes as there will be less confusion in terms of navigating through the document to understand the whole DR.			
Survey	Groentenfruit Huis	Business association (other than association of financial institution)	Netherlands	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Groentenfruit Huis	Business association (other than association of financial institution)	Netherlands	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	I agree, but we should watch out that it is not being used as greenwashing			
Survey	Groentenfruit Huis	Business association (other than association of financial institution)	Netherlands	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	Groentenfruit Huis	Business association (other than association of financial institution)	Netherlands	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Groentenfruit Huis	Business association (other than association of financial institution)	Netherlands	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Groentenfruit Huis	Business association (other than association of financial institution)	Netherlands	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Groentenfruit Huis	Business association (other than association of financial institution)	Netherlands	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Groentenfruit Huis	Business association (other than association of financial institution)	Netherlands	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Groentenfruit Huis	Business association (other than association of financial institution)	Netherlands	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Groentenfruit Huis	Business association (other than association of financial institution)	Netherlands	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	Groentenfruit Huis	Business association (other than association of financial institution)	Netherlands	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree				
Survey	Groentenfruit Huis	Business association (other than association of financial institution)	Netherlands	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree				
Survey	Groentenfruit Huis	Business association (other than association of financial institution)	Netherlands	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Crédit Agricole	Bank	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Materiality assessment: - In general, we support the simplification and amendments proposed by EFRAG. Nevertheless, all proposals made by EFRAG are not clear at this point: - Paragraph 48(a) of ESRS 1, implies that undertakings are allowed to "derive" the materiality of certain topics without DMA. This paragraph is not coherent with part 3.3 on the double materiality assessment and would result in divergent interpretations. - Paragraph 48(b) implies that when an undertaking thinks that IROs are "likely" to be material "limited assessment" is enough, what does that mean? Is DMA required in those case? How to define "likely"? We advise EFRAG to clarify this paragraph. Filter of materiality: - ESRS 2 is now subject to a filter of materiality, as preparator, we do not support this change, as ESRS 2 requires essential information to understand the sustainability reporting of our counterparties and stakeholders (scope of the reporting, time horizon used…). If we do not have key information regarding the basis of preparation of sustainability reporting, it will limit our understanding and the relevance of these reports. Moreover, we do not understand how to apply this concept to several of the DR included in ESRS 2, for example the basis for preparation (BP 1 et BP 2) or the DR that requires undertaking to disclose their methodology (IRO 1). We advise EFRAG to take into account these considerations. Crédit Agricole agrees with proposed simplification which is not changing the methodology regarding the double materiality analysis, in order to guarantee the permanence of information and to ensure the comparison of disclosures for all banks and firms.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Crédit Agricole	Bank	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	Crédit Agricole suggests not changing the methodology regarding the double materiality analysis and only considering the gross impacts (not net impacts). If this notion is retained, it should be specified because we have difficulties understanding what is expected from undertakings regarding gross and net impacts; Appendix C does not help and even introduces incoherent request with paragraph 34 to 36: - Actual negative impacts: we understand that undertakings perform DMA and the "gross" impact must be reported along with eventual remediation actions. Therefore, during the DMA undertakings should not consider remediation actions to address actual negative impacts but only report those if the impact is considered material. Nevertheless, it is written in the same paragraph "When assessing the materiality of actual negative impacts [..] the severity of the impact shall be evaluated considering the outcomes of any mitigation or prevention measures" These two sentences do not seem coherent with each other, can you clarify? -Potential negative impact, an undertaking shall report "gross" impacts when it "needs to maintain significant ongoing mitigation and/or prevention actions, to contain the severity and/or likelihood of occurrence of the potential impact below a materiality level". Can you clarify what constitutes a "significant mitigation actions"? Moreover, how to: Perform de DMA regarding potential impacts: those impacts should be considered "material" before or after considering remediation measures? Report the "net" impacts deemed material? Should they be disclosed two times in the sustainability report, on in "gross" and one in "net" so users of sustainability reporting understand the positive impacts of mitigations measures? Incoherence with appendix C: The table presented includes a 3rd column, that implies that undertakings should assess and report "future" potential and actual impact, but current impacts are already assessed and potential impacts are inevitably future impacts.			
Survey	Crédit Agricole	Bank	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Incoherence in section 8.3 : - There is an incoherence between paragraph 109 and the corresponding AR 36 and AR 37. This paragraph indicates that it is possible to include an executive summary in the sustainability statement and that the undertaking has also the ability to include this summary by reference to another executive summary, included in another document. Nevertheless, AR 36 relates to the methodology of calculation of GHG emissions, and AR 37 relates to internal cross references inside the sustainability statements. - Can you fix this incoherence by clarifying what is allowed and what type of information can be cross referenced inside and outside of the sustainability reporting? - Moreover, part 8.3 refers to cross reference inside the sustainability reporting while paragraph 109 refers to cross reference in other documents. - This incoherence should be fixed: paragraph 109 should be moved in section 9 "connected information and linkages with other part of the corporate reporting." Deletion of the phase-in regarding entity-specific disclosures : - As EFRAG has tried to enhance "the flexibility that preparers have in preparing their statements", we do not understand why it has completely deleted all paragraphs that relate to phase-in provisions on entity-specific disclosures. - We ask EFRAG to keep this phase-in in the final draft, in particular allowing undertakings to continue prioritize the publication of disclosures already reported in prior periods.			
Survey	Crédit Agricole	Bank	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	EFRAG indicates that the various amendments should "support more connectivity between IRO disclosure and Policies, Actions and Targets (PAT) disclosure, avoid repetition and support better understanding". Nevertheless, ESRS 2 is not clear regarding the location where IROs should be reported: -We understand that paragraph 28 of ESRS 2 (IRO 2) now requires undertaking to disclose "a concise description of its actual and potential, positive and negative material impacts, [...] as well as its material risks and opportunities, specifying the related topics and how and where impacts, risks and opportunities are connected to its business model, its own operations and its upstream and downstream value chain; -At the same time, AR 24 of this paragraph 28 gives the possibility to disclose those IRO "In the same location as its disclosures on the related policies, actions, targets and metrics through which it addresses them, in order to avoid duplication and support a coherent narrative" and it precises that "If the undertaking exercises this option, it shall still present a concise description of its material impacts, risks and opportunities alongside its disclosures prepared in accordance with IRO-2". We understand from these paragraphs that IROs shall be reported twice (if the undertaking decides to publish the IROs along its PAT): once in the general part and once in the corresponding topical standard. Moreover, a "brief" description of IROs is also required in SBM 3 (paragraph 22), can you confirm this interpretation? If this is correct, we encourage EFRAG to limit duplication and enhance coherence by allowing undertakings to only publish its IROs in SBM 3 and in the corresponding topical standards, along its PAT.			
Survey	Crédit Agricole	Bank	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The term "shall consider" should also be deleted from all AR, because this wording has caused various interpretative questions on what is really expected from the preparator. For example (AR 10 ESRS 1): "when disclosing on its capacity to adjust its strategy and business model according to paragraph 21(c), the undertaking shall consider [...] the effects of current and planned investments in climate mitigation, adaptation and transition opportunities on climate resilience enhancement". In practice what is expected from undertakings when they disclose information on their capacity to adjust their strategy? Are they only expected to "acknowledge" their planned investments to answer the DR? Are they required to take it into account? If they don't, are they required to provide an explanation?			
Survey	Crédit Agricole	Bank	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Delete voluntary disclosure requirements in the non-mandatory implementation guidance (NMIG). It should consist only of voluntary implementation guidance and not voluntary disclosure requirements			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Crédit Agricole	Bank	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We have several comments regarding these new burden reliefs: -The scope of this notion lacks a clear definition, which may lead to inconsistent interpretation or application. It should be clearly stated that the use of 'undue cost or effort' must be documented and justified; under no circumstances should it serve as a pretext for withholding information that could be disclosed. eEven if the notion of "undue cost of efforts" comes from IFRS S1, these precisions are necessary for undertakings to understand what they are required to do and what auditors should require from undertakings. -Second, paragraph 89 seems to introduce an additional concept that undertakings should consider when applying the "cost of efforts" relief: "the benefits resulting information for users"? Can you explain how to apply in practice this new relief? If the information is deemed material, it seems complicated to conclude that the "benefit" is not important. Another relief is also proposed by EFRAG regarding sensitive information (part 7.8). -In the corresponding AR 35, EFRAG indicates that Member States have to choose individually whether their national undertakings can use this phase-in. -Nevertheless, this same AR mentions another phase-in by allowing undertakings to "limit information relating to impending developments or matters in the course of negotiation". Is the phase-in introduced by AR 35 (limit information for matters in course of negotiation) different that the phase-in regarding the one on sensitive information, or is it the same phase-in? EFRAG should clarify.			
Survey	Crédit Agricole	Bank	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We have several comments regarding the relief for data quality: -Paragraph 90 indicates: "Activities within the undertaking or group may be excluded from metric calculations if, due to their nature, they are not expected to be a significant driver of the impacts, risks and opportunities". Can you clarify what a "significant driver of the impacts, risks and opportunities" means? The lack of precision could result in divergent interpretations between undertakings and auditors. -Regarding paragraph 91, we understand that it is possible to calculate metrics for a part of the consolidation scope only, "except for E1-6". Does it mean that for this metric the scope must be complete, even if the undertaking was not able to collect or estimate reliable data? Can you confirm that undertakings can apply the "undue cost and efforts relief" on this data point too? -To clarify paragraph 91 we propose the following wording : "When the undertaking is not able to use reliable direct or estimated data for a part of its consolidated scope (including part of the value chain), the undertaking shall specify, when relevant, that it has identified material impacts, risks and opportunities in its own operations or value chain, but the corresponding metric can currently only be partially estimated. In this circumstance, the undertaking shall disclose the actions it has taken to increase the coverage and quality in future reporting periods, and the progress compared to the previous reporting period. The undertaking shall also assess at the subsequent reporting dates whether reliable data or input to be used in the estimate has become available, and if this is the case, adjust the estimates and the disclosure accordingly. This relief is not applicable for [Draft] Amended ESRS E1-6 GHG Emissions".			
Survey	Crédit Agricole	Bank	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Anticipated financial impact should not be subject to compulsory public disclosure. Data that is highly dependent on estimates and subject to significant uncertainty does not provide reliable insights for investors or other users, due to its potential variability. Premature disclosure of such information may not only mislead stakeholders but also expose companies to reputational and legal risks associated with misinterpretation. Reputational risk: To date such data would be considered as strategic and while we do take into account financial aspects of such risk and improve our methods of estimation, risk frameworks we consider that the level of reliability is still to be improved in particularly for such long-term time horizons where there is high uncertainty. Strategic risk: Some of such long-term data would expose the strategy of the group. Risk of inconsistency and methodological aspects: There are no methodological cross industry standards for such calculation. We consider that some of them do not make sense for financial institutions. Furthermore methods are being shared and discussed with supervision as to the expectations and granularity levels.			
Survey	Crédit Agricole	Bank	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	Risk of inconsistency and methodological aspects: There are no methodological cross industry standards for such calculation. We consider that some of them do not make sense for financial institutions. Furthermore, methods are being shared and discussed with supervision as to the expectations and granularity levels. Location of assets can be linked to either companies own operations or financing of its clients: For point 1. Own operations: Publication of assets financial worth and location is considered as strategic and confidential. For points 2: There are no methodological cross industry standards for such calculation. We consider that some of them do not make sense for financial institutions. Furthermore methods are being shared and discussed with supervision as to the expectations and granularity levels.			
Survey	Crédit Agricole	Bank	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Interoperability with ISSB's standards is not a key point for us. That is also why we have chosen option 2 in question 19.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Crédit Agricole	Bank	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Crédit Agricole	Bank	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	We agree with the proposition on Water Data (E3 Water - Own operations total withdrawal and E3 Water – Own operations total discharges) as we need this data from our clients to better understand their water impacts and accurately assess their overall environmental footprint. We disagree with the suggestion of E4 mandatory Disclosure of transition plan for biodiversity and ecosystems as there is no concrete definition as to what a biodiversity transition plan looks like. It is impossible to measure at this stage for both companies and financial institutions. Unless EFRAG wants to provide a very concrete and well-defined methodology for companies AND financial institutions - we would welcome a working group on this endeavor. Otherwise, this creates unnecessary reporting burden on a topic where basic indicators, such as biodiversity impacts, are still difficult to measure at the company level. It should remain as a "may" until a robust methodology on how to measure impacts and dependencies for financial institution is developed and adopted. ESRS G1 Regarding the provision related to business conduct – training of procurement team, we disagree with this suggestion. This requirement does not seem a simplification, but rather constitutes a new element to report. Furthermore, the availability of this data is complex, given the our structure and our processes, which don't allow to easily obtain these training data, representing a significant additional administrative burden without proportional benefit. ESRS G1 Regarding the point related to business conduct confirmed incidents (nature of incidents / number of incidents), we disagree with this suggestion. On one hand, the notion of "confirmed incidents" appears ambiguous and open to multiple interpretations, creating legal and operational uncertainty for reporting companies. This terminology lacks clarity. On the other hand, the introduction of this new quantitative reporting requirement goes against the stated objective of simplification.			
Survey	Crédit Agricole	Bank	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree with the introduction of this new general statement on compliance with ESRS 1 requirements in preparation of the Statement. This update, by providing a detailed, unified list of potential deviations from basis for preparation gives clear guidance for undertaking while increasing readability and clarity of information. We welcome the addition of the new data point "E2-4 Secondary microplastics resulting… from the breakdown of larger plastic items … ," as this information was already required to be reported in ESRS E2 through AR20. However, given the significant complexity involved in calculating secondary microplastics being released in the downstream value chain, especially unintentionally, we recommend that this data point should be treated qualitatively rather than quantitatively, allowing for a descriptive assessment of impacts without requiring precise measurements that are difficult to achieve with current knowledge and methodologies. We support the addition of ESRS E5-4 paragraph 15(c) requiring disclosure of the percentage of total weight that are critical and strategic raw materials. This level of detail would improve our ability to assess and manage sustainability risks associated with critical raw materials while supporting more effective due diligence processes. Additionally, we believe that information regarding the geographical source of these minerals would be highly valuable, as well as the different stages of the supply chain of these minerals from extraction, processing to final product, as it would enable a more comprehensive understanding of potential environmental and social impacts of these minerals. We agree on the addition of ESRS E5-5 paragraph 18(e) "percentage and/or total weight for which the final destination is unknown" data point as it completes the mass balance approach to waste reporting. By allowing transparent reporting of unknown destinations alongside known waste streams, this requirement enhances disclosure integrity while maintaining reasonable documentation expectations.			
Survey	Crédit Agricole	Bank	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	We advise EFRAG to delete this concept. We are familiar with this concept, taken from IFRS, nevertheless, we are not sure to understand how it would apply in the case of ESRS: -First, the definition of this concept let us believe that it only duplicates existing concepts that are already applied in the ESRS (materiality of information, qualitative characteristics of the information). Therefore, we do not understand how it constitutes a simplification. -Second, EFRAG mentions that the sustainability reporting is not a compliance exercise and that the fair presentation concept will give undertakings "more discretion in reporting and in the presentation of disclosures". Nevertheless, sustainability reporting are reviewed by auditors who 1/check if the undertaking complies with all disclosure requirements 2/ who need sufficient information and transparency to carry out their verifications. If the application of fair presentation results in multiple requests (information, justifications) by auditors, we do not see the added value of this concept.			
Survey	Crédit Agricole	Bank	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	This is a key point for financial institutions. Disclosing climate absolute GHG emissions values targets does not appear to be relevant: inflation or an external growth could lead to an increase in absolute GHG emissions, even though their intensity would be decreasing. We quote EFRAG on this point: "We strongly consider that emphasizing the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing". You can't simultaneously ask banks to increase transition and adaptation financing for the most carbon-intensive sectors—which will mathematically raise the GHG emissions of their portfolios—and ask them to publish absolute emissions targets that some will interpret as "banks are not honoring their commitments to reduce greenhouse gas emissions."			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Crédit Agricole	Bank	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	This proposal does not sound like a simplification, but rather adds more complexity to the disclosure requirements. We believe this change would trigger an increase in the number of countries to report on for these disclosures, and increase the burden for information preparation. Where we reported on just 2 countries, we would now have to report on 10, which are not necessarily significant in terms of employment. We also believe that the various tables displaying this information would become difficult to read.			
Survey	Crédit Agricole	Bank	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The CSRD objective of harmonization/comparability/transparency on various ESG topics, including fair wages, is key. It is our firm belief that applying a homogeneous third-party methodology for all a company's locations makes sense to reach this comparability and helps harmonize practices within and across industries. Depending on various specificities in various locations and jurisdictions, we understand that this target of an homogeneous third-party methodology is a big challenge on a short term basis. At this point, our position is neutral towards the current proposal: "removal of approved benchmarks and the possibility of choosing between statutory minimum wages, wage levels reached through collective bargaining, or any mandated estimate"			
Survey	Crédit Agricole	Bank	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	There is a clear need to ensure consistency between the sustainable finance framework and particularly between the ESRS and SFDR. The European Commission should ensure that the ESRS simplification are properly reflected in the SFDR disclosure requirements, particularly regarding the PAI indicators.			
Survey	Crédit Agricole	Bank	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We believe biodiversity and ecosystem targets can be better tailored to make these ARs more practical and relevant for diverse businesses. Currently, AR26 only addresses site-based biodiversity goals aimed at restoring ecological integrity, overlooking non-site-specific actions. This limits the AR in two ways: 1) it excludes corporate-level biodiversity targets important for large companies and financial institutions, and 2) it misses the chance to have companies set targets to reduce their negative impacts on biodiversity, such as the five pressures outlined by IBPES. Target-setting should reflect each company's business activities. Financial institutions differ from other sectors, as their main impacts are linked to financing and investments activities, usually at the counterparty level (clients or issuers). Due to the lack of common biodiversity impact indicators, financial institutions should start with "process-based targets", following guidance from UNEP FI PRB Nature Target Setting (2023) and the Finance for Biodiversity Pledge, both aligned to the Global Biodiversity Framework (GBF). Corporates are encouraged to set site-specific targets, distinguishing between overall corporate goals (process-related targets) and site-specific targets based on the mitigation hierarchy. We also do not understand why references to the GBF were removed from this consultation process. Companies, especially those that operate internationally, should be able to rely on both on national and international frameworks to set biodiversity-related targets.			
Survey	Crédit Agricole	Bank	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	We are concerned that there is no specific definition of what is understood/expected by "adjusted" and "unadjusted" pay gap, as this may differ from country to country (definition link) . We consider it essential that the new text explicitly states, as previously written in point 98 of Annex 1 of the former version of the standard, that we can present data broken down by employee category, geographical area and remuneration component. The "log of amendments" states that this breakdown is maintained as voluntary guidance to provide context, but the option of breaking down the data is not stated in the accompanying "NMIG" document. We would like to still be able to publish a breakdown of the pay gap data (by sector, location, employee category, for instance) as contextual elements, as we did this year.			
Survey	Crédit Agricole	Bank	France	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	European Work Council AF-KL group	Trade union	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Double materiality is essential and must remain at the heart of the ESRS framework and European Union sustainability regime for corporate reporting to be credible and useful. The principle of "materiality of information" is concerning since it introduces a further filter for companies to not report information. For example, it represents a step backwards from ID-177, which says that most S1 metrics must be reported if S1 Own Workforce is material. It is essential to maintain the principle of fair presentation in the reporting standards. It is positive that the revision of the AR 16 list of topics has maintained all of the sub-subtopics for S1 + S2. These are based on the list of social topics in the CSRD and should all be maintained. The emphasis on aggregation (as opposed to disaggregation) is concerning, as disaggregated information (both site-specific and country-specific) is key to understanding the distribution of IROs.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Work Council AF-KL group	Trade union	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	It is important that companies report not just their net impact – the gross impact should be reported, and the recommended text preserves this principle.			
Survey	European Work Council AF-KL group	Trade union	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The proposed changes are helpful. However, para 113 is difficult to understand: "113. If the description of the material impacts, risks and opportunities prepared in accordance with [Draft] Amended ESRS 2 IRO-2 is not presented alongside the respective policies, actions and targets, the undertaking shall make explicit which policies, actions and targets relate to which material impacts, risks, or opportunities, in accordance with paragraph 22." Para 22 addresses the issue of appropriate aggregation or disaggregation of information on material impacts, risks and opportunities and their management, without setting any rules regarding the location of such disclosures depending (or not) on the level of aggregation.			
Survey	European Work Council AF-KL group	Trade union	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The Exposure Draft removes duplications between the cross-cutting and topical standards. The preservation of the 4-part architecture in the social standards is important to respect the distinctiveness of different affected stakeholder groups. However, we have two critical concerns. First, the original DR in environmental standards concerning screening of sites in materiality assessment were replaced by an application requirement to ESRS 2 IRO-1. This in effect makes transparency on this aspect optional. Consideration of local context is a key element of an appropriate materiality assessment. This should be both recognised in Chapter 3 of ESRS 1, and in ESRS 2 IRO-1, which should include an explicit datapoint on how the undertaking screened its locations and value chains. We welcome that E standards provide a clearer reference on the importance of disaggregation of disclosures, but this can only be done well if locations are properly screened. Second, we strongly recommend adding an explicit reference to the disclosure of relevant, entity-specific metrics directly in S standards. The fact that S2, S3 and S4 do not include any metrics should not imply that entity-specific metrics for S topics should not be disclosed.			
Survey	European Work Council AF-KL group	Trade union	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The "may" (voluntary) data points should not be eliminated. In many cases they are "shall" in GRI standards, so it is important to keep them to align with GRI standards. Also, many of them were originally proposed as mandatory by EFRAG to the EC. The first wave of reports show that many companies have reported some "may" data points. Retaining them would help ensure standardization/comparability between company reports. Almost all of the datapoints for non-employee workers are voluntary, thus most datapoints for this vulnerable group of workers has been lost. Also, important datapoints on full time versus part time workers has been eliminated.			
Survey	European Work Council AF-KL group	Trade union	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	It is concerning that mandatory guidance in the Set 1 ESRS has been downgraded to "non-mandatory". Mandatory guidance is key to ensuring comparability and completeness of sustainability reporting. At a minimum, Non-mandatory Implementation Guidance (NMIG) should be included in the Delegated Act, and ideally called Mandatory Implementation Guidance. A major point of concern is that ID-177, which provided guidance that most S1 metrics should be reported if S1 Own Workforce is material, has now been downgraded into NMIG. Instead, EFRAG should preserve and promote the guidance that most S1 metrics shall be reported.			
Survey	European Work Council AF-KL group	Trade union	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	As a whole the reliefs go too far, overshooting the balance between cost/effort and transparency. There is a danger of enabling green/social washing. The relief for "undue cost or effort" is too vague thus leaving too much room for interpretation. The relief for direct data for value chain reporting is too extensive, as direct data is key for transparency. The relief for reporting on operations which are not "significant drivers of IROs" also opens up too much leeway for interpretation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Work Council AF-KL group	Trade union	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	These combined reliefs overshoot the balance between transparency and cost/effort and risk enabling green/social washing. At a minimum, there should be a time limit introduced for these reliefs on value chain metrics.			
Survey	European Work Council AF-KL group	Trade union	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ability to estimate financial effects is critical for the undertaking's ability to integrate sustainability into its business strategy considerations, planning and risk management. It is also key for the determination of financial materiality, including in terms of overreporting topics as financially material. Reporting on financial effects is crucial to achieving the objective of putting sustainability reporting on the same level as financial reporting and integrating both. The European Union has recognised the value of a double materiality approach to corporate reporting which requires disclosure of both material environmental and social impacts, risks and opportunities as well financially material data, It is important to keep the requirement on businesses to analyse and understand the financial effects of their business model. This will ensure investors have access to credible data as well as providing the underpinning for future business planning.			
Survey	European Work Council AF-KL group	Trade union	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	ESRS reliefs should not go beyond those set in IFRS. The principle of fair presentation needs to be protected to provide transparency on all material IROs. As noted in the response to question 15, it is also important to consider interoperability with GRI when considering changes to the ESRS, rather than only considering ISSB's standards.			
Survey	European Work Council AF-KL group	Trade union	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	ESRS reliefs should not go beyond those set in IFRS. The principle of fair presentation needs to be protected to provide transparency on all material IROs. As noted in the response to question 15, it is also important to consider interoperability with GRI when considering changes to the ESRS, rather than only considering ISSB's standards.			
Survey	European Work Council AF-KL group	Trade union	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	European Work Council AF-KL group	Trade union	France	22.ESRS2	Comments on deleted datapoints in ESRS 2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The reduction in the number of mandatory and voluntary datapoints goes far beyond striking an acceptable balance. As mentioned above, the voluntary datapoints should be maintained to provide alignment with GRI, which is currently in the process of strengthening its labor standards, as well as guidance and standardization for companies reporting more than just the mandatory datapoints. An explicit quantitative goal of 50%+ reductions was never set by the European Commission for EFRAG. A number of S1 datapoint metrics have been eliminated which should be reinstated:			
Survey	European Work Council AF-KL group	Trade union	France	22.E1.	Comments on deleted datapoints in ESRS E1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	•S1-5 Employees: gender breakdown for zero-hour employees •S1-8 Diversity: age distribution; •S1-10 Social protection: reinstatement of retirement •S1-12: Training and development: gender breakdowns, •S1-13 Health and safety: fatalities from ill-health for non-employees and other workers on site; •S1-14 Work-life balance: employees that took family related leave;			
Survey	European Work Council AF-KL group	Trade union	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Adding a datapoint on training of the procurement team is needed to support the implementation of human rights in the supply chain. The addition of a datapoint on confirmed incidents of bribery is needed to improve transparency on the effectiveness of bribery/corruption policies and measures.			
Survey	European Work Council AF-KL group	Trade union	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Agree that the following mandatory datapoint should be added: ESRS 2 General disclosures – BP 1 the undertaking shall state that the general requirements of ESRS 1 have been applied for the preparation of its sustainability statement			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Work Council AF-KL group	Trade union	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	The "fair presentation" principle is essential to reduce the risk of green/social washing, as it emphasizes the full disclosure of all material impacts, risks and opportunities and their management. It is not understandable why this principle is under attack, as it is included as one of the general principles of the Accounting Directive.			
Survey	European Work Council AF-KL group	Trade union	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	It is essential that financial institutions disclose absolute targets to assess how their strategies align with the economy-wide transition to net zero. Absolute targets are relevant for users of sustainability statements and for understanding the real-world climate impact of financed activities. While intensity measures provide insights into efficiency, they can mask rising absolute emissions in growing portfolios or sectors. Granting an exemption would also undermine fairness in a sector-agnostic standard. Other industries could equally argue for exceptions based on their own difficulties, reducing comparability across sectors. Moreover, absolute financed emissions are already recognised in existing standards and regulations: the SBTi financial sector net-zero standard, the UNEP FI/NZBA recommendations, and EU SFDR all require or encourage absolute emissions disclosure. Exempting banks would risk misalignment and reduce the usefulness of reported data for stakeholders, including asset owners who depend on it for their own disclosures.			
Survey	European Work Council AF-KL group	Trade union	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The "top 10" threshold for reporting country-level data on employment, collective bargaining and social dialogue is a major improvement over the current 10% employment threshold. An analysis of the first sustainability statements from Wave 1 companies shows that the current 10% threshold results in country-level disclosures on as little as 21% of total employees. More country-level information is needed to understand the distribution of impacts across countries, as well as whether employment thresholds for specific labour rights have been exceeded. The new threshold does not require additional effort/cost by companies, since they must gather country-level data anyways to calculate the global figures. Furthermore, it does not result in extra datapoints, since the information currently is (and can be under the revised ESRS) reported as one table.			
Survey	European Work Council AF-KL group	Trade union	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	An analysis of the first year ESRS reports shows that most companies are simply reporting that they pay minimum wages, whereas the intention (as outlined in the ESRS Basis for Conclusions) is that companies should be enabled to disclose commitments to paying a wage "sufficient to support themselves and their families in dignity" as well as the extent to which they do this. This shows that the methodology for non-EU countries needs to be changed. Furthermore, the new ILO agreement on a methodology for living wages needs to be taken into account. While the proposed new methodology takes a step forward in both regards, two key changes are needed: •The methodology for reporting on 'adequate wages' should measure actual wages against an adequate/living wage for all employees, not only those within the EU. In particular, for employees outside the EU, the methodology should allow employees' actual wages to be measured: oA) against the local legal minimum wage only when this is set in line with the ILO principles on estimating living wages; or oB) against living wage estimates that are set in line with ILO principles on estimating living wages. •Companies should be able to rely on local legal minimum wages or living wage estimates when the authorities or organisations that set them provide public evidence of their alignment with the ILO principles for estimating living wages. Furthermore, the transitional provision for the EU needs to be reinstated, as not all Member States have transposed the Adequate Minimum Wage Directive.			
Survey	European Work Council AF-KL group	Trade union	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-54) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	The new, simplified framework makes it easier for companies to report on these SFDR-related matters in a way that corresponds to how their policies are set. For users, this consolidation makes it easier to locate the relevant information. However, the SFDR datapoints are very helpful and should only selectively be amended.			
Survey	European Work Council AF-KL group	Trade union	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	The unadjusted gender pay gap should be kept as mandatory, since the methodology for calculating it is clear. The adjusted pay gap figure as voluntary. In practice many companies are reporting both figures, which is useful for improved transparency. However, since the methodology for calculating the adjusted figure is not standardized, the unadjusted should be kept mandatory.			
Survey	European Work Council AF-KL group	Trade union	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS 1: As detailed above, cumulative impact of the various reliefs is concerning.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Work Council AF-KL group	Trade union	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS 2: The improved language on DMA is welcomed, including on the engagement with workers' representatives.			
Survey	European Work Council AF-KL group	Trade union	France	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The proposed "top 10" threshold for the reporting of country-level information for employee headcount, collective bargaining and social dialogue is a significant improvement over the current 10% employment threshold. Country-level information needs to be reported in more detail, and on other metrics as well, in order to have more transparency on the distribution of impacts across countries. In the metrics, voluntary datapoints need to be reinstated as well as the datapoints on gender breakdowns, workforce age distribution, etc. detailed above need to be reinstated. The proposed new methodology for adequate wages outside of the EU also needs attention, and the transition language for EU member states needs to be reinstated, since the Adequate Minimum Wage Directive has not been implemented in some Member States. We would also like to reiterate our longstanding demand for including franchise workers in the S1 definition of own workers, as well as the need for sector-specific standards to supplement the Set 1 sector-agnostic standards.			
Survey	European Work Council AF-KL group	Trade union	France	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We are concerned that the loss of many specific datapoints related to workers in the value chain will mean that disclosures about material impacts, risks and opportunities become more generic and have less information about the specific stakeholder groups because specifications about the level of granularity have been deleted. Many of the points that are being deleted from ESRS S2 had originally been included because they reflected effective practice in relation to improving supply chain labour rights, for example, AR 6 awareness of the impacts on value chain workers from an undertaking's strategy or business model, AR 20 illustrating how the perspectives of value chain workers have informed specific decisions or activities of the undertaking and AR 25 which looks at retaliation and whether workers can use grievance mechanisms confidentially.			
Survey	European Work Council AF-KL group	Trade union	France	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	European Work Council AF-KL group	Trade union	France	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	European Work Council AF-KL group	Trade union	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The definition of own workforce should be expanded to include franchise workers. The term "non-employees" should be supplemented with the phrase "non-employee workers" or "non-employee workers in own workforce".			
Survey	BSR	Business association (other than association of financial institution)	United States	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BSR	Business association (other than association of financial institution)	United States	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	BSR	Business association (other than association of financial institution)	United States	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	BSR welcomes EFRAG's efforts to improve the readability, conciseness, and connectivity of ESRS sustainability statements. The addition of an optional executive summary and greater flexibility in the use of appendices are constructive steps toward making disclosures more accessible for a wider audience, particularly investors, policymakers, and other stakeholders who need a clear synthesis of key information. Likewise, the clarification of the "connected information" concept usefully discourages fragmentation and duplication, which has long been a concern among preparers and users alike. These changes should help situate sustainability information more firmly within the broader context of corporate reporting, reinforcing its relevance to enterprise value and strategy and strengthening overall connectivity with financial reporting. At the same time, our members have highlighted several limitations that temper full endorsement. First, while the amendments provide options for structuring disclosures, they do not significantly reduce the effort or resources required to produce them. Stakeholders perceive the simplification as "simpler on paper but not in effort" In addition, some of the flexibility offered raises questions for assurance and comparability. This is the case, for example, for some of the amendments proposed to the DMA process and reliefs for metrics (see our comments to the related questions). In summary, BSR supports the spirit of these amendments to improve accessibility and connectivity, but stresses the need for further guidance to ensure flexibility does not come at the expense of comparability, transparency, or auditability.			
Survey	BSR	Business association (other than association of financial institution)	United States	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	BSR recognizes and supports EFRAG's intent to simplify the ESRS architecture by streamlining the role of ESRS 2, clarifying the relationship with topical standards, consolidating duplicative items and adopting a more principles-based approach to policies, actions, and targets (PAT). These amendments should make the standards easier to navigate, and the reduced prescriptiveness allows companies to focus on disclosures most relevant to their material impacts, risks, and opportunities. We particularly welcome the improved linkage between PAT disclosures and the corresponding IROs, which should strengthen the coherence of sustainability statements. However, our member discussions indicate that these improvements do not fully resolve the balance between prescriptiveness and comparability. On one hand, the reduction of mandatory datapoints provides welcomed relief from administrative burden. On the other hand, stakeholders are concerned that excessive flexibility risks weakening transparency and comparability across companies. As noted elsewhere, for example, comparability may be negatively impacted by some of the amendments proposed to the DMA process and reliefs for metrics (see our comments to the related questions). In summary, BSR supports the direction of simplification and appreciates efforts to reduce duplication. At the same time, we caution against reforms that erode accountability and comparability, and encourage EFRAG to refine guidance to maintain credibility and usefulness of reporting.			
Survey	BSR	Business association (other than association of financial institution)	United States	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	BSR appreciates EFRAG's effort to improve the structure and presentation of the ESRS by separating mandatory from non-mandatory content, eliminating "may disclose" provisions, and simplifying the overall language. These steps should make the standards easier for preparers to navigate and improve accessibility for users. In particular, the relocation of application requirements directly beneath each Disclosure Requirement enhances usability, giving preparers clearer "how to disclose" guidance in context rather than dispersed across annexes. Taken together, these amendments represent a meaningful step toward greater understandability and accessibility. At the same time, feedback from our member discussions suggests that these changes alone will not fully resolve concerns around clarity or practical application. While the removal of "may disclose" datapoints avoids confusion, the reduction of prescriptive detail also shifts more responsibility to companies to interpret requirements. For some preparers, this may increase rather than reduce complexity, as they must exercise significant judgment without always having sufficient guidance. As observed in our consultations on the Double Materiality Assessment, greater flexibility can inadvertently lead to inconsistent practices, reduce comparability, and complicate assurance In summary, BSR supports the direction of these amendments, particularly the consolidation of mandatory content and elimination of ambiguous "may disclose" provisions. However, we encourage EFRAG to supplement these reforms with more concrete illustrative examples and practical guidance to ensure that simplification translates into genuine clarity, comparability, and accessibility in practice.			
Survey	BSR	Business association (other than association of financial institution)	United States	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Most of our members found the NMIG at least partially useful, particularly as a practical reference for understanding "how to disclose" under certain datapoints. While it does not address all implementation questions, it provides a helpful orientation tool and reduces some uncertainty during first-time application. At the same time, members cautioned that its role should remain clearly non-mandatory, to avoid creating unintended additional disclosure expectations or audit burdens.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BSR	Business association (other than association of financial institution)	United States	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	BSR welcomes the introduction of certain reliefs and efforts towards interoperability, particularly the alignment with IFRS S1 and S2 through the "undue cost or effort" exemption. These provisions acknowledge the practical challenges companies face in gathering complete and reliable data across their operations and value chains, and they should provide meaningful relief to preparers. The explicit option to rely on estimates or proxies, as opposed to direct data, where appropriate also reflects a pragmatic, principle-based approach that may reduce unnecessary burden. At the same time, our member discussions have underscored important risks. While reliefs are helpful, their extensive use could undermine the credibility and comparability of disclosures. For instance, allowing partial scope reporting for metrics due to lack of data quality is useful in practice, but it may discourage companies from investing in improved data collection systems over time. At the same time, stakeholders highlighted the importance of flexibility with respect to calculation of GHG Emissions. For example, the GHG Protocol accepts three boundary approaches—equity share, financial control, or operational control—and many companies expressed strong preference that ESRS continue to recognize all three. Prescribing only financial control would place unnecessary burden on companies that have applied flexibility allowed in other standards. Similarly use of wording "shall consider" is welcomed in allowing companies to reference the GHG Protocol or ISO 14064 without rigidly following them line by line.			
Survey	BSR	Business association (other than association of financial institution)	United States	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	BSR recognizes the practical need for flexibility in calculating metrics across complex value chains, and we support the introduction of the "undue cost or effort" exemption and the ability to use proxies and estimates when reliable direct or estimated data is unavailable. These reliefs align with IFRS S1 and S2 and respond to a clear demand from preparers for pragmatic solutions that reduce the reporting burden. We note, however that while the relief for metrics acknowledges the difficulty of producing perfect data, there is a risk that flexibility could undermine the quality and comparability of disclosures and reduce the incentive to improve over time. Flexibility should not come at the expense of transparency, comparability, or credibility. In particular, allowing partial estimation of a metric where reliable data is not available (such as a portion of operations or value chain) could result in information that is neither comparable nor decision useful. Inconsistent application of reliefs could also result in reporting gaps or blind spots, particularly in value chain metrics where estimation methods vary widely. In summary, BSR supports the reliefs as a practical measure, but cautions against leaving them open-ended. We encourage EFRAG to consider clearer guidance on application or indicative timeframes (e.g, for transitioning from partial to complete metrics), to ensure that flexibility does not come at the expense of transparency, comparability, and continuous improvement in data quality.			
Survey	BSR	Business association (other than association of financial institution)	United States	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	BSR recognizes that the disclosure of anticipated financial effects presents one of the most technically and commercially challenging areas of the ESRS. Methodologies remain immature, data availability is uneven, and in some cases, disclosures may touch on commercially sensitive information. We therefore welcome EFRAG's effort to provide reliefs that make these requirements more practicable for preparers. At the same time, BSR strongly believes that quantitative disclosures are essential in the long run to achieve the objective of placing sustainability information on par with financial reporting. Option 2, which limits disclosure to qualitative information only, risks creating a significant loss of decision-useful data for investors and other stakeholders. It would also slow progress toward the development of more robust methodologies and reduce comparability across companies. BSR is also concerned that an exclusively qualitative approach could undermine alignment with IFRS S1 and S2, which would create inefficiencies for companies reporting under both frameworks and weaken global interoperability. For these reasons, BSR supports Option 1 as the approach that best balances ambition with feasibility. At the same time, we recognize that a number of our members expressed preference for Option 2, given current practical challenges with quantitative measurement. We view Option 2 as a suitable short-term relief, but stress the importance of transitioning toward Option 1 as methodologies mature. We encourage EFRAG to develop practical application guidance to support companies in making this transition.			
Survey	BSR	Business association (other than association of financial institution)	United States	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BSR	Business association (other than association of financial institution)	United States	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	BSR strongly supports the objective of interoperability and welcomes EFRAG's efforts to further align the ESRS with IFRS S1 and S2. A high degree of interoperability reduces duplication, lowers compliance costs, and enhances comparability for global companies that report under multiple frameworks. We particularly welcome the alignment on fair presentation principles, the strengthened role of materiality as a general filter, and the use of common language across ESRS and IFRS requirements. The permanent reference to SASB Standards and IFRS Industry-based Guidance for sector-specific disclosures is also a constructive step that improves usability and strengthens global consistency. At the same time, stakeholders highlighted the importance of flexibility with respect to calculation of GHG Emissions. For example, the GHG Protocol accepts three boundary approaches—equity share, financial control, or operational control—and many companies expressed strong preference that ESRS continue to recognize all three. Prescribing only financial control would place unnecessary burden on companies that have applied flexibility allowed in other standards. Similarly use of wording "shall consider" is welcomed in allowing companies to reference the GHG Protocol or ISO 14064 without rigidly following them line by line. Second, the introduction of reliefs that go beyond those in IFRS S1 and S2 — for example, allowing purely qualitative disclosure on financial effects and indefinite reliance on partial metrics due to data quality — risks weakening interoperability by creating divergences that stakeholders will struggle to reconcile. While reliefs are important for feasibility, they should not compromise the goal of a globally consistent reporting baseline. In summary, BSR welcomes EFRAG's commitment to interoperability and acknowledges the significant progress achieved. However, we encourage EFRAG to revisit areas where simplification has introduced new divergences or introduced unnecessary burdens, particularly around GHG boundaries and data quality reliefs, to ensure that simplification strengthens rather than fragments the global reporting landscape.			
Survey	BSR	Business association (other than association of financial institution)	United States	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	BSR	Business association (other than association of financial institution)	United States	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree				
Survey	BSR	Business association (other than association of financial institution)	United States	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	BSR supports the principle of explicitly clarifying ESRS as a fair presentation reporting framework, aligned with IFRS S1 and S2. This framing has the potential to reduce the "checklist mentality" that many preparers fear and to encourage companies to focus on the substance of material impacts, risks, and opportunities rather than mechanically working through disclosure requirements. By emphasizing fair presentation, EFRAG strengthens the role of the materiality filter, which can help ensure sustainability statements remain concise, decision-useful, and better integrated into corporate reporting. At the same time, our member discussions highlighted concerns that in areas such as DMA where methodologies are still being established, the requirement to exercise judgment without sufficient guidance could create inconsistencies across companies and expose preparers to higher legal and audit risks. For example, BSR members emphasized that fair presentation must be accompanied by clearer illustrative guidance on threshold-setting, treatment of gross vs. net impacts, and what constitutes "reasonable and supportable information" for different data types (e.g. internally generated vs third party). To ensure auditability, there should be clear expectations for the level of evidence needed to support disclosures. In summary, BSR welcomes the clarification of ESRS as a fair presentation framework but urges EFRAG to supplement this principle with practical guidance. This is essential to ensure that fair presentation achieves its intended purpose of improving relevance and conciseness without increasing complexity, legal exposure, or inconsistency.			
Survey	BSR	Business association (other than association of financial institution)	United States	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We encourage EFRAG to refer to BSR's publication Insights Plus issued in September 2025 and entitled ESRS Revisions Mark a Turning Point Toward Principle-Based Reporting, With Open Questions. It can be found here: https://www.bsr.org/en/sustainability-insights/insights-plus/esrs-revisions-mark-a-turning-point-toward-principle-based-reporting-with-open-questions			
Survey	Carbone 4	Consultant (including software vendor)	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Agree: These clarifications are very useful to guide companies and correspond to expectations we have observed when accompanying clients. Interesting to allow both bottom up and top down approaches when performing a DMA. Good to allow flexibility to carry out a DMA with or without consulting internal stakeholders (more heavy to organize workshops and consultations). Disagree: regarding environmental matters, especially water, resources and biodiversity, analysing dependencies (not only impacts) is necessary to have a complete visions of companies' interactions with nature and shift business minsets. Carbone 4 thinks that elevating the current reference to 'dependencies' on nature and explicitly refer to the assessment and disclosure of 'DIROs', not only 'IROs' for environmental ESRS, is necessary.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Carbone 4	Consultant (including software vendor)	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	Disagree : This appendix introduces more complexity to the DMA exercice, especially as it will not be carried out every year (which would allow to move IROs from one category of the table to another). If we take a step back, DMA aims to identify topics that are relevant for the company, considering its sector(s) and activities, regardless of remediation measures already set. Identifying gross IROs is necessary, because these topics should be tackled anyway. Our position is: to carry out the DMA on gross IROs and communicate on actions already taken to mitigate these risks in a simple way (e.g., table format with 3 columns: gross IROs, remediation actions during the year and previous years, net IROs). Doing so will allow companies to identify gross IROs when the DMA is carried out, and reevaluating each year net IROs considering actions set and their results.			
Survey	Carbone 4	Consultant (including software vendor)	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Agree: these modifications are definitely very useful, they enhance simplification while maintaining a certain level of ambition. ESRS are really easier to read and follow. Disagree: regarding interactions between ESRS, detailed in each ESRS, it would be useful to explain how to treat these interactions, for example: - my activity requires to use pesticides that affect biodiversity > can I treat pollution of soil / air / water in the biodiversity ESRS, or should I also report on the pollution ESRS? - and if I report on both ESRS, how can I avoid repetitions between the paragraphs in my sustainability report?			
Survey	Carbone 4	Consultant (including software vendor)	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Agree : it is useful to simplify content of topical ESRS referring as much as possible to ESRS 1 & 2. Disagree: in environmental ESRS, policies should integrate specific data points and should not remain general. See below comments in each environmental ESRS relating to policies.			
Survey	Carbone 4	Consultant (including software vendor)	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	Great work done by EFRAG to find the right balance between ambition and simplification. WELL DONE!			
Survey	Carbone 4	Consultant (including software vendor)	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E4	NMIG 1 for para. 15: mention (t) Indicate "biodiversity offsets or positive contributions in the value chain and outside the value chain" to cover a broader scope of action. NMIG 3 for para. 13 Paragraphs (a) and (e) seem redundant. NMIG 7 for para. 15 It would be interesting to mention the mitigation hierarchy here, highlighting that avoidance and reduction measures should be set first. NMIG 10 for para. 17 Beyond reference to GBF, EU biodiversity strategy 2030, and national policies, we suggest mentioning alignment with regional / local biodiversity strategies and action plans, where relevant. NMIG 12 for para. 17 - Mention that targets detailed here are quantitative (as companies can set either quantitative and/or qualitative targets) - In the table, it would be more relevant to distinguish avoidance / minimization / positive contribution / offsetting (as offsets can include rehabilitation and restoration measures) NMIG 17 for para. 21 It would be very useful to list some metrics and make reference to corresponding frameworks detailing calculation methodologies. With regards to biodiversity, companies' often mention that they struggle to navigate the complex list of possible indicators and have difficulty identifying the proper methodologies to calculate the metrics and indicators.			
Survey	Carbone 4	Consultant (including software vendor)	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Agree on points (2) to (8) Disagree on point (1) : There is room for interpretation in the definition of "undue cost or effort" by the undertaking, leaving space for not deciding not to make any effort. Carbone 4 suggests to be clearer on the definition in ESRS 1 paragraph 89. For example: undue cost or effort can be associated to the allocation of an excessive amount of financial resources compared to budgets dedicated to other sustainability measures or topics, incapacity from internal teams due to absorbe associated workload, impossibility to collect associated data at this stage (due to non-existing reporting - company and its stakeholders). Companies shall also explain why they deemed excessive a specific cost or effort.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Carbone 4	Consultant (including software vendor)	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	Agree : this modification allowing more flexibility on scopes is in line with companies' feedback on difficulty to collect data on all scopes for every metric. Disagree : - The need to mention the scope covered by each metric or analysis should however be specified clearly in the paragraph with a sentence like: "Any exclusion shall be documented / justified." - Add a sentence explaining that data collected directly from counterparties shall prevail over estimates - (AR 28 for para 67) For some companies, IROs occur mainly on upstream or downstream value chain, not on direct operations (e.g. land use impacts associated to upstream deforestation for a paper producer). Making metrics disclosure not mandatory for all topics by default seems not relevant.			
Survey	Carbone 4	Consultant (including software vendor)	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Carbone 4 suggest to select option 1 which prioritize quantitative information while leaving flexibility on providing only qualitative information of financial effects, if too complicated.			
Survey	Carbone 4	Consultant (including software vendor)	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	Agree: overall this DR is easier to read and relevant cuts has been made (e.g., on climate related opportunities). Disagree: - reconciliation with financial statements is absolutely key to ensure climate stakes are considered as important as other strategic topics, subject to financial analysis to take strategic decisions - consideration of cost savings from actions is necessary to have a complete financial view of costs and benefits to implement climate actions - consideration of expected changes to net revenue from low carbon products and services and adaptation solutions is necessary to engage companies transform their business model			
Survey	Carbone 4	Consultant (including software vendor)	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Agree: improving interoperability with other regulations is a relevant change to reduce companies' "burden" to comply with regulations.			
Survey	Carbone 4	Consultant (including software vendor)	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Carbone 4	Consultant (including software vendor)	France	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	E1-4 - Policies: - Carbone 4 suggests to mention climate adaptation and climate mitigation in policies (not only in E1-5 on actions). E1-5 - Targets: - Disagree: Reference to 2030 and 2050 time horizon has been deleted. Without mentioning time horizons, companies might only set targets from one year to another without defining a real pathway. Carbone 4 suggests to add: "Undertakings shall define climate targets in the medium and long terms." (no need to specify specific years like 2030 and 2050). - Agree: Maintaining this reference to 1.5°C pathway is absolutely key. E1-7: - Agree: identifying activities in high climate sectors vs. other activities and associated energy consumptions was very painful (or impossible) for companies. - Disagree: table template for disclosing on energy consumption deleted. This table was useful to companies to have guidelines and directly copy-paste the table. - Disagree: not mandatory to calculate the energy intensity ratio. Carbone 4 suggests to make mandatory disclosure of physical intensity ratios (e.g. in tons of products). E1-8: Disagree: AR 27 for paras. Replace "may" by "shall" concerning presentation of comparative information.			
Survey	Carbone 4	Consultant (including software vendor)	France	22.E2.	Comments on deleted datapoints in ESRS E2	I partially agree and partially disagree	E2-5: need to clarify which companies can be considered as an "undertaking that manufactures chemical substances, formulates chemical mixtures and/or operates in the retail of chemical substances.", by providing a list of NACE codes concerned? E1-3: Policies - Disagree: very important to add a mandatory DR on disclosing a list of direct assets and operations located in areas at water risk (previously in AR and now removed to NGIM), especially as open-source databases like Aqueduct / WWF Risk filter are available to carry out this analysis - Disagree: the overall simplification is too reductive here. This simplification is too reductive. Topics to be covered should be reintegrated from NGIM to mandatory DR, at least: (a) Water management including the use and sourcing of water and marine resources in its own operations, water treatment as a step towards more sustainable sourcing of water; and the prevention and abatement of water pollution resulting from its activities. (b) Product and service design in view of addressing water-related issues and the preservation of marine resources.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Carbone 4	Consultant (including software vendor)	France	22.E3.	Comments on deleted datapoints in ESRS E3	I partially agree and partially disagree	Disagree on the removal of "Anticipated financial effects from material water risks and opportunities" > Why remove this analysis? Simplification has already been suggested through selecting between 2 options (quantification before qualification or qualification directly) in ESRS 2. Financialization of biodiversity risks and opportunities is key to integrate these topics in strategic discussions.			
Survey	Carbone 4	Consultant (including software vendor)	France	22.E4.	Comments on deleted datapoints in ESRS E4	I partially agree and partially disagree	E4-2: Policies - Add a mention of "whether policies address biodiversity and ecosystems in product and process design", to provide a more strategic view of whether and how companies reshape their business model. - AR 4 for para. 13: In line with the overall spirit of CSRD simplification, why not remove this AR on the use of scenario analyses and move it to NGIM? E4-3: - Current discussions are ongoing at the EU and member states levels about how to frame nature credits markets. There is no clear positioning on whether offsetting or positive contribution should be favored. We suggest to refer in paragraph 16 to "biodiversity offsets or positive contributions in the value chain and outside the value chain" to cover a broader scope of action. E4-4: Targets Provide guidelines on the types of targets that can be set (no net loss, net positive gain) in NGIM. E4-5: Metrics Provide more details on possible metrics to set targets and associated databases in NGIM. We disagree on the removal of the paragraph on anticipated financial effects. Why remove this analysis? Simplification has already been suggested through selecting between 2 options (quantification before qualification or qualification directly) in ESRS 2. Financialization of biodiversity risks and opportunities is key to integrate these topics in strategic discussions.			
Survey	Carbone 4	Consultant (including software vendor)	France	22.E5.	Comments on deleted datapoints in ESRS E5	I partially agree and partially disagree	E5-5 Resources outflows Add a distinction between recycled and reused materials > "the rate of recycled or reused materials used in its key products."			
Survey	Carbone 4	Consultant (including software vendor)	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Carbone 4	Consultant (including software vendor)	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Carbone 4	Consultant (including software vendor)	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	Agree: the principle of "fair representation", derived from financial accounting, is necessary to avoid greenwashing.			
Survey	Carbone 4	Consultant (including software vendor)	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Agree: as developed by new standards like NZIF and SBTi, absolute emissions are a lagging metrics, that may, in the case of financial portfolios, not drive the impact (=real economy emissions reduction). That's why we consider that it is important to use a maturity approach (aligning / aligned / solutions) to ensure the improvement of the companies' performance in the portfolio next to the carbon intensity metric.			
Survey	Carbone 4	Consultant (including software vendor)	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	Agree: It is interesting to integrate the evolving methodological landscape for target setting in the CSRD considerations. Disagree: These considerations should be integrated in the NMIG, not in the AR, to allow companies to take other directions when defining their targets.			
Survey	Carbone 4	Consultant (including software vendor)	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See above			
Survey	Carbone 4	Consultant (including software vendor)	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See above			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Carbone 4	Consultant (including software vendor)	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See above			
Survey	Carbone 4	Consultant (including software vendor)	France	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See above			
Survey	Carbone 4	Consultant (including software vendor)	France	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See above			
Survey	Carbone 4	Consultant (including software vendor)	France	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See above			
Survey	Carbone 4	Consultant (including software vendor)	France	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See above			
Survey	FBF	Association of financial institutions	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	1.Value chain The "value chain" concept is fundamentally different for financial institutions, whose downstream value chain encompasses business relationships with clients, investees and portfolio-related matters. The majority of impacts, risks, and opportunities (IROs) and material subtopics arise from this downstream value chain. Banks have different degrees of proximity to counterparties in the value chain and hence different degrees of ability to assess the tangible impact that clients/investees/counterparties have on sustainability matters. Reporting qualitative information and metrics on the downstream value chain is particularly challenging. 2.DMA update frequency As mentioned during EFRAG's outreach in Paris on the 12 September, the frequency of the DMA update should be clearly specified in the ESRS. Following the EFRAG President's answer during the outreach, the requirement to perform full DMA every 3 to 5 years (unless a major change occurs) should be clearly specified. 3.Materiality filter ESRS 2 is now subject to a materiality filter. As report preparers, we do not support this change, as ESRS 2 requires essential information to understand our counterparties' and stakeholders' sustainability reporting (reporting scope, time horizon…). If we do not have key information regarding the basis of preparation of sustainability reporting, this will limit our understanding and the relevance of these reports. 4.Definition of materiality assessment A homogeneous definition of materiality assessment is needed across EU legislation. Banks note that the EBA Risk Management Guidelines say materiality assessment of ESG risks should be consistent with materiality assessments in CSRD and the ESRS. Close alignment between EBA's concept of materiality and the new draft ESRS needs to be ensured to avoid discrepancies between outcomes of financial companies' materiality assessments for different exercises (ICAAP vs CSRD).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FBF	Association of financial institutions	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	This topic should be deleted in the interests of simplification and clarity. The proposed rules are complicated to comprehend, quite abstract and thus potentially challenging to apply in practice. The application would be overly complex. The "gross and net" concept needs reworking and the guidelines should be subsequently written more clearly and ensure that preparers of sustainability reports can take into account in their materiality assessment both prevention measures and the possibility of adapting the balance sheet. This will also give users of sustainability statements a more useful and realistic view of companies' impacts/risks. We note also that the proposal is limited to impact materiality, while risks and impacts should be treated consistently. EFRAG should overall consider a more flexible approach that focuses on whether impacts and risks, after considering management's response, remain material to stakeholder decision-making.			
Survey	FBF	Association of financial institutions	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The reliefs introduced are helpful, supporting more practical and streamlined reporting. They acknowledge the data challenges faced by reporting entities and users of sustainability information. While direct data is preferred, allowing for estimations where necessary is important, as long as there is transparency about data quality and sources. However, applying "undue cost or effort" relief may be challenging in practice, especially in discussions with auditors. Clear guidance for auditors would help ensure consistent interpretation and use of this relief. To further support clarity, it would be useful to include an Application Requirement outlining a hierarchy of data sources. As it stands, §91 would oblige financial institutions to calculate and publish GHG emissions across their entire value chain regardless of data quality and coverage. The bulk of financial institutions' GHG emissions come from their clients, and client data is not always sufficient or sufficiently high quality to achieve a reliable calculation (especially for scope 3). Publication of such data is not consistent with ESRS requirements on qualitative characteristics of information. The majority of FBF members therefore support application of the §91 relief to all metrics. Given use of reliefs will be audited, this should not lead to a decrease in the high-quality climate-related information needed by both banks and asset managers. Alongside these reliefs, there is a need for incentives to be put in place for companies to find ways to publish more information in the future. The majority of members thus propose this wording: §91 "When the undertaking cannot provide (using reliable direct or estimated data) a metric related to a material IRO in its own operation or value chain without incurring undue cost or effort, the undertaking can disclose the metric on a partial reporting boundary or for a subset of the value chain.			
Survey	FBF	Association of financial institutions	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Anticipated financial impact should not be subject to compulsory public disclosure. Data that is highly dependent on estimates and subject to significant uncertainty does not provide reliable insights for investors or other users, due to its potential variability. Premature disclosure of such information may not only mislead stakeholders but also expose companies to reputational and legal risks associated with misinterpretation.			
Survey	FBF	Association of financial institutions	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree				
Survey	FBF	Association of financial institutions	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	This topic should be deleted. The interpretation of the "fair representation" principle and the auditing process that would be used are unclear. Overall, this principle in its current version creates an additional burden rather than simplification.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FBF	Association of financial institutions	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We strongly consider that emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those most in need of transition financing.			
Survey	Nature Positive Initiative Secretariat	NGO	United States	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	It is vitally important for principle of double materiality to be maintained in order for the information reported to be meaningful for users. This is also important for aligning with commonly-used and long-standing corporate reporting frameworks such as GRI. We support the inclusion of the four sub-topics for biodiversity and ecosystems listed in ESRS Appendix 1. Items two and three for biodiversity and ecosystems should be merged into one sub-topic to streamline reporting processes, as one will never be material without the other and they should be assessed together, i.e. "State of nature: species and extent and condition of terrestrial and marine ecosystems".			
Survey	Nature Positive Initiative Secretariat	NGO	United States	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E4	Whilst we are supportive of the overall goal of streamlining reporting for companies and recognise that moving some information into the NMIG is one means of doing so, there is a risk it will result in more time/resource requirements rather than less for some topics. Removal of the ESRS E4 biodiversity and ecosystems metrics metric specifications from the mandatory requirements is particularly problematic because standardisation is more limited at present than with other metrics. Specifying metrics (now in NMIG 18-20) within the Standard would give companies the information they need to select and report practical, credible and comparable metrics. If this does not occur, at the very least it is important that (i) the NMIG stays attached to the Standard in some form and (ii) a process is in place for ensuring updates are made on a timely basis, particularly for guidance on topics where data/tools for reporting are evolving rapidly.			
Survey	Nature Positive Initiative Secretariat	NGO	United States	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The requirement to only dislcose transition plans if they are already public is counter to the principles of double materiality and the focus on reporting where there are material impacts, risks and dependencies throughout the ESRS Standards. We agree that these should be moved to "shall" but the qualification should be for companies/sectors with the highest risks and dependencies on nature, not just those who have already made this disclosure.			
Survey	Nature Positive Initiative Secretariat	NGO	United States	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Companies may consider the pressure-state-response framework developed by FAO and used by many frameworks, including SBTN, GRI and TNFD when setting and disclosing progress against biodiversity and ecosystems-related targets. As biodiversity is location-specific, appropriate targets will differ depending on the local context and guidance such as that developed by SBTN can aid companies in ensuring they have a robust, science-based approach to identifying the targets needed.			
Survey	Nature Positive Initiative Secretariat	NGO	United States	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	It is vitally important for principle of double materiality to be maintained in order for the information reported to be meaningful for users. This is also important for aligning with commonly-used and long-standing corporate reporting frameworks such as GRI. We support the inclusion of the four sub-topics for biodiversity and ecosystems listed in Appendix 1. Items two and three should be merged into one sub-topic to streamline reporting processes, as one will never be material without the other and they should be assessed together, i.e. "State of nature: species and extent and condition of terrestrial and marine ecosystems".			
Survey	Nature Positive Initiative Secretariat	NGO	United States	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We strongly support the alignment with the draft global consensus metrics for measuring the state of nature, developed by the Nature Positive Initiative. This is important for ensuring metrics are credible, practical and aligned for companies. As these metrics are intended to be embedded in frameworks such as TNFD and GRI, alignment will also ensure consistency of requirements for companies across standards. Four key recommended updates are: (i) Maintaining the metric specifications within the mandatory requirements for companies - this is important as there is currently limited standardisation or maturity in biodiversity metric reporting by companies; (ii) The option to report metrics only for locations relevant to existing sustainability targets (AR7(b)) should be removed or made an additional. In order to align with the double materiality concept in ESRS 1 and throughout the standards, metrics should be reported for locations that are material for biodiversity and ecosystems. (iii) It should be clear that ecosystem extent, condition and species are all needed for assessing the state of nature for a material location, rather than a selection from these. While reporting is generally less mature, ecosystem service metrics are also vital for linking the company's impact on biodiversity and ecosystems to local communities and nature-related dependencies. (iv) The value of national and global datasets should be recognised for where site-level measurements are not feasible and prioritised above resorting to estimates.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Society for Corporate Governance	Business association (other than association of financial institution)	United States	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The Society respectfully requests EFRAG clarify and revise three aspects of its proposed approach to (1) permit companies to consider the effect of all mitigation and prevention actions taken during a reporting year when assessing the materiality of potential negative impacts for that same reporting year; (2) permit companies to take mitigation and prevention actions that require significant ongoing efforts into account when assessing materiality; and (3) to avoid any ambiguity, expressly permit consideration of mitigating and preventative actions when assessing financial materiality. In that the word limits in this survey tool (Parts 2 and 3) won't accommodate our full response to this question, we detailed the above points in our concurrently submitted comment letter to EFRAG.			
Survey	Society for Corporate Governance	Business association (other than association of financial institution)	United States	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	As detailed below, in Part 3, and in our concurrently submitted comment letter to EFRAG (necessitated due to the fact that the word limit prevents us from including our full response in this survey), the Society respectfully requests EFRAG clarify the application and meaning of the newly introduced and undefined terms "reasonable" and "supportable," which currently lack consistent interpretation and thus create implementation and compliance uncertainties and challenges. The term "reasonable and supportable" has been adapted for use in a context for which it was not originally intended. As detailed in our letter and noted in Part 3 (subject to constraints due to word limitations), modifications are necessary in the following disclosure requirements to ensure that the introduction of this concept does not have the perverse result of making disclosure preparation more burdensome, creating additional regulatory liability and the DMA process impracticably onerous and subject to a greater degree of auditor scrutiny, which is already intensive: ESRS 1 – 7.2; ESRS 1: AR 30 | ESRS 1 – 7.3; ESRS 1: 87(c) and (d) | ESRS 2 – SBM-3; ESRS 2: AR 15 | ESRS 1 – 7.3; ESRS 1: 87 (a) and (b) | ESRS 1: 35 and 45(b); | ESRS 1 – 3.5; ESRS 1: 47 | ESRS 1 – 5.2; ESRS 1: 60			
Survey	Society for Corporate Governance	Business association (other than association of financial institution)	United States	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	For the reasons set out in the Society's May 2025 letter to EFRAG (available here: https://scsgp.informz.net/SCSGP/data/images/Alert%20Documents/EFRAG%20ESRS%20Letter%20&%20Copy%20of%20Public%20Consult%20Questionnaire.pdf), the Society continues to believe that a requirement to disclose — qualitatively or quantitatively — anticipated financial effects of sustainability related risks and opportunities is not appropriate as it is extremely difficult for companies to quantify, often includes commercially sensitive information, and is unnecessary for an understanding of a company's sustainability-related risks and opportunities; as a result, we previously proposed eliminating any requirement to disclose anticipated financial effects of sustainability related risks and opportunities. As between Option 1 and Option 2, the Society supports requiring only qualitative disclosure of anticipated financial effects of sustainability related risks and opportunities. We believe that qualitative disclosure of anticipated financial effects will provide more value to the users of this information and will be more feasible for the reporting entities to prepare in a reliable and accurate manner than quantitative disclosure.			
Survey	Ceres	NGO	United States	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The Ceres Investor Network comprises institutional investors advancing responsible investment practices and policies that improve long-term portfolio value and build a cleaner, more resilient economy. Members include leading asset owners, such as pension and labor funds, foundations, endowments, family offices, and asset managers. Investor Network members approach mandatory sustainability risk disclosures in general purpose financial reports from an investor protection viewpoint, focusing on whether the disclosures provide decision-useful information about important risks. Also, for many years, they have been focused on ensuring that disclosure standards/rules are clear and interoperable. The changes proposed by EFRAG, including the executive summary option, use of appendices, and simplifying the ESRS, all support these goals. We appreciate the sensible requirement that an entity "shall structure its sustainability statement in four parts in the following order: general information, environmental information, social information and governance information." In addition, Investors and companies we work with have told us they are highly focused on increasing interoperability and alignment of climate disclosure rules, and many have advocated for the alignment of U.S. SEC, California, and non-U.S. climate disclosure rules with the ISSB Standards. California's Corporate Greenhouse Gas Reporting and Climate Related Financial Risk Disclosure Program permit the use of the ISSB Standards to satisfy compliance, which is an important alignment with international developments. Therefore, we recommend improving the structure of sustainability statements based on the ESRS E1: Climate Change Standard by aligning better with the ISSB S2 Standard's structure. For example, the Strategy Disclosure Requirements in E1 (transition plan, climate risk and scenario analysis, and resilience) could be better aligned with S2's Strategy categories (climate risks and opportunities, business model and value chain, etc.). For climate risk disclosures, this alignment with the many countries adopting S2 would result in a global boost in comparability, standardization, and readability.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ceres	NGO	United States	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E1	For E1-2 – Climate-related risks and scenario analysis, the Non-Mandatory Illustrative Guidance (NMIG) 1 for para. 17 provides a useful classification of climate-related physical hazards like changing precipitation patterns and variability, coastal erosion, etc. NMIG 2 for para. 17 (climate-related transition events) would be improved by providing additional examples of transition events like those listed in the Final Report: Recommendations of the TCFD (June 2017), p. 10: write-offs and early retirement of existing assets, R&D expenditures in new and alternative technologies, and capital investments in technology development. For E1-4 – Policies related to climate change, we recommend that NMIG 3 for para. 22 specify "short-, medium-, and long-term time horizons" rather than "different" time horizons. This will encourage more disclosure about the short- and medium-term policies that are so important for reducing climate risks and meeting targets over these time periods.			
Survey	Ceres	NGO	United States	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The "undue cost or effort" relief for identifying material impacts, risks and opportunities is concerning, because this is a crucial phase of the corporate sustainability risk assessment process and should not be shortchanged. For example, Ceres' Roadmap 2030 discusses key elements of that process. We recommend that companies develop and articulate a clear business case for sustainability by actively considering sustainability issues through different lenses, including risk mitigation, cost savings, increased resilience, improved growth, workforce attraction and retention, consumer loyalty, innovation and license to operate, among others. To do this, it is important that companies regularly engage with and consider the perspectives of all key stakeholder groups in the evaluation of material and salient sustainability impacts, and then integrate material and salient priorities in their determination of corporate purpose, evaluation of enterprise risk, refinement of corporate strategy and identification of business priorities. See https://roadmap2030.ceres.org/. We suggest the following change to address this concern. The draft states that information used in preparing financial statements, operating its business model, etc. "is considered available . . . without undue cost or effort." See Draft ESRS E1: General Requirements, section 3.5. Practical considerations in determining the material impacts, risks and opportunities and their related topics to be reported, para. 47. Similarly, the draft should make clear that the "usual internal and external sources of evidence" used for a materiality assessment, including important inputs like engagement with affected stakeholders and experts' engagement, should be considered available without undue cost or effort for identifying material impacts, risks and opportunities. See Draft ESRS 1, section 3.3. Double materiality assessment, para. 27. This would help ensure that companies undertake an adequate sustainability risk assessment process.			
Survey	Ceres	NGO	United States	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	The undue cost or effort relief applicable to metrics in a company's own operations could reduce the clarity of decision-useful information for investors or result in confusing changes in calculation methodology from year to year. For example, whether a business activity is expected to be "a significant driver of impacts, risks and opportunities" may change year to year, resulting in confusion as a business activity is repeatedly added or removed from the metrics calculation. See Amended ESRS 1, para. 90. Companies may use different definitions for evaluating what is "a significant driver", which may result in a wide range of approaches to this assessment. We recommend that EFRAG consider providing Application Guidance regarding how to evaluate what constitutes a "significant driver".			
Survey	Ceres	NGO	United States	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Ceres supports Option 1 and opposes Option 2. Option 1 will have the effect of providing investors improved disclosures and will spur companies to improve their abilities to provide quantitative information about financial effects. For U.S. investors, disclosure of forward-looking information is a vital component of SEC filings (in the MD&A, Risk Factors, and other sections), and climate-related forward-looking information is an important part of that. In the report "Disclosing information about anticipated financial effects applying ISSB Standards" (August 2025), the ISSB provides useful information about why it requires this type of disclosure, mechanisms in ISSB Standards that help with the preparation of this information, and illustration of disclosures. The EU should provide similar guidance to accompany the final ESRS. Under Disclosure requirement SBM-3 – Interaction of material impacts risks and opportunities with strategy and business model, and financial effects, para. 21 discusses the "appropriate level of aggregation, i.e. individually, aggregated or at topic level" for disclosures. Paragraph 23 discusses disclosure of financial effects but does not discuss the appropriate level of aggregation. It would be helpful if the Application Requirements or the NMIG discuss the advantages of disclosing, where feasible, the anticipated financial effects of individual sustainability risks. For example, the ISSB's report, "Disclosing information about anticipated financial effects applying ISSB Standards," provides illustrative disclosures about the risk of carbon prices and the risk of floods (pp. 17-18).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ceres	NGO	United States	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	The ISSB Standards aim to provide the foundations for globally applicable disclosure requirements for financially material sustainability information, establishing a consistent and comprehensive global baseline. Enhanced ESRS interoperability with the ISSB Standards is very important for creating that global baseline, which has numerous benefits for investors, companies, and stakeholders. We appreciate EFRAG's thoughtful efforts to increase interoperability with the ISSB Standards. In the exposure draft of ESRS 1: General Requirements, the new language that the sustainability statement shall include material information for meeting users' needs will help companies focus on the most important sustainability issues and will provide better information for investors. The now-permanent reference to IFRS Industry Based Guidance (including SASB Standards) is an important area of alignment with the ISSB Standards. The changes in Appendix 7 that enhance interoperability with ISSB's S2 are also helpful (related to transition plans, scenario analysis, resilience, scope 3 measurement, etc.). One area where interoperability could be improved is discussed in our response to question 13: improving the alignment of the reporting structure in the ESRS E1: Climate Change Standard with the ISSB S2's structure. Also, we recommend removing the acquisitions and disposals relief (ESRS 1, section 5.4) because inconsistency with the ISSB Standards would lead to less useful information for investors. The ISSB Standards, in contrast to this relief provision, require disclosure about expectations for a changing financial position, taking into consideration major acquisitions and divestments (S1, para. 35(c)). And S1 Application Guidance para. B11 requires the reassessment of the scope of sustainability-related risks and opportunities throughout the value chain when a significant change in the entity's business model, activities or corporate structure (for example, a merger or acquisition that expands the entity's value chain) occurs.			
Survey	Ceres	NGO	United States	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree with changing the two water data points from "may" to "shall" (own operations total withdrawal, and own operations total discharge) because they form basic elements of understanding pressure on local water resources. We agree that the disclosure of transition plan for biodiversity and ecosystems is decision-useful in some sectors. While standards for disclosing nature transition plans are at an earlier stage of development than those for climate transition plans, they are no less important in some sectors. Because nature transition plans need not be disclosed unless a plan exists and is publicly available, this does not add a burden for companies.			
Survey	Ceres	NGO	United States	35.E1-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Ceres recommends that disclosure of compatibility of targets with limiting warming in line with the Paris Agreement be moved from the Application Requirements to Disclosure Requirement E1-1 paragraph 14, and that EFRAG considers specifying that targets shall include short-, medium-, and long-term targets. While information on the compatibility of a company's strategy and business model with the Paris Agreement is important, the timeframe in which the targets apply is equally important. This is a core element of a transition plan and is useful information for investors.	E1	Disclosure Requirement E1-1 - Transition plan for climate change mitigation	
Survey	Ceres	NGO	United States	35.E1-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Scenario analysis is an important tool for a company to understand its climate resilience and to develop a transition plan, resulting in disclosure that is useful to investors. The ISSB S2 Standard's section on climate resilience offers very useful disclosure requirements in this area. E1's provisions on scenario analysis, especially the Application Requirements, are largely aligned with key elements of the ISSB S2 Standard's section on climate resilience. We recommend that EFRAG further align either the Application Requirements (or if possible the Disclosure Requirement) with S2's paragraph 22 section b (how/when scenario analysis was carried out, including inputs and key assumptions). Alignment with the following areas is particularly important: which scenarios were used and whether they are aligned with the latest international agreement on climate change, time horizons, and what scope of operations were used.	E1	Disclosure Requirement E1-2 - Climate-related risks and scenario analysis	
Survey	Ceres	NGO	United States	35.E1-3.	Do you agree with the amendments of this chapter?	I agree	The clarity of this section has been improved, and we appreciate the improved alignment with the ISSB S2 Standard.	E1	Disclosure Requirement E1-3 - Resilience in relation to climate change	
Survey	Ceres	NGO	United States	35.E1-6.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Disclosure Requirement E1-6 and ESRS 2 GDR-T provide metrics that are largely aligned with the ISSB S2's requirements. However, the ISSB S2 provision on climate-related targets states that entities shall disclose "the period over which the target applies" and "any milestones and interim targets". The ESRS GDR-T General Disclosure Requirement for targets, by contrast, states that entities shall disclose "if applicable, any milestones or interim targets set". Also, E1-6 requires disclosure of information about whether GHG emissions reduction targets are science-based and compatible with limiting warming to 1.5 degrees C. To understand if companies are on the path to science-based emissions reductions, investors could benefit from more information about interim targets. To achieve this, E1-6 could provide a clearer statement that interim GHG emissions reduction milestones and interim targets are critical for ensuring compatibility with limiting dangerous warming. We recommend adding information to either the Application Requirements or the Non-Mandatory Illustrative Guidance about the importance of these milestones and interim targets.	E1	Disclosure Requirement E1-6 - Targets related to climate change	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ceres	NGO	United States	35.E1-8.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The EFRAG Basis for Conclusions: Draft Amended ESRS notes that "[r]equests received from stakeholders to include reference to PCAF B and C were not incorporated given their early development stage and lack of endorsement by the GHG Protocol." Because of the importance of facilitated and insurance-associated emissions, however, we recommend that PCAF B and C be referenced as an optional part of the Application Requirements. This would be similar to AR 24 for para. 32(b), in which undertakings "can also consider" Commission Recommendation (EU) 2021/2279. This comes across as optional, compared to the mandate that undertakings "shall . . . take into account the principles and requirements of the GPH Protocol Scope 2 Guidance". Two factors support these recommendations. First, PCAF B and C have passed their early development stage. PCAF's facilitated emissions standard (December 2023) applies to a relatively small group: mainly financial institutions with the scale/sophistication to engage in underwriting, syndication, advisory services, and other activities where these emissions are most important. Nearly 20 PCAF signatories have already disclosed or indicated plans to disclose facilitated emissions using the Standard, and more than half of the 20 largest European banks by assets have taken similar steps. For PCAF's insurance-associated emissions standard (November 2022), there is a clear commitment by leading insurers to use it, as 52 reinsurance and insurance companies are PCAF signatories, which entails a commitment to "assess and disclose the greenhouse gas emissions of [their] financial activities in line with the PCAF Standard." Also, nine of the 20 largest European insurers have disclosed insurance-associated emissions. Second, the GHG Protocol Scope 3 update process will not be completed until Q4 2027, which could result in at least a two-year delay until PCAF B and C are endorsed by the GHGP.	E1	Disclosure Requirement E1-8 - Gross Scopes 1, 2, 3 emissions	
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	We do not support the gross approach introduced in ESRS 1 §34-36 and App. C. We recommend deleting Appendix C. A gross-only approach risks over-inclusion, double counting, and reduced auditability. A net approach better reflects decision-useful risk, recognises embedded mitigations, and improves faithful representation. The gross methodology is theoretical and does not align with established risk management practices, as mitigation is often embedded in the design and operation of activities. Mandatory gross quantification may obscure material topics, misrepresent actual risk, and impose unnecessary burden on preparers. Both qualitative and quantitative disclosures under this section should remain voluntary, allowing companies to apply established, risk-based approaches that are auditable and proportionate.			
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	Equinor supports and appreciates the shift to a more principle-based approach and amendments increasing the preparers flexibility in how information is presented. This includes the use of appendices and "executive summaries". The concept of "connected information" will have a positive impact on the need to repeat information. This was something we as a wave 1 reporter found challenging when developing our first CSRD aligned report. We believe these changes will lead to better and more useful reporting. We also support the option to use cross-references, but are concerned that the need to include the applicable ESRS requirement in each instance may impact readability. ESRS 1/AR 28 for para 29 suggests that undertakings should avoid text about policies and actions that have been implemented to comply with law and regulation. It should be noted that much of what companies report is in compliance with law and regulation and we do not believe this reduces the value or relevance of such information.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We support the removal of the duplicative requirements that existed in the MDRs and PATs in the original ESRS. GDR-Actions – Requesting financial/other resources allocated to key actions is not very value adding. It does not say anything about the potential outcome or effectiveness. Stakeholders are likely to care more about the outcome than amounts spent. Comparability/materiality - the term "significant" is not defined. Companies operate in different contexts (size, industry, geography), so X million in one case may be negligible, but in another it may be transformative. There may also be challenges related to scoping what to include (or not) given indirect contributions to an action, collaboration with others, etc. We suggest focusing sustainability reporting on material impacts and descriptions of main actions. Detailed allocation of financial resources should be more for internal management than an external indicator of sustainability performance. GDR-Metrics – We suggest removing paragraph 41 b. Requiring the specific environmental conditions and characteristics of the area where the impact is occurring for environmental metrics may be labour-intensive, challenging and provides little additional insight. It imposes a disproportional burden on companies without significantly improving the value of the reporting. GDR-Targets – Please consider placing the target requirements before actions and resources. We believe it is a more natural order of disclosures in a sustainability statement to present the targets/ambitions first and then disclose actions and resources responding to these. Target Base Year adjustments - ESRS 1, Para 84(c) requires adjusting the base year of the target following a major acquisition or disposal. Acquisitions or divestments might be part of the business strategy to achieve the target, so the base year should not necessarily be changed. Additionally, this is a behavioural requirement, which contradicts ESRS 1/Para 5 about not mandating behaviour. We recommend making this a voluntary requirement.			
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Moving ARs closer to DRs has improved readability of the standards. Removing voluntary disclosures and streamlining a clear set of mandatory disclosure requirements is an improvement. The use of "May" and "Shall consider" statements within the Application Requirements implies voluntary action, which is counter to the stated objective of eliminating voluntary disclosures from the ESRS. The drafting convention says these are used to bring flexibility to the reporting, but it has the potential to create confusion and misunderstandings with auditors. To reduce complexity, it'd be helpful to remove definitions, examples, and repetitive guidance. Definitions could for example be moved to the Glossary and guidance on GDRs could go directly into the GDR section. Ambiguity around the word 'significant' - we recommend explicitly stating that undertakings determine significance based on their specific context, ensuring disclosures remain relevant and material.			
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	As a starting point Equinor believe the standards themselves should be clearly written without ambiguity making additional guidance unnecessary. However, if the NMIG is implemented we support EFRAG's recommendation that the NMIG are not included in the Delegated Act – to make sure that it's clear that the guidance is additional voluntary support for preparers and clearly not mandatory or part of the audit procedures.			
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The ESRS are still new, and it takes time for companies to adapt. Equinor strongly supports the inclusion of burden reliefs in the amended ESRS in general, supported by the explicit reference to using reasonable and supportable information that is available without undue cost and effort and focusing on what is decision useful to report users. Equinor welcome the relief allowing for exclusion of joint operations over which it does not have operational control from the calculation scope of environmental metrics reported in accordance with ESRS E2 Pollution, ESRS E3 Water, ESRS E4 Biodiversity and ecosystems and ESRS E5 Resource use and circular economy. Based on our experience as a wave 1 reporter we believe this an important and necessary relief which enhances feasibility and integrity of sustainability reporting and avoids duplicative reporting. That said, the current phrasing "may exclude joint operations over which it doesn't have operational control" is not an operational boundary defined or used by our industry. We propose amending to: "For the environmental metrics disclosed in accordance with ESRS E2 Pollution, ESRS E3 Water, ESRS E4 Biodiversity and ecosystems and ESRS E5 Resource use and circular economy, the undertaking may adopt an operational control (consolidation) boundary."			
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We appreciate efforts made to reduce the reporting burden for companies through allowing disclosure of only part of the scope for a corresponding metric of an IRO when the metric can currently only be partially estimated. The ESRS are still new and acknowledging that companies need time to adapt, expand data gathering and develop new methodologies this is an important improvement. The relief give companies support in ensuring reported data are robust and reliable. We believe the suggested approach still supports the importance of transparency in sustainability reporting. Acknowledging that this amendment may have some impacts for direct comparability between companies we still believe this is a necessary and pragmatic trade off in the process of evolving sustainability reporting and facilitates quality in reported data.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	We recommend making disclosures on anticipated financial effects voluntary. Forward-looking financial estimates lack established methodologies, risk misleading users, and conflict with the financial statements' recognition and measurement bases. The commercial, strategic, and operational challenges of incorporating such data into statutory reports argue strongly against maintaining it as a compulsory requirement. Financial reporting of this nature should remain within the scope of the financial statements.			
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	We oppose mandatory gross exposure quantification. Without defined drivers and boundaries, unmitigated risk estimates are non-operational and potentially misleading. Qualitative narrative or ranges should be allowed on a voluntary basis. This approach ensures disclosures remain decision-useful, auditable, and proportionate.			
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	In general, Equinor appreciate all efforts taken to ensure interoperability between the reporting frameworks. We encourage standard setters and decision makers to continue aligning and considering principles of equivalence between the reporting frameworks. We propose permitting primary reporting using established GHG Protocol sector boundaries, with explanation, to ensure comparability, data quality, and interoperability. The current financial-control default imposes disproportionate burden in complex joint venture structures. Allowing sectoral boundaries will improve data quality and ensure a level playing field. The current boundaries deviate from other national authority required reporting, common industry practice and introduce challenges with coherence and global comparability of data.			
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	General comment across all standards: While there is a reduction in the number of mandatory datapoints, it remains to be seen how much the reporting burden will actually be reduced. Simplifications and streamlining have made several requirements easier to understand. Flexibility introduced in how information is presented in the sustainability statement will likely improve the process of presenting the information. And the relief allowing for exclusion of joint operations over which the undertaking does not have operational control from the calculation scope of environmental metrics will reduce efforts needed to get data from partner companies. However, in practice we believe the overall reporting burden is unlikely to change significantly. The requirements removed are largely the least important, including many of the narrative based DRs. Quantitative datapoints have been prioritized and many of the underlying metrics and data remain the same.			
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	In principle we believe new obligatory disclosure requirements contradicts the purpose of reducing the reporting burden on companies. We believe the amended ESRS G1 14 is of particular concern. While we support transparency on anti-corruption performance, we remain concerned that obliging disclosure of "confirmed incidents" may lead to: •Risk self-incrimination – Requiring publication of internally confirmed violations that have not been tested by a court could place companies in a problematic position, threatening the important and fundamental protection against self-incrimination. •Undermine the presumption of innocence – An internal conclusion is not equivalent to a court conviction, and disclosure could prejudice ongoing or potential cases. •Create uneven or misleading data – Firms with robust internal controls may appear to have "more incidents" simply because they detect and investigate them thoroughly, not because they have higher exposure to corruption or bribery risks. This is highly-sensitive, context-dependent (Comparing "total number" across firms can be misleading without normalization), and difficult to standardize, which undermines its reliability and comparability, and hence not value adding information to the external stakeholder. Given these issues, our preference remains to retain paragraph 14 as a voluntary disclosure. If kept as mandatory, we recommend narrowing its scope to avoid an obligation to also report the type of corruption and bribery where the company does not risk legal liability. In addition, we believe biodiversity transition plans should remain a voluntary disclosure requirement given the uncertainties and maturity level of this topic.			
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We oppose adding new mandatory datapoints during a simplification exercise. Delete secondary microplastics (E2-4 §16) and E5-4(c)/(d) and E5-5(18e. These requirements introduce significant methodological and operational burdens without commensurate decision-usefulness.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We support fair presentation. Please consider guardrails to avoid subjective overreach and ensure auditability. Clarify the interaction with materiality and the scope of permissible management judgement. This will reduce legal uncertainty and support robust assurance processes.			
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	Amended human rights incidents scope – we are strongly against the removal of the term "severe" from the disclosure requirements for human rights incidents across all social standards. This is basically introducing a new datapoint. Specific concerns include: -Increased scope – without a qualifier, companies may be required to report even minor or less relevant incidents. This broad scope risks undermining the materiality of disclosures and contradicts the objective of simplification. -Inconsistency with SFDR's Indicator 14 – which calls for "the number of identified cases of severe human rights issues and incidents." -Misalignment with risk-based due diligence – keeping the qualifier "severe" ensures the ESRS remains in line with the principle of risk-based due diligence as outlined in the UNGPs. For these reasons, we recommend reverting to the original terminology: "severe human rights incidents". Coherence - we are supportive of all efforts to make EU regulation more coherent. Consolidation – we agree that the consolidation of the human rights policy requirements into ESRS 2 GDR-P is a helpful way to streamline reporting.			
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	Do not reintroduce former AR 26. Defer methodology guidance until stable, widely accepted approaches exist; avoid locking-in immature voluntary frameworks. Premature mandatory guidance risks inconsistent disclosures and legal exposure.			
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We welcome the simplified structure and clearer language of the revised ESRS 1, demonstrating a genuine effort to make the framework more user-friendly. We appreciate changes such as the explicit reference to using reasonable and supportable information that is available without undue cost and effort and focusing on what is decision-useful to sustainability report users. We have some concerns and see room for further improvement in several areas, including the gross risk approach (see Q12), the fair presentation framework (see Q25) and impact materiality assessment encompassing an undertaking's entire value chain. Equinor supports a DMA approach. We welcome the proposed simplifications to the DMA process, including the top-down approach and the ability to derive materiality conclusions based on business model, peer analysis, and other relevant factors. This represents a positive shift away from the overly prescriptive and compliance-driven requirements of the current ESRS, which made the DMA process unnecessarily resource-intensive. We support increased flexibility in the materiality assessment of the broader value chain. To further enhance legal clarity and operational feasibility, we recommend that the standard explicitly state that the materiality assessment of value chain impacts should be risk-based. This would ensure a proportionate approach, focusing efforts on areas where impacts, risks, and opportunities are most likely to arise, and is consistent with international due diligence frameworks. We also support the strengthened focus on materiality, including the clarification that individual datapoints are subject to materiality. To avoid legal uncertainty and excessive audit burden, we recommend clarifying that the auditor's role is to assess the soundness and documentation of the DMA methodology, rather than to challenge the company's materiality conclusions. This will help ensure the process remains decision-useful, auditable, and proportionate. We also support the strengthened focus on materiality, including the clarification that individual datapoints are subject to materiality.			
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Equinor appreciate the overall effort to simplify and clarify the standards. In general, we support the amended GDR approach in ESRS 2, which should result in some simplification. We welcome option to report at level of IROs or at level of topic to allow for more accurate depiction on how material IROs are managed. However, we still have some concerns particularly related to the requirements on anticipated financial effects (see also Q19). Please see more details in earlier questions of part 2 as well as our response in part 3.			
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See feedback in part 3.			
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We have concerns about the level of detail required in E2 – this adds a reporting burden for companies to disclose information that is likely not decision-useful for report users. Additionally, E2 / AR2 broadens the scope beyond E-PRTR. And we strongly believe that the addition of secondary microplastics datapoint is not in line with simplification. See part 3 for more details.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See feedback in part 3 as well as Q23 and Q30 above.			
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See feedback in part 3.			
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Reinstate the 'severe' qualifier across S1, S2, and S3 for incident counts, aligning with risk-based due diligence under the UNGPs and ensuring proportional, decision-useful disclosure. Removing this qualifier broadens the scope excessively and undermines the materiality principle. In addition, we propose some edits to health and safety metrics to make the definitions compatible with current industry practice. See details in part 3.			
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Reinstate the 'severe' qualifier across S1, S2, and S3 for incident counts, aligning with risk-based due diligence under the UNGPs and ensuring proportional, decision-useful disclosure. Removing this qualifier broadens the scope excessively and undermines the materiality principle. See details in part 3.			
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Reinstate the 'severe' qualifier across S1, S2, and S3 for incident counts, aligning with risk-based due diligence under the UNGPs and ensuring proportional, decision-useful disclosure. Removing this qualifier broadens the scope excessively and undermines the materiality principle. See details in part 3.			
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Replace 'confirmed incidents' with aggregated outcomes and remediation status. Avoid disclosures that could prejudice proceedings or conflict with the presumption of innocence. Reporting should not require publication of internally confirmed violations that have not been tested by a court. See details in part 3.			
Survey	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Equinor emphasize the importance of ensuring a due process and adequate consultation periods for the revision of the ESRS. In line with good practice a minimum duration of 90 days should be applied for stakeholders to provide feedback to the draft standards. And sufficient industry representation should be ensured. While we recognise the urgency of implementing simplifications, we encourage standard setters, and decision makes to ensure due process for the upcoming task of finalising the revised standards. High quality standards reflecting all stakeholder perspectives is more important than a rushed process. We encourage avoiding introducing sectoral standards and prioritise giving all involved parties time to mature and adapt to the sector agnostic ESRS.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Confindustria	Business association (other than association of financial institution)	Italy	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Following the disposition of chapter 3.7, preparers cannot anymore apply the top-down approach, because it can result in a level of disaggregation on reporting and another on the materiality assessment. We support the use of reasonable and supportable information available without undue cost or effort (ESRS 2 §47 and chapter 7.3), as well as the principles in ESRS 1 §48 on materiality based on the business model and AR 17 on the top-down approach. However, it is unclear how this approach aligns with chapter 3.7 on aggregation, disaggregation, and group reporting. If the preparer "shall aggregate or disaggregate the reported information", cannot anymore apply the top-down approach, because it can result in a level of disaggregation on reporting and another on the materiality assessment. We recommend allowing undertakings the discretion to define the appropriate level of disaggregation, based on topic or business structure. Regarding sub-sub-topics, we welcome the intention to remove them. However, they still appear in brackets in ESRS 1 Appendix A and in the "Objective" sections of several standards—especially the social. This creates confusion, as it suggests these sub-sub-topics must still be assessed for materiality. We recommend deleting them to avoid the risk of auditors requiring individual assessments for each one. Overall, the process seems simplified, but in the end, the level of details becomes very subjective and often depends on the auditor's expectations. Instead of using a scoring system, why don't we define a topic as material if it meets the following criteria: 1)It is linked to the business model 2)It aligns with sector analyses 3)It is referenced in industry standards or guidelines 4)It is a priority for stakeholders Moreover, some general concerns remain regarding the concept of double materiality, particularly with reference to the economic quantification of negative impacts, risks, and opportunities.			
Survey	Confindustria	Business association (other than association of financial institution)	Italy	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	The new approach makes, in fact, the materiality assessment more rigid, which contradicts the overall simplification: while § 34 seems to support a net approach, § 35 force companies to use a gross approach in case of "significant ongoing mitigation actions". These 2 paragraphs are very difficult to apply as, first of all, it is normal to have in place mitigation action to avoid impacts and secondly to agree with auditors on what it means "significant and ongoing" leading to a complete exercise on a gross basis. Differently, the net approach is essential to help users of the sustainability statement appreciate the effectiveness of mitigation actions and so better addressing their investment decisions. Therefore, the suggestion is to move to a more flexible and principle-based approach, eliminating Appendix C, which is very prescriptive. In the standards it is not clear how to perform the risk evaluation; as such, auditors could oblige preparers to follow the same approach of the impacts which would lead to problems in terms of connectivity whith the risks disclosure. It would be better to require a net approach also for risks or the standards should clearly state a flexible approach, to ensure that risks disclosure is aligned with the one already delivered for the financial statement. Another point that deserves greater clarity concerns the materiality analysis process. The new draft does not sufficiently specify when a new materiality assessment should be initiated: is it sufficient to repeat it only in the event of significant changes in the business? And if so which events can actually be considered "significant"? Furthermore, for the purposes of comparability of the relevant mandatory information, it would be helpful to provide more example regarding the methodology used to assign the materiality threshold for IROs in the DMA.			
Survey	Confindustria	Business association (other than association of financial institution)	Italy	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We generally welcome the increased flexibility introduced through the proposed amendments to the ESRS Sustainability Statements.			
Survey	Confindustria	Business association (other than association of financial institution)	Italy	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	In general, PATs have been simplified and we agree on the main changes. However, ESRS 1 Paragraph 84(c) requires adjusting the base year of the target following a major acquisition or disposal. Firstly, this constitutes a behavioral requirement, which contradicts Paragraph 5 stating that "the ESRS do not mandate behavior but set Disclosure Requirements[...]". Secondly, it is inconsistent with the possibility of investments or divestments being part of the business strategy to achieve the target. ESRS 2 AR 35 the disclosure on resources allocation (in particular, capital expenditure and operating expenditure) should be "may".			
Survey	Confindustria	Business association (other than association of financial institution)	Italy	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	In general, we agree with the improvements performed. To further clarify it is better to eliminate all the unclear terms like "shall consider" in particular as shall refers to a mandatory action and consider more an optional step, leaving the way forward up to interpretation. This is important in order not to create confusion and avoid misunderstandings with the auditors.			
Survey	Confindustria	Business association (other than association of financial institution)	Italy	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Non-Mandatory Illustrative Guidance should be excluded from the delegated act to make sure that are interpreted as not mandatory nor should it receive any formal endorsement by the European Commission. Instead, it could be released by EFRAG only. It would be important to clearly state that: •the non-binding nature of NMIG remains clearly communicated and consistently understood by both preparers and auditors; •there should be no implicit expectation that the examples provided must be followed or justified if not applied; •an explicit statement saying that the NMIG cannot be used for audit purposes and the separation of the NMIG from the legislative text would support this.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Confindustria	Business association (other than association of financial institution)	Italy	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	Relief clauses play a fundamental role, especially in the first reporting years, as they allow companies the necessary time to collect and consolidate data. It would be ineffective and disproportionate to require data solely for the sake of comparability when the underlying information is not yet sufficiently mature to ensure reliability – thereby defeating the real objective of comparability itself. Below, further explanation supporting why the use of reliefs is extremely important for preparers, in particular: -Relief for metrics in the value chain: Collecting quantitative data from all actors within the value chain can be particularly burdensome. Therefore, the possibility to use estimates focused on the most relevant parts of the value chain is crucial. -Relief for acquisitions/disposals: Companies need sufficient time after an acquisition to set up systems for collecting sustainability data and to organize the information flow for reporting. It is estimated that at least six months are required for these activities; hence, the relief provides an adequate time frame to initiate high-quality data collection. -Relief for data quality on metrics: Please refer to the comment provided in response to question 18. It should be clarified that reliefs do not contradict fair presentation, allowing companies to protect sensitive information without being pressured by auditors to report under this clause.			
Survey	Confindustria	Business association (other than association of financial institution)	Italy	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	The relief for lack of data quality is particularly important for companies to ensure that data collected for reporting are robust and reliable. This relief promotes the creation of trends: sustainability data needs to be collected for some years to create reliable trends. Forcing the collection of weak data does not contribute to 1) ensure quality in reporting, 2) increase comparability and 3) avoiding legal risks linked to the disclosure of unreliable metrics. Furthermore, using relief helps companies to face the lack of methodologies for calculating some indicators and bridge preparers to the time when methodologies will be available. We support the decision not to impose a time limit on this relief. In cases like SOC/SVHC data collection, expanding the scope may only become feasible if non-European regulatory frameworks evolve to align more closely with EU standards. This is beyond a company's control and cannot be planned within a fixed timeframe.			
Survey	Confindustria	Business association (other than association of financial institution)	Italy	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	The topic is very sensitive and burdensome for companies. Companies expressed serious concerns regarding the limited measurability and reliability of forward-looking information, the potential lack of reliability for users, and the sensitivity of commercially relevant data. EFRAG has retained the requirement for companies to choose between two alternatives: (1) providing quantitative data, or (2) providing only qualitative data, with the option to voluntarily include quantitative information. From the preparers' perspective, it would be preferable to allow voluntary disclosure for both quantitative and qualitative aspects when they are actually relevant. This is due to the lack of mature and established methodologies, the high level of uncertainty and subjectivity of the assumptions that should ground the assessments, the sensitivity of the information involved, and—most importantly—the associated legal risks. In fact, these risks are particularly relevant when disclosures include financial information data that are not reported in the official Financial Statements and that are not reliably estimable. Such sensitive disclosures should be addressed by the Financial Board to ensure consistency with financial reporting requirements. It would be more reasonable to acknowledge the still pioneering nature of this disclosure and allow for a voluntary approach. In general, it is crucial not to require disclosure of inherent effects, as these are theoretical, not grounded on reasonable and supportable information and would not add value for. In fact, mitigation actions are often embedded within the strategy, structural in nature, and linked to multiple risks. Therefore, it would be overly complex and unreliable to conduct a hypothetical exercise calculating monetary amounts that are neither estimable nor dependable. Such assessments could be misleading, in particular for external readers. Furthermore, ISSB does not mention anything regarding the gross approach "Before the mitigation action".			
Survey	Confindustria	Business association (other than association of financial institution)	Italy	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	There is currently no reliable or comparable method to link specific climate-related risks or opportunities to financial metrics such as assets, liabilities, or revenue. The complexity and lack of integration between sustainability and financial systems make such quantification impractical. Without this linkage, even qualitative disclosures carry legal uncertainty and risk of misinterpretation. In the case of capital market participants, they typically rely on standardized models and data, which are not enhanced by inconsistent, company-specific disclosures. This type of information should be embedded within a financial framework (following the financial information due process) and disclosed in the notes to the financial statements. Mandating financial disclosures through ESRS risks exceeding the scope of sustainability reporting. For §40a and §41(a), requiring disclosure of physical /transitional risk "before considering mitigation actions" is problematic. It does not reflect how strategy is defined, because adaptation and mitigation is often embedded within the strategy, and it is linked to multiple risks. Estimating gross monetary impacts would be unreliable since they are not accounted for in the financial statements, especially for non-technical readers. In the light of the alignment with ISSB, IFRS S2 does not mention any disclosure of anticipated financial effect gross of mitigation actions. Regarding ESRS E1 §41(e), revenue generation is rarely attributable to individual assets or specific physical risks. Companies operate through complex supply chains and integrated operations, making it extremely difficult—if not impossible—to disaggregate revenue linked to a specific risk. Additionally, ESRS E1 §41(d) could confuse users by requiring disclosure of potential liabilities not recognized in financial statements. This may suggest a disconnect between sustainability and financial reporting, undermining the credibility of both. Finally, we reiterate the difficulty for companies in calculating Scope 3, particularly when a company wishes to carry out the analysis using primary data (as defined by the UNI 14064 standard).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Confindustria	Business association (other than association of financial institution)	Italy	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	1.Fair presentation in the ISSB standard is only on financial materiality, so extending this concept could create problems (see question N. 25) 2.IFRS allows to have any GHG boundary while here financial control is mandatory, failing to align to the GHG Protocol. 3.The relief clauses introduced by the simplified standard are welcome and needed by preparers. 4.It is very important to maintain these additional reliefs in the IFRS because in the ESRS we go beyond climate aspects, where methodologies are less advanced, and these clauses are needed. 5.agree 6.agree 7.agree 8.Agree However, it should be noted that the additional exemptions introduced by the ESRS, not provided for by the IFRS, could create new divergences.			
Survey	Confindustria	Business association (other than association of financial institution)	Italy	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Confindustria	Business association (other than association of financial institution)	Italy	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	It is true that some simplifications have been introduced, particularly in the structure and presentation of the reporting framework. However, in practice, the overall reporting effort will not change significantly. While the format of the PATs may be streamlined, many of the underlying metrics remain the same, as the deletion of datapoints primarily affects how requirements are presented, not what is required. This means that preparers will still need to collect and disclose a substantial amount of data, and the core reporting obligations are largely preserved. Moreover, it is concerning the fact that additional datapoints have been added but also new requirements in the ARs that would lead to a change in the consolidation process.			
Survey	Confindustria	Business association (other than association of financial institution)	Italy	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	This exercise not only makes the transition difficult for current preparers, but it also undermines the objective of simplification of the ESRS. Therefore, we suggest to maintain those datapoints on a voluntary basis or to delete them.			
Survey	Confindustria	Business association (other than association of financial institution)	Italy	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We strongly disagree with the introduction of new mandatory datapoints, as this would add additional burden. In particular, we strongly object to the inclusion of the datapoint of secondary microplastic. Quantitative estimation of microplastics is currently not feasible, as there are no widely accepted methodologies in place. Such estimates are highly variable, as they are based on assumptions regarding a significant number of variables (e.g. manufacturing processes, usage phase, conditions of usage, etc.). In this case, quantitative information may not meet the necessary comparability requirements to ensure a meaningful disclosure. In addition, this metric is beyond company control and so it would also increase difficulties in the external audit. This datapoint should be eliminated. Furthermore, it is important to note that these four DRs are not the only addition in the revised version. Concept like "fair presentation", "Gross Vs Net" or the need to amend the base year for targets in case of major acquisition are all new concept, which will introduce further complexity for preparers. In ESRS 2 §41 (b) it has been added that "the undertaking shall disclose, for environmental metrics, the specific environmental conditions and characteristics of the area ..."; this is not clear and could lead to very granular reporting. Furthermore, this provision cannot be applicable for Climate Change E1, since emissions are a transboundary phenomenon and their impact is not location-based. Overall, the expressions "environmental conditions" and "characteristics of the area" lack clarity and should be reconsidered. Furthermore, ESRS E2 AR 2 expands pollutant reporting under E2-4 §16(a) to include not only Annex II of Regulation (EU) 2024/1244 (Industrial Emissions Portal) but also pollutants from environmental permits. This would significantly increase the reporting burden, requiring companies to track and assess pollutants without clear thresholds, unlike the E-PRTR list, and would complicate materiality assessments.			
Survey	Confindustria	Business association (other than association of financial institution)	Italy	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	While the concept of fair presentation is well-established in financial reporting, its boundaries are far less defined in the context of sustainability reporting, especially considering the double materiality principle that requires to take into account a multi-stakeholder approach compared to the single/financial materiality perspective. The main issue related to a shift from a compliance-based approach to a fair presentation regime is the potential increase in the accountability of Board members regarding the Sustainability Statement, as they should ensure not only consistency with standards, but also demonstrate that information is presented in a manner that is fair to all relevant stakeholders. This creates a gray area, increasing the risk of litigation if stakeholders dispute the adequacy of the information provided. Such a regime, as confirmed also by audit firms, could also complicate their review process, especially considering the lack of a common European standard for sustainability review. The possible solution could be the removal of all the references to fair presentation introduced by EFRAG in ESRS 1 (paragraphs 16, 17, 18), and also in the other standards, if any, and the clarification that the objective of the sustainability reporting is to ensure the compliance with the provisions of CSRD and of ESRS.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Confindustria	Business association (other than association of financial institution)	Italy	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	Confindustria	Business association (other than association of financial institution)	Italy	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	In this way we are forcing a detail which is not necessarily relevant, for a multinational company it may be more relevant to ask for the disclosure of workforce in every macro-geographical area or continent rather than per country with more than 50 employees (that for example may be all in Europe without adding any value to the information disclosed). Furthermore, such a granular disclosure of employee numbers by country could potentially disrupt the overall narrative of the Annual Report, as the most strategic countries (in terms of business or production) may differ from those with the highest headcount.it will be more representative to return to the previous version of the disclosure, asking for the disclosure in countries where there are more than 50 employees representing 10% of the total workforce. With reference to ESRS S1-6 it would be advisable to reduce the quantitative metrics required for non-employees, complying with the aim of simplification of the disclosure process.			
Survey	Confindustria	Business association (other than association of financial institution)	Italy	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	In our perspective, it is necessary to provide greater clarity in the description of how the adequate wage is calculated in non-EU countries. It is very important to have a single, authoritative reference for the definition of an adequate wage. In fact, allowing companies to choose different—or potentially more convenient—providers could result in inconsistent and non-comparable disclosures, and this would ultimately compromise data quality. For this reason, establishing a common database of adequate wages that all companies can refer to is absolutely critical. This would not only ensure comparability across jurisdictions but also reduce the burden on companies to independently determine what constitutes an adequate wage in each country where they operate.			
Survey	Confindustria	Business association (other than association of financial institution)	Italy	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	Yes, we should always consider more and more the importance of feasibility and coherence in reporting according to different legislations.			
Survey	Confindustria	Business association (other than association of financial institution)	Italy	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	It would not be appropriate to reinsert the AR 26 considering that the methodologies for defining biodiversity targets are not yet well defined and are often site-specific. Furthermore, in the absence of a mandatory biodiversity standard, we do not see the opportunity to refer to specific frameworks (which are still voluntary). The risk would be that each company could adapt these standards to its own needs by making reporting incomparable. At last, also in the light of the simplification process, we should not add guidance from non-mandatory frameworks.			
Survey	Confindustria	Business association (other than association of financial institution)	Italy	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	No, we do not agree on the deletion of the (voluntary) datapoint on "adjusted gender pay gap". The adjusted pay gap indicator should be the only mandatory metric, and the unadjusted version should be eliminated, for the following reasons: •Starting in 2027, the European Directive on Pay Transparency (EU Directive 2023/970) will come into force, requiring the use of the adjusted pay gap indicator. The ESRS must align with EU legislative requirements; otherwise, stakeholders will face difficulties interpreting and reconciling inconsistent data sets. •The adjusted indicator is the only one that provides meaningful insights for stakeholders, as it accounts for legitimate factors that influence pay—such as job level, experience, location, and performance—thereby offering a more accurate and fair representation of pay equity.			
Survey	Confindustria	Business association (other than association of financial institution)	Italy	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	We welcome the simplification in the metrics, however "the percentage of payments aligned with these standard terms" is extremely difficult to collect on a consolidated basis.			
Survey	Confindustria	Business association (other than association of financial institution)	Italy	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The cross-cutting standard ESRS 1 remains particularly critical, especially regarding the concept of fair presentation and the materiality approach, including the provisions on gross versus net reporting. Additionally, the disclosure requirement on the level of aggregation and disaggregation continues to be highly subjective, which may lead to interpretative challenges and potential disagreements with auditors.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Confindustria	Business association (other than association of financial institution)	Italy	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	With respect to ESRS 2, the disclosure on anticipated financial effects should be eliminated. As highlighted in multiple internal discussions and documents, preparers are not yet sufficiently equipped to provide reliable forward-looking financial data, and such disclosures may involve commercially sensitive information. The current formulation risks overburdening companies and generating low-quality data.			
Survey	Confindustria	Business association (other than association of financial institution)	Italy	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Confindustria	Business association (other than association of financial institution)	Italy	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Regarding environmental topics, both ESRS E2 and E4 raise concerns due to the level of detail required and the potential for excessive disaggregation. These requirements could result in disproportionate reporting efforts, especially for large companies, and may not yield meaningful insights for stakeholders. For detailed feedback please look at the excel file.			
Survey	Confindustria	Business association (other than association of financial institution)	Italy	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Confindustria	Business association (other than association of financial institution)	Italy	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Regarding environmental topics, both ESRS E2 and E4 raise concerns due to the level of detail required and the potential for excessive disaggregation. These requirements could result in disproportionate reporting efforts, especially for large companies, and may not yield meaningful insights for stakeholders. For detailed feedback please look at the excel file.			
Survey	Confindustria	Business association (other than association of financial institution)	Italy	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Confindustria	Business association (other than association of financial institution)	Italy	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	For social standards the removal of the term "severe" from the disclosure requirements for human rights incidents across the social standards is particularly critical. If we are not able to limit the perimeter of human rights incidents to the most severe cases, considering the magnitude of the human rights subject, we risk having to disclose even less relevant aspects; this consequence, in addition to creating confusion when selecting the fact to be reported, would be contrary to the spirit of simplification of the ESRS amendments. Maintaining a focus on severe human rights incidents is essential to ensure that reporting remains meaningful, proportionate, and aligned with the principles of relevance and efficiency.			
Survey	Confindustria	Business association (other than association of financial institution)	Italy	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Confindustria	Business association (other than association of financial institution)	Italy	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Confindustria	Business association (other than association of financial institution)	Italy	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Confindustria	Business association (other than association of financial institution)	Italy	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Confindustria	Business association (other than association of financial institution)	Italy	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Confindustria	Business association (other than association of financial institution)	Italy	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		General approach. In light of the above observations, a further effort is deemed necessary to simplify the sustainability reporting standards, which are still too complex and articulated, in line with the spirit of the European Commission behind the Omnibus 1, to simplify the sustainability reporting burdens. Otherwise, the announced simplification will be limited only to the postponement of the obligations (Stop the clock directive), disregarding the objective of striking a greater balance between the path of sustainable transition and the competitiveness of European companies. Reporting Boundary. We welcome the relief clause of paragraph 92 ESRS 1 (data of joint operations). If this relief clause were to be deleted, it is essential that it is explicitly stated that for fair presentation, for specific sectors, environmental data can be disclosed on an operated boundary. Furthermore, it would be welcome to allow for GHG to report on any boundary mentioned in the GHG protocol, to be in line with the most relevant international framework on GHG and to align with ISSB. Value Chain. The assessment of impacts in the value chain and data collection, especially beyond Tier 1, remains a critical issue. About evaluation, quantitative evaluation is usually very complicated and not significant at the reporting level. Due to the difficulties for collecting data we believe appropriate to limit the request for quantitative indicators in the ESRS as much as possible. It should be noted that this challenge would be particularly pronounced for SMEs and less structured companies, especially when they are called upon to disclose information regarding the value chain. It is of paramount importance that the measures introduced under Omnibus 1 be upheld, and that SMEs within the value chain should not be compelled to disclose detailed information that is not expressly required of them by the regulation.			
Survey	Fair Finance Guide Germany	NGO	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	The original disclosure requirement related to environmental standards on site screening during materiality assessments has been replaced, making transparency on site screening optional. The specific local context of certain sites are important to assess materiality. Thus, a specific datapoint on how the screening of locations and value chains took place would be important. Meaningful disaggregation requires that locations are properly screened. Moreover, it would be purposeful to have a clear reference to the disclosure of relevant, entity-specific metrics directly within the S standards. Defined metrics should not be provided by undertakings themselves. Disclosure of appropriate entity-specific metrics in S standards would be important.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fair Finance Guide Germany	NGO	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Some reliefs are not helpful and rather create confusion and might lead to missing material information or to diverging reporting practice. The relief "undue cost or effort" focuses only on reporting burden for companies, while omitting sustainability impacts and risks. It is very likely that some companies will avoid reporting on material information which they think would be costly or complicated. This could lead to misreporting and hinder standardization and comparability. Moreover, the relief that allows unconditional exclusion of data from joint operations where the entity lacks "operational control" could lead to omitted material information. If the environmental metrics concerning such operations are material, then they should be disclosure. Even when companies lack operational control they usually can obtain data through financial control or influence over the operator. Furthermore, relief on anticipated financial effects would hinder the integration of transition risks in financial planning. Quantifying financial effects is uncertain, but "what doesn't get measured, doesn't get addressed". Quantitative disclosures of these risks are highly relevant. Finally, the relief on the possibility to increasingly rely on estimates instead of direct data will probably reduce measurement of material data. If gathering direct data is possible, it should be the preferred option to ensure data accuracy.			
Survey	Fair Finance Guide Germany	NGO	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	The reliefs mentioned in question 17 could be abused and lead to ommitted material information and lower comparability.			
Survey	Fair Finance Guide Germany	NGO	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We generally criticize the relief for anticipated financial effects (see question 17). But between option 2 and option 1, the lass bad one is option 1 since option 2 would go beyond the IFRS relief and therefore would undermine standardization and building a level playing field.			
Survey	Fair Finance Guide Germany	NGO	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Some reliefs go beyond IFRS which undermines the ESRS as a global baseline for standardized sustainability reporting and a level playing field. ESRS does not require exorbitant reporting and burden compared to other common reporting standards. After various rounds of watering down standards and requirements (from the first ESRS draft), the current ESRS version is not very demanding compared to common sustainability reporting standards.			
Survey	Fair Finance Guide Germany	NGO	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Fair Finance Guide Germany	NGO	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	These changes are purposeful and do not add new burden. We recommend that the requirement to disclose a biodiversity and ecosystems transition plan should be based on the identification of material impacts, dependencies, risks, or opportunities—rather than the prior existence of such a plan. Otherwise, changing the requirement from "may" to "shall" would have little practical effect, as most companies currently lack such plans and would have nothing to disclose. Additionally, where a biodiversity transition plan is disclosed, it should clearly reference its links to related environmental topics. Biodiversity loss and recovery are closely tied to issues such as pollution, water and marine resource use, and resource extraction, while circular economy strategies often form part of the response. Making these interconnections explicit would not create new reporting obligations, but would promote coherence, encourage a systems-based approach, and help avoid a fragmented or overly narrow interpretation of what a biodiversity transition plan should cover.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fair Finance Guide Germany	NGO	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Fair Finance Guide Germany	NGO	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We, the Fair Finance Guide Germany, frequently analyze financial institutions decarbonization targets. The experience shows that financial emissions intensity targets (e.g. CO2 emissions per EUR financed) are not purposeful at all. The only targets that are helpful are absolute emissions reduction targets and physical intensity targets (e.g. CO2 emissions per ton of steel produced). In our work, we have seen that current methodologies for financed emissions are largely inadequate, not related to real emissions and ineffective for the real economy. One of the key problems is the use of an attribution factor that leads to financed emissions volumes evolving due to changes in the value of companies, and not of their GHG emissions. Thus, ESRS should instead require financial institutions to report on 1) sectoral physical intensity targets ("weighted average physical intensity" or WAPI) for all sectors except the fossil fuel sector and on 2) targets to reduce the volume of financing to the sector and absolute emission targets that do not rely on attribution factors (directly aggregating absolute emissions of all financed companies) for the fossil fuel sector.			
Survey	Fair Finance Guide Germany	NGO	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	We do not agree with the proposed change since it is not in line with the ILO position on living wages. The change would undermine the objective of ensuring living wages and would be more complex for companies since it would require companies to assess countries minimum wages themselves.			
Survey	Fair Finance Guide Germany	NGO	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Fair Finance Guide Germany	NGO	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We disagree with some reliefs (see question 17).			
Survey	Fair Finance Guide Germany	NGO	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We disagree with the transparency on local sites screenings.			
Survey	Fair Finance Guide Germany	NGO	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	It would be helpful if companies have to specify what type of fossil fuel projects exactly they are investing in (coal power, coal mine, oil and gas fields, LNG export, LNG import, pipeline, maintaining infrastructure, building new infrastructure…)			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fair Finance Guide Germany	NGO	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fair Finance Guide Germany	NGO	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Fair Finance Guide Germany	NGO	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Companies should be required to disclose all sites located close to biodiversity sensitive areas. We disagree that disclosure shall be limited to material impacts since this could lead to abuses and ommitted relevant information.			
Survey	Fair Finance Guide Germany	NGO	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Fair Finance Guide Germany	NGO	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fair Finance Guide Germany	NGO	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fair Finance Guide Germany	NGO	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fair Finance Guide Germany	NGO	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fair Finance Guide Germany	NGO	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	There should be a link between the lobbying activities disclosed in ESRS G1 and the climate transition plan in ESRS E1. Moreover, lobbying activities should not be limited to lobbying by a company itself but also cover lobbying through representative organizations which are responsible for most of lobbying activities on climate.			
Survey	Fair Finance Guide Germany	NGO	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We welcome the simplification of the DMA guidance and the stronger emphasis on the materiality filter, which make the process clearer for preparers and more decision-useful for stakeholders. However, we caution against over-simplification that could reduce comparability across companies. In particular: 1. The removal of mandatory location-level screening risks under-disclosure of impacts where risks are concentrated in hotspots (e.g. biodiversity-sensitive sites, high-risk suppliers). We recommend at least requiring transparency on the scope of screening performed (geographies, entities, and value-chain tiers considered). 2. The DMA outputs should include quantitative baselines (e.g. number of sites screened, percentage of value chain covered) rather than only narrative conclusions. This supports assurance and facilitates comparison across companies. 3. Reliefs such as "undue cost or effort" should not exempt companies from conducting the DMA itself; instead, they should be used only for temporary data gaps with a clear plan for improvement. Overall, the amendments strike a useful balance but further safeguards are needed to ensure the DMA remains robust, transparent, and comparable across all undertakings.			
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We support the clarification that negative impacts must be assessed on a gross basis, before considering remediation, mitigation, or prevention. This is critical to maintain comparability and prevent under-reporting of significant risks and impacts. However, we also welcome the possibility to disclose net effects where companies can demonstrate credible actions and outcomes. To balance transparency with completeness, we recommend: 1. Require disclosure of both gross impact and any net reduction achieved, clearly distinguishing between the two. 2. Ensure that mitigation claims are supported by quantitative evidence (e.g. tonnes of emissions avoided, number of workers covered by new policies) rather than narrative only. 3. Clarify that the existence of mitigation actions does not automatically make an impact "non-material." Users need visibility into both the severity of the gross impact and the effectiveness of responses. This dual reporting (gross + net) approach avoids the risk of companies overstating mitigation benefits, while still recognising progress on impact reduction. It would significantly enhance decision-usefulness and comparability for data users, including civil society and investors.			
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Wikirate supports the flexibility to use executive summaries and appendices to improve readability, and appreciates efforts to avoid repetition. However, conciseness should not come at the expense of data comparability. ESRS 1 emphasises that sustainability information must be comparable, verifiable and understandable, yet many companies currently provide only narrative PDFs. The amended standards should explicitly encourage or require tabular presentation of key metrics and provide guidance on digital tagging to ensure that data can be extracted. We also caution against excessive flexibility in organising content, which could allow undertakings to bury critical information. Wikirate urges EFRAG to require cross-references to the management report and to maintain clear links between sustainability topics and corresponding financial information.			
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The amendments aim to strike a balance between prescriptive requirements and reducing preparer burden, but the current proposals tilt too far towards flexibility. Granular disclosure requirements are necessary to produce comparable, decision-useful data. Removing or merging datapoints without clear alternatives can encourage undertakings to provide high-level narrative instead of quantitative performance indicators, undermining the ESRS's purpose. Wikirate recommends maintaining prescriptiveness for metrics that capture progress toward the EU Green Deal, such as greenhouse-gas emissions, resource consumption, social indicators and governance metrics. Such metrics should be tagged using XBRL to minimise reporting burden while enhancing comparability.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We appreciate the removal of "may disclose" datapoints and the clearer structure distinguishing mandatory content from application guidance. This can reduce confusion and encourages more focused reporting. Nonetheless, the standards' accessibility depends not just on wording but on how data are delivered. Most companies still publish sustainability information only as text-based PDFs. To make ESRS truly accessible, the amended standards should mandate digital, machine-readable formats (e.g., iXBRL) and encourage the provision of spreadsheets for key metrics. Without such requirements, the simplified language will not overcome the barriers to data extraction and comparability.			
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We support keeping NMIG outside the Delegated Act and treating it as non-authoritative, practical "how-to" support. This avoids creating de-facto mandatory lists and preserves the simplification objective. To maximise usefulness without undermining comparability, we suggest: (1) keep NMIG web-hosted and versioned with clear change logs; (2) embed links from the Standards to relevant NMIG sections for first-time preparers (esp. E4, S-topics) while stating plainly that NMIG is not a checklist; (3) prioritise quantitative examples and minimum calculational baselines over long narrative lists, supporting data comparability across reporters; (4) add cross-references where NMIG examples align with IFRS S1/S2 methods to aid interoperability; and (5) tag NMIG examples for digital reporting (data fields/units) so examples translate into structured disclosures, not prose. This balances implementer support with restraint, ensuring NMIG reduces Q&A traffic and audit ambiguity without morphing into shadow requirements.			
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Horizontal reliefs, such as the "undue cost or effort" provision and the ability to use estimates, address genuine challenges for smaller preparers. However, they risk becoming loopholes for under-reporting, especially if no time limit is set. Wikirate supports reliefs only when accompanied by a requirement to disclose the scope limitations and a concrete plan to improve data quality, and to provide progress updates in subsequent reports. The introduction of reliefs must not allow undertakings to avoid disclosing key metrics needed for assessing performance. To avoid ESG-washing, reliefs should be applied transparently and data should remain quantitative and machine-readable. We encourage EFRAG to reconsider the removal of the requirement to prioritise direct data for value-chain metrics; estimates should be clearly labelled and improved over time.			
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	The relief allowing partial-scope reporting when data quality is lacking recognises current data limitations, particularly in value chains. Nevertheless, Wikirate is concerned that no time limit could perpetuate incomplete reporting. We recommend including a sunset clause or at least requiring companies to set a target date for full coverage and to disclose progress annually. The absence of reliable data should not be used to avoid reporting; instead, companies should provide estimations with clear methodologies and commit to improving them. Data disclosed under this relief should still be presented in a machine-readable format to enable tracking of improvements over time.			
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Quantitative disclosures of anticipated financial effects (e.g., investments, capex, opex related to sustainability) are crucial for investors and civil society to assess the financial materiality of sustainability impacts and to detect greenwashing. Option 2 would make quantitative reporting voluntary, leading to inconsistent and incomparable disclosures. We therefore support Option 1 but urge EFRAG to narrow the circumstances under which quantitative information may be omitted and to require disclosure of estimation methodologies. Data should be provided in formats compatible with XBRL tagging.			
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	The reduction of disclosure requirements in ESRS E1 aims to ease reporting burden, yet some of the deleted datapoints relate to quantitative information about climate-related financial effects. Wikirate agrees that duplicative narrative requirements can be eliminated, but we caution against removing metrics that allow stakeholders to evaluate an undertaking's transition and physical risk exposure and planned investments. We recommend keeping or restoring disclosures on capital expenditure for climate transition, financing strategies and expected cost savings from mitigation actions, and ensuring that these are presented in structured tables. Simplification should focus on clarity and digital tagging rather than on reducing transparency.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Wikirate supports alignment between ESRS and IFRS sustainability standards to reduce duplicative reporting and increase global comparability. Implementing IFRS reliefs, such as "undue cost or effort" and allowing disclosure of ranges, is helpful when they do not compromise the quality of data. However, some proposed reliefs go beyond IFRS S1/S2 and risk reducing interoperability. We encourage EFRAG to prioritise interoperability while preserving data granularity and to ensure that any relief is accompanied by clear disclosure of its impact on data quality. We also advocate for a common digital taxonomy for both ESRS and IFRS to enhance machine readability and comparability.			
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	Reducing the number of mandatory datapoints can relieve reporting burden, but Wikirate is concerned that this process focused on deleting narrative datapoints rather than ensuring that essential quantitative metrics are retained. Deleting narrative requirements is positive if it leads to clearer, more concise disclosures; however, some "may disclose" datapoints—particularly around social and governance metrics—may be crucial for understanding an undertaking's impacts. We urge EFRAG to review each deletion carefully and to maintain datapoints that contribute to cross-sector comparability and evidence-based assessments. Any reduction should be coupled with a move toward machine-readable and digitally tagged disclosures.			
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Wikirate welcomes the decision to make six formerly voluntary datapoints mandatory. These include water withdrawals and discharges, biodiversity transition plans, procurement team training, and confirmed corruption incidents. All of these metrics provide quantitative or clearly defined disclosures that are essential for evaluating company impacts and mitigation actions. Making them mandatory enhances comparability and discourages ESG-washing. We further recommend requiring companies to report these datapoints in machine-readable formats so that civil society (and other stakeholders) can analyse them easily.			
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	The four new datapoints – confirmation that ESRS 1 requirements were applied, secondary microplastics, percentage of critical and strategic raw materials, and percentage/weight of waste with unknown destination – address significant information gaps. For instance, secondary microplastics and critical raw materials are emerging areas of concern where data scarcity hampers understanding. Making these disclosures mandatory will improve transparency and support policy goals. Wikirate urges that the reporting of these datapoints be quantitative and that companies provide them in digital formats to facilitate aggregation.			
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	Clarifying that ESRS is a fair-presentation framework aligns it with IFRS and emphasises professional judgment over box-ticking. This could help companies focus on material information. However, the concept requires guidance to ensure that undertakings do not use fair presentation to omit inconvenient metrics. There is a risk that subjective judgment, particularly for impact materiality where practices are still developing, could increase legal uncertainty and audit costs. Wikirate supports adopting fair-presentation but stresses the need for clear criteria, robust oversight and quantitative disclosures to prevent greenwashing. Fair presentation should complement, not replace, prescribed datapoints.			
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Wikirate opposes exempting financial institutions from disclosing absolute GHG emission targets when they have only set intensity targets. Both absolute and intensity metrics are necessary to assess alignment with climate goals. Intensity targets may hide absolute increases in financed emissions, while absolute targets show progress in decarbonisation. Exemptions for banks, insurers or asset managers would create an uneven playing field and reduce transparency, undermining comparability across sectors. We recommend that financial institutions disclose both absolute and intensity targets, explaining assumptions and methodologies, and provide data in machine-readable formats.			
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	Changing the threshold from 50 employees and 10 % of headcount to the top ten countries by employee headcount improves transparency without imposing excessive burden. It ensures that country-level data is reported for the largest jurisdictions, where differences in labour conditions, collective bargaining coverage and social dialogue are most material. Wikirate supports this change and encourages EFRAG to require that disaggregated social data be provided in structured tables and machine-readable formats to facilitate cross-country comparisons.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	We do not agree with the proposed non-EU wage methodology. It risks (a) allowing disclosures benchmarked to legal minimum wages that are typically below a living/adequate wage, (b) discriminatory treatment versus EU employees, (c) complexity companies cannot consistently assess (alignment with ILO principles), and (d) loss of comparability across reporters with different workforce geographies. We propose two changes: Require all undertakings to benchmark actual wages against an adequate/living wage for all employees. Outside the EU, allow use of (i) local legal minimum wage only if it is evidenced to align with ILO estimation principles for living wages, or (ii) recognised living-wage benchmarks aligned with those principles. Permit companies to rely on public evidence from authorities/benchmark providers regarding ILO alignment, avoiding reporter-by-reporter methodological judgements. These revisions protect the disclosure's objective (are wages adequate?), improve comparability, and reduce burden while aligning with international expectations on living wages.			
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	Wikirate supports integrating SFDR Principal Adverse Indicators (PAIs) into ESRS to streamline reporting and improve the data pipeline to investors. The consolidation of human-rights policy datapoints and clarification of incident reporting is helpful. However, we caution that some PAIs may be perceived as less relevant, leading to their deletion; eliminating them could leave gaps in ESG analysis. We recommend retaining key indicators (e.g., fatalities, human-rights incidents) and ensuring their definitions align with the SFDR and other EU regulations. All SFDR-related datapoints should be disclosed quantitatively and digitally.			
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Given the fast-evolving landscape for biodiversity metrics, reviewing and updating AR 26 to align with science-based frameworks like the Science Based Targets Network (SBTN) is essential. Clearer guidance on setting and disclosing biodiversity targets will improve comparability and encourage companies to adopt ambitious, measurable objectives. Wikirate suggests including quantitative indicators such as area protected or restored, number of sites with approved ecological integrity, and species recovery metrics. Guidance should emphasise digital reporting and data-tagging to support analysis.			
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	Removing the voluntary datapoint on adjusted gender pay gap (by employee category) eliminates valuable context. The unadjusted pay gap reflects overall pay differences but can be influenced by workforce composition, while the adjusted gap isolates discrimination by controlling for factors such as role and experience. Without the adjusted measure, stakeholders cannot fully assess equity within an undertaking. Wikirate recommends reinstating the adjusted gender pay gap as a mandatory datapoint and requiring companies to disclose data by country and job category in machine-readable formats. This will enhance transparency and support the EU's Pay Transparency Directive.			
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	Replacing the former payment-practice requirements with broader PAT provisions risks reducing visibility on how companies manage relationships with suppliers, particularly SMEs. Late payments and unfair terms can have significant social impacts. Wikirate believes that specific metrics on average payment terms, percentage of invoices paid late, and initiatives to support SME suppliers should remain. The information should be reported quantitatively and digitally so that stakeholders can monitor business conduct and SMEs can be protected. Removing these datapoints undermines comparability and accountability.			
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Wikirate International e.V.	Other - please specify (required)	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We welcome simplification that reduces cost without sacrificing comparability. To that end, we encourage EFRAG to: (i) emphasise quantitative baselines and minimum calculational scopes wherever feasible; (ii) ensure reliefs (undue cost/effort; data-quality) are used with time-bound improvement plans to prevent permanent partial scopes; and (iii) continue tight alignment with IFRS S1/S2 to support a global baseline. These steps will keep ESRS decision-useful for data users (including civil-society datasets such as Wikirate), while easing implementation for preparers.			
Survey	PKF Consult Spółka z ograniczoną odpowiedzialnością Sp. k.	Auditor	Poland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We understand and support the proposed simplifications. However, in our view, the definition of materiality of information is too broad and may lead to differing interpretations—for example, between a company and its auditor during the assurance process. From a practical standpoint, it is very challenging to determine which information is truly important for users.			
Survey	PKF Consult Spółka z ograniczoną odpowiedzialnością Sp. k.	Auditor	Poland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The intention behind Annex C is very helpful. However, from a practical perspective, it introduces the need to assess impacts both before and after mitigation, as well as to specify when prevention and mitigation actions were taken—which is not always straightforward (for example some mitigations actions are long term). In our view, this could actually make the DMA process more complicated. The Annex C also seems not to be consistent with part 3.5 Practical considerations, when it states that no comprehensive analysis are needed in DMA.			
Survey	PKF Consult Spółka z ograniczoną odpowiedzialnością Sp. k.	Auditor	Poland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	PKF Consult Spółka z ograniczoną odpowiedzialnością Sp. k.	Auditor	Poland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We support most of the changes regarding the interactions between ESRS 2 and the topical standards. However, in our opinion some of the topical specifications to SBM and IRO shall be rather removed to ESRS 2 than delated (foe example the companies shall explain if and how they perform analysis of DMA for E3-E4). The requirement to disclose whether an undertaking plans to implement policies, actions, and targets (PATs) for a material topic should remain as a mandatory ("shall") requirement.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	PKF Consult Spółka z ograniczoną odpowiedzialnością Sp. k.	Auditor	Poland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	PKF Consult Spółka z ograniczoną odpowiedzialnością Sp. k.	Auditor	Poland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	The proposed amendments may lead to a lack of comparability across sustainability reports and reduce the pressure on companies to advance their sustainability transition. This, in turn, could hinder progress toward achieving the objectives of the EU Green Deal.			
Survey	PKF Consult Spółka z ograniczoną odpowiedzialnością Sp. k.	Auditor	Poland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	The reliefs related to "undue cost or effort" and lack of data quality may be overused by companies, especially in cases where data disclosure is negative for the company. Moreover, these reliefs will be very difficult to assess during the assurance process. If such reliefs are allowed, they should be strictly temporary. In cases where disclosures are genuinely challenging due to data limitations, companies should be encouraged to provide reasonable estimates based on available information. In our view, allowing broad use of these reliefs will reduce the comparability and usefulness of sustainability disclosures for users.			
Survey	PKF Consult Spółka z ograniczoną odpowiedzialnością Sp. k.	Auditor	Poland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Quantitative information on anticipated financial effects is essential for investors and financial institutions and should be required to be assessed and disclosed. However, we recognize the challenges involved in evaluating these anticipated effects. Even for financial institutions, this can be difficult, and for non-financial companies, it may pose a significant challenge. We recommend developing a standardized methodology— for example similar to stress tests used by banks or insurance companies—to support these evaluations and enhance comparability.			
Survey	PKF Consult Spółka z ograniczoną odpowiedzialnością Sp. k.	Auditor	Poland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	PKF Consult Spółka z ograniczoną odpowiedzialnością Sp. k.	Auditor	Poland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	PKF Consult Spółka z ograniczoną odpowiedzialnością Sp. k.	Auditor	Poland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	PKF Consult Spółka z ograniczoną odpowiedzialnością Sp. k.	Auditor	Poland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We believe the concept of the Fair Presentation framework is not sufficiently explained. While it emphasizes materiality and the quality of disclosures, it does not clarify whether fair presentation also entails the disclosure of specific data or allows flexibility in how mandatory disclosures are presented			
Survey	PKF Consult Spółka z ograniczoną odpowiedzialnością Sp. k.	Auditor	Poland	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	PKF Consult Spółka z ograniczoną odpowiedzialnością Sp. k.	Auditor	Poland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	PKF Consult Spółka z ograniczoną odpowiedzialnością Sp. k.	Auditor	Poland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree				
Survey	PKF Consult Spółka z ograniczoną odpowiedzialnością Sp. k.	Auditor	Poland	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree				
Survey	Accountancy Europe	Auditor	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We support making the "materiality of information" the principal focus of the assessment. However, we suggest: •adding the objective of the DR to clarify why to report certain information. E.g. for financial effects, ESRS could mirror the ISSB standards, which add: "[…] for users to understand the financial effects of […]" •clarifying who the users are (particularly other users) and what types of decisions they make, as this would help determine relevance and users' objectives •incorporating the chief decision-maker's/board's/management's considerations (ie. what are they looking at?) •clarifying whether the relief in pa47 can be applied only for the identification of material IROs or all the elements of the assessment •clarifying that the "unit of account" is IROs •clarifying that "undue costs or effort should not be misused to omit material information •clarifying that the relief in pa65 does not result in ignoring already available data in the company. Section3.5 "Practical considerations" Focusing on sustainability matters to determine material information is simpler in theory, but in practice material IROs will need to be disclosed anyway, particularly as Articles 19a/29a(2f and g) CSRD explicitly reference IROs. In addition, whilst the top-down approach to materiality intends to simplify, we suggest clarifying the intentions of the standard setter when allowing the assessment to remain at topical level when it is "evident" that a matter is or is not material. This in order to always make sure that no material information is omitted on IROs.			
Survey	Accountancy Europe	Auditor	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We suggest revising para34/35, and the respective guidance in Appendix C, which may be overly prescriptive and be interpreted as contradicting the main paragraph. In addition, we call for a similar guidance for risks and opportunities as well. Moreover, we call for clarifications on: -the approach to be adopted for potential impacts (ie before mitigation/prevention/remediation measures?) -whether the cases in Appendix C are to be applied only for own operations or also the value chain -distinction between positive impacts and actions, i.e. positive impact as a potential consequence of a positive action -maintaining significant ongoing mitigation as it remains very judgemental and risks comparability. Finally, when reviewing these proposals, EFRAG should consider the ISSB's TIG approach which emphasises ensuring that no material information is omitted when evaluating net considerations.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Accountancy Europe	Auditor	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We suggest reinstating the requirement to cross-reference with the financial statements in ESRS 1 pa114 as the proposed optionality impairs connectivity and contradicts Articles 19a/29a of the CSRD. This is key for regulators, investors, and other stakeholders. The current proposal hinders users' understanding of the connections of the 2 statements. Moreover, it creates divergence with the ISSB standards. We appreciate the ESRS now allow for an Executive Summary, Appendices and sections with information material only to certain users. However, we call for clarifications on how to prepare them, including how to ensure fair presentation (of IROs) and avoid greenwashing. EFRAG could also provide an example of how and where in the sustainability statement these elements could be found, noting that if these elements are provided, they will be subject to the same (digitalisation, assurance) rules as the other part of the ESRS. Regarding Appendices, we call for clarifications as to what type of information would be best suited for an Appendix versus in the main body of the sustainability statement.			
Survey	Accountancy Europe	Auditor	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Accountancy Europe	Auditor	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We support these proposed changes and suggest the following comments to further improve the understandability of standards: - deleting the last sentence of ESRS 1.59 (as it gives the impression that it is a relief) - avoid using the old language "shall consider". Particularly for GHG, we suggest rewording "should apply GHGP except when contradicts other provisions of ESRS".			
Survey	Accountancy Europe	Auditor	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We support the NMIG not being part of the ESRS DA. We suggest finalising this guidance at a later stage to incorporate guidance from feedback received from this consultation as well as the final DA after the EC's revision and adoption. This would also give EFRAG time to allow for a full due process. In addition, we suggest EFRAG clarifies the role (eg retire or supersede them) of the original supporting materials, eg the Q&As published for the original ESRS. It is important to bring order to the due process of this ecosystem by clarifying the difference between all the guidance both in terms of hierarchy of guidance and due process followed, particularly for updates of these documents. It would also be useful if EFRAG clarified in the future how the contents of the guidance are to be considered in cases when a company practice differs from the contents of the guidance. This clarification would ease audit conversations.			
Survey	Accountancy Europe	Auditor	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We propose clarifying: (1) how are the reliefs related to each -other and work together? (eg undue cost&effort vs practicability, GHG emissions reliefs vs all metrics); (2) what are practical illustrations of a general principle? We note that the cost-benefit analysis will better determine the burden reduction following these proposals. On #1 we suggest extending the relief to all disclosures, not simply those of pa87. In addition, we suggest this principle is better aligned with the ISSB wording (both in the main text of the standard and Basis for Conclusions), which we find very clear. EFRAG could also consider examples on how to exercise judgement on the "undue cost&effort" relief, particularly for impact in order to avoid misunderstanding and misusing this relief (e.g. if difficult, is that then undue effort?) Moreover, it will help prevent assurance challenges (when has the preparer struck the right balance between providing useful information vs "cost & effort"). On #4, we appreciate the relief in pa90. However, we suggest EFRAG clarifies the situations/conditions where it would be appropriate to use this relief (ie. an activity should not be excluded if part of the business driving the IRO eg a small site producing carbon emissions from manufacturing). On the other hand, we suggest deleting the relief in pa92 of ESRS 1 as it creates confusion (new operational boundaries?). We call for clarifications on how to deal with joint operations generally before creating reliefs. We appreciate #7 is pragmatic, even though it temporarily impairs connectivity with financial statements and creates a divergence with the ISSB standards. However, we call for clarifications on operations held for sale meeting the definition of discontinued operations (eg. when revenue and all other financial items are excluded from continued operations, should they also be excluded from the calculation of metrics?)			
Survey	Accountancy Europe	Auditor	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We suggest the ESRS better align with the ISSB on this matter an instead of explaining the efforts to improve the data quality of metrics with a partial scope of calculation, it provides qualitative information relating to the IROs associated with the respective metric. In addition, this exceptions risks providing less useful data for users. Therefore, we suggest as a minimum companies explain why certain data is missing (ideally also the plan to improve the data) as this provides transparency. In addition, we suggest EFRAG clarifies what is meant by "partial metric" in order to avoid obscuring material information or the reporting of a metric that does not meet the qualitative characteristics of information. Lastly we invite EFRAG to explain why the relief of ESRS 1 pa91 is not available for Scope 3.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Accountancy Europe	Auditor	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We support option 1 as it: -enables connectivity with the financial statements - provides useful information to users -helps better understand the risks & opportunities management for companies -increases the credibility of the PATs, and - better aligns with the ISSB standards.			
Survey	Accountancy Europe	Auditor	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We suggest EFRAG, the EC and the ISSB collaborate to minimise differences between standards as much as possible Below we list some differences between the 2 sets of standards: -the materiality language in ESRS 1 (eg pa21, particularly item b determines when information is material by including "it is necessary" language that is not aligned with the ISSB, but also raises questions whether it is a threshold or a higher hurdle to determine what is necessary) -the "undue cost and effort" language and explanations between ISSB and ESRS -the ESRS E1 GHG emission boundary slightly vs the GHG Protocol and IFRS S2 provisions -the new ESRS requirement on leased assets information in the value chain -cross-referencing with the FS by restating the original requirement rather than allowing the proposed optionality -with the 4 ISSB pillars in ESRS 2 -considering reliefs that do not impair alignment (reliefs in Q17 currently do). In addition, we suggest the ESRS: -incorporate Option 1 in mandating quantitative anticipated financial effects -adopt the same language as the ISSB without omissions -clarify whether the GHG Protocol simplifications also apply to ESRS -include the latest proposed ISSB's Scope 3 simplification on Category15.			
Survey	Accountancy Europe	Auditor	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Accountancy Europe	Auditor	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	Whilst we appreciate the significant reduction in granularity in the ESRS, we note that the ESRS reports may now overly rely on entity-specific information and impair comparability. In addition, we call for clarification on how to deal with previously disclosed information from the removed "shall" datapoints. This will help avoid discussions as to whether previously disclosed information should continue to be disclosed, eg as "entity-specific" information.			
Survey	Accountancy Europe	Auditor	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We suggest better addressing the following elements for the correct application of the fair presentation principles: - providing a better link with materiality and entity-specific information - adding the objective of the standard and report - linking with users' objective for needs of information - considering providing a definition for the term in the Glossary These would help better align with IFRS S1, which addresses all these elements. In addition, we call for clarifications, for example via a practical consideration AR as to what fair presentation means in practice. For more, please refer to our publication: Sustainability statements based on ESRS: "compliance" or "fair presentation"?: https://tinyurl.com/46v357vb			
Survey	Accountancy Europe	Auditor	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We suggest EFRAG addresses the ESRS 1 principles in calculating metrics based on data from associates and joint ventures. This would include: -whether the financial effects reflect the group's exposure and benefits from sustainability-related risks and opportunities in associates and joint ventures -whether joint ventures accounted for using the proportionate consolidation method are own operations or not -clarifying leases where it will be the contractual terms that determine the extent to which the lessee is exposed to costs/losses or benefits from risks and opportunities linked to the leased asset -clarifying in ESRS 1.71 that only assets in defined benefit plans should be considered. We also note that the wording "usually" in ESRS 1.59 may lead to uncertainty in setting the reporting boundaries. According to the rationale, it has been added in relation to the exceptions and other provisions in paragraphs 60 and 69. Therefore, rather than using "usually", it could be stated that these are exceptions in ESRS 1.59. On another note, we suggest EFRAG and the EC invest in developing ESRS reporting practices, such as "lessons learnt from reporters" as this would promote good practices and share experiences between stakeholders. Lastly, we suggest EFRAG carefully considers the language used in the "Basis for Conclusion" when explaining an amendment in the ESRS. This because the current use of "clarified" has risen questions with the first time reporters as to whether these clarifications should be viewed as part of the intent of the original provisions and can be applied even to the current ESRS version. Alternatively, EFRAG and the EC could issue a joint communication on what wave 1 stakeholders, preparers particularly can and cannot use from the real clarifications of the ESRS.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Asteria	User (analyst, data provider, rating agency, etc.)	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		ESRS E1: I would suggest further reflection on the scope of GHG removals. The revised ESRS E1 indeed states on p.19: "When preparing the information on its projects the undertaking shall: (a) apply consensus methods on accounting for GHG removals as soon as they are available, notably the EU Carbon Removals and Carbon Farming Certification (CRCF) Regulation." The CRCF (https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L_202403012) indicates in 10) that: "activities which do not result in either carbon removals or soil emission reductions, such as avoided deforestation projects or renewable energy projects, should not be included in the scope of the Union certification framework." The revised wording of ESRS E1 thus tends to exclude projects of the REDD+ AUD type (Avoided Unplanned Deforestation), even though they are certified by international standards like VCS Verra based on increasingly stringent frameworks. Global studies show that deforestation is among the leading causes of global GHG emissions every year (over 3 billion tonnes CO_2 equivalent). This is therefore a deep and structural trend, calling for a massive and structural solution across all forests affected by imported deforestation. Academic work and Verra in 2025 have mapped deforestation risk worldwide, which helps secure the definition of the baseline scenario for AUD. Forest conservation projects are an essential counterpart to reforestation projects to ensure the growth of carbon sinks in forests. The impact is also significant in limiting biodiversity erosion, which is irreversible and notably hinders the discovery of new molecules in health-related fields.			
Survey	Asteria	User (analyst, data provider, rating agency, etc.)	France	35.E1-9.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	I would suggest further reflection on the scope of GHG removals. The revised ESRS E1 indeed states on p.19: "When preparing the information on its projects the undertaking shall: (a) apply consensus methods on accounting for GHG removals as soon as they are available, notably the EU Carbon Removals and Carbon Farming Certification (CRCF) Regulation." The CRCF (https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=OJ:L_202403012) indicates in 10) that: "activities which do not result in either carbon removals or soil emission reductions, such as avoided deforestation projects or renewable energy projects, should not be included in the scope of the Union certification framework." The revised wording of ESRS E1 thus tends to exclude projects of the REDD+ AUD type (Avoided Unplanned Deforestation), even though they are certified by international standards like VCS Verra based on increasingly stringent frameworks. Global studies show that deforestation is among the leading causes of global GHG emissions every year (over 3 billion tonnes CO_2 equivalent). This is therefore a deep and structural trend, calling for a massive and structural solution across all forests affected by imported deforestation. Academic work and Verra in 2025 have mapped deforestation risk worldwide, which helps secure the definition of the baseline scenario for AUD. Forest conservation projects are an essential counterpart to reforestation projects to ensure the growth of carbon sinks in forests. The impact is also significant in limiting biodiversity erosion, which is irreversible and notably hinders the discovery of new molecules in health-related fields.	E1	Disclosure Requirement E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Double materiality is essential and must remain at the heart of the ESRS framework and European Union sustainability regime for corporate reporting to be credible and useful. The principle of "materiality of information" is concerning since it introduces a further filter for companies to not report information. For example, it represents a step backwards from ID-177, which says that most S1 metrics must be reported if S1 Own Workforce is material. It is essential to maintain the principle of fair presentation in the reporting standards. It is positive that the revision of the AR 16 list of topics has maintained all of the sub-subtopics for S1 + S2. These are based on the list of social topics in the CSRD and should all be maintained. The emphasis on aggregation (as opposed to disaggregation) is concerning, as disaggregated information (both site-specific and country-specific) is key to understanding the distribution of IROs.			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	It is important that companies report not just their net impact – the gross impact should be reported, and the recommended text preserves this principle.			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The proposed changes are helpful. However, para 113 is difficult to understand: "113. If the description of the material impacts, risks and opportunities prepared in accordance with [Draft] Amended ESRS 2 IRO-2 is not presented alongside the respective policies, actions and targets, the undertaking shall make explicit which policies, actions and targets relate to which material impacts, risks, or opportunities, in accordance with paragraph 22." Para 22 addresses the issue of appropriate aggregation or disaggregation of information on material impacts, risks and opportunities and their management, without setting any rules regarding the location of such disclosures depending (or not) on the level of aggregation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The Exposure Draft removes duplications between the cross-cutting and topical standards. The preservation of the 4-part architecture in the social standards is important to respect the distinctiveness of different affected stakeholder groups. However, we have two critical concerns. First, the original DR in environmental standards concerning screening of sites in materiality assessment were replaced by an application requirement to ESRS 2 IRO-1. This in effect makes transparency on this aspect optional. Consideration of local context is a key element of an appropriate materiality assessment. This should be both recognised in Chapter 3 of ESRS 1, and in ESRS 2 IRO-1, which should include an explicit datapoint on how the undertaking screened its locations and value chains. We welcome that E standards provide a clearer reference on the importance of disaggregation of disclosures, but this can only be done well if locations are properly screened. Second, we strongly recommend adding an explicit reference to the disclosure of relevant, entity-specific metrics directly in S standards. The fact that S2, S3 and S4 do not include any metrics should not imply that entity-specific metrics for S topics should not be disclosed.			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The "may" (voluntary) data points should not be eliminated. In many cases they are "shall" in GRI standards, so it is important to keep them to align with GRI standards. Also, many of them were originally proposed as mandatory by EFRAG to the EC. The first wave of reports show that many companies have reported some "may" data points. Retaining them would help ensure standardization/comparability between company reports. Almost all of the datapoints for non-employee workers are voluntary, thus most datapoints for this vulnerable group of workers has been lost. Also, important datapoints on full time versus part time workers has been eliminated.			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	It is concerning that mandatory guidance in the Set 1 ESRS has been downgraded to "non-mandatory". Mandatory guidance is key to ensuring comparability and completeness of sustainability reporting. At a minimum, Non-mandatory Implementation Guidance (NMIG) should be included in the Delegated Act, and ideally called Mandatory Implementation Guidance. A major point of concern is that ID-177, which provided guidance that most S1 metrics should be reported if S1 Own Workforce is material, has now been downgraded into NMIG. Instead, EFRAG should preserve and promote the guidance that most S1 metrics shall be reported.			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	As a whole the reliefs go too far, overshooting the balance between cost/effort and transparency. There is a danger of enabling green/social washing. The relief for "undue cost or effort" is too vague thus leaving too much room for interpretation. The relief for direct data for value chain reporting is too extensive, as direct data is key for transparency. The relief for reporting on operations which are not "significant drivers of IROs" also opens up too much leeway for interpretation.			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	These combined reliefs overshoot the balance between transparency and cost/effort and risk enabling green/social washing. At a minimum, there should be a time limit introduced for these reliefs on value chain metrics.			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ability to estimate financial effects is critical for the undertaking's ability to integrate sustainability into its business strategy considerations, planning and risk management. It is also key for the determination of financial materiality, including in terms of overreporting topics as financially material. Reporting on financial effects is crucial to achieving the objective of putting sustainability reporting on the same level as financial reporting and integrating both. The European Union has recognised the value of a double materiality approach to corporate reporting which requires disclosure of both material environmental and social impacts, risks and opportunities as well as financially material data, It is important to keep the requirement on businesses to analyse and understand the financial effects of their business model. This will ensure investors have access to credible data as well as providing the underpinning for future business planning.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	ESRS reliefs should not go beyond those set in IFRS. The principle of fair presentation needs to be protected to provide transparency on all material IROs. As noted in the response to question 15, it is also important to consider interoperability with GRI when considering changes to the ESRS, rather than only considering ISSB's standards.			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	22.S1	Comments on deleted datapoints in ESRS S1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The reduction in the number of mandatory and voluntary datapoints goes far beyond striking an acceptable balance. As mentioned above, the voluntary datapoints should be maintained to provide alignment with GRI, which is currently in the process of strengthening its labor standards, as well as guidance and standardization for companies reporting more than just the mandatory datapoints. An explicit quantitative goal of 50%+ reductions was never set by the European Commission for EFRAG. A number of S1 datapoint metrics have been eliminated which should be reinstated:			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	22.S2	Comments on deleted datapoints in ESRS S2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The reduction in the number of mandatory and voluntary datapoints goes far beyond striking an acceptable balance. As mentioned above, the voluntary datapoints should be maintained to provide alignment with GRI, which is currently in the process of strengthening its labor standards, as well as guidance and standardization for companies reporting more than just the mandatory datapoints. An explicit quantitative goal of 50%+ reductions was never set by the European Commission for EFRAG. A number of S1 datapoint metrics have been eliminated which should be reinstated:			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	22.S3	Comments on deleted datapoints in ESRS S3	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The reduction in the number of mandatory and voluntary datapoints goes far beyond striking an acceptable balance. As mentioned above, the voluntary datapoints should be maintained to provide alignment with GRI, which is currently in the process of strengthening its labor standards, as well as guidance and standardization for companies reporting more than just the mandatory datapoints. An explicit quantitative goal of 50%+ reductions was never set by the European Commission for EFRAG. A number of S1 datapoint metrics have been eliminated which should be reinstated:			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	22.S4	Comments on deleted datapoints in ESRS S4	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The reduction in the number of mandatory and voluntary datapoints goes far beyond striking an acceptable balance. As mentioned above, the voluntary datapoints should be maintained to provide alignment with GRI, which is currently in the process of strengthening its labor standards, as well as guidance and standardization for companies reporting more than just the mandatory datapoints. An explicit quantitative goal of 50%+ reductions was never set by the European Commission for EFRAG. A number of S1 datapoint metrics have been eliminated which should be reinstated:			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Adding a datapoint on training of the procurement team is needed to support the implementation of human rights in the supply chain. The addition of a datapoint on confirmed incidents of bribery is needed to improve transparency on the effectiveness of bribery/corruption policies and measures.			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Agree that the following mandatory datapoint should be added: ESRS 2 General disclosures – BP 1 the undertaking shall state that the general requirements of ESRS 1 have been applied for the preparation of its sustainability statement			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	The "fair presentation" principle is essential to reduce the risk of green/social washing, as it emphasizes the full disclosure of all material impacts, risks and opportunities and their management. It is not understandable why this principle is under attack, as it is included as one of the general principles of the Accounting Directive.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	It is essential that financial institutions disclose absolute targets to assess how their strategies align with the economy-wide transition to net zero. Absolute targets are relevant for users of sustainability statements and for understanding the real-world climate impact of financed activities. While intensity measures provide insights into efficiency, they can mask rising absolute emissions in growing portfolios or sectors. Granting an exemption would also undermine fairness in a sector-agnostic standard. Other industries could equally argue for exceptions based on their own difficulties, reducing comparability across sectors. Moreover, absolute financed emissions are already recognised in existing standards and regulations: the SBTi financial sector net-zero standard, the UNEP FI/NZBA recommendations, and EU SFDR all require or encourage absolute emissions disclosure. Exempting banks would risk misalignment and reduce the usefulness of reported data for stakeholders, including asset owners who depend on it for their own disclosures.			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The "top 10" threshold for reporting country-level data on employment, collective bargaining and social dialogue is a major improvement over the current 10% employment threshold. An analysis of the first sustainability statements from Wave 1 companies shows that the current 10% threshold results in country-level disclosures on as little as 21% of total employees. More country-level information is needed to understand the distribution of impacts across countries, as well as whether employment thresholds for specific labour rights have been exceeded. The new threshold does not require additional effort/cost by companies, since they must gather country-level data anyways to calculate the global figures. Furthermore, it does not result in extra datapoints, since the information currently is (and can be under the revised ESRS) reported as one table.			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	An analysis of the first year ESRS reports shows that most companies are simply reporting that they pay minimum wages, whereas the intention (as outlined in the ESRS Basis for Conclusions) is that companies should be enabled to disclose commitments to paying a wage "sufficient to support themselves and their families in dignity" as well as the extent to which they do this. This shows that the methodology for non-EU countries needs to be changed. Furthermore, the new ILO agreement on a methodology for living wages needs to be taken into account. While the proposed new methodology takes a step forward in both regards, two key changes are needed: · The methodology for reporting on 'adequate wages' should measure actual wages against an adequate/living wage for all employees, not only those within the EU. In particular, for employees outside the EU, the methodology should allow employees' actual wages to be measured: o A) against the local legal minimum wage only when this is set in line with the ILO principles on estimating living wages; or o B) against living wage estimates that are set in line with ILO principles on estimating living wages. · Companies should be able to rely on local legal minimum wages or living wage estimates when the authorities or organisations that set them provide public evidence of their alignment with the ILO principles for estimating living wages. Furthermore, the transitional provision for the EU needs to be reinstated, as not all Member States have transposed the Adequate Minimum Wage Directive.			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	The new, simplified framework makes it easier for companies to report on these SFDR-related matters in a way that corresponds to how their policies are set. For users, this consolidation makes it easier to locate the relevant information. However, the SFDR datapoints are very helpful and should only selectively be amended.			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	The unadjusted gender pay gap should be kept as mandatory, since the methodology for calculating it is clear. The adjusted pay gap figure as voluntary. In practice many companies are reporting both figures, which is useful for improved transparency. However, since the methodology for calculating the adjusted figure is not standardized, the unadjusted should be kept mandatory.			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS 1: As detailed above, cumulative impact of the various reliefs is concerning.			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS 2: The improved language on DMA is welcomed, including on the engagement with workers' representatives.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS S1: The proposed "top 10" threshold for the reporting of country-level information for employee headcount, collective bargaining and social dialogue is a significant improvement over the current 10% employment threshold. Country-level information needs to be reported in more detail, and on other metrics as well, in order to have more transparency on the distribution of impacts across countries. In the metrics, voluntary datapoints need to be reinstated as well as the datapoints on gender breakdowns, workforce age distribution, etc. detailed above need to be reinstated. The proposed new methodology for adequate wages outside of the EU also needs attention, and the transition language for EU member states needs to be reinstated, since the Adequate Minimum Wage Directive has not been implemented in some Member States. We would also like to reiterate our longstanding demand for including franchise workers in the S1 definition of own workers, as well as the need for sector-specific standards to supplement the Set 1 sector-agnostic standards.			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS S2: We are concerned that the loss of many specific datapoints related to workers in the value chain will mean that disclosures about material impacts, risks and opportunities become more generic and have less information about the specific stakeholder groups because specifications about the level of granularity have been deleted. Many of the points that are being deleted from ESRS S2 had originally been included because they reflected effective practice in relation to improving supply chain labour rights, for example, AR 6 awareness of the impacts on value chain workers from an undertaking's strategy or business model, AR 20 illustrating how the perspectives of value chain workers have informed specific decisions or activities of the undertaking and AR 25 which looks at retaliation and whether workers can use grievance mechanisms confidentially.			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS S1, S2, S3, S4: An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS S1, S2, S3, S4: An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	Global Unions' Committee on Workers' Capital	Trade union	Canada	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The definition of own workforce should be expanded to include franchise workers. The term "non-employees" should be supplemented with the phrase "non-employee workers" or "non-employee workers in own workforce".			
Survey	Chartered Accountants Ireland	Auditor	Ireland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We welcome the efforts to clarify and simplify the DMA. The question of whether the DMA has been sufficiently simplified is somewhat difficult to answer, as the scope of company who will be subject to the ESRS is, as of yet, not clear. Larger companies may find that the requirements have been clarified and simplified to a point that the DMA process is appropriate and workable, whereas other companies may find that the process is not sufficiently simplified. Without sight of the agreed scoping thresholds, the appropriateness of the simplification is difficult to pass judgement on. Notwithstanding the efforts made to clarify and simplify the requirements, we continue to be of the view that the guidance and criteria in ESRS 1 in relation to the performance of a DMA is not sufficient such that when it is applied by similar entities within the same sector that it will not produce a sufficiently consistent and comparable result.			
Survey	Chartered Accountants Ireland	Auditor	Ireland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	We welcome the new guidelines. We believe that the standard could better deal with the concept of what a positive impact is as this is often misinterpreted with what is a mitigating action for a negative impact. Appendix C references 'significant' ongoing mitigation which is judgemental and risks comparability and clarification of what 'significant' means in this context would be useful. Perhaps EFRAG should consider the ISSB's TIG approach which emphasises ensuring that no material information is omitted when evaluating net considerations.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Chartered Accountants Ireland	Auditor	Ireland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	While we note that conciseness is welcome, the standards should be phrased in a manner that continues to encourage the level of detail required for completeness and transparency in reporting to satisfy user's information needs.			
Survey	Chartered Accountants Ireland	Auditor	Ireland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Chartered Accountants Ireland	Auditor	Ireland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	Agree, but there remains the term 'shall consider' from the original ESRS, particularly for GHG, and suggest rewording to "should apply GHGP except when contradicts other provisions of ESRS".			
Survey	Chartered Accountants Ireland	Auditor	Ireland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We agree that the NMIG as a document may be useful and may help users in applying the ESRS. However, we would question whether it is actually helpful to have non-mandatory guidance accompanying the standards. The status of NMIG may be unclear, particularly when a regulator is called upon to assess a user's compliance with the standards. On the one hand, a user may be tempted to ignore the guidance, given its non-mandatory status, however, on the other hand, there may be a market/regulator expectation that the NMIG must be applied in order to correctly apply the standards. We believe that the guidance title may mislead users and that it may be more appropriate to call this "Implementation guidance" and that it accompanies the standard in a way that users must have regard for it when applying the ESRS. We recommend that the approaches taken by other standard setters in relation to documents of a similar stature is considered by EFRAG. For example, the status of the FRC's FRS Factsheets and the IASB's examples and Practice Statements.			
Survey	Chartered Accountants Ireland	Auditor	Ireland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We have concerns regarding the use of the "undue cost or effort" relief. We believe that such a relief may be misused and misunderstood by some entities to their advantage, and it may be difficult to define when this situation is actually present. Assurance providers might also encounter difficulty when carrying out their assurance assignment, and without clear guidance and examples of what this entails, it may prove difficult to apply consistently and correctly (and therefore difficult for an assurance provider to challenge). If it is intended that this relief will be used in limited circumstances then the standard should state this, including the circumstances where an entity might apply this relief. When considering interoperability with the ISSB standards, we note that the ISSB standards are more prescriptive regarding the application of the "Undue cost or effort" relief to value chain data. The Exposure Draft suggests that this may be applied in a very general manner in value chain reporting under ESRS.			
Survey	Chartered Accountants Ireland	Auditor	Ireland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We support option 1 due to the fact that its alignment with the relief in IFRS S1 supports interoperability which will be welcomed by users of the standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Chartered Accountants Ireland	Auditor	Ireland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We suggest that the ESRS adopt the same language as the ISSB, where practicable. Using slightly different language and terms can lead to a lack of understanding when the information that is required is actually the same.			
Survey	Chartered Accountants Ireland	Auditor	Ireland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Chartered Accountants Ireland	Auditor	Ireland	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	We agree that the ESRS should have a minimum set of disclosures, and thereafter there should be enough guidance regarding when entity specific disclosures are required. We would question whether the standards contain this necessary guidance to allow entity-specific disclosures to be applied consistently. This point is important in the context of the desire for the standards to be a fair presentation set of standards as, without the necessary guidance on entity-specific disclosures, it is difficult to see how the necessary framework to facilitate fair presentation would function.			
Survey	Chartered Accountants Ireland	Auditor	Ireland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Chartered Accountants Ireland	Auditor	Ireland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	While we note that the amendments seek to clarify that the ESRS is a fair presentation reporting framework, we believe that there is still too much uncertainty regarding the status of the ESRS as a fair presentation vs. compliance framework. We believe that this fact should be stated in the ESRSs to avoid confusion and to actually achieve fair presentation. Underpinning this concern is the lack of maturity of the sustainability reporting framework (compared to, for example, financial reporting standards, which have been developed over many decades in order to arrive at a position where they are suitable to achieve fair presentation). For the framework to be truly fair presentation, it needs to be supported by the necessary building blocks which facilitate this, and such frameworks typically take a significant amount of time to develop. EFRAG should be guided by other bodies, such as the IASB, the ISSB and the FRC to consider what steps it may need to take as it pursues this. There are some valid arguments that can be made for the framework to be either compliance or fair presentation. But whatever method is chosen, the requirements need to be clear to users of the standards. Compliance might be easier to achieve in the first instance, with a carefully thought out move towards fair presentation at some point in the future (acknowledging and managing the various unintended consequences that might arise during the transition).			
Survey	Chartered Accountants Ireland	Auditor	Ireland	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We note that this consultation has been conducted over a 60 day period over the summer months of August and September. We have concerns as to whether this short period will allow for sufficient due-process to be carried out. Despite the simplifications achieved, we would question whether the 60 day period is adequate for sufficient and comprehensive stakeholder engagement.			
Survey	Observatorio RSC	NGO	Spain	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	We respectfully disagree that the proposed amendments achieve an acceptable balance between simplification and robustness of the Double Materiality Assessment (DMA). While the July 2025 drafts undoubtedly simplify the wording of Chapter 3 of ESRS 1 and reduce the reporting burden, the changes risk undermining the distinctiveness and credibility of the European approach to double materiality. Several elements contribute to this concern. First, the transformation of the AR16 list of sustainability matters from a mandatory checklist into a mere reference tool grants preparers excessive discretion to omit entire categories of impacts without providing transparent justification. Second, the explicit allowance to rely solely on qualitative assessments, without any obligation to apply severity/probability scales or temporal horizons, reduces comparability across entities and sectors. Third, the introduction of the "reasonable and supportable information without undue cost or effort" relief, while understandable from a cost perspective, is drafted in terms that are overly ambiguous and could be invoked too broadly to avoid addressing sensitive issues. In addition, the relocation of key datapoints to Application Requirements or to the Non-Mandatory Illustrative Guidance (NMIG) weakens auditability and assurance. Stakeholder engagement, documentation of data sources, and the justification of non-materiality decisions are no longer mandatory elements of the disclosure, even though these are crucial for users of sustainability information to evaluate the integrity of the DMA process. Taken together, these amendments convert the reporting about DMA from a structured, verifiable process into a more narrative and declarative exercise. This may ease compliance for preparers, but it significantly diminishes the ability of investors, auditors, and other stakeholders to rely on the information provided. In our view, the proposed text is indeed simplified, but at the expense of robustness, comparability, and credibility.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Observatorio RSC	NGO	Spain	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	Observatorio RSC	NGO	Spain	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	In our assessment, the proposed amendments do not achieve an appropriate balance between the reduction of preparation effort and the provision of relevant and comparable sustainability information. While the restructuring of ESRS 2 and the interaction with topical standards does simplify the overall architecture, the extent of simplification comes at a significant cost in terms of robustness and accountability. The drastic reduction of mandatory datapoints for Policies, Actions and Targets, coupled with the deletion of topical specifications, weakens the framework's ability to ensure consistent and verifiable reporting. Disclosures of particular importance for the assessment of governance quality—such as the independence of board members, sustainability expertise at board level, methodologies for risk assessment, and the involvement of stakeholders in the materiality process—are no longer guaranteed. Their absence risks creating asymmetries in reporting practices and undermines comparability across sectors and jurisdictions. Moreover, the removal of the obligation to disclose whether and when companies intend to implement measures for material topics diminishes forward-looking transparency and accountability. The result is a framework that is procedurally lighter but substantively weaker, and therefore less capable of delivering the reliable, decision-useful information that the CSRD and ESRS were originally designed to provide.			
Survey	Observatorio RSC	NGO	Spain	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We welcome the objective of enhancing clarity and internal consistency by eliminating the ambiguous "may disclose" provisions. The consolidation of all "shall disclose" datapoints in the main body of the standards and the improved drafting are positive steps that simplify navigation and reduce confusion for preparers and users. However, we are concerned that the restructuring may have unintended consequences. In particular, several datapoints of clear relevance have been downgraded from mandatory requirements to the Non-Mandatory Illustrative Guidance (NMIG). While this guidance can be useful, its non-binding character creates a strong risk that preparers will simply ignore these datapoints, especially when they require additional effort or touch on sensitive issues such as governance, risk methodologies, or stakeholder engagement. This would lead to a narrowing of disclosures in practice and to a loss of comparability across companies and sectors. Simplification and clearer drafting are welcome, but they should not undermine the substance of sustainability reporting. Without safeguards to ensure that datapoints in the NMIG are still considered in materiality assessments and reporting practices, there is a real danger that the amended standards encourage minimal compliance rather than meaningful transparency.			
Survey	Observatorio RSC	NGO	Spain	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We recognise the need to address implementation challenges and avoid disproportionate burdens, particularly in the first years of application. However, we are concerned that the package of reliefs introduced by the July 2025 amendments goes beyond pragmatic streamlining and risks significantly weakening the ESRS framework. The introduction of a broad "undue cost or effort" exemption for metrics, the possibility to report partial coverage due to "lack of data quality", and the removal of the systematic preference for direct value-chain data all create wide margins for discretion. In practice, these reliefs may lead to selective reporting, systematic reliance on estimates, and a lack of incentives to strengthen data collection. Without strict conditions, there is a real danger of lowering the quality of disclosures and undermining comparability across companies and sectors. Equally concerning are the new possibilities to exclude activities deemed "not significant drivers of IROs" or certain joint operations. These exclusions reduce transparency and comparability in ways that preparers may interpret expansively, weakening stakeholders' ability to assess the full scope of impacts and risks. Transparency about financial effects is also curtailed by limiting disclosures to already announced plans, which weakens accountability for future commitments and long-term alignment with the EU Green Deal. In our view, these reliefs shift the overall balance excessively towards preparers' convenience, at the expense of comparability, transparency, and accountability. To preserve credibility, they must be time-bound, subject to clear minimum coverage thresholds, and accompanied by mandatory disclosure of exclusions and estimation practices. Otherwise, the amendments risk undermining the transformative ambition of the CSRD.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Observatorio RSC	NGO	Spain	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We refer to our previous response on burden reliefs (Question 17). Our assessment remains that the proposed approach does not strike an appropriate balance between flexibility for preparers and the preservation of meaningful, comparable information. Allowing undertakings to disclose metrics based only on a partial scope where reliable data are not available provides important flexibility in the early years of implementation. However, without a clear time limit or minimum coverage thresholds, there is a serious risk that companies will continue to rely on this relief indefinitely, resulting in persistent data gaps and undermining comparability across entities and sectors. While the requirement to disclose actions to improve coverage is positive, both practical experience and scientific evidence indicate that voluntary improvement plans often lack effectiveness. Early academic and practitioner assessments of the first wave of ESRS/NEIS reporting highlight precisely this issue: companies tend to disclose intentions to enhance coverage but frequently fail to deliver measurable progress in subsequent reporting cycles. Without enforceable deadlines and minimum coverage expectations, such commitments remain aspirational rather than operational. To be credible, the relief should therefore be explicitly time-bound and supported by mandatory disclosure of the percentage of operations covered and a clear timeline for achieving full scope. In its current form, the relief risks encouraging minimal compliance rather than driving genuine improvements in data quality, and thus undermines the objectives of the CSRD.			
Survey	Observatorio RSC	NGO	Spain	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Observatorio RSC	NGO	Spain	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	We do not agree that the proposed 57% reduction in mandatory datapoints achieves an acceptable balance. While eliminating redundancies is useful, many deletions affect areas that are central to transparency and accountability. The trimming of narrative PAT disclosures and of the DMA process weakens traceability and comparability; in NEIS 2, key governance datapoints (board independence, sustainability expertise, risk methodologies) are no longer guaranteed; in NEIS G1, critical issues such as whistleblowing, supplier due diligence, anti-corruption training and lobbying transparency are downgraded. Coupled with broad burden reliefs, this reduction risks entrenching data gaps and encouraging minimal compliance. A leaner standard is desirable, but it must preserve core datapoints on materiality, governance and business conduct to ensure the credibility of the ESRS and alignment with EU Green Deal objectives.			
Survey	Observatorio RSC	NGO	Spain	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	We welcome the decision to elevate the datapoints on training of procurement teams and confirmed incidents of corruption from "may disclose" to "shall disclose". Both areas are high-risk and of clear relevance for users of sustainability information: mandatory training helps ensure integrity in procurement and supply chains, while disclosure of confirmed corruption incidents provides a minimum level of transparency and accountability. However, this positive step must be seen against the broader weakening of G1. Other datapoints of equal importance—such as disciplinary measures, actions against implicated suppliers, or transparency register disclosures—have been removed or downgraded. As a result, while these two additions improve the standard, they do not compensate for the overall reduction in scope and specificity. Strengthening G1 requires restoring mandatory status to a wider set of business conduct datapoints.			
Survey	Observatorio RSC	NGO	Spain	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	We do not consider the current formulation to be sufficient to meet the CSRD's objectives regarding the protection of SMEs. The deletion of the former paragraphs 14 and 33(a) reduces transparency on how undertakings manage payment practices in their supply chains. Although the revised provisions are covered by general PAT requirements and by an additional specification in paragraph 33(b), these do not provide the same level of visibility on payment behaviour towards smaller suppliers. Payment practices are a critical dimension of business conduct, particularly in the EU context where late payments are a major source of financial vulnerability for SMEs. Without mandatory disclosure of concrete indicators—such as average payment periods, the percentage of invoices paid beyond agreed terms, and corrective actions—the information disclosed will remain high-level and insufficient for assessing whether companies are effectively supporting SMEs. In our view, more granular, mandatory datapoints are necessary to ensure accountability and alignment with the CSRD's objectives.			
Survey	Observatorio RSC	NGO	Spain	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Observatorio RSC	NGO	Spain	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Observatorio RSC	NGO	Spain	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Observatorio RSC	NGO	Spain	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Observatorio RSC	NGO	Spain	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Observatorio RSC	NGO	Spain	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Observatorio RSC	NGO	Spain	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Observatorio RSC	NGO	Spain	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Observatorio RSC	NGO	Spain	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Observatorio RSC	NGO	Spain	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Observatorio RSC	NGO	Spain	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Observatorio RSC	NGO	Spain	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	Observatorio RSC	NGO	Spain	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Observatorio RSC	NGO	Spain	35.ESRS1_1.1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Entity-specific disclosures are, by definition, highly contextual and dependent on the judgement of each undertaking. Without a clear methodological framework or implementation guidance, this approach risks leading to fragmented, inconsistent, and non-comparable reporting practices across sectors. Moreover, the absence of sector-specific benchmarks may reduce the ability of stakeholders to assess performance and risks in areas where sectoral impacts are known to be particularly material (e.g. extractives, energy, financial services). In our view, relying on entity-specific disclosures as a substitute for sector-specific standards weakens the overall consistency and decision-usefulness of the ESRS. It is therefore essential that EFRAG provides stronger guidance, methodological support, and minimum disclosure expectations to avoid arbitrary or superficial reporting in this area.	ESRS1	1.1 ESRS standards, reporting areas and entity-specific disclosures	
Survey	Observatorio RSC	NGO	Spain	35.ESRS2_GOV-1.	Do you agree with the amendments of this chapter?	I disagree	The amendments to GOV-1 considerably weaken the governance dimension of the ESRS. By removing from the mandatory core datapoints such as the proportion of independent members and the presence of sustainability expertise at board level, the revised text undermines stakeholders' ability to assess whether boards are genuinely equipped and accountable for overseeing sustainability matters. These are not peripheral details but essential indicators of board quality, independence, and competence. Without such mandatory disclosures, undertakings retain wide discretion to present governance arrangements in purely narrative terms, obscuring whether sustainability oversight is substantive or symbolic. This approach risks creating precisely the type of "tick-box" reporting the CSRD sought to overcome. Simplification cannot justify diluting transparency on the very bodies responsible for strategic direction and accountability. To ensure credibility, GOV-1 must restore mandatory datapoints on independence, sustainability competencies, and internal information flows, otherwise governance reporting under the ESRS will remain superficial and of limited value.	ESRS2	GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	
Survey	Observatorio RSC	NGO	Spain	35.ESRS2_GOV-2.	Do you agree with the amendments of this chapter?	I disagree	The revised GOV-2 maintains the general requirement to disclose the integration of sustainability-related performance into incentive schemes, but the amendments offer little improvement in scope or precision. The absence of mandatory datapoints on the weight of sustainability criteria, their alignment with material impacts, risks and opportunities, and the proportion of variable remuneration linked to these indicators significantly limits the usefulness of the disclosure. Without such specificity, undertakings can report the existence of sustainability-linked incentives without clarifying whether they are marginal, symbolic, or genuinely driving behavioural change. This risks perpetuating a "green bonus" narrative where minimal and poorly defined sustainability KPIs are presented as meaningful integration. To ensure accountability and comparability, GOV-2 should include mandatory disclosure of the percentage of variable remuneration tied to sustainability criteria, the time horizons considered, and the link to material sustainability outcomes. Otherwise, reporting about incentives under GOV-2 will remain superficial and open to misrepresentation.	ESRS2	GOV-2 - Integration of sustainability-related performance in incentive schemes	
Survey	Observatorio RSC	NGO	Spain	35.ESRS2_IRO-1.	Do you agree with the amendments of this chapter?	I disagree	The amendments to IRO-1 significantly weaken the traceability and robustness of the double materiality process. While the requirement to disclose a description of the process is maintained, most datapoints that ensured transparency have been deleted or downgraded. Companies are no longer obliged to provide structured information on the participation of stakeholders, the criteria used for assessing severity, probability and time horizon, or the sources of data and methodologies employed. The mandatory justification of why specific issues were deemed non-material has also been removed. As a result, undertakings may provide only high-level narratives of their DMA, with wide discretion and limited comparability. This undermines the ability of users and assurance providers to evaluate whether materiality assessments are rigorous or superficial. In our view, IRO-1 must go beyond general descriptions and include core mandatory datapoints on stakeholder engagement, assessment criteria, and justifications for exclusions. Without these elements, the risk is that DMA reporting under ESRS degenerates into a declarative exercise, falling short of the CSRD's ambition.	ESRS2	IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Observatorio RSC	NGO	Spain	35.G1-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The revised G1-1 weakens corporate accountability by removing mandatory datapoints on whistleblowing systems, protection of whistleblowers, and fair payment practices. These elements are central to assessing whether business conduct policies are effectively implemented rather than symbolic. The current wording leaves companies with wide discretion to provide high-level narratives without demonstrating concrete mechanisms or safeguards. Such an approach risks reducing comparability and undermining assurance. To meet the objectives of the CSRD, G1-1 should reinstate mandatory disclosures on whistleblowing and supplier payment practices, as they are indispensable indicators of integrity and responsible business conduct.	G1	Disclosure Requirement G1-1 - Policies related to business conduct	
Survey	Observatorio RSC	NGO	Spain	35.G1-3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree		G1	Disclosure Requirement G1-3 - Targets related to business conduct	
Survey	Observatorio RSC	NGO	Spain	35.G1-4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The revised G1-4 introduces greater clarity by requiring disclosure of confirmed corruption incidents and convictions within the reporting year, including related financial amounts. This is a positive step, but the scope remains too narrow. Limiting disclosures to criminal convictions excludes administrative sanctions, disciplinary measures, and actions against suppliers, even though in many jurisdictions corruption cases are resolved outside the criminal courts. In addition, the deletion of datapoints on cases initiated in previous years but with significant developments or impacts in the reporting period weakens transparency. Stakeholders require a full picture of ongoing proceedings and their implications, not only new cases. To ensure accountability and comparability, G1-4 should mandate disclosure of all relevant sanctions and actions, including administrative and supplier-related measures, as well as updates on prior cases that materially affect the current reporting period	G1	Disclosure Requirement G1-4 - Metrics related to Incidents of corruption or bribery	
Survey	Observatorio RSC	NGO	Spain	35.G1-5.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The revised G1-5 makes only minor adjustments and continues to require disclosure of political contributions and lobbying activities. However, the removal of datapoints on registration in transparency registers and the lack of disaggregation of lobbying expenditures significantly weaken the disclosure. Without explicit information on whether undertakings are enrolled in official registers (such as the EU Transparency Register) and without a breakdown of membership fees or indirect lobbying through industry associations, stakeholders are left with partial and potentially misleading information. Lobbying and political influence are highly material areas, directly linked to policy capture and misalignment with sustainability objectives. High-level narrative reporting on "topics and positions" is insufficient. To ensure accountability, G1-5 should include mandatory disclosure of registration status, disaggregated lobbying expenditures, and alignment of association memberships with stated sustainability commitments. Otherwise, the risk of green- or social-washing through lobbying remains significant.	G1	Disclosure Requirement G1-5 - Metrics related to political influence and lobbying activities	
Survey	UGT-ESPAÑA	Trade union	Spain	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Double materiality is essential and must remain at the heart of the ESRS framework and European Union sustainability regime for corporate reporting to be credible and useful. The principle of "materiality of information" is concerning since it introduces a further filter for companies to not report information. For example, it represents a step backwards from ID-177, which says that most S1 metrics must be reported if S1 Own Workforce is material. It is essential to maintain the principle of fair presentation in the reporting standards. It is positive that the revision of the AR 16 list of topics has maintained all of the sub-subtopics for S1 + S2. These are based on the list of social topics in the CSRD and should all be maintained. The emphasis on aggregation (as opposed to disaggregation) is concerning, as disaggregated information (both site-specific and country-specific) is key to understanding the distribution of IROs.			
Survey	UGT-ESPAÑA	Trade union	Spain	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	It is important that companies report not just their net impact – the gross impact should be reported, and the recommended text preserves this principle.			
Survey	UGT-ESPAÑA	Trade union	Spain	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The proposed changes are helpful. However, para 113 is difficult to understand: "113. If the description of the material impacts, risks and opportunities prepared in accordance with [Draft] Amended ESRS 2 IRO-2 is not presented alongside the respective policies, actions and targets, the undertaking shall make explicit which policies, actions and targets relate to which material impacts, risks, or opportunities, in accordance with paragraph 22." Para 22 addresses the issue of appropriate aggregation or disaggregation of information on material impacts, risks and opportunities and their management, without setting any rules regarding the location of such disclosures depending (or not) on the level of aggregation.			

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Survey	UGT-ESPAÑA	Trade union	Spain	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The Exposure Draft removes duplications between the cross-cutting and topical standards. The preservation of the 4-part architecture in the social standards is important to respect the distinctiveness of different affected stakeholder groups. However, we have two critical concerns. First, the original DR in environmental standards concerning screening of sites in materiality assessment were replaced by an application requirement to ESRS 2 IRO-1. This in effect makes transparency on this aspect optional. Consideration of local context is a key element of an appropriate materiality assessment. This should be both recognised in Chapter 3 of ESRS 1, and in ESRS 2 IRO-1, which should include an explicit datapoint on how the undertaking screened its locations and value chains. We welcome that E standards provide a clearer reference on the importance of disaggregation of disclosures, but this can only be done well if locations are properly screened. Second, we strongly recommend adding an explicit reference to the disclosure of relevant, entity-specific metrics directly in S standards. The fact that S2, S3 and S4 do not include any metrics should not imply that entity-specific metrics for S topics should not be disclosed.			
Survey	UGT-ESPAÑA	Trade union	Spain	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The "may" (voluntary) data points should not be eliminated. In many cases they are "shall" in GRI standards, so it is important to keep them to align with GRI standards. Also, many of them were originally proposed as mandatory by EFRAG to the EC. The first wave of reports show that many companies have reported some "may" data points. Retaining them would help ensure standardization/comparability between company reports. Almost all of the datapoints for non-employee workers are voluntary, thus most datapoints for this vulnerable group of workers has been lost. Also, important datapoints on full time versus part time workers has been eliminated.			
Survey	UGT-ESPAÑA	Trade union	Spain	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	It is concerning that mandatory guidance in the Set 1 ESRS has been downgraded to "non-mandatory". Mandatory guidance is key to ensuring comparability and completeness of sustainability reporting. At a minimum, Non-mandatory Implementation Guidance (NMIG) should be included in the Delegated Act, and ideally called Mandatory Implementation Guidance. A major point of concern is that ID-177, which provided guidance that most S1 metrics should be reported if S1 Own Workforce is material, has now been downgraded into NMIG. Instead, EFRAG should preserve and promote the guidance that most S1 metrics shall be reported.			
Survey	UGT-ESPAÑA	Trade union	Spain	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	As a whole the reliefs go too far, overshooting the balance between cost/effort and transparency. There is a danger of enabling green/social washing. The relief for "undue cost or effort" is too vague thus leaving too much room for interpretation. The relief for direct data for value chain reporting is too extensive, as direct data is key for transparency. The relief for reporting on operations which are not "significant drivers of IROs" also opens up too much leeway for interpretation.			
Survey	UGT-ESPAÑA	Trade union	Spain	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	These combined reliefs overshoot the balance between transparency and cost/effort and risk enabling green/social washing. At a minimum, there should be a time limit introduced for these reliefs on value chain metrics.			
Survey	UGT-ESPAÑA	Trade union	Spain	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ability to estimate financial effects is critical for the undertaking's ability to integrate sustainability into its business strategy considerations, planning and risk management. It is also key for the determination of financial materiality, including in terms of overreporting topics as financially material. Reporting on financial effects is crucial to achieving the objective of putting sustainability reporting on the same level as financial reporting and integrating both. The European Union has recognised the value of a double materiality approach to corporate reporting which requires disclosure of both material environmental and social impacts, risks and opportunities as well financially material data, It is important to keep the requirement on businesses to analyse and understand the financial effects of their business model. This will ensure investors have access to credible data as well as providing the underpinning for future business planning.			
Survey	UGT-ESPAÑA	Trade union	Spain	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree				

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Survey	UGT-ESPAÑA	Trade union	Spain	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	ESRS reliefs should not go beyond those set in IFRS. The principle of fair presentation needs to be protected to provide transparency on all material IROs. As noted in the response to question 15, it is also important to consider interoperability with GRI when considering changes to the ESRS, rather than only considering ISSB's standards.			
Survey	UGT-ESPAÑA	Trade union	Spain	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	UGT-ESPAÑA	Trade union	Spain	22.S1	Comments on deleted datapoints in ESRS S1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The reduction in the number of mandatory and voluntary datapoints goes far beyond striking an acceptable balance. As mentioned above, the voluntary datapoints should be maintained to provide alignment with GRI, which is currently in the process of strengthening its labor standards, as well as guidance and standardization for companies reporting more than just the mandatory datapoints. An explicit quantitative goal of 50%+ reductions was never set by the European Commission for EFRAG. A number of S1 datapoint metrics have been eliminated which should be reinstated: •S1-5 Employees: gender breakdown for zero-hour employees •S1-8 Diversity: age distribution; •S1-10 Social protection: reinstatement of retirement •S1-12: Training and development: gender breakdowns, •S1-13 Health and safety: fatalities from ill-health for non-employees and other workers on site; •S1-14 Work-life balance: employees that took family related leave;			
Survey	UGT-ESPAÑA	Trade union	Spain	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Adding a datapoint on training of the procurement team is needed to support the implementation of human rights in the supply chain. The addition of a datapoint on confirmed incidents of bribery is needed to improve transparency on the effectiveness of bribery/corruption policies and measures.			
Survey	UGT-ESPAÑA	Trade union	Spain	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Agree that the following mandatory datapoint should be added: ESRS 2 General disclosures – BP 1 the undertaking shall state that the general requirements of ESRS 1 have been applied for the preparation of its sustainability statement			
Survey	UGT-ESPAÑA	Trade union	Spain	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	The "fair presentation" principle is essential to reduce the risk of green/social washing, as it emphasizes the full disclosure of all material impacts, risks and opportunities and their management. It is not understandable why this principle is under attack, as it is included as one of the general principles of the Accounting Directive.			
Survey	UGT-ESPAÑA	Trade union	Spain	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	It is essential that financial institutions disclose absolute targets to assess how their strategies align with the economy-wide transition to net zero. Absolute targets are relevant for users of sustainability statements and for understanding the real-world climate impact of financed activities. While intensity measures provide insights into efficiency, they can mask rising absolute emissions in growing portfolios or sectors. Granting an exemption would also undermine fairness in a sector-agnostic standard. Other industries could equally argue for exceptions based on their own difficulties, reducing comparability across sectors. Moreover, absolute financed emissions are already recognised in existing standards and regulations: the SBTi financial sector net-zero standard, the UNEP FI/NZBA recommendations, and EU SFDR all require or encourage absolute emissions disclosure. Exempting banks would risk misalignment and reduce the usefulness of reported data for stakeholders, including asset owners who depend on it for their own disclosures.			
Survey	UGT-ESPAÑA	Trade union	Spain	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The "top 10" threshold for reporting country-level data on employment, collective bargaining and social dialogue is a major improvement over the current 10% employment threshold. An analysis of the first sustainability statements from Wave 1 companies shows that the current 10% threshold results in country-level disclosures on as little as 21% of total employees. More country-level information is needed to understand the distribution of impacts across countries, as well as whether employment thresholds for specific labour rights have been exceeded. The new threshold does not require additional effort/cost by companies, since they must gather country-level data anyways to calculate the global figures. Furthermore, it does not result in extra datapoints, since the information currently is (and can be under the revised ESRS) reported as one table.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UGT-ESPAÑA	Trade union	Spain	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	An analysis of the first year ESRS reports shows that most companies are simply reporting that they pay minimum wages, whereas the intention (as outlined in the ESRS Basis for Conclusions) is that companies should be enabled to disclose commitments to paying a wage "sufficient to support themselves and their families in dignity" as well as the extent to which they do this. This shows that the methodology for non-EU countries needs to be changed. Furthermore, the new ILO agreement on a methodology for living wages needs to be taken into account. While the proposed new methodology takes a step forward in both regards, two key changes are needed: •The methodology for reporting on 'adequate wages' should measure actual wages against an adequate/living wage for all employees, not only those within the EU. In particular, for employees outside the EU, the methodology should allow employees' actual wages to be measured: oA) against the local legal minimum wage only when this is set in line with the ILO principles on estimating living wages; or oB) against living wage estimates that are set in line with ILO principles on estimating living wages. •Companies should be able to rely on local legal minimum wages or living wage estimates when the authorities or organisations that set them provide public evidence of their alignment with the ILO principles for estimating living wages. Furthermore, the transitional provision for the EU needs to be reinstated, as not all Member States have transposed the Adequate Minimum Wage Directive.			
Survey	UGT-ESPAÑA	Trade union	Spain	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	The new, simplified framework makes it easier for companies to report on these SFDR-related matters in a way that corresponds to how their policies are set. For users, this consolidation makes it easier to locate the relevant information. However, the SFDR datapoints are very helpful and should only selectively be amended.			
Survey	UGT-ESPAÑA	Trade union	Spain	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	The unadjusted gender pay gap should be kept as mandatory, since the methodology for calculating it is clear. The adjusted pay gap figure as voluntary. In practice many companies are reporting both figures, which is useful for improved transparency. However, since the methodology for calculating the adjusted figure is not standardized, the unadjusted should be kept mandatory.			
Survey	UGT-ESPAÑA	Trade union	Spain	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	As detailed above, cumulative impact of the various reliefs is concerning.			
Survey	UGT-ESPAÑA	Trade union	Spain	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The improved language on DMA is welcomed, including on the engagement with workers' representatives.			
Survey	UGT-ESPAÑA	Trade union	Spain	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The proposed "top 10" threshold for the reporting of country-level information for employee headcount, collective bargaining and social dialogue is a significant improvement over the current 10% employment threshold. Country-level information needs to be reported in more detail, and on other metrics as well, in order to have more transparency on the distribution of impacts across countries. In the metrics, voluntary datapoints need to be reinstated as well as the datapoints on gender breakdowns, workforce age distribution, etc. detailed above need to be reinstated. The proposed new methodology for adequate wages outside of the EU also needs attention, and the transition language for EU member states needs to be reinstated, since the Adequate Minimum Wage Directive has not been implemented in some Member States. We would also like to reiterate our longstanding demand for including franchise workers in the S1 definition of own workers, as well as the need for sector-specific standards to supplement the Set 1 sector-agnostic standards.			
Survey	UGT-ESPAÑA	Trade union	Spain	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We are concerned that the loss of many specific datapoints related to workers in the value chain will mean that disclosures about material impacts, risks and opportunities become more generic and have less information about the specific stakeholder groups because specifications about the level of granularity have been deleted. Many of the points that are being deleted from ESRS S2 had originally been included because they reflected effective practice in relation to improving supply chain labour rights, for example, AR 6 awareness of the impacts on value chain workers from an undertaking's strategy or business model, AR 20 illustrating how the perspectives of value chain workers have informed specific decisions or activities of the undertaking and AR 25 which looks at retaliation and whether workers can use grievance mechanisms confidentially.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UGT-ESPAÑA	Trade union	Spain	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	UGT-ESPAÑA	Trade union	Spain	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	UGT-ESPAÑA	Trade union	Spain	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The definition of own workforce should be expanded to include franchise workers. The term "non-employees" should be supplemented with the phrase "non-employee workers" or "non-employee workers in own workforce".			
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	We welcome the fact that the dual materiality approach has been retained. The materiality of the impacts of a company's own business activities and of the entire value chain should remain decisive for the scope of reporting, as required by the United Nations Guiding Principles on Business and Human Rights (UNGPs).			
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	It is important to address the question of how the avoidance, mitigation, and remediation of impacts should be taken into account in the materiality assessment. We believe that the actual impacts should be taken into account as they occurred during the reporting period. Successful subsequent remediation will then be reflected in the next reporting period. We welcome the clarification that potential impacts that require significant ongoing prevention or mitigation measures should be considered material.			
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We consider the proposed changes to be reasonable.			
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We welcome the elimination of overlaps between cross-cutting and topical standards. However, one aspects that we consider important has fallen by the wayside: The obligation to disclose whether the company plans to implement PAT for material topics and to specify the timetable for doing so,. An identified material topic should also be addressed as a matter of urgency. Simply indicating which material topics are not covered by PAT is not sufficient.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We support simplification, and the proposed amendments largely achieve this. In our view, it would not have been necessary to completely delete the "may disclose" elements. Rather, some could have been retained as useful examples of disclosures, particularly to help first-time preparers understand what type of information is likely to be relevant.			
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Transitional arrangements for new standards are sensible, but the planned reliefs go too far overall. The interpretation and application of these reliefs could easily lead to abuse and open the door to the omission of essential information. This also leads to considerable differences in reporting practices, which undermines the comparability of reports. We consider the combination of undue cost or effort and concessions regarding data quality to be particularly critical. The standards should set explicit requirements and deadlines for companies to improve data coverage and quality.			
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	A time limitation is mandatory for the use of this type of relief.			
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Quantitatively estimating anticipated financial effects is crucial for companies to integrate sustainability into their business strategy, planning, and risk management, as well as for determining financial materiality. Here, too, a time limit is needed for this relief.			
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Reliefs should in no case exceed those specified in IFRS, as IFRS already sees itself as a baseline for ESG reporting. Further relief would also undermine the goal of creating a level playing field for EU companies in a global context.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	The exceptions are reasonable and, in our view, do not represent an additional burden.			
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	The exceptions are reasonable and, in our view, do not represent an additional burden.			
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	We believe that explicitly requiring fair presentation helps companies gain clarity about the discretion they should exercise in applying the standards.			
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	The global carbon budget is defined in absolute terms, which is why absolute targets are also relevant for understanding the actual climate impact of financed activities.			
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The new threshold sets a clear upper limit and should therefore be easy to apply.			
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The proposed change in the calculation method would be discriminatory. It would mean that companies apply lower standards to their employees outside the EU than to those within the EU, as the statutory minimum wage is significantly below the subsistence level almost everywhere. The methodology should measure actual wages against an living wage for all employees, not only those within the EU.			
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	This consolidation should make it easier for users to find the relevant information.			
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Add references to relevant global frameworks, such as SBTN (Measure, Set & Disclose Targets) and TNFD (Sector guidance and guidance on Target Setting).			
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	Unlike the unadjusted gender pay gap, the adjusted gender pay gap is primarily a company-specific figure and provides information on the difference in gross hourly earnings between women and men with comparable characteristics in a given company. Therefore, there should at least be an indication of this.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	Indeed, this deletion could make it less visible how companies work with and support SMEs.			
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Economy for the Common Good (ECOnGOOD)	NGO	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		In principle, we agree with the balance that has been achieved, subject to the comments made above. However, we have particular concerns about the impact of the various reliefs and the lack of a time limit for them.			
Survey	Alliance for Water Stewardship (AWS)	NGO	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree				
Survey	Alliance for Water Stewardship (AWS)	NGO	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Alliance for Water Stewardship (AWS)	NGO	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Alliance for Water Stewardship (AWS)	NGO	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Ensure that transparency and disclosure lead to action and not just a reporting requirement.			
Survey	Alliance for Water Stewardship (AWS)	NGO	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree				
Survey	Alliance for Water Stewardship (AWS)	NGO	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Alliance for Water Stewardship (AWS)	NGO	United Kingdom	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	-Though not specific but financial metrics could be useful from an investor point of view. - mitigation timelines - removal of corrective action			
Survey	Alliance for Water Stewardship (AWS)	NGO	United Kingdom	22.E3.	Comments on deleted datapoints in ESRS E3	I partially agree and partially disagree	- timelines for corrective action/mitigation should be maintained - corrective actions should also be retained (could potentially be any action instead of removing its requirement altogether).			
Survey	Alliance for Water Stewardship (AWS)	NGO	United Kingdom	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Alliance for Water Stewardship (AWS)	NGO	United Kingdom	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	From a Standard System perspective, I see that AWS Standard implementation can be extremely useful for assessment and implementation of ESRS-E3 now. The current revision includes the same outcomes (just spread across ESRS topical standards). Referencing interoperable standards/frameworks like AWS, GRI, IFRS, TNFD, CDP etc. even in the NMIG would help and encourage corporates to use the same information for ESRS. Examples and guidance could also be improved in the AR.			
Survey	Alliance for Water Stewardship (AWS)	NGO	United Kingdom	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		- Value chain context should not be lost, upstream value chain is usually most resource intensive as well as most impacting. - All corrective/mitigation actions should have a time frame limitation. - Reporting without corrective action is useless, use the ESRS implementation as an opportunity to make a difference and encourage best practice. - More guidance and examples could prove useful.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Current issues with materiality assessment: preparers need double materiality assessment steps guidance such as ISO 31000 in enterprise risk management or maybe even combine these too, standard-setters use different terms what is material (GRI, ISSB and ESRS), certainly it shouldn't be ticking boxes, but not using 'comply or explain' method either, which is most flexible of methods and undermines legislative requirements and credibility (source: IFRS FSA study guide). The process's only goal should be to find relevant material and IROs (incl. dependencies) of specific entity.			
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The materiality and impacts, risks, opportunities and dependencies changes over time, such as in enterprise risk management, therefore, it is entity's responsibility to report them accordingly during each reporting period and time horizon. E.g. if entity has done enough to reduce its effects on water drought areas, certainly it would interest both investors (primary users in ISSB) and local stakeholders (GRI). Additionally, once chronic climate risk can change to 'normal' risk with proper actions and even further an opportunity if entity changes its value creation and business model (source: TFCD and IFRS materials on risks and opportunities).			
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	I believe fair presentation and connected information are important additions and enable further co-operative with ISSB standards. The reports should be also relevant and less jargon with less greenwashing. However, I am concerned that GRI standards are sidelined. They are most used standards around the world and if entities need to move away from them, it is possibly creating more cost and reporting burden them. The whole omnibus project might have opposite and unknown effects that politics and cost-cutting lobbyists haven't anticipated.			
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	I think these steps are towards clearer reports. Also, it is probably good that PATs are in one place, and requirements are all 'shall'. However, metrics and targets shouldn't be cut down just for sake of better publicity but make them important part of the transition plan towards sustainability world and Europe. That is what the report should be all about. Useful info for investors (ISSB) and entity part of the larger community (GRI). Putting 'may's in another document, NIMG, and possibly forget them after omnibus project is not benefitting anyone, though. Forward-looking entities might benefit them and gain new customers when going beyond legislative requirements. Again, this would interest also investors (ISSB) and provide value creation potential opportunities (TFCD) and be valued members of larger community (GRI).			
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The mandatory content should be as clear as possible and in plain language. There are still some different terms between standard-setters as everyone has their own terms. E.g. materiality topic, material matter, sub-topic, and when matter is material or is it such risk or opportunity. There are many spoken languages in Europe and comparison between metrics should be easiest as possible which then would enable fairer and open competition. Isn't that what omnibus is based on, right? That would benefit both report creators and users such as data aggregators, digital platforms etc.			
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Indeed, the aim is good to provide additional support and encourage further develop sustainability reports. On the other hand, there is big risk that extra effort won't be seen necessarily, and no one bothers to look these useful extra guides. The whole omnibus project is screaming that we are cutting costs and rather 'comply or explain' flexibility.			

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Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	I think these reliefs jeopardize the process of relevant and fair presentation reports. Providing reliefs on resilience, future financial projects, joint operations and especially on value chain doesn't benefit anyone. Value chain and value creation are key parts of the ISSB standards too. And involve other stakeholders in other parts of the world (GRI). I agree to make reports shorter and clearer, but it can be done by providing relevant disclosures with appropriate metrics and targets. Again, these reliefs are steps from wrong direction and send message to public that it is ok that we pushes back and eventually we don't have to follow the legislation or it will be changed if we just keep lobbying.			
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	The short-, medium-, and long-term time periods are essential in other standards (ISSB and GRI) when concerning materiality of the risks, opportunities, impact and dependencies. Precise and correct data is crucial to follow actions, metrics (eg. SASB) and targets. I don't see that lack of data should be the biggest issue, maybe collecting correct and appropriate data. Even for that there are other options e.g. industry, sector and country databases, which e.g. ISSB references. Additionally, comparing it to competitors helps too. And, we are moving so fast towards better data quality that it should be supported to provide accurate data rather than give relief. Again, forward-looking entities should benefit by taking extra miles and be trend-setters in this area.			
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Alignment with IFRS is good as those standards are targeted for the their primacy users and give info for their needs.			
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	Climate change concerns all the living beings on the planet, thus, satisfying lenders' and investors' needs cannot be enough. The transition plan should cover climate as well as environment, biodiversity and marine. Reference, the Planetary boundaries report 2025. We are too late already and Europe must be front-runner.			
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	All the standards should use each other as an appropriate source and not prefer their own. Saying that, ESRS have legislative standards, and they should set a way in Europe, and world, using the work done by GRI and ISSB to be most current and forward-looking e.g. double materiality. For the future, the co-operation of the ISO and GHG Protocol should be already noted that everyone can prepared themselves for the future GHG standard applicable around the world (hopefully).			
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	For me the most important thing is not the amount of the datapoints, but their relevance. Moreover, they should be comparable, accurate and timely (see principles of the ISSB and GRI). This requires similar metrics and targets with same unit of measurements. Same applies for the SMEs and sectors and industries. I hope EFRAG gets mandate to work on standards for the LSMEs and sectors. The work which first seems now costly pays of later when reports are comparable between each other. Legislative authorities benefit too for the comparative data when developing reporting legislation and future standards such as sector ones.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	I am happy to see that water and biodiversity matters are considered important enough to be moved mandatory.			
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Microplastics is especially important metric and target.			
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	I have just gained FSA certification and fair presentation is discussed in the study material. ISSB standards are based on relevance and fair presentation which make sense. Then again GRI has similar principles. Hopefully, in the future the reports could be implemented according to same principles which all the standards setters could agree. In the end, they are not that different but rather have different wordings. Providing accurate, relevant and honest data should be main goal and benefit any report reader.			
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Finance sector has big part to reducing GHG emission and therefore their transparent and honest metrics and targets are crucial for all of us. Greenwashing is especially concern in the sectors where emissions are high. Additionally, transparency would encourage leadership and stewardship in the finance sector, which then would dripple down to companies as investors would require similar metrics and targets for the potential investing projects and targets.			
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	I think three concerns are real and should be considered carefully.			
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-54) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	I agree, this content should align with SBTN. Generally, the existing frameworks should be used as much as possible to make use of tested best practices, avoid creating new similar framework, and avoiding extra work and costs moving to other framework.			
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	The main goal should be to promote no gender pay gap world and all the actions towards it should be used.			
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	Generally, I am worried about the direction these amendments are taking away from value chain and SMEs recognition. It is not the direction I would take in the globalized world. European Commission promoted earlier a need of the SME standards due to most of the companies in EU are SMEs. However, this new direction is going in the opposite direction as LSME will probably be abandoned too.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Harri Timonen Consulting OU	Consultant (including software vendor)	Estonia	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Earlier I did create Excel table and visualization about datapoints based EFRAG 3 file and appendix. However, it was difficult to get figures match. I noticed the same with various publications by e.g. consulting firms when they were trying to make sense of the DR, AR, MDRs, mays, phasing-offs etc. I hope that in the future there will be clear amounts and figures and they match with different sources. I believe that would create clearer understating of the requirements and cooperativeness of datapoints.			
Survey	Anker Research Institute	NGO	United States	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Anker Research Institute	NGO	United States	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	Anker Research Institute	NGO	United States	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The revised language and hierarchy of benchmarks for adequate wages for non-EU members gives preference to statutory minimum wages and ILO minimum wage setting principles over living wage benchmarks that objectively measure how much workers need to earn to afford a decent standard of living for themselves and their family. This is wrong as minimum wages are set through political and economic compromise and in almost all countries fall below what is needed for workers and their families to live decently. Accepting minimum wage as a benchmark risks legitimising poverty wages and undermines the purpose of wage adequacy standards. Furthermore, since human rights are universal, there should be no distinction between EU and non-EU countries in how adequate wages are defined. ESRS should be grounded in an understanding that in many countries there remains a significant gap between current pay levels and adequate wages and there needs to be a gradual approach to closing this gap to ensure sustainable employment. ESRS should encourage payment of adequate wages while also allowing companies to demonstrate progress towards closing gaps to adequate wages over time. This is important to avoid ESRS requirements driving counterproductive strategies such as outsourcing of production and employment to companies outside the ESRS scope and with lower wage levels. To substantiate claims of wage adequacy, companies should provide robust evidence, including disclosure of the lowest wages paid in each country of operation. All individuals engaged in company operations must be included in scope, including subcontracted and self-employed workers working alongside directly employed workers, as these groups are often at greatest risk of excessively low wages. To support this, the EU should promote the establishment of a global living wage database, developed with technical experts, and require companies to report regularly on progress towards achieving living wages across all operations.			
Survey	Anker Research Institute	NGO	United States	35.S1-9.	Do you agree with the amendments of this chapter?	I disagree		S1	Disclosure Requirement S1-9 - Adequate wages	
Survey	Clean Clothes Campaign	NGO	Netherlands	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	Chapter 3 has been improved. Especially in section 3.1, replacing "significance" to "understandability" of impacts makes for better alignment with both CSRD and international due diligence standards. It improves understanding of how materiality of information interacts with the qualitative characteristics in Chapter 2, and of the aggregation/disaggregation rules. See for instance para 52 on "not obscuring". Section 3.5 "Practical Considerations" is helpful to reduce complexity. However, that being said, there remains too much confusion between "topics" and "impacts, risks and opportunities (IRO)". In Para 22, it is suggested to present information "either at the topical level or at [IRO] level". That is a false choice; where IROs are entity-specific, topics are broad themes. For good reasons, the CSRD and other frameworks such as IFRS, TCFD, TNFD focus on IROs. The broad nature of 'topics' will lead to overly generic disclosure. ESRS should focus clearly on IROs, while explaining that in some context these IROs can be expressed at a general level that can map to topics. The same clarity should be made in para 23 (and para 10 in Chapter 1)			
Survey	Clean Clothes Campaign	NGO	Netherlands	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	It's good that Chapter 3 now describes how prevention, mitigation and remedy factor into materiality, but the guidance could be made simpler. As an example, Para 34 uses highly complex language to illustrate a simple point: entities should assess actual impacts as they occured over the reporting period; any remediation that has occurred ater that does not change the materiality. This should be stated quite concise and clear. We agree with, and want to emphasize, the clarification that potential impacts requiring significant, ongoing prevention and/or mitigation should be assessed on 'gross' basis (meaning, before management effects). Otherwise it makes it difficult for entities to explain how they mange such issues. To help make this workable and practical, it would be good to link this section to the "materiality of information" filters. That can help entities to distinguish what counts as *significant* prevention/mitigation, from routine compliance and common practice. Describing some criteria and examples (like scale, cost, duration, deviation from baseline) would improve consistency.			
Survey	Clean Clothes Campaign	NGO	Netherlands	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The changes are largely meaningful and useful.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Clean Clothes Campaign	NGO	Netherlands	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We find the removal of the duplications between the cross-cutting and topical standards useful. We also support the emphasis on general disclosure requirements. Also, many PAT provisions in the topical standards had a character of examples or guidances rather than datapoints. Additionally, the preservation of the 5-part and 4-part architecture of the environmental and social standards respectively is welcome and important in providing a structure and language for preparers to navigate the issues, communicate internally with colleagues and organise their disclosures with regard to social issues. The architecture should be complete and equivalent across the standards. However, we strongly recommend adding an explicit reference to the disclosure of relevant, entity-specific metrics directly in S standards. The fact that S2, S3 and S4 do not include any metrics and the anticipated sectoral standards which would have provided such metrics will not be adopted, shift the expectations for disclosure of metrics for S topics to entity-specific disclosures. As highlighted by the Danish Institute for Human Rights, a leading National Human Rights Institute on business and human rights and reporting, adding the reference to metrics to disclosure requirements S1-4 on targets would improve consistency between the topical and the cross-cutting standards and acknowledge the common use and disclosure by companies of metrics relevant to their social sustainability impact management and progress.			
Survey	Clean Clothes Campaign	NGO	Netherlands	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	While most of the proposed changes improve clarity, there are still vague terms being used. As also specified further below in response to question 28 on adequate wages, there is a lack of conceptual clarity. EFRAG should specify that an "adequate wage" within the EU should be construed as a "living wage". This would create policy coherence between the CSDDD and CSRD, as the CSDDD includes living wages in its annex as a protected right. And now that an agreement on a living wage framework has been explicitly adopted and endorsed by ILO since March 2024, undefined terms like "adequate" or "fair" wages should be replaced with the standardized "living wage".			
Survey	Clean Clothes Campaign	NGO	Netherlands	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	There is a risk that these new reliefs could dilute core disclosures without a path to full compliance. Paragraph 92 — "undue cost or effort" - is too broad. It has no requirement for progressive improvement or a deadline, and it can be applied not only to entity-specific metrics but also to ESRS-mandated own-operations data (for example workforce KPIs, pollution, water consumption, impacts in biodiversity-sensitive areas). That risks hollowing out decision-useful metrics. Recommendations: 1) Limit the relief to genuinely entity-specific metrics. 2) Require a timeline-based plan to build data systems, plus annual progress reporting and 3) For own-operations metrics, allow only exceptional, short, time-bound relief with clear justification. Paragraph 93 — joint operations without operational control – includes an indefinite, unconditional exemption which is not justified. In many cases, companies can secure data over time via financial control, contractual rights, governance leverage, or supply-chain clauses. Recommendations: 1) Replace the blanket exemption with a "best efforts + timeline" obligation. 2) Require proportionate estimates and a clear deadline for collecting primary data.			
Survey	Clean Clothes Campaign	NGO	Netherlands	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	Especially when reliefs can be combined, there is a concrete risk of abuse and omission of material data disclosure. Instead, the combined reliefs should clearly require the undertaking to improve the coverage and quality of the data over time, rather than just an unlimited relief. For the metrics concerning own operations and/or metrics standardized directly in the ESRS, this should be subject to clear time limits. For other metrics, improvements over the years should be also explicitly required, subject to undue cost and effort relief.			
Survey	Clean Clothes Campaign	NGO	Netherlands	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	While Option 1 is still extensive and lacks a time limitation, it is still better than Option 2. It is not justifiable to go beyond the IFRS relief. It's essential for building up a global baseline that ESRS should be aligned with IFRS unless there is specific EU legislation that requires *more* information. We should never go in the direction of *less* information, in order to provide EU companies a level playing field.			
Survey	Clean Clothes Campaign	NGO	Netherlands	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Clean Clothes Campaign	NGO	Netherlands	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Interoperability is good, while noting that overall Reliefs should definitely not go beyond those set in IFRS.			
Survey	Clean Clothes Campaign	NGO	Netherlands	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Clean Clothes Campaign	NGO	Netherlands	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	The number of datapoints in each standard represent the minimum necessary to ensure cohesive disclosure requirements. They are reasonable, seen as common practice, and are internationally recognised in reporting standards and frameworks like IFRS, GRI, or TNFD. In most cases, the ESRS datapoints are generally more concise and less demanding. Therefore, reducing them further would bring no benefit and in fact introduce extra paperwork for entities reporting under multiple frameworks. Disclosure of this minimum level of E, S and G metrics is absolutely necessary to fulfill the objectives of the EU Green Deal and other EU policies.			
Survey	Clean Clothes Campaign	NGO	Netherlands	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree with these changes, noting that the suggested changes do not add a new burden. We particularly agree with the ESRS G1 on business conduct on training of procurement teams and confirmed incidents being included as "shall" points. Whether or not these individual datapoints are to be disclosed is correctly subject to materiality of the information filter applied by the undertaking.			
Survey	Clean Clothes Campaign	NGO	Netherlands	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree with these changes, noting that the suggested changes do not add a new burden.			
Survey	Clean Clothes Campaign	NGO	Netherlands	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	ESRS was already subject to a fair presentation regime, given that it is based on the materiality principle, on the CSRD requirement to disclose impacts, risks and opportunities and their management, and the general principles of the Accounting Directive. Making it explicit is useful. It makes clear that preparers must exercise informed judgment and discretion, while applying appropriate safeguards against bias, omission, or cherry-picking.			
Survey	Clean Clothes Campaign	NGO	Netherlands	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	While recalculating absolute values may be complex, there is the undeniable fact that the global carbon budget has absolute limits. Intensity measures can give insight into efficiency, but they can also obfuscate real rising absolute emissions in growing portfolios and sectors. To be effective, both types of measurements are needed. And estimation difficulties are not unique to the financial sector. We see no base to explicitly exclude this sector.			
Survey	Clean Clothes Campaign	NGO	Netherlands	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The new threshold is simpler and clearer, and therefore easier to apply. It also sets a clear cap.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Clean Clothes Campaign	NGO	Netherlands	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The proposed change is discriminatory. It also adds unnecessary burden onto companies. A living wage is a human right. In its position on living wages, adopted in 2024, the ILO recognizes this, as do EU policy and law. In practice, legal minimum wages today fall far below a living wage in most countries of the world. Under S1-9, the methodology requires companies to compare actual wages to an "adequate wage" standard for their employees in the EU, but directing them to compare with legal minimum wages for their employees outside the EU if those minimum wages are agreed in line with the ILO's wage-setting principles – which are not relevant to the estimation of living wages. Only if there is no legal minimum wage in locations outside the EU should they apply an ILO-compliant living wage benchmark. This has major faults: a. It undermines the objective of measuring 'adequate wages', as the legal minimum wage is often utterly insufficient. b. It is discriminatory. The disclosure would apply a lower standard to employees outside of the EU than those inside. c. It is complex for companies, they generally lack the capacity to make living wage assessments across jurisdictions and may arrive at varying conclusions. d. It undermines comparability of reports. We propose the following changes: 1. The methodology should measure actual wages against a living wage for *all* employees, not only those within the EU. It should use the ILO framework, and refer to 'living wage'. 2. Companies should be able to rely on local living wage estimates when the authorities or organisations that set them provide public evidence of alignment with the ILO principles on living wages.			
Survey	Clean Clothes Campaign	NGO	Netherlands	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	The new, simplified framework is better for preparers and helpful for users.			
Survey	Clean Clothes Campaign	NGO	Netherlands	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Measurable targets related to biodiversity and ecosystems shall be set and disclosed according to the guidance and examples given by relevant global frameworks, such as SBTN (Step 3 - Measure, Set & Disclose Targets), TNFD (component P1 and P2 & Annex 5, sector guidance and guidance on Target Setting) & resources by World Economic Forum Nature-Positive Transitions.			
Survey	Clean Clothes Campaign	NGO	Netherlands	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	We propose not to include such a datapoint. It is better to provide a paragraph in the application requirements that explains that the adjusted pay gap is primarily an *entity-specific* disclosure. It is particularly relevant for complex companies to better understand where and how the pay gap manifests, and what are the specific drivers of it. There is no one 'standardizable' way to adjust the pay gap calculation. Therefore, including a datapoint - whether mandatory or voluntary - on adjusted pay gap in the standards is problematic, because it is impossible to provide a standardized methodology. On the other hand, for many companies' information on adjusted pay gap is likely to be material, and therefore such information should be provided.			
Survey	Clean Clothes Campaign	NGO	Netherlands	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	The new drafts removed the data point on invoice payment times, which is useful for assessing the protection of SMEs from unfair payment practices. In contrast, the retained metric—"number of legal proceedings for late payments"— is of limited relevance, as such proceedings are rare, particularly in the case of vulnerable suppliers.			
Survey	Clean Clothes Campaign	NGO	Netherlands	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We are concerned about the combined effect of various reliefs, and about unclarity due to the confusing explanation of the relationship between impacts, risks and opportunities on one hand, and sustainability topics on the other.			
Survey	Clean Clothes Campaign	NGO	Netherlands	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We disagree with the downgrading of the transparency on site/assets/activities screening from the level of datapoints in the E standards to an Application Requirement in ESRS 2.			
Survey	Clean Clothes Campaign	NGO	Netherlands	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We do not think that the streamlining of the E1-1 Transition Plan for Climate Change Mitigation added value. If anything, more rather than less details and clarifications are needed. The glossary could retain the definition of net zero targets and related criteria, as use and reporting of such targets is a common practice.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Clean Clothes Campaign	NGO	Netherlands	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We welcome the changes made, including the clarification and minor additions to the datapoints in the metrics section. They provide for greater clarity and do not add further reporting burden.			
Survey	Clean Clothes Campaign	NGO	Netherlands	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We welcome the changes made, including the clarification and minor additions to the datapoints in the metrics section. They provide for greater clarity and do not add further reporting burden.			
Survey	Clean Clothes Campaign	NGO	Netherlands	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Given the current state of art in this area, it would be helpful to include more guidance on how to set metrics and how to use the other reporting frameworks and standards such as the TCFD.			
Survey	Clean Clothes Campaign	NGO	Netherlands	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We welcome the changes made, including the clarification and minor additions to the datapoints in the metrics section. They provide for greater clarity and do not add further reporting burden.			
Survey	Clean Clothes Campaign	NGO	Netherlands	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We strongly object to the newly suggested methodology for 'adequate' wages outside of the EEA. It would lead to misleading disclosures and add burden for companies, and fails to use proper ILO defined terminology like "living wage".			
Survey	Clean Clothes Campaign	NGO	Netherlands	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We would recommend adding an explicit reference to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, being the standards that lack any metrics.			
Survey	Clean Clothes Campaign	NGO	Netherlands	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We would recommend adding an explicit reference to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, being the standards that lack any metrics.			
Survey	Clean Clothes Campaign	NGO	Netherlands	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We would recommend adding an explicit reference to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, being the standards that lack any metrics.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Clean Clothes Campaign	NGO	Netherlands	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We particularly welcome the streamlining and alignment of the structure of this standard with the remainder of the standards.			
Survey	Clean Clothes Campaign	NGO	Netherlands	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	References to vague wording like "adequate" or "fair" wages should be removed, and replaced with the ILO 2024 adopted terminology of "living wages".			
Survey	ANIMONDIAL	Consultant (including software vendor)	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We welcome TNFD's proposal1 to consolidate the current nature-related standards (E2-E5) into a single, integrated nature standard and to (i) ensure a structured materiality assessment for nature-related issues; (ii) elevate reference to 'dependencies' on nature; and (iii) streamline and prioritize the number of quantitative nature-related data points. We call on EFRAG to make note of it and apply as possible.			
Survey	ANIMONDIAL	Consultant (including software vendor)	United Kingdom	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E4	We do not support the removal of the ESRS E4 biodiversity and ecosystems metrics metric specifications from the mandatory requirements. This is problematic because standardization is more limited at present than with other metrics. Specifying metrics (now in Non-Mandatory Illustrative Guidance (NMIG) 18-20) within the Standard would give companies the information they need to select and report practical, credible and comparable metrics and would support alignment with the TNFD disclosure metrics. If this does not occur, at the very least, it is important that (i) the NMIG stays attached to the Standard in some form and (i) a process is in place for ensuring updates are made on a timely basis, particularly for guidance on topics where data/tools for reporting are evolving rapidly.			
Survey	ANIMONDIAL	Consultant (including software vendor)	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We support the simplified standards aligning with core elements of TNFD and encourage EFRAG to continue striving to maintain alignment with other international standards and frameworks, including ISSB and GRI. Improving the interoperability between the requirements in ESRS and the ISSB Standards, to enable companies to use the ISSB Standards as a starting point and 'top up' with specific impact disclosures to achieve compliance with the CSRD/ESRS, is important. We would disagree with the removal of these fundamental requirements.			
Survey	ANIMONDIAL	Consultant (including software vendor)	United Kingdom	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We welcome the ESRS being simplified in a way that maintains the double materiality approach of the Corporate Sustainability Reporting Directive (CSRD), covering environmental, social and governance topics. This principle of double materiality is vitally important for the reported information to be meaningful for users. It is also essential for the EU to respect its international engagement under the UN CBD Global Biodiversity Framework Target 15.			
Survey	ANIMONDIAL	Consultant (including software vendor)	United Kingdom	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We welcome the simplification effort mainly targeting unclear or duplicative requirements, maintaining essential disclosures on environmental metrics and ask EFRAG to maintain that approach in the simplification process. It is imperative that businesses undertake the double materiality assessment and implement biodiversity loss or impact mitigation measures. We also welcome alignment with the draft global consensus metrics on the state of nature, convened by the Nature Positive Initiative. This is important for ensuring metrics are credible, practical and aligned for companies.			
Survey	ANIMONDIAL	Consultant (including software vendor)	United Kingdom	35.E4-5.	Do you agree with the amendments of this chapter?	I disagree	The option to report metrics only for locations relevant to existing sustainability targets should be removed or made additional. In order to align with the double materiality concept in ESRS 1 and throughout the standards, metrics should be reported for locations that are material for biodiversity and ecosystems.	E4	Disclosure Requirement E4-5 - Metrics related to biodiversity and ecosystems change	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	It is still not suitable for private banking / retail clients and consultants			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	Better metrics are necessary			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I disagree	Better metrics are necessary PAIs should be used			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I disagree	Better metrics are necessary PAIs should be used			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I disagree	Better metrics are necessary PAIs should be used			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	Better metrics are necessary PAIs should be used			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	We need information about data quality, sources, and assumptions			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	Same metrics should be used, like PAIs			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	All PAI metrics are needed as they are required under SFDR			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	22.E1.	Comments on deleted datapoints in ESRS E1	I disagree	All PAI metrics are needed as they are required under SFDR			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	22.E2.	Comments on deleted datapoints in ESRS E2	I disagree	All PAI metrics are needed as they are required under SFDR			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	22.E3.	Comments on deleted datapoints in ESRS E3	I disagree	All PAI metrics are needed as they are required under SFDR			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	22.E4.	Comments on deleted datapoints in ESRS E4	I disagree	All PAI metrics are needed as they are required under SFDR			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	22.E5.	Comments on deleted datapoints in ESRS E5	I disagree	All PAI metrics are needed as they are required under SFDR			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	22.S1	Comments on deleted datapoints in ESRS S1	I disagree	All PAI metrics are needed as they are required under SFDR			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	22.S2	Comments on deleted datapoints in ESRS S2	I disagree	All PAI metrics are needed as they are required under SFDR			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	22.S3	Comments on deleted datapoints in ESRS S3	I disagree	All PAI metrics are needed as they are required under SFDR			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	22.S4	Comments on deleted datapoints in ESRS S4	I disagree	All PAI metrics are needed as they are required under SFDR			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	22.G1	Comments on deleted datapoints in ESRS G1	I disagree	All PAI metrics are needed as they are required under SFDR			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	They are not fitting to SFDR requirements (like PAIs)			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	Not fitting to SFDR requirements (like PAIs)			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	I need absolute numbers to compare developments over time, regardless of inflation and other factors.			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	Not clear enough			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	Full implementation of SFDR (PAIs) is necessary			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	We need better metrics			
Survey	ESG Portfolio Management	User (analyst, data provider, rating agency, etc.)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	We agree that the proposed amendments to text on DMA have improved clarity and accessibility on DMA. In particular, the new section on practical considerations and the option of conducting a top-down DMA is welcomed and will help to improve simplification in particular for undertakings which are yet to conduct a DMA. Clarification on relationship between IROs and ESRS topics and sub-topics will work to remove unnecessary confusion, we had experienced with the previous guidance different interpretations from assurance service providers.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	The 'may disclose' data points were a source of confusion, so it is helpful that these have been removed and further clarification has been brought in to distinguish mandatory from non-mandatory data points.			
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The information in the NMIG document is helpful to enable clarity and consistency in reporting. It is agreed that this should be a non-binding and supporting document, similar to the previously published EFRAG Q&As. It would be most useful if all non-binding yet official implementation guidance was gathered in one document. Generally, the provision of more examples, definitions, and recommended methodologies would enable improved consistency in reporting. For example, this is lacking on metrics such as recycled content/secondary materials.			
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Agree with option 1 but with full alignment with IFRS, do not support a divergence from IFRS on this topic as this does not support interoperability.			
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	VELUX Group	Preparer (non-financial preparing a sustainability report)	Denmark	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		•We welcome the approach to make the standards more simple, user friendly, and aligned with existing standards. •We support the intention to retain the ambition of the standards to enable transparency and benchmarking. •Therefore, we see the need not for regulation to be reduced, but to be improved, by designing it in a way that is more practical to be operationalized by businesses. •This can be achieved with clear communication, guidance, and defined standards and definitions.			
Survey	Reporting and Economic Analysis Committee of the Scientific Council The Accountants Association of in Poland (SKwP)	Auditor	Poland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	AK: The DMA essentially determines the scope of matters that will be disclosed in the sustainability report, thereby deciding what stakeholders will (or will not) learn about the undertaking. The professionalism associated with the DMA process is therefore of primary importance. Despite the assurance provided by the assurance of sustainability statements, this assessment may still be exposed to the risk of ethical principles being misused in reporting practice. With regard to the proposed amendments to the DMA principle: 1.It is appropriate to emphasise the need to focus on the information and decision-making needs of stakeholder groups in gremium, rather than those of individual representatives, thereby lending the reporting information greater objectivity. 2.The guidance on potential sources of information to be used by undertakings when performing the materiality assessment is valuable. 3.It is important to stress the expectation (given possible volatility) that undertakings should update the conclusions of the materiality assessment from previous reporting periods, thereby assuring stakeholders of the timeliness of the disclosures. 4.The simplification of the wording of many paragraphs is to be welcomed, as it makes the legal text in this difficult area more precise and comprehensible. 5.The introduction of new provisions in section 3.5 (Practical considerations…) is valuable for reporting practice, as it clarifies the necessary steps in performing and documenting the materiality assessment. OM: To fully streamline the DMA process, it seems reasonable to introduce a standardized list of risks, impacts, and opportunities that may potentially occur in enterprises. This list should include typical events, allowing for their selection during the assessment, while retaining the ability to add elements unique to a given organization, both from a financial materiality and impact materiality perspective. Using such a list would significantly increase the comparability of results across enterprises (terminology problem, different phenomena classification).			
Survey	Reporting and Economic Analysis Committee of the Scientific Council The Accountants Association of in Poland (SKwP)	Auditor	Poland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	OM: The current guidelines remain relatively general, albeit somewhat clearer owing to the distinction between actual and potential impacts. However, in order to genuinely simplify the reporting process, a catalogue of sample events or impacts from which companies could select would be required. Such a solution would facilitate the identification of material issues and could contribute to a broader scope of disclosure. AN: Taken together, these considerations suggest that although the new guidance provides welcome clarifications, its practical value will depend on stronger standardisation and simplification. Introducing illustrative catalogues and ensuring terminological consistency would significantly enhance comparability across undertakings and increase the usefulness of the DMA framework for both preparers and stakeholders. AK: With regard to the proposed amendments to the DMA principle, we consider that: 1.The removal of the distinction between remedial, preventive and corrective measures is appropriate, since these are essentially synonymous concepts, all referring to actions designed to avoid (through mitigation or prevention) undesirable situations. Instead of this threefold terminology, the consistent use of the term "mitigation or prevention actions" is recommended. Furthermore, it would be advisable to reconsider the rationale for introducing additional terms such as "remediation, mitigation and prevention policies and actions" (see para. 3.3.1 p. AR 9 for para. 31), with a view to ensuring terminological consistency across the document. 2.Paragraph 3.3.1 p. 34 should be simplified, as its current formulation is convoluted and may lead to misunderstandings about what and how continuity in reporting is to be ensured for a given year. 3.AR 12 for paras. 34/35 (Assessing actual and potential impacts for materiality) is redundant and unnecessary, as it is overly general.			
Survey	Reporting and Economic Analysis Committee of the Scientific Council The Accountants Association of in Poland (SKwP)	Auditor	Poland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Reporting and Economic Analysis Committee of the Scientific Council The Accountants Association of in Poland (SKwP)	Auditor	Poland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	OM: Overall, I raise no objections to Chapter 9. Nevertheless, enterprises will continue to prepare statements, declarations or reports covering various environmental and social aspects for different institutions, while the ESRS standard allows their presentation within the sustainability report (para. 8.2, point 107). This, however, results in environmental and social reporting still being duplicated in many respects. My main recommendation is therefore the creation of a single, standardised report from which the respective institutions could obtain the necessary information. At present, the situation is reversed – enterprises are obliged to provide the same data repeatedly to different bodies.			
Survey	Reporting and Economic Analysis Committee of the Scientific Council The Accountants Association of in Poland (SKwP)	Auditor	Poland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Reporting and Economic Analysis Committee of the Scientific Council The Accountants Association of in Poland (SKwP)	Auditor	Poland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	KKP: Reducing the number of required data points and disclosures.			
Survey	Reporting and Economic Analysis Committee of the Scientific Council The Accountants Association of in Poland (SKwP)	Auditor	Poland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	KKP: Reaching all suppliers is challenging, almost impossible. It may be better to wait for the introduction of new, simplified ESRS and the stabilization of regulations before imposing obligations regarding information collection across the value chain. KKP: The complexity of the ESRS themselves, along with numerous references to other EU documents/regulations and guidelines, makes the ESRS difficult to read and interpret. KKP: Availability of all documents in Polish – Some documents and regulations concerning sustainability reporting are published only in English, which makes navigating the documentation quickly difficult. Relying on individual translations also carries a risk of misinterpretation.			
Survey	Reporting and Economic Analysis Committee of the Scientific Council The Accountants Association of in Poland (SKwP)	Auditor	Poland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	WS: This relief is consistent with the principle of ensuring the rationality of the reporting process. The presentation of a given scope of information should take into account, in addition to the adopted principles (such as double materiality and data quality), the cost of obtaining that information. This aspect is not sufficiently emphasised in the standards developed so far, nor in the assumptions underlying the consultations, where the priority has been to reduce administrative burdens and to ensure high-quality sustainability reporting. Yet, as past experience shows, this is associated with significant costs borne by enterprises. AN: We consider the relief in ESRS 1 paragraph 92 to be acceptable, but also very important for ensuring a workable balance between flexibility and the avoidance of information loss. In practice, its usefulness will depend on strict transparency: undertakings should clearly disclose the scope limitations of their calculations and outline actions to improve coverage in future periods.			
Survey	Reporting and Economic Analysis Committee of the Scientific Council The Accountants Association of in Poland (SKwP)	Auditor	Poland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2				
Survey	Reporting and Economic Analysis Committee of the Scientific Council The Accountants Association of in Poland (SKwP)	Auditor	Poland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	KKP: We observe that many implementation challenges result from the accelerated development of the ESRS, which were not field-tested in advance. The first reporting cycle therefore serves as their initial test. In our opinion the key challenges include: •overly detailed standards that obscure material information and overload reports, •limited comparability of disclosures, even within the same sector, •uneven maturity across ESG topics (e.g., higher quality in ESRS E1 reporting than in other environmental standards), •complexity of double materiality assessments, •difficulties in addressing value chain considerations. The complexity of ESG reporting compels many companies to seek the support of specialized service providers which can be extremely costly. For those companies that cannot afford such services, numerous problems arise during the assessment process. Auditors requested a large volume of information that exceeded the capacity of entities to prepare, particularly in the first year of ESG reporting. It can be argued that the ESG reporting obligation has created a new and very costly market for ESG advisory services, which nevertheless does not guarantee a smooth assurance process for the ESG report. OM: I believe that estimating the impact of individual risks and opportunities over the medium and long term provides rather unreliable information in today's dynamic environment.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Reporting and Economic Analysis Committee of the Scientific Council The Accountants Association of in Poland (SKwP)	Auditor	Poland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	KKP: Disclosure requirements related to sustainability should be applied with the aim of communicating information to users rather than merely fulfilling a compliance exercise. Service providers, however, tend to focus predominantly on compliance (particularly in the context of the DMA process). Consequently, the language used is often highly technical and difficult for an "ordinary" user to understand. KKP: It should be noted that in 2012 EFRAG published a discussion paper "Towards a Disclosure Framework for the Notes", which emphasized that "Disclosures should be clear, balanced, concise and written in plain language." The key observation was that "Disclosures are often written or presented in a style that makes them difficult to read and understand. Therefore, they fail to provide an adequate explanation of the subject matter" (EFRAG, 2012, p. 17). KKP: Future obligation for XBRL tagging – This should be implemented only after market practices for non-financial reporting have been established.			
Survey	Reporting and Economic Analysis Committee of the Scientific Council The Accountants Association of in Poland (SKwP)	Auditor	Poland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Reporting and Economic Analysis Committee of the Scientific Council The Accountants Association of in Poland (SKwP)	Auditor	Poland	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	We observe that many implementation challenges result from the accelerated development of the ESRS, which were not field-tested in advance. The first reporting cycle therefore serves as their initial test. In our opinion the key challenges include: •overly detailed standards that obscure material information and overload reports, •limited comparability of disclosures, even within the same sector, •uneven maturity across ESG topics (e.g., higher quality in ESRS E1 reporting than in other environmental standards), •complexity of double materiality assessments, •difficulties in addressing value chain considerations. The complexity of ESG reporting compels many companies to seek the support of specialized service providers which can be extremely costly. For those companies that cannot afford such services, numerous problems arise during the assessment process. Auditors requested a large volume of information that exceeded the capacity of entities to prepare, particularly in the first year of ESG reporting. It can be argued that the ESG reporting obligation has created a new and very costly market for ESG advisory services, which nevertheless does not guarantee a smooth assurance process for the ESG report.			
Survey	Reporting and Economic Analysis Committee of the Scientific Council The Accountants Association of in Poland (SKwP)	Auditor	Poland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	WS: This relief is consistent with the principle of ensuring the rationality of the reporting process. The presentation of a given scope of information should take into account, in addition to the adopted principles (such as double materiality and data quality), the cost of obtaining that information. This aspect is not sufficiently emphasised in the standards developed so far, nor in the assumptions underlying the consultations, where the priority has been to reduce administrative burdens and to ensure high-quality sustainability reporting. Yet, as past experience shows, this is associated with significant costs borne by enterprises.			
Survey	Reporting and Economic Analysis Committee of the Scientific Council The Accountants Association of in Poland (SKwP)	Auditor	Poland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	KKP: Availability of all documents in Polish – Some documents and regulations concerning sustainability reporting are published only in English, which makes navigating the documentation quickly difficult. Relying on individual translations also carries a risk of misinterpretation.			
Survey	Reporting and Economic Analysis Committee of the Scientific Council The Accountants Association of in Poland (SKwP)	Auditor	Poland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	PM: We agree with some EFRAG SRG members who believe that a fair presentation requirement is not a simplification. Fair presentation requires entities to dedicate significant time and effort to comprehensively assess the situation, particularly in terms of double materiality. Introducing this requirement would leave entities in considerable uncertainty regarding the scope and content of their reports. We also confirm that it could significantly increase audit costs and legal risks. PM: In financial reporting, it took many years to develop the definition of fair presentation and give it practical meaning. While the concept is generally desirable for any type of reporting and communication of information about an entity, its implementation requires time, and above all, broad and lengthy discussion. Sustainability reporting does not have as long a history as financial reporting. Many terms and requirements, although formally defined, lead to ambiguity and controversy in practice, often resulting in divergent interpretations and incomparable information. Sustainability reporting should be kept as a structural framework that gradually fills up with clarifications of the meaning of minor practical issues. We consider the imposition of a fair presentation requirement to be premature at this stage. This would require the development of specific regulations rather than the copying of principles. PM: It is also important to mention that the concurrent process of changes in taxonomy regulations includes a proposal to explicitly define the materiality (cut-off) threshold for reported revenues and expenses in KPIs. Setting the threshold at 10% would clearly simplify reporting, although it is debatable whether this threshold meets the fair presentation requirement. In practice, it may also conflict with the general requirement of fair presentation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Reporting and Economic Analysis Committee of the Scientific Council The Accountants Association of in Poland (SKwP)	Auditor	Poland	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		AK: We acknowledge that the rationale behind the effort to introduce the "Omnibus" initiative, as well as the ambition to develop reasonable simplifications in the standards governing the structure of sustainability reporting, is fully justified. Achieving consensus on the scope of such simplifications is essential both from a cost perspective (for the undertaking as the preparer of the report) and from a usability perspective (for its stakeholders). We therefore wish to emphasise our appreciation of the ongoing work and consultations, as these reflect the commitment (of both legislators and various advisory and consultative bodies) to eliminating redundant reporting practices that add no value to either stakeholders or the reporting entity itself. Nevertheless, we expect that the ultimate usefulness of the proposed simplifications will be confirmed through a proper cost–benefit analysis, which EFRAG has undertaken. In this context, the leading issue concerns the proposed amendments relating to the double materiality assessment (DMA) and its documentation. This assessment is inherently linked to the unavoidable subjectivity of the choices made, the procedures adopted to evaluate significance, and the parameters and issues that may or may not fall within the reporting obligation, depending on whether their attributes are deemed material. AN: In order to reduce this subjectivity and ensure greater comparability across undertakings, there is a pressing need for further standardisation of the criteria, procedures and documentation of the DMA process. Clearer and more harmonised guidance would not only increase the credibility of disclosures but also strengthen stakeholders' confidence in the reliability of sustainability reports. KKP: Future obligation for XBRL tagging – This should be implemented only after market practices for non-financial reporting have been established. Prepared by: AK: Prof. Anna Karmańska WS: Prof. Wanda Skoczylas AN: Prof. Andrzej Niemiec KKP: dr Katarzyna Kobiela-Pionnier OM: dr Olga Martyniuk PM: Przemysław Mućko			
Survey	The Future of Sustainable Data Alliance (FoSDA)	User (analyst, data provider, rating agency, etc.)	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	With respect to materiality, it is positive that the ESRS are now put forward as a fair presentation framework based on relevance and faithful representation, rather than being perceived as more compliance-driven. The changes should help companies to report sustainability information in a way that is most tailored to their business model and that will be decision-useful to their own operations as well as to capital providers and other stakeholders. We also welcome the move to make the ISSB sectoral standards permanently available as a tool for meeting ESRS requirements. While commending EFRAG on successfully balancing a wide set of aims and ambitions, there are some aspects of the draft standards that we question. Companies' materiality assessment disclosures remain mandatory, but this position is weakened by making it voluntary for them to explain why a topic is or is not material. It is quite possible that different companies in the same sector may have different views on the materiality of data points leading to the creation of data gaps or the use of a mixed set of direct data and estimates. To safeguard consistency and sector-level comparability, further guidance is needed, including practical examples and clear prescriptions to help build capacity among companies.			
Survey	The Future of Sustainable Data Alliance (FoSDA)	User (analyst, data provider, rating agency, etc.)	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Another area that may adversely impact interoperability is the option for gross or net reporting on material impacts. Under the ISSB standards, companies may not net off the effect of past mitigation measures, but they can do so under the proposed revisions to the ESRS. The common use of a gross basis across standards frameworks would be less likely to confuse investors and would protect the interoperability between the two key global baselines for disclosures.			
Survey	The Future of Sustainable Data Alliance (FoSDA)	User (analyst, data provider, rating agency, etc.)	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We propose a more limited application of reliefs and, in addition, the possibility for companies claiming a relief to report on whether the datapoint is regarded as material or not. Further, EFRAG might usefully consider a time limit on the use of reliefs in relation to some key metrics. The use of reliefs is an area that also adversely affects the interoperability between the ISSB standards and the ESRS. Under the ESRS, companies can claim the relief for 'undue cost or effort' across the entirety of the standards, whereas they can only do it in limited circumstances under the ISSB standards. This may erode the comparability and completeness of sustainable data.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	The Future of Sustainable Data Alliance (FoSDA)	User (analyst, data provider, rating agency, etc.)	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	With respect to the relief to allow companies to report based on a partial scope of calculation due to the lack of quality data, we share the view of some EFRAG SRB members that this relief should be time limited. Relying on partial data may lead to inconsistent methodologies and diluted accountability, undermining ESRS' principles of verifiability and representational faithfulness.			
Survey	The Future of Sustainable Data Alliance (FoSDA)	User (analyst, data provider, rating agency, etc.)	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The treatment of Anticipated Financial Effects is another area where there is the potential for a dangerous distinction between the ISSB standards and the ESRS. Like a company applying ISSB Standards, a company applying current ESRS is required to provide qualitative and quantitative information about the effects of climate (and other sustainability-related risks and opportunities) on its financial position, financial performance and cash flows. EFRAG proposes two potential future approaches. Under option one, companies would need to provide quantitative information about anticipated financial effects subject to proportionality mechanisms similar to those available to companies applying the ISSB standards. Option two would not require companies to provide quantitative information about anticipated financial effects. As noted by the ISSB's Jenny Bofinger-Schuster : 'If the disclosure of all quantitative information about anticipated financial effects is made optional in ESRS, comparable investor-relevant information will be unavailable when ESRS are applied and companies would need to perform additional work to comply with both ISSB Standards and ESRS'. With respect to anticipated financial effects, option one would enhance interoperability. Option two would damage it. We support Option one.			
Survey	The Future of Sustainable Data Alliance (FoSDA)	User (analyst, data provider, rating agency, etc.)	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	With respect to interoperability, we note that convergence among global reporting standards is key for delivering consistent sustainability-related financial information. In order to fully understand how the baseline is being addressed within ESRS, we suggest that following the consultation, EFRAG should work with other standard setters to prepare a mapping that clearly identifies which requirements under ESRS can be considered equivalent to those under ISSB and other key frameworks. In addition, we emphasize the need for the early availability of a digital tagging taxonomy for ESRS statements that is interoperable with the ISSB equivalent to enable comparability, accuracy and machine-readability of the data that undergoes digital extraction. The availability of standardized, XBRL reports will help investors and other users to extract the information that they need from statements. A challenge to interoperability arises in relation to GHG emissions. The proposed standards amend the emissions boundaries to align more closely to the GHG Protocol but would require the use of the financial control approach (unless that prevented fair presentation). The ISSB standards and the GHG Protocol allow the use of either the financial or operational control approach. Users would benefit from an interoperable approach. We also note that the proposed standards eliminate common data points such as the disclosure on gross GHG emissions intensity and the preference for direct data in value chain metric calculations. Interoperability with the ISSB is not our only concern. We also support EFRAG's aim to take account of the work done by the Taskforce on Nature-related Financial Disclosures (TNFD).			
Survey	The Future of Sustainable Data Alliance (FoSDA)	User (analyst, data provider, rating agency, etc.)	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	The Future of Sustainable Data Alliance (FoSDA)	User (analyst, data provider, rating agency, etc.)	United Kingdom	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	We flag that PAB and CTB fields like granular fossil fuel revenue exposure are critical for screening, and making these voluntary under the ESRS would undermine their usability for SFDR purposes.			
Survey	The Future of Sustainable Data Alliance (FoSDA)	User (analyst, data provider, rating agency, etc.)	United Kingdom	22.E4.	Comments on deleted datapoints in ESRS E4	I partially agree and partially disagree	In the recently released exposure drafts, EFRAG suggests the elimination of most PAT data points and the removal of metrics related to biodiversity and ecosystems that would damage the alignment between the ESRS and TNFD core disclosure metrics, especially for those metrics related to land-use change, freshwater-use change and/or sea-use change. We also note that the removal of the requirement to provide location specific information will significantly reduce the usefulness of the remaining biodiversity disclosures and will reduce interoperability with the TNFD framework – one which the ISSB may adopt in time. We recommend the reinstatement of data points that will allow location specific analysis and a further review of the alignment with TNFD's key metrics.			
Survey	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Some of the recent incorporations are highly beneficial—for instance, the explicit inclusion of non-material topics, enabling reporting at both topical and impacts, risks, and opportunities (IRO) levels, streamlining the list of topics in AR 16, and emphasizing aggregation and disaggregation criteria. However, certain aspects require further clarification to support comparability and consistent interpretation. This primarily concerns the practical considerations outlined for the DMA, where more detailed guidance on both bottom-up and top-down approaches would enhance understanding. From the impact materiality perspective, this process, as proposed, may add complexity by requiring identification of actions to mitigate, remediate, and prevent negative impacts to support its final score.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	This approach introduces important additional burdens as undertakings shall go through the different actions, classify them as prevention, mitigation, remediation, etc actions, and after that, evaluate the severity. We fully agree with the feedback provided by Cristina Saporetti, Marcello Bianchi, and Maria Dolores Urrea Sandoval in this regard "Since ERM's risk assessment is based on a net approach (as "gross" is rarely used in practice), impacts should generally be evaluated on a net basis for consistency. However, where mitigation actions are particularly significant in terms of effort and resources, they could be disclosed alongside the net impact".			
Survey	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We welcome the addition of an executive summary and clarification of 'connected information'. However, we believe cross-referencing financial statements should be mandatory, not voluntary, to maintain consistency in both documents. Consequently, we would suggest changing "may" by "shall" in paragraph 114.			
Survey	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Please see comments on spreadsheet attached, containing details on the different disclosure requirements			
Survey	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Please see comments on spreadsheet attached, containing details on the different disclosure requirements			
Survey	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	In relation to point 7. This provision should be aligned with the provisions established for financial statements. if not, inconsistencies could raise Please see more comments on spreadsheet attached, containing details on the different disclosure requirements.			
Survey	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Para 40 A) and 41. A) create requirements that differ from those outlined in ESRS 1, which states that "Internal risk management processes are a critical source of input for the materiality assessment of risks." If these internal risk management processes employ a net approach, it would introduce a distinct requirement.			
Survey	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	As reporting under ISSB standards will be compulsory for certain companies within specified jurisdictions, it is advisable to promote interoperability between both frameworks.			
Survey	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	While reporting requirements have been reduced and simplified, some disclosures are now grouped in the revised version; thus, the claimed 57% reduction may be overstated. Compatibility with widely used frameworks, such as GRI, is recommended.			
Survey	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	We would encourage to ensure compatibility with other widely used frameworks, such as GRI. Please see more comments in the attached spreadsheet			
Survey	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	We recommend providing further clarification regarding the concept of fair presentation, especially as it pertains to sustainability reporting, since its interpretation may not be entirely clear within this context.			
Survey	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	Please bear in mind that depending of the country, the statutory minimum wage may be set in by year, month or even day. This could add complexity to this requirement, particularly for companies which operate in multiple countries around the globe.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	We would encourage to ensure compatibility with other widely used frameworks, such as GRI. Please see more comments in the attached spreadsheet.			
Survey	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	We recommend adding a voluntary option to report the adjusted gender pay gap.			
Survey	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The attached spreadsheet contains relevant details and comments.			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	•We call for the removal of the fair presentation principle: it will not be useful and risk causing differences in assessment, particularly with auditors, and especially since the proposed revised ESRS would otherwise allow for simplification options (scope of reporting, data collection, etc…). •Chapter 3.7 requirements on level of aggregation, disaggregation and group reporting contradict both the top-down and information materiality approaches which could result in one level of disaggregation for reporting and another for materiality assessment. •We call for the removal of the impact assessment principle: it is a major change in the principles of double materiality assessment. The proposals made in Appendix C (ESRS 1) are vague an lack clarity. This approach could lead to undermining the principles of comparability. •Greater emphasis is needed on the role of auditors, who should focus on assessing the soundness of the DMA methodology, rather than challenging its outcomes. The DMA should only be audited when updated. •Companies should not be required to disclose detailed methodological descriptions in their CSRD reports, nor should they be asked to provide unnecessary scoring details. •Efforts to pre-empt DMA outcomes—by implying sectoral relevance, suggesting indicative material topics, or embedding assumptions—risk reintroducing the complexity and rigidity that the framework aims to eliminate. •EFRAG should make the disclosure of positive impacts and opportunities voluntary. We recommend moving these disclosures to the NMIG, given the significant complexity involved in projecting future benefits and the inherent legal and reputational risks associated with these uncertain projections. •EFRAG should clarify that the standards allow for partial materiality declarations within a topic or sub-topic supported by narrative disclosures that explain which elements of the sub-topic are material and why. This ensures transparency and avoids over-reporting or misrepresentation.			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	•We agree with the adoption of a net approach to assessing potential negative impacts within the Double Materiality Assessment (DMA). The net approach is essential to help users of the sustainability statement appreciate the effectiveness of mitigation actions and so better addressing their investment decisions. In contrast, focusing solely on gross impacts prevents a clear understanding of residual risks and the efforts made by companies to address them. Requiring a gross approach in case of significant ongoing mitigation actions is confusing and complicated, moreover considering that mitigation actions in place is what differentiate companies. •To support sustained prioritization of the most significant matters in own operations and value chain for future reporting years, we propose rephrasing paragraph 35 of the amended ESRS 1 exposure draft as follows: "Mitigation and prevention measures can be considered in the materiality assessment when there is reasonable and supportable information to demonstrate that they reduce the severity and/or likelihood of a potential impact." •We recommend removing 'Appendix C – Assessing Actual and Potential Impacts for Materiality' from the amended ESRS 1 exposure draft as is too granular, very prescriptive, and introduces unnecessary complexity. We suggest moving to a more flexible and principle-based approach.			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We generally welcome the increased flexibility introduced through the proposed amendments to the ESRS Sustainability Statements. However, we recommend removing ESRS 1, paragraph 108 (new). it risks undermining the principle of materiality and may lead to the inclusion of non-essential information. Removing this datapoint would support concise reporting and not obscure material information			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	•We strongly support the removal of GOV, SBM, and IRO-1 disclosure requirements from the topical standards. •ESRS 1 Paragraph 84(c) requires adjusting the base year of the target following a major acquisition or disposal. Firstly, this constitutes a behavioral requirement, which contradicts Paragraph 5 stating that "the ESRS do not mandate behavior but set Disclosure Requirements[…]". Secondly, it is inconsistent with the possibility of investments or divestments being part of the business strategy to achieve the target. •ESRS 2 AR 35 the disclosure on resources allocation (in particular, capital expenditure and operating expenditure) should be "may". •To further reduce reporting burden, we propose the deletion of the paragraph in GDR-A related to resources allocated to key actions (ESRS 2, paragraph 38 a–c), and GDR-M paragraph 41 b.			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	•Disclosure and application requirements that use the term "may" should be removed. The use of "may" implies voluntary action, which contradicts the stated objective of eliminating voluntary disclosures from the ESRS. •terms like "shall consider" should be deleted, in particular as shall refers to a mandatory action and consider more an optional step, leaving the way forward up to interpretation. This is important in order not to create confusion and avoid misunderstandings with the auditors but also clear, mandatory language is essential to ensure consistency and enforceability across undertakings. •The term "significant" is currently ambiguous. We recommend explicitly stating that undertakings determine significance based on their specific context, ensuring disclosures remain relevant and material. •Many ARs still lack actionable, mandatory content and instead contain definitions, examples, or repetitive guidance. To reduce complexity and improve focus: 1) Eliminate duplication by relocating definitions to the Annex II Glossary and illustrative examples to the Non-Binding Implementation Guidance (NMIG); 2) Define key terms in the Annex II Glossary rather than within ARs (e.g., ESRS 1, AR 3 for paragraph 21, using bold/italics to indicate that the term is defined in the Annex II Glossary); 3) Embed presentation guidance directly within datapoints, removing optional Ars; 4) Integrate guidance on General Disclosures Requirements (GDR) directly into the GDR section to avoid layering.			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We support EFRAG's recommendation that the Commission should not include the Non-Mandatory Illustrative Guidance (NMIG) in the future Delegated Act. Supportive resources like EFRAG's Non-Mandatory Illustrative Guidance (NMIG) can be valuable tools for preparers. However, it is crucial that such materials remain clearly non-authoritative and distinct from the core standards, to preserve the flexibility and application of judgement central to the DMA process. The non-binding nature of NMIG should be clearly communicated and consistently understood by both preparers and auditors; there should be no implicit expectation that the examples provided must be followed or justified if not applied. An explicit statement saying that the NMIG cannot be used for audit purposes and the separation of the NMIG from the legislative text would support this.			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	Relief clauses play a fundamental role, especially in the first reporting years, as they allow companies the necessary time to collect and consolidate data. It would be ineffective and disproportionate to require data solely for the sake of comparability when the underlying information is not yet sufficiently mature to ensure reliability – thereby defeating the real objective of comparability itself. Below, further explanation supporting why the use of reliefs is extremely important for preparers, in particular: -Relief for metrics in the value chain: Collecting quantitative data from all actors within the value chain can be particularly burdensome. Therefore, the possibility to use estimates focused on the most relevant parts of the value chain is crucial. -Relief for acquisitions/disposals: Companies need sufficient time after an acquisition to set up systems for collecting sustainability data and to organize the information flow for reporting. It is estimated that at least six months are required for these activities; hence, the relief provides an adequate time frame to initiate high-quality data collection. -Relief for data quality on metrics: Please refer to the comment provided in response to question 18. It should be clarified that reliefs do not contradict fair presentation, allowing companies to protect sensitive information without being pressured by auditors to report under this clause.			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	•The relief for lack of data quality is particularly important for companies to ensure that data collected for reporting are robust and reliable. This relief promotes the creation of trends: sustainability data needs to be collected for some years to create reliable trends. We support the decision not to impose a time limit on this relief. It is also justified because in the case of large Capital Groups, some information may not be available for a long time, not just a year or two, because it requires a complete remodelling of the current method of data collection. •We support the provisions outlined in ESRS 1, paragraph 92, which recognize the practical limitations of data availability in joint operations where the undertaking lacks operational control. Allowing the exclusion of such operations from the scope of environmental metric calculations is a pragmatic and necessary relief that enhances the feasibility and integrity of sustainability reporting and avoids duplicative reporting. •We support endorse the flexibility provided under ESRS 1, paragraph 91, which permits the use of metrics based on a partial scope of calculation. This approach acknowledges the evolving nature of data systems and reporting capabilities. Crucially, it encourages transparency by requiring undertakings to disclose the limitations of their current data coverage and to outline concrete actions aimed at improving completeness in future reporting periods.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	From the preparers' perspective, it would be preferable to allow voluntary disclosure for both quantitative and qualitative aspects. This is due to the lack of mature and established methodologies, the high level of uncertainty and subjectivity of the assumptions that should ground the assessments, the sensitivity of the information involved, and—most importantly—the associated legal risks. In fact, these risks are particularly relevant when disclosures include financial information data that are not reported in the official Financial Statements and that are not reliably estimable. Such sensitive disclosures should be addressed by the Financial Board to ensure consistency with financial reporting requirements. In general, it is crucial not to require disclosure of inherent effects, as these are theoretical, not grounded on reasonable and supportable information and would not add value for. In fact, mitigation actions are often embedded within the strategy, structural in nature, and linked to multiple risks. Therefore, it would be overly complex and unreliable to conduct a hypothetical exercise calculating monetary amounts that are neither estimable nor dependable. Such assessments could be misleading, in particular for external readers. Furthermore, ISSB does not mention anything regarding the gross approach "Before the mitigation action".			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	There is currently no reliable or comparable method to link specific climate-related risks or opportunities to financial metrics such as assets, liabilities, or revenue. The complexity and lack of integration between sustainability and financial systems make such quantification impractical. Without this linkage, even qualitative disclosures carry legal uncertainty and risk of misinterpretation. Capital market participants typically rely on standardized models and data, which are not enhanced by inconsistent, company-specific disclosures. We strongly believe this type of information should be embedded within a financial framework (following the financial information due process) and disclosed in the notes to the financial statements. Mandating financial disclosures through ESRS risks exceeding the scope of sustainability reporting and could expose companies to legal challenges. For §40a and §41(a), requiring disclosure of physical /transitional risk "before considering mitigation actions" is problematic. It does not reflect how strategy is defined, because adaptation and mitigation are often embedded within the strategy, and it is linked to multiple risks. Estimating gross monetary impacts would be unreliable, overly complex and potentially misleading, since they are not accounted for in the financial statements, especially for non-technical readers. In the light of the alignment with ISSB, IFRS S2 does not mention any disclosure of anticipated financial effect gross of mitigation actions. Regarding ESRS E1 §41(e), revenue generation is rarely attributable to individual assets or specific physical risks. Companies operate through complex supply chains and integrated operations, making it extremely difficult—if not impossible—to disaggregate revenue linked to a specific risk. Finally, ESRS E1 §41(d) could confuse users by requiring disclosure of potential liabilities not recognized in financial statements. This may suggest a disconnect between sustainability and financial reporting, undermining the credibility and perceived accuracy of both.			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	1.Fair presentation in the ISSB standard is only on financial materiality, so extending this concept could create problems (see question N. 25) 2.IFRS allows to have any GHG boundary while here financial control is mandatory, failing to align to the GHG Protocol. 3.The relief clauses introduced by the simplified standard are welcome and needed by preparers. 4.It is very important to maintain these additional reliefs in the IFRS because in the ESRS we go beyond climate aspects, where methodologies are less advanced, and these clauses are needed. 5, 6, 7, 8 - agree			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	It is true that some simplifications have been introduced, particularly in the structure and presentation of the reporting framework. However, in practice, the overall reporting effort will not change significantly. While the format of the PATs may be streamlined, many of the underlying metrics remain the same, as the deletion of datapoints primarily affects how requirements are presented, not what is required. This means that preparers will still need to collect and disclose a substantial amount of data, and the core reporting obligations are largely preserved. Moreover, it is concerning the fact that additional datapoints have been added but also new requirements in the ARs that would lead to a change in the consolidation process.			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We do not agree on adding new datapoints, especially when these datapoints were assessed as voluntary after a thorough drafting process of the ESRS and should remain as such since their content, and therefore their relevance, have not changed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	•We strongly disagree with the introduction of new mandatory datapoints, as this would add additional burden and thus contradict the stated objective of the ESRS simplification. Organizations are already facing significant challenges in collecting and reporting the extensive information required under ESRS. Adding further datapoints will increase the complexity of the process, which is still in the early stages of building robust reporting systems. This challenge is particularly acute in the downstream value chain, where companies have very limited visibility and control over how products are used after leaving their facilities. Obtaining reliable data from customers, distributors, or end-users is in practice extremely complex, and in many cases simply not feasible. In particular, we strongly object to the inclusion of the datapoint of secondary microplastic: currently, no risk-based framework exists that enables undertakings to evaluate how their own activities —or those of actors in their value chain— may contribute to potential downstream harms from secondary microplastics. This undermines the reliability and auditability of such disclosures. •We recommend removing the proposed disclosure requirement on secondary microplastics in paragraph 16(d) of the amended ESRS E2, alongside removal of definitions related to synthetic polymer microparticles and secondary microplastics in Annex II. They are inconsistent with both the legal limits of Set 1 and the EC's mandate to streamline and clarify ESRS reporting obligations. •Furthermore, it is important to note that these four DRs are not the only addition in the revised version. Concept like "fair presentation", "Gross Vs Net" or the need to amend the base year for targets in case of major acquisition are all new concept, which will introduce further complexity for preparers.			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	We do not agree. The transposition of the concept of fair presentation into ESRS raises significant concerns. While the concept is well established in financial reporting, its boundaries are much less defined in sustainability reporting: this creates a gray area, increasing the risk of litigation if stakeholders dispute the adequacy of the information provided. Applying a fair presentation standard in this context risks disproportionate legal, assurance, and reputational exposure for preparers. Sustainability data is often forward-looking, qualitative, and judgement-based, lacking the evidentiary rigor of financial data. The absence of established practices and experience for impact materiality makes it difficult to define what constitutes a "complete and faithful" representation, increasing uncertainty and inconsistency.			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	•The new threshold would entail a level of detail which is not necessarily relevant, for a multinational company it may be more relevant to ask for the disclosure of workforce in every macro-geographical area or continent rather than per country with more than 50 employees, •We recommend removing the requirement to disaggregate employees by contract type (permanent, temporary, non-guaranteed), as it offers limited value to users while introducing significant complexity for report preparers. These categories are defined differently across jurisdictions, leading to inconsistent and non-comparable data, and they tend to fluctuate throughout the year, especially in sectors with seasonal or project-based work.			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	It is necessary to provide greater clarity in the description of how the adequate wage is calculated in non-EU countries. A single, authoritative reference for defining adequate wage is essential, as allowing companies to choose different—or potentially more convenient—providers could result in inconsistent and non-comparable disclosures, ultimately compromising data quality. Establishing a common database of adequate wages that all companies can refer to is absolutely critical. This would not only ensure comparability across jurisdictions but also reduce the burden on companies to independently determine what constitutes an adequate wage in each country where they operate.			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	Yes, we should always consider more and more the importance of feasibility and coherence in reporting according to different legislations.			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	It would not be appropriate to reinsert the AR 26 considering that the methodologies for defining biodiversity targets are not yet well defined and are often site-specific. Furthermore, in the absence of a mandatory biodiversity standard, we do not see the opportunity to refer to specific frameworks (which are still voluntary). The risk would be that each company could adapt these standards to its own needs by making reporting incomparable. At last, also in the light of the simplification process, we should not add guidance from non-mandatory frameworks			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	While gender pay gap reporting has played a role in highlighting workplace disparities, its current mandatory structure often leads to oversimplified narratives, misinterpretation of data, and administrative strain. A more constructive approach would be to transition toward voluntary, context-sensitive reporting, allowing organizations to share gender-related insights in ways that reflect their unique workforce composition, industry characteristics, strategic priorities and materiality assessment. Flexibility would empower companies to focus on meaningful internal equity initiatives without being constrained by rigid, one-size-fits-all metrics; or even hold off on reporting when this is not an issue in their industry or company. Voluntary reporting also fosters transparency through choice, encouraging organizations to disclose progress when it aligns with their values and stakeholder expectations.			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	We welcome the simplification in the metrics, however "the percentage of payments aligned with these standard terms" is extremely difficult to collect on a consolidated basis.			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	•impact materiality assessment should only include business relationships that have direct contractual relationships. This modification would enable preparers to focus on assessing and disclosing impact materiality in the areas of the value chain where they have the greatest visibility and influence, thereby easing the application of the guidance and supporting more effective data collection from the most significant actors in an entity's value chain. •Delete sub-sub topics from ESRS 1 Appendix A in the "Objective" sections of several standards—especially the social. This creates confusion, as it suggests these sub-sub-topics must still be assessed for materiality and would increase the risk of auditors requiring individual assessments for each one.			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	the disclosure on anticipated financial effects should be eliminated. As highlighted in multiple internal discussions and documents, preparers are not yet sufficiently equipped to provide reliable forward-looking financial data, and such disclosures may involve commercially sensitive information. The current formulation risks overburdening companies and generating low-quality data. •ESRS 2 GDR-P for S1-S4: The UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises are not legally binding. When referring to an undertaking's overarching human rights policy, replace "committing to implement" the referenced human rights frameworks with "committing to respect for human rights aligned with" these frameworks.			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	•ESRS E2 and E4: raise concerns due to the level of detail required and the potential for excessive disaggregation. These requirements could result in disproportionate reporting efforts, especially for large companies, and may not yield meaningful insights for stakeholders. •In particular, ESRS E2 AR 2 expands pollutant reporting to include not only Annex II of Regulation (EU) 2024/1244 (Industrial Emissions Portal) but also pollutants it measures and monitors based on environmental permits. This would significantly increase the reporting burden, requiring companies to track and assess pollutants without clear thresholds, unlike the E-PRTR list, and would complicate materiality assessments. •We recommend that undertakings have the flexibility to define the level of disaggregation needed to reflect the nature of the company's impacts, risks and opportunities.			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	•ESRS E2 and E4: raise concerns due to the level of detail required and the potential for excessive disaggregation. These requirements could result in disproportionate reporting efforts, especially for large companies, and may not yield meaningful insights for stakeholders. Concerning ESRS E4, we have concerns about AR8, which introduces the concept of 'near' a site, requiring site level analysis to determine the buffer zone. This could lead to excessive disaggregation – providing little insight for stakeholders and substantive work for report preparers. •We recommend that undertakings have the flexibility to define the level of disaggregation needed to reflect the nature of the company's impacts, risks and opportunities.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	•Social standards the removal of the term "severe" from the disclosure requirements for human rights incidents across the social standards is particularly critical. If we are not able to limit the perimeter of human rights incidents to the most severe cases, considering the magnitude of the human rights subject, we risk having to disclose even less relevant aspects; this consequence, in addition to creating confusion when selecting the fact to be reported, would be contrary to the spirit of simplification of the ESRS amendments. Maintaining a focus on severe human rights incidents is essential to ensure that reporting remains meaningful, proportionate, and aligned with the principles of relevance and efficiency. •S1 Own Workforce: Exclude "non-employees" from S-1 Own workforce reporting. Non-employees are implicitly covered under S-2 as they are contractors (i.e., workers in the value chain). Treating non-employees as part of own workforce can have legal implications. Furthermore, metrics for non-employees are monitored and stewarded as part of site contractor management programs and policies. Itemizing the metrics for this group of site contractors requires a major system and work process revision across all operating and/or office assets.			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	•Indirect Business relationships: should only include those directly linked to the undertaking's business operations, products or services. •Human rights incident: should only include confirmed incidents, and not those that are still under investigation at the end of the reporting period. •Risks: should be qualified to material risks. Value chain: limit the scope of the impact materiality assessment to entities in the value chain for which the undertaking has a direct contractual relationship. Large multinational organizations are operating within highly complex and expansive value chains. Tracking and assessing impacts beyond direct contractual relationships presents significant practical and operational challenges, particularly in the absence of consistent data availability and supplier transparency.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		•We would like to highlight once more that the costs associated with compliance still remain significantly substantial, even when factoring in the proposed amendments to the revised ESRS. •EFRAG should replace all instances of "shall disclose" with "may disclose" to enable reporting entities to apply materiality-based judgments and avoid unnecessary or irrelevant disclosures. •Reporting Boundary: We welcome the relief clause of paragraph 92 ESRS 1 (data of joint operations). If this relief clause were to be deleted, it is essential that it is explicitly stated that for fair presentation, for specific sectors, environmental data can be disclosed on an operated boundary. Furthermore, it would be welcome to allow for GHG to report on any boundary mentioned in the GHG protocol, to be in line with the most relevant international framework on GHG and to align with ISSB. •SOC/SVHC. It is still extremely complicated to consolidate the quantities of these kinds of substances as also for SOC it is very difficult. to classify It makes sense to disclose which SOC/SVHC substances are being used and what the company is doing to replace or reduce their use, rather than collecting quantities, which is very complicated given the wide variety of regulations across countries — including differences in usage limits for mixtures containing these substances.			
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	35.E1-1.	Do you agree with the amendments of this chapter?	I disagree	•Application Requirements are far from a simplified approach. It is prescriptive in nature and pressures companies to make uneducated guesses on future economic outcomes	E1	Disclosure Requirement E1-1 - Transition plan for climate change mitigation	
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	35.E1-6.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	•We are in favour of removing the Net Zero definition, but we believe it would be possible to report GHG emission reduction targets on a net basis, and not only on a gross basis.	E1	Disclosure Requirement E1-6 - Targets related to climate change	
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	35.E4-5.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	•The concept of a buffer zone for assets close to biodiversity-sensitive areas should not be introduced. It would be too complex to apply.	E4	Disclosure Requirement E4-5 - Metrics related to biodiversity and ecosystems change	
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	35.S2-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	•We oppose the new definition of "human rights incidents" and its extension to new ESRS.	S2	Disclosure Requirement S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	35.S2-3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	•We oppose the new definition of "human rights incidents" and its extension to new ESRS.	S2	Disclosure Requirement S2-3 - Actions and resources related to value chain workers	
Survey	FuelsEurope	Business association (other than association of financial institution)	Belgium	35.S2-4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	•We oppose the new definition of "human rights incidents" and its extension to new ESRS.	S2	Disclosure Requirement S2-4 - Targets related to value chain workers	
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The new procedure is more complicated than the previous requirements and would lead to additional workload. Materiality should generally be determined based on net effects, analogous to the assessment carried out as part of the risk inventory in bank risk management. If the net effects are not considered material, there should be no reporting obligation. If, on the other hand, they are considered material, the net effects and, where applicable, significant measures taken or planned, should be reported. This approach appears sufficient, also from the user perspective. An artificial distinction between different time horizons should not be enforced, as the added value of specifying the period in which a topic became material appears questionable. The NMIG could include examples that are helpful in distinguishing between potential and actual effects. A decision tree to support the logic in appendix C would be helpful.			
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The option to include a summary at the beginning of the CSRD disclosure is helpful. As it allows users to get an overview quickly. The increased use of appendices could also improve readability, while clearer references would help shorten the sustainability statement without risking any loss of information. Nevertheless, there is still room for improvement in terms of flexibility and striking the right balance between financial and sustainability reporting. We also note that many requirements have been merely summarised rather than simplified, leading to greater complexity and less clarity in discussions with external auditors. Already published concise CSRD reports confirm that the ESRS Set 1 was not the only reason for overly detailed reporting. The individual expectations of the auditors have also contributed to this. Simplifications should therefore focus not only on the report itself, but even more on the process of creating the CSRD report and documentation.			
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The new architecture and interdependencies appear more streamlined overall, but the implementation effort for entities that have already started ESRS reporting is considerable. The removal of GOV, SBM and IRO from the thematic standards is a positive step and the amended wording makes the GDRs less restrictive. However, the renaming of notions, changes in the numbering of reporting requirements and inconsistent headings in the table of contents are problematic, particularly for the metrics in the social chapter. These amendments would lead to a high level of subsequent adjustment burden for first reporting wave entities. Amendments that increase the burden for reporting entities in the long term should be avoided. A one-off increase in the effort required may be justified for reasonable and necessary modifications, but the cost-benefit aspect should always be taken into account.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The revised structure of the ESRS is generally positive, particularly the clear arrangement of the application requirements (AR) directly after the disclosure requirements (DR), the deletion of 'may disclose' data points and the consistent conversion of 'shall' data points, which contribute to greater stringency. However, language comprehension remains a challenge, since many passages have been significantly condensed, require repeated reading and are sometimes less clear. Extensive changes to the numbering, particularly in the E and S standards, would cause additional adjustment workload, which is why cost-benefit aspects should be taken into account. In addition, some titles disclosure requirements (DRs) for metrics in the S1 standard are inconsistent, we would prefer uniform terminology, analogous to the G standard ('metrics related to ...'), in order to ensure consistency and comprehensibility.			
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We consider the conceptual basis of the NMIG to be comprehensible and meaningful, and its illustrative and non-binding nature should certainly be retained. We are against it being included in the delegated act because the granularity and the overall extent of the ESRS are already considered sufficiently broad. It is also important that the NMIG is not used to introduce new auditing requirements or to allow interpretations by auditors that lead to increased documentation and reporting obligations. An explicit clarification is crucial.			
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The proposed amendments are appreciated. The stronger focus on the principle of proportionality, greater flexibility in considering the value chain and the move away from systematically favouring primary data over estimates are particularly welcome. We also consider the concept of "undue cost and effort" a sound and practical approach as it enables entities to avoid disproportionately costly data collection. However, this requires uniform auditing standards in order to avoid extensive discussions with external auditors. In addition, the long-term use of estimates without mandatory annual updated assessment should be permitted, as otherwise this would negate the intended simplification. Another positive aspect is the option to postpone reporting on new investments or subsidiaries until the next reporting period. This represents a practical reduction in workload. We consider the planned consolidation of disclosure requirements DR SX-2 and SX-3 into a single DR SX-2 to be possible in the long term, as it brings together thematically related aspects such as engagement, reporting channels and corrective measures. At the same time, however, we would highlight the considerable implementation effort involved in renumbering all DRs in standards S1 to S4 – particularly with regard to external and internal documentation. We would welcome a reduction in the effort involved here. A balance between burden and benefit is still required. Adjustments should only be made where they generate long-term added value. Overall, we are in favour of the draft in key areas, although individual aspects should be made clearer and more practical.			
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	The proposed simplifications create meaningful flexibility for reporting and are consistent with the requirements of IFRS S1 and S2, which we welcome. Particularly noteworthy is the introduction of the principle of "undue cost or effort", as it supports pragmatic implementation. In addition to the option of partial coverage, a purely qualitative disclosure should also be permitted, provided that it is sufficiently transparent and meaningful. At the same time, efforts should be made to improve data quality. This is particularly relevant for financial institutions that rely on improved customer data for both regulatory requirements and strategic management. In order to ensure transparency and promote continuous further development, the application of the simplifications could therefore be accompanied by regular, though not necessarily annual, reassessment that are proportionate in terms of cost and benefit.			
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Our preferred option is definitely Option 2 because it allows for a more practical and less costly implementation. Quantifying financial effects is very challenging by now, therefore the focus should be more on qualitative information. Option 2 simplifies reporting and significantly reduces the amount of documentation required. Nevertheless, if another option is to be applied, it must be ensured that existing internal processes and calculation systems can continue to be used unchanged. There must be no obligation to develop additional calculation logic or provide new datapoints that go beyond existing structures. When adjusting requirements to anticipated financial effects, the EBA guidelines should also be taken into account. The Guidelines on ESG Risk Management (Section 28 a) vi.) explicitly require financial institutions to collect information from their customers ("large counterparties") on the current and expected financial impact of environmental risks and opportunities. However, quantification is not required there and in many cases the effects cannot even be calculated within a particular range. In addition, financial institutions would depend on data from their customers, most of which do not fall within the scope of the CSRD. We are therefore strongly in favour of Option 2. The modelling of Option 1, the verification of the results and their disclosure would create significant problems – ranging from technical complexity to competition concerns. Should Option 1 nevertheless be implemented, it is necessary that AR 17 for paragraph 23 is part of the main bodies.			
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	As for expected financial effects we generally prefer Option 2. The current requirements for the reporting on climate-related financial effects under the ESRS are considered too far-reaching, unclear and potentially problematic. We are in favour of a stronger focus on the existing regulatory requirements of the EBA and other supervisory authorities, without introducing additional quantitative datapoints. In cases of doubt, it should be possible to assess the relevance both from the perspective of financial institutions in general and of the respective bank individually, with the decision-making power on assessment and disclosure remaining with the reporting entity. The required disclosures are challenging to implement in practice as they are not compatible with the current system logic and, in some cases, relate to sensitive strategic information. In addition, some ESRS requirements are legally vague and pose a risk of being misinterpreted and of legal liability. Overall, we are calling for differentiated, risk-oriented and practicable simplification of the requirements that realistically take into account how institutions actually deal with physical and transition risks and opportunities, without creating new disclosure requirements that go beyond current business practices or jeopardise strategic positioning.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	We welcome the improved interoperability between ESRS and ISSB. Interoperability creates consistent and reliable data, irrespective of the framework used, thereby bolstering confidence in the information used for analysis and reporting. Wording adjustments will contribute to better common understanding and greater comparability. In addition, EFRAG should provide an updated table with a complete 1:1 mapping that is more detailed than the previous one and shows, at the level of each individual datapoint, which ESRS requirements simultaneously comply with reporting requirements under IFRS S1 and S2. Without such a table, each single reporting entity would be forced to carry out a time-consuming comparison at datapoint level to demonstrate compliance with IFRS S1 and S2, in addition to ESRS compliance.			
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	We generally consider the reduction of mandatory datapoints to be a step in the right direction. However, the announced reduction in the number of datapoints wouldn't lead to a siginificant reduction of reporting efforts, which is more likely to be moderate to minimal. This is partly because many removed datapoints were already classified as non-material in the first report. On the other hand, the expected simplification is offset by the effort required for the implementation of modificationsand by largely unchanged expectations regarding auditing processes and documentation. However, we appreciate the efforts to strike an acceptable balance between workload and information value. Due to comprehensive regulatory requirements, such as the EBA Guidelines on ESG Risk Management, as well as data requirements for strategic management (portfolio, risk, etc.), financial institutions depend on prompt and continuous improvement of customer data. These needs should be taken into account when removing data points. We are interested in a permanently established core set of decision-useful data that does not need to be adjusted regularly. Continuity is the key to a robust reporting framework that aims to provide meaningful information over time.			
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	E4: We support the proposed wording and preconditions for the disclosure of the biodiversity transition plan. G1-2: 10c: With regard to the management of suppliers' relationships, it seems sensible for consistency reasons to include a separate chapter on metrics. The materiality of training of the procurement team should be considered independently of other training topics, as the relevance may vary depending on the sector. In the financial sector, the data point is often considered not material compared to other issues.			
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	The introduction of the 'fair presentation' concept could be positive but will only work if auditors confirm it as a pragmatic, simplified approach to ESRS implementation. Corporate reporting should be principles-based to ensure focused, decision-useful information. However, the legal basis of the European Sustainability Reporting Standards (ESRS), the Accounting Directive (2013/34/EU), is compliance-oriented. Article 34(1)(2)(aa) explicitly requires adherence to its provisions. The double materiality analysis reflects a rules-based approach driven by datapoints requiring disclosure when material. We are critical of the interplay between entity-specific disclosures, double materiality with its broad stakeholder focus (unlike IFRS S1/S2), and the unclear definition of 'fair presentation' in the sustainability context. Together, these create a risk of uncontrolled expansion of reporting, undermining ESRS's political goal of simplification and proportionality. Ensuring 'fair presentation' could require additional processes. Under the compliance-driven approach, auditors expect checklist-style assessments that may include irrelevant information. This risks overburdening reports and reducing their usefulness. On the one hand, ESRS could help companies strengthen ESG practices. On the other, it remains a comprehensive framework with disclosures of questionable decision-making relevance. Thus, 'fair presentation' could become just another criterion leading to debates with auditors. It must therefore be clarified that within ESRS, 'fair presentation' is meant to streamline reporting and processes, not create an extra hurdle. Including concrete examples (e.g., in NMIG or the basis for conclusions) would highlight its beneficial effects and ensure the concept supports simplification rather than complication.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Absolute emissions targets are crucial in the real economy for assessing actual emission reductions and compliance with climate targets. They allow for transparency and for progress to be tracked credibly. However, indirect emissions, particularly financed Scope 3 emissions, are by far the largest emission driver for financial institutions. The direct influence on the emissions of counterparties and their value chains is limited, meaning that absolute targets could potentially suggest a misleading direct influence. In addition, the heterogeneity of portfolios makes it difficult to meaningfully compare absolute target values. Intensity targets, whether physical or economic, and sectoral reduction pathways are considered more appropriate for aligning with EU climate targets and presenting developments transparently. Since over 90% of greenhouse gas emissions from financial institutions are attributable to financing activities, intensity targets provide a realistic and comparable basis for assessing progress towards net zero. A comprehensive disclosure framework should therefore cover the intensity evolution as well as the long-term net-zero strategy and relevant interim targets.			
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	The new disclosure requirement (DR) is suitable not for every reporting entity. The change from 10% to "Top 10" could lead to excessive and misleading information, for example if a country with very few employees is included in the list. In addition, there are businesses that are represented in fewer than ten countries. It should therefore be clarified that the list may be correspondingly shorter. It should also be made explicitly clear that countries should only be indicated in which both more than 50 employees and more than 10% of the total workforce are employed. This clarity is currently lacking in AR 11. We suggest that the type and granularity of the breakdown should not be made mandatory, as key figures at group level are usually more commonly used and are more meaningful.			
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	We welcome that "minimum wage" is relevant in the first step and is not to be preceded by a comparison with "collective bargaining agreements". However, the following issues remain unresolved: For "living wage estimate produced by an institution mandated by the public authorities of the country", a specific provider should be named or provider lists should be published, e.g. by ILO. It is unclear what auditing steps are required to ensure compliance with ILO standards with regard to minimum wages. It should be clarified that own calculations are permitted if no such benchmarks incorporating ILO standards are available.			
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	It is crucial that all the information on Principal Adverse Impact (PAI) that must be disclosed by financial market participants in accordance with SFDR, can continue to be derived from the CSRD reports of portfolio companies even after the ESRS amendments. It is therefore particularly important that reporting obligations under the SFDR are harmonised with disclosure requirements for undertakings under the revised ESRS. Financial market participants, such as asset managers, should not be required to provide information that goes beyond the obligations of non-financial undertakings. The alignment of ESRS and PAI is important particularly given the upcoming SFDR review. We see the integration of Human Rights Policy in ESRS 2 as positive. At the same time, there is a need to clarify the scope of application for "human rights incidents" in ESRS S1 16: It is not clear whether this also applies to ESRS S2 because there is no corresponding mention of it in Appendix 6 of the BfC. Furthermore, it should be clarified in the application notes for ESRS S3 and ESRS S4 that ESRS S1-16 applies to human rights incidents under S3 and S4. There should be greater coherence between the SFDR and CSRD in order to reduce regulatory complexity.			
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	The current wording is closely oriented on the area targets according to Global Biodiversity Framework (GBF). However, there is empirical evidence to suggest that area alone does not automatically lead to a positive contribution for biological diversity and functioning ecosystems. It would therefore be sensible to also take into account the targeted stabilisation or improvement of the 'state of nature' i.e. the status of species and ecosystem functions. The focus should not be placed exclusively on rare or endangered species, as the decline in flora and fauna affects the entire range (keyword: population protection). We propose the following amendment to AR26 (amendments are marked in CAPITAL LETTERS): Measurable targets related to biodiversity and ecosystems may, for example, refer to the following aspects: •Size and location of all habitat areas IN WHICH THE STATE OF NATURE IS PROTECTED OR HAS BEEN restored, whether directly or indirectly controlled by the undertaking, and whether the success of the restoration measure was or is approved by independent external professionals; •Recreated surfaces ((environments in which management initiatives are implemented so as to create a DIVERSE habitat WITH BIODIVERSITY THAT IS SPECIFIC OF THE LOCATION where it did not exist initially); •Number or percentage of projects / sites whose ecological integrity was improved (e.g., installation of fish passes, wildlife corridors). The addition of "specific to the location" is important since otherwise any change, including those that would not serve to protect nature (e.g. the planting of non-native species or faunal distortions), could be considered renaturation. Given the dynamic development in this area, it would seem sensible to promote the application of a standard recognised in this sector, instead of making the requirements mandatory.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	The removal of voluntary datapoints as part of the disclosure requirements seems reasonable since it contributes to simplification and standardisation. Nevertheless, the option to voluntarily publish the adjusted Gender Pay Gap (GPG) should remain in place. Adjusted GPG provides a significantly more differentiated interpretation of the mandatory unadjusted GPG, since it takes into account characteristics that determine salary levels, such as the organisational unit, the job performed and the hierarchical classification (e.g. level of responsibility, pay scale group, management level). As a result, structural distortions that may be included in the unadjusted value are largely excluded. The disclosure of adjusted GPG therefore contributes to a more appropriate assessment of any pay differences and increases the transparency and traceability of the remuneration structures. Even though this metric is voluntary, the disclosure is useful since it provides a more realistic picture and prevents the unadjusted value being misinterpreted. An example of the calculation logic should be presented in the application notes (NMIG), whereby the data point should be allowed to be disclosed as entity specific data point without additional justification. The removal of the mandatory adjusted gender pay gap is reasonable, as calculating it at group level could be very complex and require clarification, different remuneration structures could have a distorting effect and conflicts with the Pay Transparency Directive may arise. Instead, entities should be allowed to voluntarily disclose their adjusted Gender Pay Gap by country and, where applicable, also take into account the cost of living.			
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Anticipating that the final publication of the new ESRS will be most likely in the second half of 2026, the first application date should be 31 December 2027. However, there should be an option to apply the new ESRS for the reference date 31 December 2026. The Excel list of datapoints (IG 3) should be updated first immediately after the final report has been transmitted to the European Commission and then again as part of the announced four-week consultation period. For the first wave undertakings, it is particularly important to receive a final and reliable version of the Excel list with all the deleted datapoints ASAP. EFRAG should ensure that the transition from the 'old' to the 'new' requirements is as seamless as possible. To achieve this, it would be useful to provide an overview table that also shows which concepts and terms have been revised. The overall aim of the review of the ESRS to reduce reporting burdens significantly has largely not been achieved with the ESRS proposal. Undertakings who already submit ESRS reports assume a reduction of around 10% according to an initial indicative estimate. However, the implementation effort to switch from 'ESRS 1.0' to 'ESRS 2.0' is enormous. We had expected a significantly more ambitious reduction in reporting effort.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CSEAR; Universidad de Burgos	Academia	Spain	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	The proposed amendments did not achieve an acceptable balance between simplification and robustness of the DMA. While point (a) in the definition of double materiality is clear, point (b) is imprecise. a)Point (b) is tautological: "Information is MATERIAL when: (…) it is necessary (…) to understand (…) MATERIAL impacts, risks and opportunities …" (emphasis added) b)The inclusion of "risks and opportunities" in point (b) is inconsistent with the notion of impact materiality, as illustrated in different parts of the same ESRS 1 (e.g., paragraphs 3 and 30). c)Point (b) refers to the "understanding" of sustainability reporting users, without reference to the implications of such understanding. d)Additionally, in paragraph 30 impact materiality correctly refers to "the identification of information that relates to the undertaking's material actual or potential, positive or negative impacts on people or the environment over the short, medium or long term (…) Business relationships are not limited to direct contractual relationships." Consequently, any framing of impact materiality based on decision-making is insufficient, since many of the stakeholders are not in a position to make any decision (e.g., nature or future generations). Therefore, if the "understanding" and the "decision-making" framings of impact materiality are unsuitable, a possible framing for point (b) could be based on the notion of stewardship and due diligence. An alternative wording is suggested: "(b) it is necessary for the corporation to show to a broad range of stakeholders that it identifies and addresses actual or potential, positive or negative impacts on people or the environment"			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	CSEAR; Universidad de Burgos	Academia	Spain	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	CSEAR; Universidad de Burgos	Academia	Spain	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I disagree	The simplification of ESRSs and the reduction of disclosure requirement and data points is premature. Companies, auditors and consultants have already invested in the implementation of ESRSs. However, the untimely revision will waste the learning that could be obtained from this experience. No less important, in general, the loss of the knowledge and positive externalities generated by the preparation, analysis and use of sustainability information and the increase in social and environmental regulation costs (e.g., government monitoring in the absence of corporate self-reported information) will overshadow the putative administrative costs savings from the ESRS simplification. The re-architecture between ESRS 2 and thematic standards reduces enforceability and comparability because although minimum "Shall" requirements are maintained in ESRS 2, their simplification weakens the common baseline and opens the door to overly flexible interpretations across companies and sectors. The elimination of the obligation to declare PAT plans and timelines diminishes forward-looking guidance and monitoring capabilities. Additionally, this omission limits the capacity of information users to evaluate the commitment of reporting organizations in achieving their stated sustainability goals.			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	CSEAR; Universidad de Burgos	Academia	Spain	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	It is reasonable to include guidelines and examples on how to disclose datapoints in "Non-Mandatory Illustrative Guidance" (NMIG). However, the simplification proposal is depriving users of the sustainability report from crucial information to assess the due diligence of the company. For example, the policies to identify and manage actual or potential, positive or negative impacts on people or the environment, are crucial to assess due diligence. Therefore, it is paramount to perform an in-depth assessment to determine whether all disclosures currently presented in the NMIG should be made mandatory in the delegated act. While the NMIG may reduce implementation questions, encourage proportional innovation, and ease the burden on PAT narratives when rigid prescriptions fail, it could also reduce comparability. Without a minimum common ground, methodological heterogeneity hinders cross-sectional and time-series analyses. In this regard, the NMIG is useful if it complements—not replaces—a clear regulatory baseline that preserves consistency, traceability, and insurability.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CSEAR; Universidad de Burgos	Academia	Spain	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	The "undue cost or effort" principle is aligned with the goal of administrative simplification. However, the articulation of this "relief" in paragraph 89 ESRS1 is so imprecise that it may turn this set of standards into dead letter. The "undue cost or effort" principle risks transforming Directive (EU) 2022/2464 into a voluntary guideline. The limitation of considering resilience in terms of risks places an emphasis on financial materiality, overlooking how an organization's activities may also affect the resilience of the ecosystems in which it operates.			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	The amendment is generally reasonable. But the "undue cost or effort" principle is too broad, as indicated in the response to question 19.			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	CSEAR; Universidad de Burgos	Academia	Spain	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Thorough information on dependencies is increasingly important to motivate organizations and industries to tackle sustainability challenges. This amendment goes against the tide. This modification is not justified on the grounds of administrative simplification, as the costs of processing this information is minimal: this information is present in information systems and calculations are trivial. Instead, this modification appears to be proposed on the grounds of avoiding information that may impact corporate reputation, at the expense of resilience.			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	IFRS and ESRS have different objectives and scope. Alignment with IFRS twists the notion of double materiality with the introduction of materiality as a filter and fair presentation, for example. As a result, ESRS is less aligned with the Green Deal. This greater alignment with the ISSB reduces the interoperability with other relevant sustainability reporting standards that companies have been applying for decades (such as the GRI).			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	CSEAR; Universidad de Burgos	Academia	Spain	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CSEAR; Universidad de Burgos	Academia	Spain	22.E2.	Comments on deleted datapoints in ESRS E2	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	22.E3.	Comments on deleted datapoints in ESRS E3	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	22.E4.	Comments on deleted datapoints in ESRS E4	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	22.E5.	Comments on deleted datapoints in ESRS E5	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	22.S1	Comments on deleted datapoints in ESRS S1	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	22.S2	Comments on deleted datapoints in ESRS S2	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	22.S3	Comments on deleted datapoints in ESRS S3	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	22.S4	Comments on deleted datapoints in ESRS S4	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	22.G1	Comments on deleted datapoints in ESRS G1	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	No substantial increase in administrative costs. Datapoints are relevant.			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	Datapoints are relevant.			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	The notion of fair presentation is ambitious. It draws on financial reporting. Some ambition in this area is positive. However, it is inconsistent with the focus on limited assurance. Additionally, the application of fair presentation may dissuade companies from disclosing information on material topics, considering the inherent complexity and incompleteness of sustainability data.			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Complex estimates are common to all sectors. The financial sector has a disproportionate effect on climate change. Absolute targets are essential for assessing progress on climate change, and banks are no exception in this regard. This exclusion is also at odds with other information on climate change required by financial institutions in other EU regulations (e.g. SFDR) and by banking supervising entities (Basel Pillar III).			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	Thresholds are reasonable.			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	Processing information about wages, considering notions such as living wages, is a significant concern for society. This modification is not justified on the grounds of administrative simplification, as the costs of processing this information is minimal: this information is present in information systems and calculations are trivial. Instead, this modification seems to be proposed on the grounds of avoiding information that may affect corporate reputation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CSEAR; Universidad de Burgos	Academia	Spain	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	The "consolidation" and reduction of DPs results in a loss of granularity and breaks the traceability necessary for the SFDR to inform investors. Merging eight DPs into a single "HR policy" in ESRS 2 limits the relevance of human rights, erases nuances by stakeholder group, and weakens operational alignment with UNGP/OECD. The single "severe cases" indicator fails to capture typologies, severity, remediation, or geography. Excluding "fatalities" from the scope of the PAI on lost days is a material setback. Investors require explicit visibility into fatalities, rates, and trends. Moving content to ESRS 2 (general) instead of maintaining it in ESRS S1–S4 reduces consistency between IROs and specific metrics and hinders insurability. The supposedly "marginal" reduction in coverage is, in fact, material for time series, benchmarking, and alignment with the SFDR Annex I tables; it increases the risk of cherry-picking and mapping gaps.			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	AR 26 could be further reviewed to better reflect current developments (e.g., SBTN).			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	Disclosing this information has enormous social benefits in terms of increasing gender equality. This modification is not justified on the grounds of administrative simplification, as the costs of processing this information are minimal: this information is present in information systems and calculations are trivial. Instead, this modification seems to be proposed on the grounds of avoiding information that may affect corporate reputation.			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	This formulation will contribute to damaging SMEs. The increase in government regulation and monitoring costs (in the absence of corporate self-reported information) will overshadow the putative administrative costs savings from this unsophisticated simplification.			
Survey	CSEAR; Universidad de Burgos	Academia	Spain	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	CSEAR; Universidad de Burgos	Academia	Spain	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	CSEAR; Universidad de Burgos	Academia	Spain	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	CSEAR; Universidad de Burgos	Academia	Spain	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	CSEAR; Universidad de Burgos	Academia	Spain	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CSEAR; Universidad de Burgos	Academia	Spain	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	CSEAR; Universidad de Burgos	Academia	Spain	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	CSEAR; Universidad de Burgos	Academia	Spain	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	CSEAR; Universidad de Burgos	Academia	Spain	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	CSEAR; Universidad de Burgos	Academia	Spain	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	CSEAR; Universidad de Burgos	Academia	Spain	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	CSEAR; Universidad de Burgos	Academia	Spain	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	CSEAR; Universidad de Burgos	Academia	Spain	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CSEAR; Universidad de Burgos	Academia	Spain	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Some emission-intensity datapoints have been trimmed. While intensity indicators are valuable to users, the cuts mainly target metrics that can be derived from other reported figures (e.g., emissions relative to revenue or total assets). We advocate preserving at least one sector-relevant intensity indicator, since stakeholders need both absolute and intensity perspectives—aligned with TCFD guidance on Metrics & Targets. On transition plans, we welcome the draft's explicit alignment with EU and international climate objectives.			
Survey	SEP Lab	Consultant (including software vendor)	Netherlands	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	SEP Lab	Consultant (including software vendor)	Netherlands	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	For all deleted datapoints: I miss the intelligence; keep all the original data points; focus on all the objectives of the Green Deal; create 'learning hubs' and/or an 'academy' for all stakeholders; to share knowlegde (example: knowlegde about biodiversity); learn from experiences, results during the coming years. And if the goals are met; then there is time and reason to reduce datapoints. That sounds smarter to me and more EU Commission intelligent!			
Survey	SEP Lab	Consultant (including software vendor)	Netherlands	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		As society we are not on track on climate and biodiversity; that's why the Green Deal is needed. Coming from a comfortable linear fossil system you could expect a lot of resistance of current stakeholders; it is hitting the comfortzone. Please keep the eyes on the ball/objectives of the Green Deal! The world is watching the EU but also works with other initiatives possible beyond the Green Deal: https://forico.com.au/natural-capital and the time of only financial numbers reporting is coming to an end: https://www.nyenrode.nl/en/news/n/social-value-top-25-dutch-companies--minus-30-percent we have all a social responsibility; there is only 1 world!			
Survey	Des Enjeux et des Hommes	Consultant (including software vendor)	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	-If the top-down approach is used : odoes it mean that the rating is not required at the IRO level and that the identification of IRO is enough ? odoes it mean that a topic/ sub-topic could be excluded without having identified the IROs ? How should it be materialized ? -On one side Combining S1 and S2 may be confusing as these topics are substantially different and the materiality may significantly differ from one topic to another (Reality may be hidden). On the contrary, 3 subtopics for Affected Communities is somehow hard to evaluate and could be aggregated. -The link between the topics/ subtopics and the data points to be reported should be done at the data point level to ease the process. -Could you add an example to illustrate significant variation of IROs between sites and the incidences on aggregation or disaggregation ?			
Survey	Des Enjeux et des Hommes	Consultant (including software vendor)	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	It is critical to evaluate the gross nature of an IRO. If an IRO is evaluated with a net approach, comparison between companies will be complex and the materiality assessment is likely to be subjective. We recommend assessing the gross nature on one side and the net nature separately.			
Survey	Des Enjeux et des Hommes	Consultant (including software vendor)	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The clarifications are appropriate.			
Survey	Des Enjeux et des Hommes	Consultant (including software vendor)	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The indication of which material topics are not covered by PAT is maintained but it remains key to explain why no PAT are in place in order to serve comparison purposes.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Des Enjeux et des Hommes	Consultant (including software vendor)	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	The changes ease the understandability, clarity and accessibility of the standards.			
Survey	Des Enjeux et des Hommes	Consultant (including software vendor)	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	The reliefs are deemed to be appropriate.			
Survey	Des Enjeux et des Hommes	Consultant (including software vendor)	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We support the relief but we consider that it is essential to include a time limit to provide full scope of calculation. The time limit may depend on the size and means of the company.			
Survey	Des Enjeux et des Hommes	Consultant (including software vendor)	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Disclosing quantitative information for financial effects is challenging but is important for investors and this will become critical in the next coming years. Quantifying is necessary so that companies could anticipate the effects on their business model. It is key to impose requirements on this topic, with different level of granularity in order to allow incremental improvements. One option might be to impose qualitative data on the first year of reporting and to then impose quantitative data for huge companies and actions to be taken to get quantitative data for smaller companies.			
Survey	Ecoacsa	Consultant (including software vendor)	Spain	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ecoacsa	Consultant (including software vendor)	Spain	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Ecoacsa	Consultant (including software vendor)	Spain	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Ecoacsa	Consultant (including software vendor)	Spain	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We welcome TNFD's proposal to consolidate the current nature-related standards (E2-E5) into a single, integrated nature standard and to (i) ensure a structured materiality assessment for nature-related issues; (ii) elevate reference to 'dependencies' on nature; and (iii) streamline and prioritize the number of quantitative nature-related data points. We call on EFRAG to make note of it and apply as possible.			
Survey	Ecoacsa	Consultant (including software vendor)	Spain	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We welcome TNFD's proposal to consolidate the current nature-related standards (E2-E5) into a single, integrated nature standard and to (i) ensure a structured materiality assessment for nature-related issues; (ii) elevate reference to 'dependencies' on nature; and (iii) streamline and prioritize the number of quantitative nature-related data points. We call on EFRAG to make note of it and apply as possible.			
Survey	Ecoacsa	Consultant (including software vendor)	Spain	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E4	We do not support the removal of the ESRS E4 biodiversity and ecosystems metrics metric specifications from the mandatory requirements. This is problematic because standardization is more limited at present than with other metrics. Specifying metrics (now in Non-Mandatory Illustrative Guidance (NMIG) 18-20) within the Standard would give companies the information they need to select and report practical, credible and comparable metrics and would support alignment with the TNFD disclosure metrics. If this does not occur, at the very least, it is important that (i) the NMIG stays attached to the Standard in some form and (i) a process is in place for ensuring updates are made on a timely basis, particularly for guidance on topics where data/tools for reporting are evolving rapidly.			
Survey	Ecoacsa	Consultant (including software vendor)	Spain	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	Ecoacsa	Consultant (including software vendor)	Spain	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ecoacsa	Consultant (including software vendor)	Spain	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	Ecoacsa	Consultant (including software vendor)	Spain	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Ecoacsa	Consultant (including software vendor)	Spain	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We support the simplified standards aligning with core elements of TNFD and encourage EFRAG to continue striving to maintain alignment with other international standards and frameworks, including ISSB and GRI. Improving the interoperability between the requirements in ESRS and the ISSB Standards, to enable companies to use the ISSB Standards as a starting point and 'top up' with specific impact disclosures to achieve compliance with the CSRD/ESRS, is important.			
Survey	Ecoacsa	Consultant (including software vendor)	Spain	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Ecoacsa	Consultant (including software vendor)	Spain	22.E4.	Comments on deleted datapoints in ESRS E4	I partially agree and partially disagree	We suggest to streamline and prioritize the number of quantitative nature-related data points. We call on EFRAG to make note of it and apply as possible.			
Survey	Ecoacsa	Consultant (including software vendor)	Spain	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Biodiversity should always be considered material as a result of its importance, either by direct operations or supply chains			
Survey	Ecoacsa	Consultant (including software vendor)	Spain	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Ecoacsa	Consultant (including software vendor)	Spain	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Ecoacsa	Consultant (including software vendor)	Spain	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ecoacsa	Consultant (including software vendor)	Spain	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I would like to skip this question and provide my feedback in Part 3				
Survey	Ecoacsa	Consultant (including software vendor)	Spain	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	Ecoacsa	Consultant (including software vendor)	Spain	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Ecoacsa	Consultant (including software vendor)	Spain	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree				
Survey	Ecoacsa	Consultant (including software vendor)	Spain	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We welcome the ESRS being simplified in a way that maintains the double materiality approach of the Corporate Sustainability Reporting Directive (CSRD), covering environmental, social and governance topics. This principle of double materiality is vitally important for the reported information to be meaningful for users. It is also essential for the EU to respect its international engagement under the UN CBD Global Biodiversity Framework Target 15.			
Survey	Ecoacsa	Consultant (including software vendor)	Spain	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Ecoacsa	Consultant (including software vendor)	Spain	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Ecoacsa	Consultant (including software vendor)	Spain	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ecoacsa	Consultant (including software vendor)	Spain	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Ecoacsa	Consultant (including software vendor)	Spain	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We welcome the simplification effort mainly targeting unclear or duplicative requirements, maintaining essential disclosures on environmental metrics and ask EFRAG to maintain that approach in the simplification process. We also welcome alignment with the draft global consensus metrics on the state of nature, convened by the Nature Positive Initiative. This is important for ensuring metrics are credible, practical and aligned for companies.			
Survey	Ecoacsa	Consultant (including software vendor)	Spain	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Ecoacsa	Consultant (including software vendor)	Spain	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Ecoacsa	Consultant (including software vendor)	Spain	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Ecoacsa	Consultant (including software vendor)	Spain	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Ecoacsa	Consultant (including software vendor)	Spain	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Ecoacsa	Consultant (including software vendor)	Spain	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ecoacsa	Consultant (including software vendor)	Spain	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Ecoacsa	Consultant (including software vendor)	Spain	35.E4-5.	Do you agree with the amendments of this chapter?	I disagree	The option to report metrics only for locations relevant to existing sustainability targets should be removed or made additional. In order to align with the double materiality concept in ESRS 1 and throughout the standards, metrics should be reported for locations that are material for biodiversity and ecosystems.	E4	Disclosure Requirement E4-5 - Metrics related to biodiversity and ecosystems change	
Survey	Clean Air Fund	NGO	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	CAF recognises the Commission's intention to simplify the DMA and appreciates that the amendments in Chapter 3 of ESRS 1 provide clearer guidance. The introduction of practical considerations, the clarification of the relationship between impacts, risks and opportunities, and the emphasis on ESRS as a fair presentation framework are useful steps. These measures can help reduce unnecessary administrative burden and avoid an overly compliance-driven checklist approach. However, the changes risk going too far by granting undertakings wide discretion in how they apply DMA. In particular, the new flexibility to decide whether to report at topical or IRO level, and the broad discretion around the treatment of non-material topics, create scope for inconsistent application. This may allow companies to narrow their assessment and conclude that critical issues such as pollution are not material. CAF does not believe that the balance between simplification and robustness has been achieved. The amendments simplify the process, but they also weaken enforceability. Explanations as to why a sustainability topic is or is not considered material remain largely voluntary. Without mandatory disclosure of the reasoning underpinning materiality assessments, transparency and comparability are undermined. Simplification should not mean deregulation. CAF supports proportionate simplification if it delivers higher-quality, decision-useful data on the most material issues. The current draft of Chapter 3 of ESRS 1, however, risks producing fewer datapoints without improving quality. CAF therefore recommends that EFRAG reinforce the DMA by requiring undertakings to provide a clear, standardised explanation of their materiality assessment outcomes.			
Survey	Clean Air Fund	NGO	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	CAF acknowledges that the new guidance in ESRS 1 brings some useful clarification on how remediation, mitigation and prevention measures should be considered in the DMA. Differentiating between actual and potential impacts and clarifying how to assess materiality before or after actions, provides preparers with more structure and consistency. This can help reduce divergent practices and promote a more uniform application of the DMA. At the same time, the framing raises significant issues. By allowing undertakings to consider the existence of mitigation or prevention measures, there is a risk that companies downplay the materiality of certain impacts, for instance, by arguing that pollution is less material simply because controls are in place. This could lead to underreporting on issues with clear and ongoing public health relevance. For CAF, the central priority is ensuring that when pollution is judged material, the data disclosed are of high quality, comparable, and decision useful. The new guidance must not become a loophole for omitting disclosures based on mitigation claims. Transparency requires companies to explain clearly both their assessment and the role of any remediation or prevention measures. CAF urges EFRAG to reinforce safeguards: companies should be required to document and disclose the reasoning behind their materiality decisions, including where mitigation is cited as a factor, to avoid selective or inconsistent reporting.			
Survey	Clean Air Fund	NGO	United Kingdom	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E2	CAF recognises that the NMIG can be a helpful tool in clarifying methodologies or providing examples of how to approach narrative disclosures. It may reduce implementation questions and avoid overburdening companies with unnecessary complexity. However, CAF is worried about the role NMIG now plays in the revised ESRS. A significant proportion of previously binding content has been shifted into NMIG. This fundamentally weakens the reporting framework because NMIG is non-binding, hence companies can choose to ignore it without explanation. As a result, disclosures are likely to become inconsistent, selective, and less comparable across companies and sectors. CAF does not support the removal of key datapoints from the binding standards. NMIG should be limited to clarifying "how to report," not redefining "what to report." In its current form, NMIG risks becoming a vehicle for deregulation. CAF supports simplification, but not at the cost of losing core disclosures that are essential to understanding companies' pollution impacts.			
Survey	Clean Air Fund	NGO	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	CAF recognises proportionate steps to simplify and streamline the reporting process and recognises that some of the newly introduced reliefs can help companies avoid unnecessary complexity and improve interoperability with ISSB standards. That said, CAF has serious reservations about the breadth of some reliefs, particularly those related to "undue cost or effort" and data quality exemptions. While these may ease implementation challenges, they risk becoming loopholes that companies use to avoid disclosing pollution-related data. The removal of the systematic preference for direct data in favour of estimates also risks lowering data quality. CAF believes it is possible to provide burden relief to companies whilst ensuring that the quality of data remains robust. Simplification must lead to better quality data, not weaker disclosure obligations. If reliefs are too generous, the system risks sliding into deregulation, producing fewer datapoints of lower quality and comparability. This is particularly problematic in relation to ESRS E2, where public health relevance requires robust, consistent information. CAF also stresses that reporting should not remain at the level of policy descriptions alone, but demonstrate how companies are prioritising effective mitigation measures in practice.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Clean Air Fund	NGO	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Clean Air Fund	NGO	United Kingdom	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	CAF acknowledges that streamlining the standards and focusing on quantitative information can be positive if it allows companies to dedicate resources to producing better quality and more relevant disclosures. A leaner set of datapoints can also reduce duplication and administrative burden. However, the scale of reduction in the current draft raises significant concerns. Cutting more than half of mandatory datapoints risks undermining transparency on core environmental issues, particularly pollution. Many of the datapoints removed affect the core integrity of the standards. By shifting substantial content into non-mandatory guidance, the draft risks reducing the ability to ensure consistent, comparable and reliable disclosures across companies and sectors. This risks turning simplification into deregulation: companies may report less, with wide variations in scope and quality, making it harder to assess their real environmental and health impacts. CAF strongly believes that simplification should not become deregulation. The risk of the current draft is that it produces fewer datapoints of lower quality, not fewer datapoints of higher quality. The ESRS must ensure that where pollution is material, the information reported is consistent, comparable, and decision-useful. This requires disclosures to link to concrete action: simply listing policies or resources is insufficient unless companies show how these translate into real mitigation outcomes.			
Survey	Clean Air Fund	NGO	United Kingdom	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	CAF is aware of the objective of the amendments to ESRS 1 concerning the clarification of the DMA and simplification of the process for preparers. The introduction of practical considerations, the option to adopt either a bottom-up or top-down approach, and the streamlining of the list of topics all reduce implementation complexity. However, CAF is concerned that the new discretion afforded to undertakings risks undermining comparability. The possibility to report at either topical or IRO level, combined with the lack of a mandatory requirement to explain why topics are judged non-material, creates space for selective reporting. This undermines the consistency that stakeholders need. Securing high-quality and comparable data is more important than broadening the scope of reporting at all costs. Materiality is central, but it must not become a loophole. CAF believes simplification is welcome if it strengthens the quality of disclosures. But the deletion of specific explanatory requirements shows how easily simplification can drift into deregulation. To maintain confidence in the system, undertakings must be obliged to provide clear, standardised reasoning for their materiality assessments, particularly when excluding environmental and health-related topics. CAF therefore partially agrees with the amendments. While the changes make ESRS 1 more usable, they fail to preserve the safeguards that guarantee comparability and accountability.			
Survey	Clean Air Fund	NGO	United Kingdom	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	CAF recognises the value of consolidating disclosures into cross-cutting requirements for policies, actions, targets, and metrics. This structure improves consistency and reduces duplication, making the standards more accessible for preparers. Yet, this streamlining comes at a cost. By moving topic-specific obligations into ESRS 2, the standard risks losing the necessary detail to evaluate company action on issues like pollution. Generic disclosures provide less assurance that undertakings are prioritising meaningful mitigation over high-level commitments. For CAF, disclosure must show how reported actions translate into effective prevention, reduction and mitigation, not just list policies. Simplification that blurs this distinction weakens accountability and makes reports less comparable. CAF therefore partially agrees with the changes to ESRS 2, the restructuring enhances readability, but shifting too much into non-binding guidance and generic requirements reduces transparency and lowers ambition in areas where clear reporting is expected.			
Survey	Clean Air Fund	NGO	United Kingdom	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	CAF cannot support the amended ESRS E2. While simplification is an important goal, the draft has gone too far, hollowing out the standard and undermining its quality. Among the 61% of datapoints that have been deleted, there are critical requirements relating to pollutant targets and methodologies. Key content has been shifted into NMIG, which companies may ignore without justification. This poses risks and reduces transparency. CAF is particularly concerned about the deletion of the requirement for undertakings to explain how their actions and resources relate to the mitigation hierarchy. Without this obligation, companies can describe policies in generic terms without clarifying whether they prioritise preventing or reducing pollution, as opposed to remediation or compensation. For CAF, this change fundamentally weakens accountability: reporting becomes descriptive, not action-oriented. The removal of methodological disclosure requirements, explaining whether emissions are measured or estimated, further erodes the reliability of reported data. The absence of binding site-level disclosures makes it impossible to assess localised pollution hotspots, where communities face the greatest health risks. Together, these changes turn simplification into deregulation. CAF strongly believes that the ESRS must ensure that, where pollution is material, disclosures are robust, consistent, and decision-useful. The draft fails this test. Reporting should demonstrate not just policies on paper, but whether companies are taking meaningful steps to reduce pollution in practice. CAF therefore disagrees with the amended ESRS E2.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We partially disagree that the revised Double Materiality Assessment (DMA) reduces complexity. - In fact, the removal of previously clear guidance—especially regarding scoring methodologies and thresholds—adds ambiguity. Without a defined scoring system or clear thresholds, companies may struggle to conduct a robust DMA, and external auditors may find it difficult to challenge or validate materiality assessments. This lack of structure risks undermining both consistency and credibility. - The revised DMA suggests that only topics identified as material through the assessment should be disclosed. DMA disclosures remain focused, consistent, and aligned with the company's validated materiality outcomes. - While this approach is logical and aligns with the principle of DMA, it raises concerns about the inclusion of other topics—such as those highlighted by rating agencies or external stakeholders. If companies are expected to report on issues beyond those identified through their own DMA, it questions the purpose and value of conducting a DMA at all. •Thus to overcome this ambiguity, our proposal would be to make the reporting of non-material topics voluntary and at the discretion of companies.			
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	The new guidelines clarifying how to consider remediation, mitigation, and prevention actions within the DMA introduce additional complexity for companies. Undertakings are now expected to assess and disclose both the gross and net impacts of their activities. This significantly increases the reporting workload. Companies must first describe the initial gross negative impacts, then detail the actions taken to remediate, mitigate, or prevent those impacts. They are also required to justify why the resulting net impact is considered non-material. Furthermore, they must provide supporting evidence—such as audits, KPIs, or internal reports—to substantiate this assessment. This raises a fundamental question: can this be considered a simplification? These requirements add substantial work and cost for reporting entities.			
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I disagree	We acknowledge and support the intention behind the proposed amendments to improve the readability, conciseness, and connectivity of ESRS sustainability statements. The introduction of an executive summary and the use of appendices to separate detailed disclosures from key messages are positive steps that enhance accessibility and coherence, particularly for stakeholders unfamiliar with technical reporting. Clarifying the concept of "connected information" and discouraging fragmentation and repetition also contributes to a more integrated approach to sustainability and financial reporting. This alignment with broader corporate reporting is essential to ensure that sustainability disclosures are not treated in isolation. However, while these changes offer greater flexibility in presentation, they do not necessarily reduce the complexity of the underlying reporting requirements. The volume and granularity of data required remain substantial, and in many cases, the simplifications are more cosmetic than substantive. For example, merging datapoints or rephrasing indicators may improve readability but does not significantly reduce the reporting burden for preparers. Therefore, while we agree that the amendments support more relevant and concise reporting in form, we believe that further efforts are needed to simplify the content itself. This would ensure that the ESRS framework remains both robust and proportionate, particularly for first-time reporters and/or smaller companies that are willing to report on voluntary basis.			
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We acknowledge the efforts made to restructure the ESRS architecture, particularly the interaction between ESRS 2 and the topical standards. The shift toward a more principles-based approach and the reduction of prescriptive datapoints in the Policies, Actions, and Targets (PAT) section represent a step forward in simplifying the framework and improving its usability. However, while these changes improve the presentation and connectivity of the standards, the actual reporting effort may not be significantly reduced. For example, the requirement to disclose PAT for material IROs remains, and companies must still explain which material topics are not covered by PAT. The elimination of the obligation to disclose future plans and timelines is helpful, but the overall complexity of assessing and reporting on material IROs persists. Moreover, the ability to disclose information at a higher aggregation level is welcome, as it better reflects how companies manage sustainability topics internally. Yet, further guidance may be needed to ensure consistency and comparability across sectors. In conclusion, the amendments strike a better balance between prescriptiveness and flexibility, and they enhance connectivity with broader corporate reporting. However, the simplification is more cosmetic than substantive, and additional efforts may be required to reduce the actual reporting burden.			
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The reorganization of content—clearly distinguishing mandatory requirements from non-mandatory guidance—is cosmetic. The removal of "may disclose" datapoints eliminates ambiguity and strengthens the consistency of interpretation across reporting entities. The relocation of all "shall disclose" datapoints into the main body of the standards, along with the placement of mandatory Application Requirements directly beneath the relevant Disclosure Requirements (DRs), improves the logical flow and usability of the standards. This structure helps preparers better understand what is required and how to report it, reducing confusion and supporting more consistent implementation. The revised language is also more concise and coherent, which contributes to improved accessibility, particularly for first-time reporters and cross-functional teams involved in contributing to the sustainability reporting.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The NMIG in the revised ESRS aims to support implementation through examples and explanations. However, its optional nature introduces several disadvantages that may affect consistency and clarity in sustainability reporting. It is confusing. Firstly, NMIG's non-binding nature means companies may choose to ignore it, leading to inconsistent application of ESRS across entities. This undermines comparability and may complicate assurance processes. Secondly, the separation of illustrative guidance from the mandatory standards can cause confusion. Companies may struggle to distinguish between what is required and what is merely recommended, increasing the risk of misinterpretation. Thirdly, the legal status of NMIG remains uncertain, creating ambiguity for regulators and auditors. Another concern is the risk of over-reliance. Companies might adopt NMIG examples without adapting them to their specific materiality assessments or sector context, resulting in disclosures that are not decision-useful or misaligned with actual impacts. Finally, while NMIG is optional, interpreting and applying its content may require significant expertise and resources, posing a burden for smaller entities. These organizations may lack the capacity to fully benefit from the guidance, potentially widening the gap in reporting quality between large and small companies. In summary, while NMIG offers valuable support, its optional status, legal ambiguity, and potential for misapplication present notable challenges for consistent and effective ESRS implementation. To avoid the lengthy discussion observed during the first auditing process our proposal would be to name the document: 'Non-Mandatory Illustrative Document/Guidance'. One the hand this will clarify its legal status and can be updated regularly by EFRAG in view of new information.			
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The proposed amendments offer a pragmatic and proportionate approach to reduce reporting burdens while maintaining the transparency required to support the EU Green Deal and interoperability with IFRS S1 and S2. Advantages include: The introduction of horizontal reliefs such as "undue cost or effort" and flexibility in data sourcing (direct vs. estimated) enhances feasibility for preparers. Provisions allowing partial scope reporting and the exclusion of non-significant activities or joint operations improve relevance and reduce unnecessary complexity. Streamlining disclosures on resilience and financial effects ensures clarity and avoids speculative reporting. The relief for acquisitions and disposals facilitates smoother transitions in reporting scope. However, some limitations remain: The absence of relief for commercially sensitive information may hinder full transparency in certain contexts, pending regulatory developments. The increased use of estimates and partial reporting could affect comparability and data reliability across undertakings. Certain reliefs go beyond those in IFRS S1 and S2, which may challenge full interoperability. Overall, the amendments reflect a constructive response to stakeholder feedback and early implementation challenges. They support a more efficient and targeted reporting process, without compromising the core objectives of the ESRS framework. Further alignment with SFDR and ISSB standards will be essential to ensure consistency and facilitate convergence across sustainability reporting regimes.			
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	The role of the external auditors is underestimated. The provision allowing for partial scope reporting when reliable data is unavailable is pragmatic and reflects the operational realities many undertakings face, particularly in complex value chains. By requiring disclosure of actions to improve data coverage in future periods, the standard ensures transparency and encourages continuous improvement without penalizing companies for initial limitations. The absence of a time limit for using this relief is understandable, given the variability in data availability across sectors and geographies. However, I acknowledge the concerns raised by some EFRAG SRB members regarding the potential for prolonged reliance on partial disclosures. A soft expectation or guidance encouraging progressive expansion of scope over time could help mitigate this risk. Importantly, this relief does not exempt undertakings from disclosure obligations—it simply allows for a more realistic and phased approach to metric calculation. This aligns with the principles of proportionality and feasibility, while still supporting the overarching goals of the ESRS framework and its interoperability with IFRS S1 and S2. In conclusion, the relief is well-calibrated to support prepares during the early phases of the implementation, but that must be accompanied by more guidance for them and external auditors.			
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	We support Option 2, which limits the requirement to qualitative information and allows companies to disclose quantitative financial effects on a voluntary basis. This approach ensures that the appropriate contextual information is provided to the users of the sustainability statements. It also acknowledges the commercial sensitivity of certain quantitative disclosures, which may pose strategic risks if made mandatory. By removing conditional requirements, Option 2 reduces complexity and avoids placing undue pressure on companies to produce uncertain or speculative figures. It enables entities to focus on building robust qualitative narratives that reflect their strategic positioning and sustainability commitments, while gradually developing the capacity to report quantitative data as the methodologies mature over multiple reporting periods. Suggestion for improvement: From EFRAG State of Play 2025 is obvious that at high level Sustainability statements are comparable. So EFRAG can encourage voluntary progress by mapping ongoing initiatives at sector level.			
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	There is a controversial point of view between the question 20 and the question 19? As we support the Option 2 - that suggests that quantitative disclosures should be voluntary, while answering "Yes" to the ESRS E1 question implies that some quantitative datapoints are still necessary and feasible.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	The message of our members (EU and non-EU companies) is to ensure a high-level of interoperability between various reporting systems to avoid double / fragmented reporting for companies. However, not enough expertise and knowledge on the IFRS S1 & S2 to comment this question.			
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	Some datapoints—such as the breakdown of employees by age—may be of limited relevance and their removal contributes to simplification, other deletions raise concerns. For example, the removal of the "total GHG emissions" datapoint does not represent a meaningful reduction in reporting effort. Companies are still required to calculate and disclose Scope 1, Scope 2, and Scope 3 emissions. Since total GHG emissions are simply the sum of these scopes, removing this datapoint adds no real value and may even reduce clarity for users of the information. This kind of change is more cosmetic than substantive. The users were seeking simplification specifically for datapoints that are difficult to obtain or not readily available, and which require the implementation of an entire process. Removing datapoints that are already easily reported does not constitute a simplification. On the contrary, it overlooks the real challenge, which lies in addressing the complex and resource-intensive datapoints.			
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	22.E3.	Comments on deleted datapoints in ESRS E3	I disagree	The intention of simplification is positive, but converting some optional datapoints to mandatory may work against the burden-reduction goal. In addition the companies operate under national or regional law for water (E3) and biodiversity (E4), how can they report at global level for these datapoints? Then they need to do a national reporting and then a corporate one at global level. •At present, the water management is structured in line with national law requirements. Companies already perform ordinary calculations of withdrawals and discharges, and in some sites, they implement measures such as rainwater capture and reuse. •However, when mapping against the ESRS datapoints, multiple companies face a gap in granularity: some metrics required by ESRS (e.g. disaggregation by source, quality, or level of reuse) are not systematically collected or can not be reported as such. •Companies are working to align their monitoring system with ESRS categories, but this requires time, investment, and technical guidance. A phased approach and flexibility would be crucial for SME's to ensure accurate and meaningful reporting, without compromising the quality of data.			
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	22.E4.	Comments on deleted datapoints in ESRS E4	I disagree	For the E4 - Biodiversity is typically managed at a local level, whether by country or individual sites, due to the specific ecological, regulatory, and geographic contexts involved. This raises a valid question: does it make sense to require a corporate-level biodiversity transition plan for a matter that is inherently location-specific? •Company approach is limited to compliance with national/regional law on protected areas and permitting. We have not yet developed systematic methodologies or KPIs for biodiversity beyond legal requirements. •Practical guidance and gradual implementation timeline would be essential to allow operators especially SME's to build capacity, develop transition plans, and progressively integrate biodiversity into the overall sustainability strategy.			
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	22.G1	Comments on deleted datapoints in ESRS G1	I disagree	For G1 Business Conduct confirmed incidents - This may lead to issues concerning the protection and disclosure of sensitive data (confidentiality).			
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	See feedback provided under point 22.			
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	It is surprising to see new datapoints being introduced while the majority of CSRD reports (waves 2 and 3) have not yet been published. Shouldn't we allow companies to release their first CSRD reports—already containing a significant number of datapoints—before adding new ones? It feels premature to go this far in the reasoning or development at this stage			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	Explicitly requiring the adoption of fair presentation in the preparation of ESRS sustainability statements would strengthen the application of the materiality filter and enhance the relevance of reported information. Fair presentation ensures that disclosures are complete, balanced, and free from bias. By embedding this principle, undertakings are guided to report only on sustainability matters that are genuinely material, based on their impacts, risks, and opportunities. This approach discourages excessive or superficial reporting and supports a more disciplined and transparent materiality assessment. Moreover, fair presentation contributes to the clarity and usability of sustainability information. It helps stakeholders—particularly investors and regulators—navigate disclosures more effectively, focusing on what is decision-useful rather than being overwhelmed by immaterial data. In this context, fair presentation acts as a safeguard against both under-reporting and over-reporting, thereby improving the overall quality and comparability of sustainability statements across entities.			
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Complex estimations are inherent across sectors, and excluding financial entities would compromise consistency and comparability. The key question is whether it is truly up to companies, as reporting entities, to assess the relevance of this exception for financial institutions.			
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	That is "the" good example of simplification. Shifting from a proportional threshold (at least 50 employees representing 10% of total workforce) to a fixed approach based on the top 10 countries by headcount—provided each has more than 50 employees—enhances the relevance and comparability of social data. This revision addresses a key limitation of the previous requirement, which often resulted in limited or fragmented country-level disclosures. By focusing on the countries with the largest employee presence, the new threshold ensures that reporting reflects the most significant social contexts within the undertaking's operations. While a minority of stakeholders have noted that this change may increase the number of countries to report on, the data required is typically available through HR systems, and the additional reporting effort is expected to be manageable. The benefits in terms of transparency and meaningful insights into collective bargaining and social dialogue outweigh the marginal increase in reporting burden. Overall, this adjustment contributes to more consistent and decision-useful sustainability reporting, aligned with the ESRS objective of improving data quality without imposing disproportionate requirements.			
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	As biodiversity and ecosystem-related methodologies continue to evolve rapidly, it is essential that the application requirements reflect the latest scientific thinking and align with emerging frameworks such as the Science-Based Targets Network (SBTN). While AR 26 provides useful guidance on the types of targets companies may set—such as area restored, natural surface recreation, or ecological integrity of sites—it could benefit from further refinement. Specifically, the current wording may not fully capture the dynamic nature of biodiversity metrics, nor the increasing emphasis on outcome-based and science-aligned approaches. A revised AR 26 should offer clearer direction on how to define meaningful and measurable biodiversity targets, including references to ecosystem services, species recovery, and landscape-level impact. It should also encourage alignment with recognized methodologies and taxonomies to support consistency and comparability across disclosures. Updating AR 26 would not only improve the quality of reporting but also support companies in setting credible and actionable biodiversity goals, in line with global expectations and regulatory developments.			
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	Not sure that the issue already mentioned in the previous survey has been solved (no alignment with the Pay Transparency Directive)			
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	see item 22			
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	see item 22			

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Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Proposal to delete: 1. CRM: Concept is regional and for different reporting regions will be different. 2. Dematerialisation; 3. Remanufacturing; 4. Repair: 5. Reparability: 6. Resource efficiency: 7. Scope of reparability: Remove 2-7 as the Concept of circular economy is clear. 8. Secondary resources: Definition of Raw material is sufficient. 9. SRM: Concept is regional and for different reporting regions will be different. 10. GFA: Irrelevant. Developed nationally/regionally due to rule of law in place. 11. Substance of Concern: 1. Bullet point 1, covered by SVHC definition. 2. The companies outside of EU do not have to comply with CLP criteria. 12 Waste stream: Definition of Raw material is sufficient. 13: GHG removal: Modify '(Anthropogenic) removals refer to the withdrawal of GHGs from the atmosphere as a result of deliberate human activities. These include enhancing biological anthropogenic sinks of CO2 and using chemical engineering to achieve long-term removal and storage. Applications of carbon capture and storage (CCS) from industrial and energy-related sources reduce emissions but do not remove carbon from the atmosphere. Removals are achieved when CCS is combined with bioenergy production, also known as bioenergy with carbon capture and storage (BECCS). Removals are also achieved through direct air carbon capture and storage (DACCS), in which CO_2 is extracted directly from the air and stored. Other removal pathways include enhanced weathering and mineralisation(e.g. such as recarbonation of lime-based products. In this process, CO_2 from the atmosphere is absorbed and permanently bound in the material during its lifetime and end-of-life phase. Removals can be subject to reversals, which are any movement of stored GHG out of the intended storage that re-enters the atmosphere. For example, if a forest that was grown to remove a specific amount of CO2 is subject to a wildfire, the emissions captured in the trees are reversed.			
Survey	IMA-Europe	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The simplifications appear more cosmetic than substantive. While the reduction in datapoints is welcome in principle, a closer look reveals that many have been merged or slightly amended, rather than removed entirely. As a result, the overall effort required to collect, calculate, and validate sustainability data remains largely unchanged for many companies. That said, the decision to retain certain provisions due to ongoing regulatory developments at Level 1—such as the definition of value chain for financial institutions or the interpretation of 1.5°C compatibility—is understandable and reflects a pragmatic approach and does not allow enough time for companies to get ready for compliance due to legal uncertainty.			
Survey	ESBG WSBI	Association of financial institutions	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	ESBG welcomes the proposed amendments to Chapter 3 of ESRS 1, which simplify and clarify the DMA and reinforce materiality as a filter. The additional guidance is helpful and should support more consistent reporting. However, undertakings still face difficulties in evaluating impacts on a comparable scale when impacts are not measured using consistent units, and in assessing effects on third parties in a way that is consistent with other undertakings. The absence of generally accepted methodologies further hinders coherence and comparability in sustainability reporting. ESBG therefore sees a need for further clarification. The identification of risks and opportunities (paragraph 42, AR 15) would benefit from clearer guidance on assessing likelihood and magnitude and on the connection with SBM-3 in ESRS 2. The current wording allowing disclosures either at topical level or at IRO level may be confusing. Our understanding is that reporting should be conducted at topic level regardless of approach, which we see as beneficial for streamlined reporting. It is important that material topics are identified at the same level in the DMA. In addition, paragraph 21(b) of ESRS 1 states that information is material when "it is necessary for users to understand the undertaking's IROs." While broad, this may impose an undue burden on preparers. We recommend explicitly incorporating the principle of decision-usefulness, in line with financial reporting, to enhance clarity and certainty. The revisions introduced in the streamlined Appendix A appear largely cosmetic, moving sub-sub-topics into main columns without substantive change. Finally, EFRAG could include, within its Non-Mandatory Implementation Guidance, a sector-specific reference list of IROs to support preparers in applying the sector-agnostic ESRS and enhance consistency and comparability across disclosures.			
Survey	ESBG WSBI	Association of financial institutions	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We consider that it is slightly clearer. However, a diagram on the separate treatment of actual vs. potential negative impacts would facilitate understanding, especially in relation to remediation actions being taken or planned. Moreover, it increases the complexity of reporting. We welcome the clarification on IROs, and particularly the interpretation of actual and potential positive and negative impacts. However, we see need for further guidance and clarification. It is important to ensure that companies provide accurate and reliable information, and that it is clear what is to count as a negative impact, for instance when it is mitigated. For the process of the DMA, it would be beneficial if it is clarified how an IRO and topic is affected if the relevant challenge is regulated in a country. Appendix C, while useful, does not provide full clarity and guidance on the identification and selection of potential impact. It could be beneficial with a concrete example in the appendix. Moreover, the visualization of Appendix C could be clearer – if it is meant to be read as a flow-chart where one leads to the other. Distinction between gross and net impacts: While the introduction of this distinction is conceptually relevant, it may add practical complexity—especially when assessing indirect impacts such as financed emissions. We recommend that EFRAG provide specific guidance for financial institutions on how to apply this distinction in the context of mitigation policies, exclusions, or engagement strategies. Clarify "significant ongoing actions": The term lacks definition and may result in inconsistent application across undertakings. Ensure alignment with auditability and comparability: The current approach risks undermining both due to subjective judgments on remaining impact.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ESBG WSBI	Association of financial institutions	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The removal of repetition and fragmentation of data is a clear indication of a more structured report. This was one of the largest issues faced by first-time reporters last year. Leaving the executive summary as an option is important, so as not to enforce additional burden. We support the increased flexibility and revised structure of ESRS reporting. We particularly appreciate the option to include taxonomy reporting in appendices and that reporting entities are only required to disclose policies once. The option to incorporate information by reference adds flexibility, especially for corporate groups. However, for financial institutions, this presents technical challenges—particularly when ESG disclosures are already provided under Pillar 3 frameworks. Differences in consolidation scope, assurance levels, and timing can lead to inconsistencies. We recommend that EFRAG clarify the criteria for referencing external documents, set minimum standards for quality and timing, and provide NMIG examples tailored to banking groups with multiple reporting scopes.			
Survey	ESBG WSBI	Association of financial institutions	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	Changes in PAT were welcoming, especially the removal of plans and timelines for PAT implementation. We also welcome the simplification of the MDRs (now GDRs), which provides more flexibility. At the same time, it is important to maintain PATs for material IROs (if adopted) as a reporting point in ESRS 2. Within GDR-A (new paragraph 38), more information should be given on the materiality threshold of what is considered as "significant resources," as this is still subjective and could be an issue during audit. The materiality/threshold could be defined by the undertaking, disclosed in the general disclosures, in order to support consistency and auditability. We also recognise that GDR-A introduces helpful flexibility by allowing voluntary disclosure of sustainability-related CapEx and OpEx. However, its applicability to financial institutions is limited. In this sector, sustainability-related resources are typically channelled through financial products—such as loans, investments, or insurance—rather than through own operations. As a result, these figures may not be operationally relevant or material.			
Survey	ESBG WSBI	Association of financial institutions	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	Welcoming changes. Overall, we believe the proposed amendments achieve the desired level of clarity and accessibility, and the overall structure of the standards contributes to this. Remaining ambiguity in "may" language: Although most "may disclose" datapoints were removed, some still remain (e.g., ESRS 1 p.114–115), which could cause confusion and should be reconsidered. Terminology consistency: Terms like "material topics" vs. "material IROs" and "adverse" vs. "negative" impacts are used interchangeably, which may lead to interpretation issues and audit challenges. Application Requirements (ARs): Wording such as "shall consider" in ARs creates ambiguity. It's unclear how "consideration" can be measured or audited, potentially leading to burdensome discussions with auditors. Need for datapoint mapping: A correlation table between old and new datapoints would help preparers transition and reduce implementation costs.			
Survey	ESBG WSBI	Association of financial institutions	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We are positive to the establishment of the NMIG and to the fact that it is not implemented in the Delegated Act, as it could create confusion for reporting entities and users of sustainability information. The shift of the information to NMIG is important, as it was creating too much complexity in the standards. We suggest to keep NMIG as voluntary and link the information directly with ESRS paragraphs and chapters, in order to facilitate reporting for undertakings that are reporting such information on a voluntary basis. NMIG should remain concise and practical: It should offer clear examples, not act as a repository of prescriptive content or implicit "best practices." Risk of confusion: If NMIG is too detailed or ambiguous, it may confuse preparers, auditors, and stakeholders about its legal status and expectations.			
Survey	ESBG WSBI	Association of financial institutions	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	PARTIALLY AGREE Overall, we are positive to the reliefs provided. There is a need for streamlined reporting that ensures that material information is easily available. We acknowledge the data challenge that exists for both reporting entities and users of sustainability information. Direct data is preferred, but it is important to allow for estimations where it is not possible. It is important to have transparency regarding the quality of the data and sources provided. We believe the intention is covered through paragraph 90, but the language could be simplified. Clarify upstream/downstream data expectations: The current drafting may imply systematic data collection across all metrics, which is impractical. It should be clarified that such data is only required for materiality assessment. The flexibility to use estimates and proxies is a practical necessity, especially in sectors with complex value chains. However, the lack of a reliability hierarchy or minimum criteria may affect data quality and comparability. In the financial sector, where data traceability is critical for risk management, indiscriminate use of proxies can lead to inconsistencies and undermine supervisory confidence. We recommend establishing a hierarchy of sources (e.g., primary data > validated proxies > sector averages), requiring explicit disclosure of estimation methodologies, and including an uncertainty assessment for each proxy used.			
Survey	ESBG WSBI	Association of financial institutions	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	ESBG agrees with the introduction of a relief for "undue cost or effort." However, we suggest that no time limit is implemented, due to the uncertainty of the VSME take-up by SMEs, which will limit the availability of actual data. At the same time, we are concerned about the potential for inconsistent understanding and application of this concept. There is a necessity for clearer guidance on how to interpret and integrate this concept into sustainability reporting. This term should be further specified and developed to prevent the need for unnecessary justification to the auditor regarding the undertaking's partial non-disclosure of certain requirements under the "undue cost or effort" exemption. Clarify terminology: The term "undue cost or effort" is used in both DMA (p47) and reporting (p89), which may cause confusion. Clear distinction is needed. Allow full estimation: Paragraph 91 should clarify that metrics may be fully estimated—not just partially—when reliable data is unavailable.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ESBG WSBI	Association of financial institutions	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	As preparer, quantifying anticipated financial effects represents a significant challenge, as it requires estimating figures over time horizon that substantially exceeds the scope of an undertaking's strategic plan and in the absence of generally accepted methodologies.The uncertainty inherent in such projections is therefore very high,and disclosing such figures entails providing data approved byBoard of Directors that is subject to a high degree of uncertainty and unreliability. For this,we support a common-ground approach.In the short term we support Option2, where quantitative data can remain voluntary, and more guidance should be provided on methodology.At the same time,we recognise the intention behind Option1 to obtain more detailed quantitative data,which would benefit financial industry as an important user of sustainability information.Credit institutions are under increasing pressure from regulatory and supervisory bodies (EBA,ECB&NCA) to collect data on anticipated financial effects from their counterparties.Quantitative anticipated financial effects are explicitly referenced inEBAGuidelines on the Management of ESG Risks as a critical metric.However, counterparties are unlikely to produce reliable data unless these metrics are included in their sustainability disclosures and subject to assurance. Without this metric in ESRS E1, credit institutions will have to collect it bilaterally through questionnaires, as supervisors will still require it for risk management purposes. Implementing Option 1 is challenging at this time due to the lack of data and could involve legal and audit risks. High uncertainty and the absence of standardised methodologies make quantitative disclosures unreliable and potentially misleading, and forward-looking data may give a false sense of certainty and increase litigation risk. Ideally, we prefer a flexible short-term solution while still aiming to achieve quantitative data in the future. A mixed approach could use disclosure heatmaps to provide a comprehensive overview without resorting to numerical data. We also ask EFRAG to explain the potential legislative risks that Option 1 may pose.			
Survey	ESBG WSBI	Association of financial institutions	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	ESBG acknowledges the importance of the datapoints retained in paragraphs 40–42 of ESRS E1 for assessing exposure to transition and physical risks. However, there are still concerns regarding their alignment with existing reporting obligations. It would be useful to clarify which datapoints correspond to those already covered under the Pillar 3 templates in order to reduce duplication and reporting burden. For example, ESRS E1 paragraph 40(a) overlaps with Pillar 3 template 5. Clearer guidance on such overlaps would ensure consistency and help streamline the reporting process. Furthermore, it would be appreciated if clarification could be provided on whether the anticipated financial effects on revenue (ESRS 1 paragraph 41 (e)) should be reported on a gross basis or net of mitigation actions, as the current wording does not appear to address this point.			
Survey	ESBG WSBI	Association of financial institutions	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	PARTIALLY AGREE We support the financial consolidation approach; however, we would urge EFRAG to provide more guidance on when to include Scope 1 and Scope 2 emissions from operated assets that are outside the reporting boundary. This would streamline reporting and contribute to real simplification. Moreover, it would be helpful to have an illustrative example that clarifies how emissions are reported for real estate investments for different ownership structures (direct investments, through ownership of a subsidiary real estate company, through funds, etc.).			
Survey	ESBG WSBI	Association of financial institutions	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	ESBG WSBI	Association of financial institutions	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	FOR ALL: We are positive to the reduction of "shall disclose" requirements, specifically the narrative PAT disclosures. We do not believe this burden reduction is in conflict with fulfilling the objectives of the EU Green Deal. Not all reductions will lead to less reporting effort: While the number of datapoints has decreased, (a)the simplifications may have taken place to topics that are not material to the undertakings (b)new concepts and methodologies may increase complexity. Ambiguity in remaining provisions: Some paragraphs (e.g., ESRS 1 p27, AR 20 to p49) still use vague language like "useful information" or "possible aspect to cover," which may create uncertainty.			
Survey	ESBG WSBI	Association of financial institutions	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We oppose the introduction of new mandatory datapoints, as converting "may" to "shall" contradicts the simplification mandate set by the European Commission. In particular, requiring disclosure of biodiversity transition plans may create uneven pressure across sectors, encouraging premature publication before robust methodologies are available.			
Survey	ESBG WSBI	Association of financial institutions	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	PARTIALLY AGREE We acknowledge that the information is justified. However, for ESRS 2 - BP 1, there should still be a balance on the financial burden for undertakings.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ESBG WSBI	Association of financial institutions	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	PARTIALLY AGREE ESBG notes that "fair presentation" can be subjective. More guidance should be given to ensure that audit costs are contained. We also believe it is important to provide robust guidance on how fair presentation should be interpreted within the sustainability sphere, if maintained as a founding principle for the ESRS.			
Survey	ESBG WSBI	Association of financial institutions	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	The obligation to disclose absoluteGHGemission reduction targets represents a red line.We are strongly against requiring banks to publish climate absoluteGHGemission targets and support intensity-based targets instead.Some provisions ofESRSare unsuitable for the banking sector. ESRSE1-4 requires institutions to report GHG reduction targets in absolute values. Currently,banks have developed targets through Net2ZeroBankingAlliance,focusing on intensity metrics for most sectors&absolute values only for fossil fuel-related sectors.Projection difficulties: Setting absolute GHGreduction targets requires complex projections of financing volumes and emissions intensities over 5–25years.This is challenging due to uncertainties in macroeconomic and climate conditions, client decarbonisation trajectories and the composition of future portfolios. Many companies have not yet measured their GHG emissions or set decarbonisation paths. Consequently, absolute targets risk contradicting banks' role in financing the low-carbon transition. They would push banks to reduce exposures to high-emitting counterparties instead of supporting their transition. Banks can only set absolute targets for sectors from which they plan to divest, while their mission involves increasing financing to transition sectors. Data reliability issues: The availability and quality of data for a reliable baseline are insufficient. Reported emissions are volatile due to methodological changes, SMEs often lack data and reliance on proxies (e.g. PCAF) does not meet CSRD quality standards. Unreliable data undermines comparability, provides limited value to stakeholders and exposes preparers to high legal risk considering Board approval requirements. Sector-specific considerations: Financial institutions face inherent limitations in forecasting long-term portfolio composition, as asset and liability structures are influenced by interest rates, macroeconomic developments and external shocks. Given these challenges, absolute values require estimation that could undermine reporting credibility. Intensity targets are today the only workable tool compatible with banks' role as financiers of the economy and aligned with SBTi. Financial institutions should be explicitly exempted from mandatory disclosure of absolute targets and retain flexibility to disclose intensity, absolute, or both.			
Survey	ESBG WSBI	Association of financial institutions	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	PARTIALLY AGREE ESBG acknowledges that different methodologies for country-by-country disclosures related to S1 may impact companies in varying ways. The financial sector is dependent on comparable information on social sustainability parameters, and we welcome the solution that would provide more information by country.			
Survey	ESBG WSBI	Association of financial institutions	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	PARTIALLY DISAGREE ESBG considers robust information on living wages as important when assessing social sustainability. We acknowledge that there exist different interpretations and see a need for streamlining. The proposed hierarchy may result in less transparent reporting, combined with a lack of requirement to report on which methodology is used. We also note that in some jurisdictions, companies are already obliged to consider living wages in their due diligence processes according to national legislation.			
Survey	ESBG WSBI	Association of financial institutions	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	ESBG welcomes the way the SFDR Principal Adverse Indicators (PAIs) have been incorporated into the amended ESRS. The consolidation of datapoints and amendments aimed at increasing relevance are considered positive developments that improve usability for both preparers and users of sustainability information. It is seen as particularly helpful that reporting on topics such as forced labour and child labour has been moved to ESRS 2, which strengthens accessibility and ensures that this information is given appropriate visibility across disclosures. At the same time, ESBG suggests that clearer references to the SFDR be included directly in the Standards, similar to the approach taken in earlier ESRS versions through footnotes. This would further support alignment between the two frameworks and provide more clarity for reporting entities.			
Survey	ESBG WSBI	Association of financial institutions	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	ESBG WSBI	Association of financial institutions	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	ESBG WSBI	Association of financial institutions	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ESBG WSBI	Association of financial institutions	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	FOR ALL: ESBG members are overall positive to the suggested changes to the ESRS standards. The wording is more understandable, more guidance has been added, and the alignment between ESRS 1 and 2 has been helpful in reducing repetition. It is important to ensure significant and meaningful simplification, while at the same time maintaining the level of ambition and the need for robust and harmonized ESG data. Simplification is uneven across standards: While some standards have been meaningfully simplified, others still contain excessive granularity or unclear provisions. Glossary and terminology: Some definitions remain vague or inconsistent, which may hinder implementation and comparability. Pending regulatory clarifications: Key issues such as value chain definition for financial institutions, phasing-in provisions, and treatment of confidential information remain unresolved and affect the overall balance.			
Survey	ESBG WSBI	Association of financial institutions	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	ESBG WSBI	Association of financial institutions	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	ESBG WSBI	Association of financial institutions	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	ESBG WSBI	Association of financial institutions	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	ESBG WSBI	Association of financial institutions	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	ESBG WSBI	Association of financial institutions	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	ESBG WSBI	Association of financial institutions	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ESBG WSBI	Association of financial institutions	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	ESBG WSBI	Association of financial institutions	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	ESBG WSBI	Association of financial institutions	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	ESBG WSBI	Association of financial institutions	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	ESBG WSBI	Association of financial institutions	Belgium	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Rainforest Action Network	NGO	United States	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	In paragraph 21.b there is an attempt to define the term 'material', but the definition is circular. AR 4 for para.21 insinuates that "material impacts" is the same as "most significant impacts". However, the latter is only a subset of the former. It is very concerning that there is no minimum standard threshold, above which impacts should be reported (para 28-30; AR 5 for para 30). It is also concerning that companies only need to report when information is 'available without undue cost or effort". Some of the worst social and environmental impacts are not necessarily easy and cheap to measure and may thus remain unreported (paragraph 47) Para 48 implies that double materiality impacts are similar for companies in the same sector, which if it were true, would make company reporting redundant. Finally, the disclosure of location specific information is crucial for a real understanding of an undertakings impacts. The fact that AR 22 and 23 allows undertakings to aggregate information as they see fit, means that many disclosures will be useless for stakeholders, in particular affected communities, and also really hard to verify.			
Survey	Rainforest Action Network	NGO	United States	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We are concerned that the new standards make it optional to screen sites in their materiality assessment. The screening of locations, and the disclosure of impacts by location, is crucial for effective disclosures. Without site specific data, stakeholders will not have the information they need to assess to what extent specific impacts are caused by a certain company. We also strongly recommend making the disclosure of all data points in Appendix A mandatory, and to add some key missing ones, including: - all locations where the company operates - all locations where the company sources from - water use/ year - area and location where land use change occurred in areas owned or managed by the company, as well as in its supply chain - number of animals, by species, it owns/controls/raises/slaughters, on a yearly basis - animal welfare policies (if the company deals with animals) - food system transition plan			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Rainforest Action Network	NGO	United States	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We suggest that disclosure elements for which disclosure is not required, especially those regarding Biodiversity and Ecosystems, are kept in the standards as examples, rather than being removed to the NMIG. This would provide guidance on what kind of information is likely to be relevant and will support the standardisation of metrics.			
Survey	Rainforest Action Network	NGO	United States	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	We agree with EFRAGs concern (Para 61 of Basis for Conclusions) that the introduction of additional reliefs, beyond the ones incorporated by ISSB, will result in additional differences in interoperability and is therefore undesirable. In particular, we are concerned about - para 62 - the extension of undue cost and effort to all metrics, as this will drastically reduce the information that will be reported. It is inherent in the nature of this type of reporting that some datapoints require effort and costs to collect. That is why the onus is on the company, who causes the impacts, to do so, and not on society, following the 'polluter pays' principle. - para 66 - the combination of a relief for metrics due to lack of data obtainable without undue cost or effort. The lack of a timebound milestone by when the companies should have this data, means that this relief can be endlessly used to avoid reporting on key aspects such as supply chain impacts. - para 67 it is important to maintain the hierarchy of inputs, and not replace it with the vague considerations of 'practicability and reliability". - para 76 - it is crucial that Financial Institutions are fully included in the disclosure standards, and the alleged lack of sector guidance should not be a relief to be exempt from disclosure requirements.			
Survey	Rainforest Action Network	NGO	United States	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	It is essential to include a time limit for these reliefs. We believe there is no evidence that shows that reporting on how the company is improving the coverage of its calculation in the next period, will actually work as an incentive to improve disclosures.			
Survey	Rainforest Action Network	NGO	United States	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Rainforest Action Network	NGO	United States	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	We dont think ESRS disclosure requirements are unacceptably burdensome. In fact, they seem generally less demanding than those of GRI or IFRS. The current set of datapoints may have been reduced so much, that, considering also all the reliefs, it is not enough to actually paint a comprehensive picture of the impacts of companies.			
Survey	Rainforest Action Network	NGO	United States	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Rainforest Action Network	NGO	United States	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Rainforest Action Network	NGO	United States	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	The ESRS is based on the CSRD and the general principles of the Accounting Directive, and has therefore already been subject to a fair presentation regime.			
Survey	Rainforest Action Network	NGO	United States	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	It is essential that financial institutions disclose absolute targets so that there is clarity about how their strategies align, or not, with the goals of the Paris Agreement. Intensity metrics can mask increase in absolute emissions, and are therefore not suitable for this type of disclosures.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Rainforest Action Network	NGO	United States	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I would like to skip this question and provide my feedback in Part 3				
Survey	Rainforest Action Network	NGO	United States	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	The information required to be disclosed by AR 26 is important and relevant, but without clear guidelines on the methodology, there is a risk that this AR will be used for greenwashing. There must be clear metrics that indicate when an area can be considered restored, and when its ecological integrity is improved.			
Survey	Rainforest Action Network	NGO	United States	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Rainforest Action Network	NGO	United States	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Rainforest Action Network	NGO	United States	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Fidelity International	Asset manager/Investor	Luxembourg	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	We support having additional guidance in this area to complement the materiality assessment. We have seen particular challenges in comparability when different time horizons have been used for materiality assessments and recommend guidance be provided on this specific point, which could involve prescribing specific short-, medium- and long-term time horizons. It would also be helpful to have more transparency on chosen value-chain boundaries and coverage for material areas.			
Survey	Fidelity International	Asset manager/Investor	Luxembourg	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	As an investor, it would be helpful to understand impacts and steps a company is taking to minimise those impacts, providing the amount of reporting required on this is simple and proportionate. We would favour this over solely disclosing on mitigated risks and impacts.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fidelity International	Asset manager/Investor	Luxembourg	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We support these changes. We are of the view this would improve the readability of disclosures. We also believe further changes could be made to improve readability of disclosures which can be technical and overly complex - an acknowledgement that reports can be prepared 'in plain English' and be focused on supporting consumer readability may help improve this.			
Survey	Fidelity International	Asset manager/Investor	Luxembourg	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We support the removal of duplicative disclosures which we think will help improve quality of disclosures and implementation for preparers. We support streamlining the prescriptive qualitative aspects of these disclosures.			
Survey	Fidelity International	Asset manager/Investor	Luxembourg	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We support the removal of the 'may disclose' discretionary data points.			
Survey	Fidelity International	Asset manager/Investor	Luxembourg	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We support providing proportionate reliefs for reporting under ESRS, particularly those in line with ISSB. However, we expect to see ISSB requirements rolled out to a broader scope of companies than CSRD, and ISSB does not contain the same value chain restrictions. For this reason, we are concerned a substantial number of companies in scope of CSRD will need to rely on this, compared to ISSB which could allow greater flow of information across the value chain. We have substantial concerns the value chain cap in Corporate Sustainability Reporting Directive (CSRD) could impact the availability of quality data and would expect to see more companies needing to rely on this relief in response to potential supply chain data challenges. We're concerned this could lead to less quality data availability for investors and would encourage EFRAG to remove any value chain caps, and advocate for proportionate supply chain coverage within the broader CSRD text, so companies may not need to frequently rely on this relief frequently. In due course, EFRAG could also consider providing supporting sector-based guidance, within ESRS and VSME, on what metrics are likely to be material and should be reported on.			
Survey	Fidelity International	Asset manager/Investor	Luxembourg	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We consider it sensible to allow reliefs for data which involves an 'undue cost and effort' however would suggest including guidance to provide some guardrails on what would be appropriate to include within this exception. We also favour including the requirement for companies to disclose actions taken to improve coverage. To support interoperability with ISSB, EFRAG could consider removing the "undue cost and effort" exception for an entity's own operations.			
Survey	Fidelity International	Asset manager/Investor	Luxembourg	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We favour Option 1. Option 1 can support interoperability with the ISSB standards and comparability of international disclosure standards. We are expecting these disclosures may be challenging in the initial years but as availability and quality of data evolves, and ISSB reporting begins globally, emerging best practice will continue to develop.			
Survey	Fidelity International	Asset manager/Investor	Luxembourg	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	As investors we look to assess the financial impact of transition and physical risk and see these disclosures as supporting this assessment.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fidelity International	Asset manager/Investor	Luxembourg	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We welcome efforts to improve interoperability with the ISSB standards. We note that, as set out in question 19 above, disclosing only qualitative financial effects would not support ISSB alignment. We would encourage EFRAG to allow equivalence with IFRS data points, with a double materiality assessment, to comply with ESRS E1.			
Survey	Fidelity International	Asset manager/Investor	Luxembourg	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	Fidelity International	Asset manager/Investor	Luxembourg	22.E3.	Comments on deleted datapoints in ESRS E3	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	We would like to see the below data point remain to support with assessing SDG alignment for our sustainable investment framework.			
Survey	Fidelity International	Asset manager/Investor	Luxembourg	22.E4.	Comments on deleted datapoints in ESRS E4	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Including disclosures on financial effects is something that EFRAG could consider phasing in as reporting practices evolve.			
Survey	Fidelity International	Asset manager/Investor	Luxembourg	22.S2	Comments on deleted datapoints in ESRS S2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	We would like to see the below data point remain to support with assessing SDG alignment for our sustainable investment framework.			
Survey	Fidelity International	Asset manager/Investor	Luxembourg	22.S3	Comments on deleted datapoints in ESRS S3	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Including a disclosure requiring location specific details for impacts & risks for affected communities can help investors understand a companies risk profile and potential actions required			
Survey	Fidelity International	Asset manager/Investor	Luxembourg	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Fidelity International	Asset manager/Investor	Luxembourg	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Fidelity International	Asset manager/Investor	Luxembourg	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	We think this proposed changed should support investors reviewing corporate disclosures in the long term.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fidelity International	Asset manager/Investor	Luxembourg	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We agree with exclusion for financed emissions but consider operational absolute targets could be reported. Scope 3 Category 15 financed absolute emissions are often the largest GHG for a financial institution. These are driven by the size of inflows/outflows of an asset manager, or for a bank by the size of the balance sheet. By setting an absolute financed emissions target, the financial institution is establishing a conflict of interest with a usual strategy target of a business, which is to grow over the longer term and finance the wider economy. Whilst there is no perfect carbon metric for a financial institution, they tend to set targets on their carbon footprint (Cat 15 Financed emissions relating to scope 1 and 2/ Assets Under Management) as it does not conflict with the commercial strategy. It is very difficult to set targets on Scope 3, category 15 scope 3 emissions relating to the companies they finance as data is incredibly poor and volatile. This stems from poor and historically under disclosure of all scope 3 categories by companies in the wide economy, which they finance. A financial institution can set absolute emissions targets for their own operations in the say way that many do – which relate to scope 1 and 2 – their renewable energy and business travel etc.			
Survey	Fidelity International	Asset manager/Investor	Luxembourg	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	We consider it important for SFDR to match the disclosure requirements in ESRS. The focus should be on ensuring ESRS has decision meaningful data, and then matching any SFDR requirements to the ESRS and ensuring no duplication.			
Survey	Fidelity International	Asset manager/Investor	Luxembourg	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We agree it's important to rely on industry-led guidance (including from TNFD and the Science Based Targets Network (SBTN)) on setting nature targets. We would strongly encourage an equivalence is provided for disclosures made under TNFD to help maintain momentum for voluntary disclosures while companies work to comply with ESRS.			
Survey	Fidelity International	Asset manager/Investor	Luxembourg	35.E1-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Scenario analysis requirements should be aligned with the ISSB standards to support consistency and improve efficiency for preparers which have reporting requirements globally.	E1	Disclosure Requirement E1-2 - Climate-related risks and scenario analysis	
Survey	Fidelity International	Asset manager/Investor	Luxembourg	35.E1-8.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We use intensity emissions when setting net zero targets and would like to see intensity emissions remain or, should they be deleted, ensure revenue breakdown is reported to allow for these calculations	E1	Disclosure Requirement E1-8 - Gross Scopes 1, 2, 3 emissions	
Survey	Fidelity International	Asset manager/Investor	Luxembourg	35.E3-4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We would like to see the below data point remain to support with assessing SDG alignment for our sustainable investment framework	E3	Disclosure Requirement E3-4 - Water metrics	
Survey	Fidelity International	Asset manager/Investor	Luxembourg	35.E4-3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Including disclosures on financial effects is something that EFRAG could consider phasing in as reporting practices evolve	E4	Disclosure Requirement E4-3 - Actions and resources related to biodiversity and ecosystems	
Survey	Fidelity International	Asset manager/Investor	Luxembourg	35.S2-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We would like to see a specific disclosure point on key supply chain locations. This could help with assessing forced labour risks in value chain and is aligned with other modern slavery regulation.	S2	Disclosure Requirement S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	
Survey	Fidelity International	Asset manager/Investor	Luxembourg	35.S3-3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We would like to see the below data point remain to support with assessing SDG alignment for our sustainable investment framework	S3	Disclosure Requirement S3-3 - Actions and resources related to affected communities	
Survey	Japanese Bankers Association	Association of financial institutions	Japan	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	- We welcome the revised draft for clearly stating that the DMA evaluation should align with ISSB Standards to a certain extent and avoid excessive costs. Furthermore, the clarification that only topics identified as material need to be reported—rather than the entire topical standards —is particularly helpful, as it enhances both flexibility and efficiency in reporting. - However, it remains unclear to what extent stakeholders across the value chain should be considered to meet the requirements of the standards. Similar to the ISSB, industry-specific guidance could be provided to indicate the minimum disclosure expectations for each sector.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Japanese Bankers Association	Association of financial institutions	Japan	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	- We agree with the provision of clear guidance on how to consider remediation, mitigation, and prevention actions in the assessment of negative impacts. The inclusion of useful examples is particularly helpful for practical implementation. - Nonetheless, it is still not entirely clear to what extent these guidelines contribute to improved comparability in reporting. From a comparability perspective, further clarification or standardisation may be necessary to ensure consistent application across entities.			
Survey	Japanese Bankers Association	Association of financial institutions	Japan	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	- We agree with the improvements in readability, conciseness, and connectivity. - The amendments are beneficial in clarifying that only material topics, not the full topical standards, need to be reported, thereby enhancing both flexibility and efficiency in sustainability reporting. Additionally, the introduction of new concepts such as "only once" and "undue cost and effort" helps reduce the practical burden in identifying IROs, determining the scope of the value chain, and reporting metrics, thereby promoting connectivity with corporate reporting as a whole. - Moreover, these amendments contribute to enhancing interoperability with other international reporting standards such as the ISSB and SSBJ, supporting both practical applicability and global alignment of the ESRS framework.			
Survey	Japanese Bankers Association	Association of financial institutions	Japan	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	- We agree that the proposed amendments reduce the overlap between ESRS 2 and the topical standards, thereby clarifying the reporting requirements. This restructuring strikes an appropriate balance between reducing the reporting burden and ensuring the relevance and comparability of disclosed information.			
Survey	Japanese Bankers Association	Association of financial institutions	Japan	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	- We agree that the proposed amendments have improved the understandability, clarity, and accessibility of the ESRS. In particular, the Non-Mandatory Illustrative Guidance (NMIG) clearly distinguishes between mandatory data points, voluntary data points, and illustrative examples, facilitating an understanding of legal requirements and supporting practical implementation. - These improvements benefit both preparers by reducing the burden and users by enhancing the clarity of information, thereby contributing to the overall effectiveness of the ESRS framework.			
Survey	Japanese Bankers Association	Association of financial institutions	Japan	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	- We welcome the reduction in mandatory disclosure items through the introduction of the Non-Mandatory Illustrative Guidance (NMIG). In particular, the clear distinction within NMIG among mandatory data points, voluntary data points, and illustrative examples helps preparers better understand the scope of reporting obligations and reduces the practical burden. - This structure supports flexibility in reporting while clearly separating legal requirements from supplementary information, thereby contributing to improved quality and transparency in sustainability disclosures.			
Survey	Japanese Bankers Association	Association of financial institutions	Japan	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	- We agree that the proposed amendments provide meaningful burden relief for preparers, and ensure alignment with ISSB Standards.			
Survey	Japanese Bankers Association	Association of financial institutions	Japan	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	- We agree that the proposed relief for lack of data quality on metrics provides necessary flexibility for preparers and contributes to reducing the reporting burden.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Japanese Bankers Association	Association of financial institutions	Japan	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	- Option 2 is welcomed for providing greater flexibility in disclosing anticipated financial effects, thereby reducing the practical burden on preparers. While Option 1 aligns with ISSB Standards, quantitative disclosures would require many entities to develop additional capabilities and tools, making implementation challenging at this stage. - From the perspective of "undue cost and effort," Option 2 offers a reasonable relief mechanism that supports both the effectiveness and practicality in sustainability reporting.			
Survey	Japanese Bankers Association	Association of financial institutions	Japan	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	- While the amendments introduce a certain level of simplification, we remain concerned that some of the disclosure requirements still diverge from those of ISSB Standards. In particular, the quantitative disclosure of the proportion of assets at material transition risk addressed by climate change mitigation actions, as required in paragraphs 41(a) and 41(b), poses practical challenges due to limited data availability. This may conflict with the principle of avoiding undue cost and effort. - We believe that paragraph 41(e), when combined with other qualitative disclosures, can sufficiently illustrate transition risk management practices, potentially rendering paragraphs 41(a) and 41(b) redundant. Additionally, the disclosure of stranded asset ratios based on multiple scenario analyses (41(f)) should be reconsidered for optional disclosure or removal to ensure alignment with ISSB Standards.			
Survey	Japanese Bankers Association	Association of financial institutions	Japan	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	- While the amendments are generally consistent with ISSB Standards, we are concerned that certain disclosure requirements exceed those of ISSB Standards and may impose additional burdens on preparers. Specifically, the quantitative disclosures in paragraphs 41(a) and 41(b) exceed requirements under ISSB Standards, and could be particularly challenging for entities reporting under multiple frameworks. - To enhance alignment with international standards and ensure practical feasibility, such requirements should be reconsidered for optional disclosure or removal.			
Survey	Japanese Bankers Association	Association of financial institutions	Japan	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Japanese Bankers Association	Association of financial institutions	Japan	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	- We do not identify any particular issues with the proposed change to make the six data points mandatory. Specifically, the requirement to disclose biodiversity and nature transition plans is applicable only if (a) nature is deemed a material topic and (b) a plan is already in place. Furthermore, the disclosure is limited to "key features," which ensures flexibility and keeps the reporting burden manageable. - This approach also aligns with voluntary disclosures already made by many organisations under the TNFD framework, making it a practical and acceptable requirement.			
Survey	Japanese Bankers Association	Association of financial institutions	Japan	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Japanese Bankers Association	Association of financial institutions	Japan	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	- We appreciate the explicit emphasis on ESRS being a "fair presentation" reporting framework, as it may help reinforce the application of the materiality principle and improve the relevance of disclosures. - However, we are concerned that the ESRS does not clearly state that immaterial information does not need to be disclosed. As ISSB Standards explicitly specify this point, a similar clarification in the ESRS would help avoid unnecessary disclosures, thereby enhancing the efficiency and practical usefulness of sustainability reporting.			
Survey	Japanese Bankers Association	Association of financial institutions	Japan	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	- We agree that financial institutions should be exempted from disclosing absolute GHG emission reduction targets when they have only set intensity-based targets. For example, in the power sector, emission intensity is often used as a more appropriate metric due to the necessity to meet growing electricity demand while transitioning to cleaner energy sources. - Similarly, for financial institutions whose emissions largely depend on investees and borrowers, setting absolute targets can be impractical. Intensity-based targets are often more reasonable and reflective of their operational realities. Therefore, the proposed exemption is appropriate and supports flexibility and feasibility in implementation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Japanese Bankers Association	Association of financial institutions	Japan	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	- We agree with the introduction of the new threshold for country-by-country disclosure under ESRS S1-5 and S1-7. This revision helps reduce the reporting burden for preparers by narrowing the scope of required disclosures, while still ensuring that users receive meaningful and relevant information.			
Survey	Japanese Bankers Association	Association of financial institutions	Japan	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	Japanese Bankers Association	Association of financial institutions	Japan	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Japanese Bankers Association	Association of financial institutions	Japan	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Japanese Bankers Association	Association of financial institutions	Japan	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Japanese Bankers Association	Association of financial institutions	Japan	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	German Environment Agency	National supervisory authority & regulator	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	see our opinion paper, section 2, ESRS 1, para. 1 (page 3)			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	see our opinion paper, section 2, ESRS 1, para. 2 (page 4)			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	German Environment Agency	National supervisory authority & regulator	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	German Environment Agency	National supervisory authority & regulator	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	see our opinion paper, section 2, ESRS 2, para. 4 (page 5)			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	German Environment Agency	National supervisory authority & regulator	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS2; E1; E2; E3; E4; E5	Feedback on NMIG for ESRS 2 and E1 to E5 is provided in our repsonse to Part 3 of the questionnaire (comment table).			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	see our opinion paper, section 2, ESRS 1, para. 3-4 (page 4)			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	The relief should only apply to value chain metrics but not for own operations. See our opinion paper, section 2, para. 4 (page 4).			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We recommend that EFRAG chooses Option 1 which would require reporting of quantitative information and, if not possible, qualitative information. Only this option is in line with EFRAG's mandate to improve interoperability with the IFRS standards. See our opinion paper section 2, ESRS 2, para. 3 (page 5)			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	German Environment Agency	National supervisory authority & regulator	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	German Environment Agency	National supervisory authority & regulator	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We note that certain proposed amendments might impede interoperability between the ESRS and IFRS S1 and S2. However, given that the IFRS standards have not been tested in practice and have simplification potential on their own, we recommend that EFRAG prioritizes simplifications and improvements derived from reporting experience over IFRS interoperability.			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	German Environment Agency	National supervisory authority & regulator	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	Overall comment: Despite significant reductions of "shall-datapoints", EFRAG achieved to preserve the key requirements that keep the core of the ESRS intact. However, for the environmental reporting standards, we note that a further reduction would likely impair their overall usefulness. We submit our detailed comments in part 3 of the questionnaire respone.			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	22.E1.	Comments on deleted datapoints in ESRS E1	I agree	We submit our detailed comments in part 3 of the questionnaire respone.			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	22.E2.	Comments on deleted datapoints in ESRS E2	I agree	We submit our detailed comments in part 3 of the questionnaire respone.			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	22.E3.	Comments on deleted datapoints in ESRS E3	I agree	We submit our detailed comments in part 3 of the questionnaire respone.			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	22.E4.	Comments on deleted datapoints in ESRS E4	I agree	We submit our detailed comments in part 3 of the questionnaire respone.			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	22.E5.	Comments on deleted datapoints in ESRS E5	I agree	We submit our detailed comments in part 3 of the questionnaire respone.			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We support the decision to include mandatory metrics on water withdrawal and discharge as well as on biodiversity transition plans. Reporting information on water withdrawals and discharges should not come with additional effort because both figures are inputs to the already existing metric on water consumption. For biodiversity transition plans, EFRAG introduced conditions on when they would need to be disclosed. Also see our opinion paper on ESRS E3 and E4.			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The datapoint on secondary microplastics is already included in the ESRS delegated act, but the respective requirement is unclear. In this regard, we consider the proposal an improvement. However, specific calculation guidance is still missing and should be developed in the NMIG.			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	see our opinion paper, section 2, ESRS 1, para. 1 (page 3)			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	The issue is primarily related to Scope 3 emission reduction targets and not only relevant for financial institutions. EFRAG should consider to allow reporting of intensity-based targets for Scope 3 as an alternative to asbolute targets. Scope 1 and 2 targets should be repoated in absolute terms.			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	German Environment Agency	National supervisory authority & regulator	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Please see our detailed feedback on ESRS 1 and 2, ESRS E1, E2, E3, E4 and E5 in the excel sheet submitted in part 3 of the questionnaire and in our opinion paper.			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Please see our detailed feedback on ESRS 1 and 2, ESRS E1, E2, E3, E4 and E5 in the excel sheet submitted in part 3 of the questionnaire and in our opinion paper.			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Please see our detailed feedback on ESRS 1 and 2, ESRS E1, E2, E3, E4 and E5 in the excel sheet submitted in part 3 of the questionnaire and in our opinion paper.			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Please see our detailed feedback on ESRS 1 and 2, ESRS E1, E2, E3, E4 and E5 in the excel sheet submitted in part 3 of the questionnaire and in our opinion paper.			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Please see our detailed feedback on ESRS 1 and 2, ESRS E1, E2, E3, E4 and E5 in the excel sheet submitted in part 3 of the questionnaire and in our opinion paper.			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Please see our detailed feedback on ESRS 1 and 2, ESRS E1, E2, E3, E4 and E5 in the excel sheet submitted in part 3 of the questionnaire and in our opinion paper.			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Please see our detailed feedback on ESRS 1 and 2, ESRS E1, E2, E3, E4 and E5 in the excel sheet submitted in part 3 of the questionnaire and in our opinion paper.			
Survey	German Environment Agency	National supervisory authority & regulator	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Please see our detailed feedback on ESRS 1 and 2, ESRS E1, E2, E3, E4 and E5 in the excel sheet submitted in part 3 of the questionnaire and in our opinion paper.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The overall simplification of Chapter 3 is welcome. We find the new chapter 3.5. with practical considerations particularly helpful, as it has a potential to relieve large portion of the burden undertakings faced performing their materiality assessments. However, we have several comments to changes we don't agree with: (1) The materiality of information principle should not be applicable to ESRS 2, as it provides key information for users on ESG management as required by CSRD and may result in omitting fundamental information required in sustainability statements, such as on the DMA process and its results, or the governance over sustainability matters, and details on the undertaking's business model and strategy. The principle of materiality of information is highly judgmental and should be applied with caution. (2) Undertakings should not be allowed to include non-material information in sustainability statements, as this will obscure material information. Companies have many other means to communicate to their stakeholders non-material sustainability related information and there is no need to include these information in official, regulated annual reports. (3) Summarizing the list of topics in current Appendix A to only two-level structure is not very helpful, it was more useful as a three-level structure. Maintaining a three-level structure would not add any burden, as the list is illustrative only. We also propose to add for clarity some changes in the list: (a) In "Climate change": add "Loss and damage" (b) In "Circular economy and resource use": add "Product and service design related to circular economy principles" (c) In "Climate change" replace "Energy" with "Energy, including use of fuels and energy efficiency"			
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Adding Annex C may provide much needed clarity for undertakings performing their DMAs. However, several elements of the Annex need to be amended. If the intention is to streamline reporting by allowing mitigated impacts to be excluded, the standard should state that such exclusion is only permitted if the impacts and the related mitigation actions were disclosed in a previous report – and that these impacts may be referenced rather than repeated. Under no circumstances should the standard include statements such as 'in principle, no need to report on impact.' Such wording would create major gaps and undermine the reliability and comparability of the materiality assessment. "If an impact occurred in the reporting period and no remediation action has been taken" The wording "If an impact occurred" suggests that to identify a topic as actual negative, "something" would need to happen. E.g. an accident. In practice, for a manufacturing company it is commonly understood that "employee health and safety" is an actual material topic regardless of whether any accidents occur. In reference to par. 36 if successfully remediated negative impacts e.g. on employee health and safety do not become positive impacts, then does the topic become non-material? The sentence in the table of the Appendix C suggests that the topic becomes immaterial: "If the potential impact was material within the reporting year, but prevention or mitigation action has been taken before the reporting date such that the impact no longer exists (...) in principle no need to report the impact, as it is not material." In practice, a manufacturing company that manages employee health and safety effectively, with no incidents or accidents occurring, might classify this topic as immaterial, despite the substantial resources required to maintain it. In a logical approach, this does not make sense.			
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We agree with most of the changes introduced in relation to interactions between ESRS 2 and topical standards. However, the requirement to disclose whether the undertaking plans to implement policies, actions and targets for a material topic, and in which timeframe, should remain as a "shall". Sustainability statements don't only document the past, but are also future-oriented. Allowing laggards in sustainable transition to remain silent on their material topics that have not been managed gives them an unjustified competitive advantage in relation to companies that are more advanced in managing sustainability matters. It should be the other way round. Requiring companies to disclose this information (on plans regarding adoption of PATs) is not burdensome, as all the information is readily available in-house.			
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We don't have comments regarding the content of particular elements of the NMIG, only comments regarding its status. We propose (at the Commission's discretion) choosing only one of the following two options: (A)Inclusion of the contents of the NMIG into the Delegated Act. In this case each element of the NMIG should be included in the main body of each standard, in a clearly separable way, right after the applicable DR and AR. In this way, the report preparer would read in one place the disclosure requirement, the corresponding application requirement (in case it exists) and the corresponding non-mandatory illustrative guidance (in case it exists) (B)Leaving the contents of the draft NMIG for EFRAG to implement it in a series of Implementation Guidance documents to be issued in the future. Both options result in an understandable structure of the standards and their accompanying documents. We recommend choosing option (A). Development of NMIG as another layer of documents, besides the mandatory standards and the non-mandatory EFRAG IGs may lead to further confusion among report preparers, users and auditors.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	Simplification of ESRS, restructuring of the standards, elimination of two thirds of datapoints, including all "may" datapoints that created confusion is the main relief report preparers receive with the set of revised ESRS. Unfortunately, the inclusion of many additional "reliefs" will have a detrimental effect on the competitive position of many companies well advanced in sustainability transition, on comparability and reliability of the reports and on the transparency needed to achieve the objectives of the EU Green Deal. Any additional reliefs, if introduced, should be only temporary, i.e. for the first year, two years or three years of application of ESRS in a particular company. Introduction of permanent reliefs contradicts the very nature of mandatory reporting standards. If a provision is too difficult for undertakings to comply with at all times, it should be deleted from the standards. If a provision may be difficult for first time adopters, a temporary relief should be introduced. The relief "undue cost or effort" should be applicable only for the DMA process. Regarding difficulties related to collecting data from the value chain, the general 3-year relief for presenting information on metrics related to value chain is sufficient.			
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	This relief should not be applicable at all for metrics related to own operations. The current draft ESRS 1 provision allows companies to hide inconvenient information, for example on their gender pay gap or high number of accidents, only due to the reason that it was difficult to collect all information from own operations. That provision will not be used by the majority of companies that fairly present their situation, it will only be abused by a small portion of companies. As a result, from this provision may benefit only companies that are trying to hide some information. Additionally, introduction of the undue cost or effort in relation to metrics related to own operations will have a detrimental effect on comparability of information disclosed in reports by all companies and by companies in particular sectors. Lack of comparability of reports will be detrimental to the goals of the EU Savings and Investments Union.			
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We prefer Option 1, as it is more closely aligned with IFRS. In our view Option 2 might provide relief in short-time horizon, however, in long-term perspective European undertakings would be in a disadvantaged position in relation to companies from other jurisdictions that adopt IFRS standards. Financial institutions will anyway need quantitative information on anticipated financial effects from non-financial companies to assess risk related to credits and investments. Even if these information is not mandated by ESRS, companies will have to provide them. At the same time we acknowledge that less experienced companies and first time adopters may face difficulties in quantifying anticipated financial effects. This should be addressed with two solutions: (1) A three-year transition period should be granted for mandatory disclosure of quantitative anticipated financial effects (according to SBM-3 and E1-11); in the transition period undertakings shall report qualitative anticipated financial effects. (2) EFRAG should develop, on it's own or as a response to a mandate from the European Commission, a uniform methodology to quantify anticipated financial effects. Development of this methodology should be done in no more of 1.5-2 years, leaving companies another 1-1.5 years to apply it before the end of the transition period. The methodology should be accompanied by appropriate tools facilitating it's application.			
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	ESRS E1 - 40. (b) - Please note that this datapoint is required by EBA guidelines on ESG risks point 28.a.vi.			
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	22.E1.	Comments on deleted datapoints in ESRS E1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	ESRS E1 E1-2 - Climate-related risks and scenario analysis The simplification regarding the exclusion of climate risks from separate disclosure is entirely appropriate, but the transfer of information on how risks are identified to the NMIG is inappropriate. The analysis should continue to include, among other things: identification of risks over different time horizons, assessment of the sensitivity and exposure of assets to risks, determination of the probability, scale, and duration of these risks, development of an analysis based on at least one high-emission climate scenario. It is necessary to have a list of risks, which is the starting point for further analysis. Consequence: • the lack of risk list will make it difficult to compare data between entities, • an entity may not have knowledge or awareness of the scale of these risks and thus omit significant risks in its analysis – incorrect risk assessment • the lack of consistency with the taxonomy regulation and SFDR.			
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	22.E2.	Comments on deleted datapoints in ESRS E2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Reduction of the number of mandatory and voluntary data points in the ESRS 2 IRO 1 for E2-E5 standards could cause problems with the proper conduct of double materiality assessment and impair comparability. The existing provisions regarding ESRS 2 IRO 1, found in appendices A, should be reinstated as they provide a reference point for conducting double materiality assessment for environmental issues.			
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	22.E3.	Comments on deleted datapoints in ESRS E3	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Reduction of the number of mandatory and voluntary data points in the ESRS 2 IRO 1 for E2-E5 standards could cause problems with the proper conduct of double materiality assessment and impair comparability. The existing provisions regarding ESRS 2 IRO 1, found in appendices A, should be reinstated as they provide a reference point for conducting double materiality assessment for environmental issues.			
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	22.E4.	Comments on deleted datapoints in ESRS E4	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Reduction of the number of mandatory and voluntary data points in the ESRS 2 IRO 1 for E2-E5 standards could cause problems with the proper conduct of double materiality assessment and impair comparability. The existing provisions regarding ESRS 2 IRO 1, found in appendices A, should be reinstated as they provide a reference point for conducting double materiality assessment for environmental issues.			
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	22.E5.	Comments on deleted datapoints in ESRS E5	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Reduction of the number of mandatory and voluntary data points in the ESRS 2 IRO 1 for E2-E5 standards could cause problems with the proper conduct of double materiality assessment and impair comparability. The existing provisions regarding ESRS 2 IRO 1, found in appendices A, should be reinstated as they provide a reference point for conducting double materiality assessment for environmental issues.			
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets			
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	Unadjusted gender pay gap is a metric that very rarely presents the actual situation in an undertaking in a fair way. The employment structure and the sector of the company often drive high level of unadjusted gender pay gap. We propose that the company is required to disclose, on a mandatory basis: (1) unadjusted gender pay gap in case unadjusted gender pay gap is adequate to fairly present the situation in the company; (2) unadjusted and adjusted gender pay gap in case unadjusted gender pay gap is inadequate to fairly present the situation in the company; in this case adjusted gender pay gap disclosure should be accompanied by disclosure of the methodology used to calculate it. This construction of the disclosure requirement would add no additional datapoints while allowing companies to explain the actual structure and reasons for differences in remuneration for men and women.			
Survey	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	The current replacement/formulation is insufficient to meet the CSRD's objectives with regard to protecting SMEs. There is a risk of a lack of visibility regarding the treatment of SMEs by reporting undertakings. As policies may not include provisions that specifically refer to SMEs, and even if they do, these may not be complied with, we believe that the following metrics should be added to reflect the actual behaviour of reporting undertakings towards SMEs. Both are necessary to understand the current situation of SMEs in the economy. a) the average time it takes the undertaking to pay an invoice from the date when the contractual or statutory term of payment for SMEs starts to be calculated, in number of days, and the average time the undertaking takes to pay an invoice from the date when the contractual or statutory term of payment for entities other than SMEs starts to be calculated, in number of days b) the average time it takes the undertaking to pay an invoice from the date when the payment for SMEs is due, in number of days, and the average time the undertaking takes to pay an invoice from the date when the payment for entities other than SMEs is due, in number of days.			
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	NMIG provides good clarification and understanding of the requirements using illustrative examples. This change is an improvement and it is a welcome move to have this as a stand-alone document.			
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	I agree with Option 2, as it will reduce the the reporting requirement but still provide the option to report quantitative information voluntarily.			
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets because an exception could disadvantage other sectors.			
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	TitanX Engine Cooling	Preparer (non-financial preparing a sustainability report)	Sweden	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Dutch Federation of Pension Funds	Association of financial institutions	Netherlands	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We appreciate the clarifications on IROs and related topics (ESRS 1, paras. 2 and 22), which enhance understanding. However, the simplified DMA approach, especially for complex value chains, may narrow the scope of disclosures. Additional guidance is required to ensure assessments remain robust. We support more detailed reporting on companies' assessment processes. The determination of negative impacts guided by scale, scope, and irremediability, aligns well with the UNGPs and OECD Guidelines. Yet, annual reports often lack sufficient detail on how these indicators and impacts inform their DMA (methodologies) and materiality thresholds. We welcome the flexibility to choose between top-down and bottom-up DMA approaches. Making Appendix A illustrative rather than prescriptive appropriately reduces rigidity. While the top-down method can be pragmatic, companies should clearly document their process and address potential blind spots. A quick scan of initially non-material topics may help mitigate these blind spots. Reporting at the IRO level may reduce comparability across companies. Clear guidance and examples illustrating differences between topical and IRO-level disclosures would support preparers in making informed choices. We also encourage undertakings to disclose what triggered changes in materiality assessments over time. Value Chain Integration: We recommend stronger alignment between due diligence and value chain reporting. When negative material impacts are identified through due diligence, stakeholder engagement could be required. Companies should explain (i) chosen value chain boundaries, (ii) coverage per material topic, and (iii) data quality for key metrics. Where policies or targets do not cover the value chain for material IROs, constraints and intended leverage mechanisms should be clarified, including time-bound plans for extension.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Dutch Federation of Pension Funds	Association of financial institutions	Netherlands	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We observe a difference in reporting approaches (net/gross) among data providers. For example, some data providers actually engage in dialogue with companies, while others do not. The "actual impact situation" therefore remains somewhat ambiguous and subjective. If companies were to report more on the "outcomes of any mitigation or prevention measures implemented before the impact occurred," this could potentially achieve greater uniformity in the assessment of adverse impacts. The annual accounts primarily reflect a net approach, and the auditor's report on the sustainability report implicitly reflects a net approach. A gross approach results in a more comprehensive sustainability report based on CSRD than a net approach. This expansion is not in line with the intended simplification.			
Survey	Dutch Federation of Pension Funds	Association of financial institutions	Netherlands	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We support reducing duplication, particularly through clearer guidance on connected information. We support the proposed amendments. When conducting sustainability disclosure analysis, we find that repeating content across sections of the annual report (most notably regarding policies, actions, and targets) only enhances complexity at the expense of transparency. We also welcome the use of appendices for detailed metrics. This structure enhances readability and provides a clearer overview for users, while maintaining access to relevant data.			
Survey	Dutch Federation of Pension Funds	Association of financial institutions	Netherlands	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We do not support the removal of the requirement to disclose whether a Policy, Action, or Target (PAT) or timelines have been removed for material topics. Transparency is essential, particularly for material negative impacts and risks. Therefore, choosing to remove PATs should require an explanation. Without an explanation, companies may simply state "no PAT" without clarifying existing gaps or intended actions, weakening accountability and comparability for investors. We also have concerns about the reformulation of certain mandatory datapoints into Application Requirements (ARs). The legal status of ARs may be unclear to preparers, potentially leading to inconsistent interpretation and reduced enforceability. Clear communication that ARs represent mandatory methodological guidance is essential to maintain consistency and reliability in reporting. Finally, we support the restructuring of the reporting architecture, which promotes conciseness and reduces duplication. It is important that companies focus on reporting what is most material to their operations, while maintaining clarity and completeness for users of sustainability information.			
Survey	Dutch Federation of Pension Funds	Association of financial institutions	Netherlands	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We welcome the proposed amendments, which significantly enhance clarity and accessibility. The removal of "may disclose", relocation of mandatory application guidance under each Disclosure Requirement (DR), and reformulations align well with Lever 4's objective of improving understandability, clarity and accessibility. The restructuring of ESRS 1, clearly separating Disclosure Requirements (DRs) and Application Requirements (ARs), is a positive step towards useability. Furthermore, removing sub-subtopics and being more consistent with the use of topics and sub-topics improves navigation and interpretation. The clearer articulation of double materiality, especially the distinction between impact and financial materiality, supports more consistent application across sectors. To build on these improvements, we recommend to: 1. Begin the ESRS 1 with a clear statement that ARs linked to DRs are mandatory and specify whether they are subject to assurance. 2. Introduce stable identifiers for each mandatory datapoint and AR (e.g., E1-6.M1 for a datapoint, E1-6.AR1 for its application requirement). This would improve navigation, reduce tagging errors, and support high-quality digital reporting and tool integration. These enhancements would make the distinction between mandatory and non-mandatory content immediately clear, consistently applied, and easier to implement across systems. We therefore support the amendments, subject to these refinements, which are fully aligned with the intent of Lever 4.			
Survey	Dutch Federation of Pension Funds	Association of financial institutions	Netherlands	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We acknowledge that the Non-Mandatory Illustrative Guidance (NMIG) can offer valuable support to companies by clarifying reporting expectations and providing practical examples. This can enhance consistency and improve the decision-usefulness of sustainability information for investors. However, the current legal status of NMIG remains unclear, which may lead to interpretive uncertainty. We support EFRAG's recommendation that NMIG content should not be included in the Delegated Act. Incorporating illustrative material into legally binding regulation could blur the distinction between mandatory and non-mandatory content, potentially increasing compliance burdens and undermining the simplification objectives. Should the European Commission decide to include NMIG content in the Delegated Act, we recommend it be presented as a separate annex. The annex introduction should clearly state that the content is for guidance purposes only and does not carry compliance obligations. It should also explicitly confirm that undertakings are not required to justify deviations from these illustrative elements, thereby maintaining a clear distinction from mandatory disclosure requirements.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Dutch Federation of Pension Funds	Association of financial institutions	Netherlands	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We support the introduction of horizontal undue cost or effort relief. However, safeguards are essential to prevent overuse (particularly in value-chain metrics) which could undermine data consistency and comparability. Companies invoking this relief should disclose the rationale, scope excluded, and any material gaps to preserve decision-usefulness for investors. On the use of estimates, we acknowledge the benefit of flexibility for preparers. At the same time, investors require estimates that are assurable, transparent, and comparable. We recommend clear criteria for estimation methodologies, including disclosure of bandwith of uncertainty, data coverage ratios, and plans to improve data quality over time. This will help maintain the integrity of reported information. Regarding financial effects, we support Option 1, which aligns with IFRS relief and is familiar to large undertakings that fall within the scope of the CSRD. Quantitative disclosures are critical for valuation, performance analysis, and stewardship. ESRS E1 must cover impact & risk (target alignment and transition investments). Competitive advantages are derived from linking sustainability impacts to financial statements, not merely harmonizing language.			
Survey	Dutch Federation of Pension Funds	Association of financial institutions	Netherlands	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We support allowing investee companies to balance thorough reporting with avoiding undue cost or effort. This flexibility may be most relevant during early implementation phases. However, we stress the importance of continuous improvement of reporting efforts by companies over time. To maintain reliability and comparability, especially across peers and reporting periods, any room for using reliefs should be accompanied by clear safeguards. These include: a transparent rationale for invoking the relief, criteria used in the decision, disclosure of excluded scope, and time-bound plans to improve data coverage and quality. As noted in the Basis for Conclusions, aligning these reliefs with IFRS S1 enhances interoperability.			
Survey	Dutch Federation of Pension Funds	Association of financial institutions	Netherlands	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We prefer option 1, but stress the importance of the applicable conditions and safeguards (on the use of the relief) to be further specified. We believe that the availability of climate risk metrics is important. For that reason, the effects of both options should be assessed as prepares often raise undue costs and burden as a reason for not providing this information. It would be valuable to assess the conditions under which it can be invoked by a preparer and whether it could negatively impact on the wide availability of climate risk metrics. In terms of conditions and safeguard, one can consider for example: * Phase-in requirement of the original ESRS, meaning that companies could comply with qualitative information in the first three years of reporting, and afterwards would need to report quantitative information. *Transparency is essential: Companies should provide a clear rationale for invoking any relief, specify the methodology and uncertainty assumptions applied, and outline concrete improvement plans — comparable to the 'best-effort' obligation under SFDR.			
Survey	Dutch Federation of Pension Funds	Association of financial institutions	Netherlands	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	We welcome the amendments aligning disclosure criteria with data requested by banks. As noted in the log of amendments, this alignment with IFRS S2 supports interoperability and consistency. We recognise the practical challenges companies may face due to evolving methodologies and limited data availability. To ensure disclosures remain both feasible and decision-useful, we strongly support the consistent application of the comply or explain principle. Under this approach, companies should disclose the required quantitative information by default. Where this is not possible, a clear and substantive explanation should be provided. Such disclosures offer valuable insights into a company's data infrastructure and risk management practices. Applying comply or explain provides short-term flexibility while promoting transparency and long-term improvement. It supports the ambition of full quantitative reporting as methodologies mature, ensuring the framework remains practical for preparers and useful for investors.			
Survey	Dutch Federation of Pension Funds	Association of financial institutions	Netherlands	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	We welcome the increased interoperability between ESRS and IFRS S1/S2 (both in wording and the reliefs) We support maximum interoperability, provided it does not compromise the ESRS's double materiality principle. Most asset owners (pension funds) require both the financial dimension offered by IFRS S1/S2 and the broader impact dimension of ESRS. Key considerations: ESRS E1 must remain broader than IFRS S2, covering both impact and risk dimensions, including target alignment, transition CAPEX, and forward-looking metrics. The true value for investors lies in linking sustainability impacts to financial statements, not merely harmonizing terminology.			
Survey	Dutch Federation of Pension Funds	Association of financial institutions	Netherlands	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We consider the proposed datapoints highly relevant for investors, as they clarify key elements essential to assessing a company's sustainability performance and risk exposure. Their inclusion can enhance transparency, comparability, and the overall decision-usefulness of reported information.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Dutch Federation of Pension Funds	Association of financial institutions	Netherlands	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We welcome the emphasis on ESRS as a fair-presentation framework, aligned with IFRS S1, and with materiality as a general filter. This could help reduce 'checklist-reporting' and imrove decision-useful information for investors. There is, however, the concern that 'fair presentation' could be interpreted by auditors as 'true and fair view' of the annual accounts, but this is only applicable with reasonable assurance, not with limited assurance (as prescribed by the CSRD). This mean that, in line with paragraph 51 of the BfC, it should be made sufficiently clear that it is the reporting company's role to assess materiality, while the assurance providers executes only a review of the process. Since EFRAG indicates that it is not their role to specify the auditor's role and mandate, we ask EFRAG to address this issue with the European legislator. However, some question whether fair presentation should solely on management judgement. To safeguard comparability and reliability, members support some sort of safeguards. For example, for the accountant to monitor the fair presentation.			
Survey	Dutch Federation of Pension Funds	Association of financial institutions	Netherlands	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	We welcome the inclusion of key elements such as collective bargaining and periodic revision of minimum wages, which are relevant for assessing wage adequacy. However, we share concerns raised by EFRAG SRB members regarding clarity and comparability. To support investor analysis, it is essential that companies disclose which prong of the wage adequacy methodology is used. Without this, it is difficult to assess the robustness of reported figures or compare across peers and through time. We recommend referencing the ILO's internationally recognised definition of a living wage to strengthen consistency. As currently phrased, adequacy may be interpreted as meeting national minimum wage levels, which in many non-EU countries fall short of covering basic needs. We are convinced that the current phrasing risks misrepresenting wage conditions and undermines comparability. The current hierarchy of wage indicators could also lead to misleading conclusions. A company reporting 100% of employees earning at least the minimum wage may appear to outperform a company that reports 80% earning a living wage, despite the latter reflecting a higher standard. We suggest reversing the order: prioritise living wage estimates, and only refer to minimum wage data where living wage benchmarks are unavailable. Finally, we welcome EFRAG's field testing initiative, which will help refine the methodology and improve practical implementation.			
Survey	Dutch Federation of Pension Funds	Association of financial institutions	Netherlands	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	We support the consolidation of datapoints and removal of overlaps, as this can improve readability and reduce duplication for preparers. However, it is essential that investor use-cases under SFDR remain fully supported. For asset owners and -managers relying on ESRS data to meet SFDR Annex I PAI reporting, changes must ensure complete and computable coverage of all relevant indicators (even after deletion and mergers). All SFDR Table 1 datapoints should remain mandatory within ESRS topics. These indicators are critical to the functioning of the Sustainable Finance Disclosure Regulation and must remain accessible to financial institutions. We specifically object to the proposed removal of Indicator 3, table 1 (Gross GHG emissions intensity). The rationale that users can calculate this themselves overlooks practical challenges: - It creates inefficiencies and increases the burden on financial institutions. - It risks inconsistent methodologies across undertakings and may promote cherry picking. - It undermines the SFDR's goal of providing standardised, comparable data. We would also prefer the obligation to report total emissions distinctly (even though it can be derived from combining Scope 1, 2, and 3 figures). Yet, the intensity ratio is a distinct and decision-useful metric that is of far greater importance to us. Its removal could lead to misleading comparisons and reduced data quality.			
Survey	Dutch Federation of Pension Funds	Association of financial institutions	Netherlands	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	The ESRS GDR-T still require companies to publish information on the methodology, baseline value, scope of target etc.			
Survey	Dutch Federation of Pension Funds	Association of financial institutions	Netherlands	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	We believe the adjusted gender pay gap is a more meaningful indicator for investors than the unadjusted metric, as it better reflects wage equity and supports robust peer and trend comparisons. While we understand the unadjusted metric was introduced to align with SFDR requirements, it is worth noting that the ESAs have previously acknowledged its limitations and proposed replacing it with the adjusted metric in the revised RTS. This was not pursued due to alignment constraints with the ESRS at the time. We see this as an opportune moment to signal that both ESRS and SFDR should adopt the adjusted gender pay gap as the primary datapoint. This would improve decision-usefulness and better reflect investor needs. The additional reporting burden for companies is expected to be limited, as the adjusted metric is already widely used in response to investor demand.			
Survey	Dutch Federation of Pension Funds	Association of financial institutions	Netherlands	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	We recommend greater transparency for the procurement practices of large undertakings, as these can significantly influence value chain impacts. For example, strict contractual terms (such as tight delivery deadlines) may unintentionally contribute to adverse labour conditions, including excessive overtime. Improved transparency in how suppliers are managed would help investors better assess social risks and the effectiveness of a company's due diligence processes.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Dutch Federation of Pension Funds	Association of financial institutions	Netherlands	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We recognize that the ESRS are overly burdensome, and a significant number of data points is irrelevant for investors and stakeholders. At the same time, it needs to be avoided that important data points for pension investors will be removed that are relevant for the responsible investment policies of pension funds or their own reporting requirements under the SFDR . The following points are most relevant for Dutch pension fund investors: ESRS 2 •Governance (2)GOV-1; GOV-2; GOV-3; GOV-4; GOV-5 •Strategy (3)SBM-3 •Metrics and Targets (5)MDR-M; MDR-T ESRS E •Climate and Energy (E1)E1-1; E1-3; E1-4; E1-5; E1-6; E1-7; E1-8; E-9 •Pollution (E2)E2-4; E2-5; E2-6 •Water and Marine Resources (E3)E3-1; E3-4; E3-5 •Biodiversity and Ecosystems (E4)E4:1; E4-2; E4-4; E4-5; E4-6 •Resource Use and Circular EconomyE5-4; E5-5 ESRS S •Own Workforce (S1)S1-1; S1-2; S1-6; S1-7; S1-8; S1-9; S1-13; S1-14; S1-16; S1-17 •Workers in the Value Chain (S2)S2-1 •Affected Communities (S3)S3-1 •Consumers and End-Users (S4)S4-1 The majority of these data points have been maintained in the exposure draft. We support this decision. Moreover, the questionnaire states that some requirements were not changed in the amended ESRS as they are subject to level 1 changes. This amongst others relates to the meaning of 'compatibility with 1.5 degrees" for the Transition Plans disclosures. In that respect we do note that clarification is needed, for example re. the base year (reference point) for measuring the reduction of greenhouse gas emissions and setting climate targets. Finally, we propose EFRAG to develop a standard model report that includes the minimum reporting requirements per ESRS, such as a structure, table of contents with tables and/or graphs, and explanatory notes.			
Survey	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	It is considered appropriate, provided that verification of the information is not required when it originates from another document mandated by European regulations that does not itself require verification. Specific cases: Annual Corporate Governance Report and Annual Report on Remuneration of the Directors			
Survey	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The use of "MAY" should be avoided in a text that is otherwise drafted entirely with "SHALL". For example, in ESRS 2: BP 2 - AR 1 and GOV 3 - AR 13. The concern is that "MAY" can be interpreted either as a checklist or as the only available options, when in reality there may be others. Therefore, the text should be limited to "SHALL" statements, and any "MAY" provisions should either be moved to the NMIG or removed altogether.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	Moreover, in relation to point 4, we propose that it should be extended to all metrics in general.			
Survey	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2				
Survey	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	Not all transition risks are estimated based on their singular impact on the company's assets. It is even possible that some sectors may not need to analyze any of their transition risks by asset. Therefore, we believe it would be most appropriate for the entire section 41 to be considered as requirements to be met when applicable, not in all cases.			
Survey	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Agreed, as long as ISSB requirements that were not included in the CSRD are not imposed on us.			
Survey	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	It contradicts the principle of simplification and entails increased reporting requirements.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	It contradicts the principle of simplification and entails increased reporting requirements.			
Survey	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	Having limited assurance verification may not reconcile very well with the fair presentation approach.			
Survey	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Why should they be exempted?			
Survey	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	We respectfully disagree with the proposal to require reporting of employee-related data at the individual country level. Telefónica operates in a wide range of geographies, and while we are fully committed to transparency and to providing high-quality sustainability reporting, we believe that a breakdown by country is neither proportionate nor appropriate. Reporting at the regional or business unit level provides stakeholders with a clearer and more meaningful view of our workforce structure and management practices. By contrast, a country-level split does not enhance the understanding of our approach to human capital management; instead, it risks placing excessive emphasis on immaterial fluctuations in smaller markets and distorting comparisons across companies and industries. Consolidated or regional data ensures greater consistency and comparability, reflecting the true scale and relevance of our operations. In addition, changing the reporting thresholds would require recalculating previously reported information from previous years to make it comparable, which means more work.			
Survey	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	We acknowledge the efforts made to refine the methodology for the calculation of non-EU adequate wages under ESRS S1. However, we believe that the methodology should be simplified and anchored exclusively in the use of statutory minimum wages as the reference point for adequate wages in all cases. Minimum wages provide a clear, objective, and verifiable benchmark, recognized by governments and embedded in national legislation. They ensure consistency across jurisdictions and allow companies to provide transparent and comparable information. Using statutory minimum wages as the single standard avoids unnecessary complexity while maintaining the clarity and reliability that stakeholders expect. Introducing additional layers, such as collective bargaining agreements or sector-specific frameworks, complicates the analysis and may create inconsistencies between markets, particularly where such frameworks are fragmented, non-binding, or unavailable. For multinational groups operating in diverse jurisdictions, this heterogeneity poses a significant challenge to feasibility, comparability, and assurance. We support the requirement for companies to disclose which methodological "prong" has been applied. This disclosure would enhance transparency and comparability, giving stakeholders clarity on the approach used without forcing reliance on heterogeneous sources or alternative definitions of adequacy that are difficult to standardize or assure. While we acknowledge the relevance of living wage debates and related international discussions, we believe that ESRS should not compel companies to use data sets or frameworks beyond statutory minimum wages. The concept of adequacy varies widely between countries and is influenced by economic, social, and cultural contexts. Attempting to standardize these divergent approaches within a single reporting framework introduces subjectivity and increases reporting burdens without adding proportional value. We therefore consider that statutory minimum wages should remain the sole baseline for defining adequate wages in EU and non-EU contexts, ensuring feasibility, consistency, and comparability across jurisdictions.			
Survey	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	Our proposal is to maintain it as a voluntary DP with global scope, where the calculation methodology is subject to determination by the company. In our case, the adjusted gender pay gap is an indicator with potential to support the qualitative remuneration DPs			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Impronta Etica	NGO	Italy	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Impronta Etica positively assesses the work carried out by EFRAG in simplifying the Double Materiality Assesment process, while acknowledging the presence of some underlying critical issues. Two specific aspects of the simplification are particularly valued: the removal of "sub-sub topics" from the list of material topics, and the implementation of the possibility for companies to adopt a top-down approach in the double materiality process. These changes provide companies with greater flexibility in assessing the relevance of information, while at the same time maintaining the robustness of the functioning system of the process. However, in order to ensure proper implementation according to the new approach, EFRAG is encouraged to include examples and guidance tools that concretely illustrate the application of the described elements. Practical examples are indeed considered necessary by companies to fully understand the required procedures and the implications arising from the adoption of the new and reinforced top-down approach to relevance assessment, as outlined in the new draft Standards.			
Survey	Impronta Etica	NGO	Italy	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Impronta Etica acknowledges and appreciates EFRAG's efforts to clarify the most critical aspects of the previous ESRS Standard, but expresses partial disagreement with the new guidelines regarding their clarity and contribution to enhancing the comparability of reporting. The text of the Standard concerning remedy, mitigation, and prevention actions within the double materiality process remains unclear and linguistically complex. This complexity may generate significant difficulties for companies, opening the way to possible divergences in the interpretation of the text. Furthermore, the lack of practical examples exacerbates these difficulties, making it challenging for companies to fully understand how to approach this section of the double materiality assessment process, and ultimately failing to clearly demonstrate the intended simplification. The need to include practical examples and guidance tools to illustrate how to concretely implement the changes introduced is therefore reiterated. In addition, to further streamline the double materiality process, it is suggested to extend the changes introduced also to the risk assessment system. Finally, it is recommended to provide a deeper definition of opportunities, in parallel with what has already been done for positive impacts, in order to harmonize and comprehensively clarify practices as a whole.			
Survey	Impronta Etica	NGO	Italy	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	Impronta Etica acknowledges the work carried out by EFRAG and welcomes the proposed amendments introduced by the technical body. The Association particularly values two aspects which, when combined, provide more relevant and concise reporting, thereby enhancing overall connectivity. First, the introduction of the option to include an executive summary is considered highly valuable. This tool can indeed facilitate communication with investors and other external stakeholders by providing a clear and accessible overview of the entire report. Furthermore, the use of appendices for more technical and granular data helps to streamline the main body of the reporting document. This choice contributes to avoiding repetition and redundancy of information, supporting a more coherent and less fragmented view of corporate reporting as a whole.			
Survey	Impronta Etica	NGO	Italy	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	Impronta Etica welcomes the simplification adopted by EFRAG, positively assessing the removal of voluntary datapoints ("may disclose"), which often caused confusion among companies, particularly following the double materiality assessment process. The integration of datapoints and "Application Requirements" into the main body of the instrument represents another crucial step that contributes to making the Standards clearer, more readable, and more accessible for companies. However, despite these significant changes, Impronta Etica hopes that guidance and alignment tools will be provided for auditors and individuals responsible for performing verification audits of the sustainability statement. This would reduce the risk of potential divergent interpretations regarding the reduction of information now required from companies and ensure robustness and consistency in the application of the implemented changes.			
Survey	Impronta Etica	NGO	Italy	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Impronta Etica partially agrees with the changes introduced, recognizing EFRAG's efforts to reduce reporting burdens, but wishes to express some concerns regarding the solutions adopted. In particular, there is a need for greater clarification on the use of estimates. The concern is that the lack of standardization in this area could compromise the quality and reliability of the data, making it uncertain and unclear. This issue further undermines the comparability of information, which is already significantly affected by the absence of sector-specific Standards. Furthermore, Impronta Etica emphasizes that smaller companies also require additional support in this process. The role of EFRAG is therefore crucial, from a capacity-building perspective, in providing practical examples and appropriate calculation parameters to enable companies to produce reliable estimates and ensure complete and transparent reporting, in line with the objectives of the Green Deal.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Impronta Etica	NGO	Italy	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	Impronta Etica agrees with the work carried out by EFRAG. The Association considers that the amendments proposed by the technical body represent a necessary compromise between the risk of low-quality available data and the need for transparent, complete, and non-redundant reporting. The proposed flexibility is aligned with the objective of focusing companies' attention on the most relevant information, facilitating the data preparation process without compromising the transparency and robustness of sustainability reporting.			
Survey	Impronta Etica	NGO	Italy	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Impronta Etica	NGO	Italy	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	Impronta Etica agrees with EFRAG's proposal regarding the reduction of mandatory datapoints. The Association considers that the adopted approach, based on strengthening the materiality filter of information, represents a fair balance between reducing reporting burdens for companies and maintaining the essential information needed to achieve the European Union Green Deal objectives. This change allows companies to move away from a mechanical, checklist-based approach focused solely on providing the requested information, and to concentrate more on the relevance of information and a truthful representation of their organization, ensuring that reporting documents are more meaningful and useful for stakeholders. It is noted that, in this case as well, it is considered useful for EFRAG to provide practical implementation support tools, to accompany this simplification without risking the production of reporting that is partial, approximate, or of low-quality information. Despite the necessary reduction introduced, it remains important that companies understand how to select relevant information in a robust manner and with the appropriate level of granularity.			
Survey	Impronta Etica	NGO	Italy	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	Impronta Etica agrees with the intention to consider the ESRS as a "fair presentation" framework, aimed at ensuring greater accountability of companies towards strategic reporting that goes beyond mere compliance. However, the Association does not consider this explicit statement a significant change for sustainability reporting compared to previous provisions. It is considered that the real push towards more effective and relevant reporting must be accompanied by the strengthening of the double materiality process and by a greater emphasis in the ESRS on the relevance of the information disclosed in the sustainability report, which should also include entity-specific information for relevant topics, based on those provided in existing sectoral standards. In essence, the explicit introduction of the "fair presentation" principle, while consistent with this approach, does not add substantial value or significant novelty unless it is accompanied by the measures outlined above.			
Survey	University of Padova	Academia	Italy	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	The proposed amendments do not achieve acceptable balance between simplification and robustness . While point (a) in the definition of double materiality is clear, point (b) is imprecise and tautological: "Information is MATERIAL when: (…) it is necessary (…) to understand (…) MATERIAL impacts, risks and opportunities …" (emphasis added) The inclusion of "risks and opportunities" is inconsistent with the notion of impact materiality, as illustrated in ESRS 1 (e.g., para 3 and 30). Point (b) refers to the "understanding" of sustainability reporting users, without considering implications of such understanding. in para 30 impact materiality refers to "the identification of information that relates to the undertaking's material actual or potential, positive or negative impacts on people or the environment (…) direct contractual relationships." any framing of impact materiality based on decision-making is insufficient, since many of the stakeholders are not in a position to make any decision (e.g., nature or future generations). if the "understanding" and the "decision-making" framings of impact materiality are unsuitable, a possible framing for point (b) could be based on the notion of stewardship and due diligence. Suggested alternative wording: "(b) it is necessary for the corporation to show to a broad range of stakeholders that it identifies and addresses actual or potential, positive or negative impacts on people or the environment" The focus on he "materiality of information" as a general filter (point 2) can help organisations performing DMA, however, the assessment of materiality of information shall not be used as a reason to omit information on a topic that was identified as material. The possibility allowed by point 6 breaks the traceability between impacts, risks, opportunities, and corresponding metrics, complicating insurability and cross-sectional comparability. Allowing the disclosure of information on non-material topics (para 108) may introduce noise and allow cherry-picking practices biasing "fair presentation".			
Survey	University of Padova	Academia	Italy	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	University of Padova	Academia	Italy	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	University of Padova	Academia	Italy	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I disagree	The simplification of ESRSs and the reduction of disclosure requirement and data points is premature. Companies, auditors and consultants have already invested in the implementation of ESRSs. However, the untimely revision will waste the learning that could be obtained from this experience. No less important, in general, the loss of the knowledge and positive externalities generated by the preparation, analysis and use of sustainability information and the increase in social and environmental regulation costs (e.g., government monitoring in the absence of corporate self-reported information) will overshadow the putative administrative costs savings from the ESRS simplification. The re-architecture between ESRS 2 and thematic standards reduces enforceability and comparability because although minimum "Shall" requirements are maintained in ESRS 2, their simplification weakens the common baseline and opens the door to overly flexible interpretations across companies and sectors. The elimination of the obligation to declare PAT plans and timelines diminishes forward-looking guidance and monitoring capabilities. Additionally, this omission limits the capacity of information users to evaluate the commitment of reporting organizations in achieving their stated sustainability goals.			
Survey	University of Padova	Academia	Italy	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	University of Padova	Academia	Italy	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	It is reasonable to include guidelines and examples on how to disclose datapoints in "Non-Mandatory Illustrative Guidance" (NMIG). However, the simplification proposal is depriving users of the sustainability report from crucial information to assess the due diligence of the company. For example, the policies to identify and manage actual or potential, positive or negative impacts on people or the environment, are crucial to assess due diligence. Therefore, it is paramount to perform an in-depth assessment to determine whether all disclosures currently presented in the NMIG should be made mandatory in the delegated act. While the NMIG may reduce implementation questions, encourage proportional innovation, and ease the burden on PAT narratives when rigid prescriptions fail, it could also reduce comparability. Without a minimum common ground, methodological heterogeneity hinders cross-sectional and time-series analyses. In this regard, the NMIG is useful if it complements—not replaces—a clear regulatory baseline that preserves consistency, traceability, and insurability.			
Survey	University of Padova	Academia	Italy	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	The "undue cost or effort" principle is aligned with the goal of administrative simplification. However, the articulation of this "relief" in paragraph 89 ESRS1 is so imprecise that it may turn this set of standards into dead letter. The "undue cost or effort" principle risks transforming Directive (EU) 2022/2464 into a voluntary guideline. The limitation of considering resilience in terms of risks places an emphasis on financial materiality, overlooking how an organization's activities may also affect the resilience of the ecosystems in which it operates.			
Survey	University of Padova	Academia	Italy	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	The amendment is generally reasonable. But the "undue cost or effort" principle is too broad, as indicated in the response to question 19.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	University of Padova	Academia	Italy	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	University of Padova	Academia	Italy	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Thorough information on dependencies is increasingly important to motivate organizations and industries to tackle sustainability challenges. This amendment goes against the tide. This modification is not justified on the grounds of administrative simplification, as the costs of processing this information is minimal: this information is present in information systems and calculations are trivial. Instead, this modification appears to be proposed on the grounds of avoiding information that may impact corporate reputation, at the expense of resilience.			
Survey	University of Padova	Academia	Italy	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	IFRS and ESRS have different objectives and scope. Alignment with IFRS twists the notion of double materiality with the introduction of materiality as a filter and fair presentation, for example. As a result, ESRS is less aligned with the Green Deal. This greater alignment with the ISSB reduces the interoperability with other relevant sustainability reporting standards that companies have been applying for decades (such as the GRI).			
Survey	University of Padova	Academia	Italy	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	University of Padova	Academia	Italy	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	The simplification proposal is depriving users of the sustainability report from information.			
Survey	University of Padova	Academia	Italy	22.E1.	Comments on deleted datapoints in ESRS E1	I disagree	The simplification proposal is depriving users of the sustainability report from information.			
Survey	University of Padova	Academia	Italy	22.E2.	Comments on deleted datapoints in ESRS E2	I disagree	The simplification proposal is depriving users of the sustainability report from information.			
Survey	University of Padova	Academia	Italy	22.E3.	Comments on deleted datapoints in ESRS E3	I disagree	The simplification proposal is depriving users of the sustainability report from information.			
Survey	University of Padova	Academia	Italy	22.E4.	Comments on deleted datapoints in ESRS E4	I disagree	The simplification proposal is depriving users of the sustainability report from information.			
Survey	University of Padova	Academia	Italy	22.E5.	Comments on deleted datapoints in ESRS E5	I disagree	The simplification proposal is depriving users of the sustainability report from information.			
Survey	University of Padova	Academia	Italy	22.S1	Comments on deleted datapoints in ESRS S1	I disagree	The simplification proposal is depriving users of the sustainability report from information.			
Survey	University of Padova	Academia	Italy	22.S2	Comments on deleted datapoints in ESRS S2	I disagree	The simplification proposal is depriving users of the sustainability report from information.			
Survey	University of Padova	Academia	Italy	22.S3	Comments on deleted datapoints in ESRS S3	I disagree	The simplification proposal is depriving users of the sustainability report from information.			
Survey	University of Padova	Academia	Italy	22.S4	Comments on deleted datapoints in ESRS S4	I disagree	The simplification proposal is depriving users of the sustainability report from information.			
Survey	University of Padova	Academia	Italy	22.G1	Comments on deleted datapoints in ESRS G1	I disagree	The simplification proposal is depriving users of the sustainability report from information.			
Survey	University of Padova	Academia	Italy	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	No substantial increase in administrative costs. Datapoints are relevant.			
Survey	University of Padova	Academia	Italy	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Datapoints are relevant.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	University of Padova	Academia	Italy	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	The notion of fair presentation is ambitious. It draws on financial reporting. Some ambition in this area is positive. However, it is inconsistent with the focus on limited assurance. Additionally, the application of fair presentation may dissuade companies from disclosing information on material topics, considering the inherent complexity and incompleteness of sustainability data.			
Survey	University of Padova	Academia	Italy	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Complex estimates are common to all sectors. The financial sector has a disproportionate effect on climate change. Absolute targets are essential for assessing progress on climate change, and banks are no exception in this regard. This exclusion is also at odds with other information on climate change required by financial institutions in other EU regulations (e.g. SFDR) and by banking supervising entities (Basel Pillar III).			
Survey	University of Padova	Academia	Italy	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	Thresholds are reasonable			
Survey	University of Padova	Academia	Italy	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	Processing information about wages, considering notions such as living wages, is a significant concern for society. This modification is not justified on the grounds of administrative simplification, as the costs of processing this information is minimal: this information is present in information systems and calculations are trivial. Instead, this modification seems to be proposed on the grounds of avoiding information that may affect corporate reputation.			
Survey	University of Padova	Academia	Italy	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	The "consolidation" and reduction of DPs results in a loss of granularity and breaks the traceability necessary for the SFDR to inform investors. Merging eight DPs into a single "HR policy" in ESRS 2 limits the relevance of human rights, erases nuances by stakeholder group, and weakens operational alignment with UNGP/OECD. The single "severe cases" indicator fails to capture typologies, severity, remediation, or geography. Excluding "fatalities" from the scope of the PAI on lost days is a material setback. Investors require explicit visibility into fatalities, rates, and trends. Moving content to ESRS 2 (general) instead of maintaining it in ESRS S1–S4 reduces consistency between IROs and specific metrics and hinders insurability. The supposedly "marginal" reduction in coverage is, in fact, material for time series, benchmarking, and alignment with the SFDR Annex I tables; it increases the risk of cherry-picking and mapping gaps.			
Survey	University of Padova	Academia	Italy	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	AR 26 could be further reviewed to better reflect current developments (e.g., SBTN).			
Survey	University of Padova	Academia	Italy	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	Disclosing this information has enormous social benefits in terms of increasing gender equality. This modification is not justified on the grounds of administrative simplification, as the costs of processing this information are minimal: this information is present in information systems and calculations are trivial. Instead, this modification seems to be proposed on the grounds of avoiding information that may affect corporate reputation.			
Survey	University of Padova	Academia	Italy	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	This formulation will contribute to damaging SMEs. The increase in government regulation and monitoring costs (in the absence of corporate self-reported information) will overshadow the putative administrative costs savings from this unsophisticated simplification.			
Survey	University of Padova	Academia	Italy	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	University of Padova	Academia	Italy	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	University of Padova	Academia	Italy	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	University of Padova	Academia	Italy	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	University of Padova	Academia	Italy	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	University of Padova	Academia	Italy	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	University of Padova	Academia	Italy	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	University of Padova	Academia	Italy	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	University of Padova	Academia	Italy	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	University of Padova	Academia	Italy	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	University of Padova	Academia	Italy	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	University of Padova	Academia	Italy	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	University of Padova	Academia	Italy	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	University of Padova	Academia	Italy	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Some emission-intensity datapoints have been trimmed. While intensity indicators are valuable to users, the cuts mainly target metrics that can be derived from other reported figures (e.g., emissions relative to revenue or total assets). We advocate preserving at least one sector-relevant intensity indicator, since stakeholders need both absolute and intensity perspectives—aligned with TCFD guidance on Metrics & Targets. On transition plans, we welcome the draft's explicit alignment with EU and international climate objectives.			
Survey	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We had a first touchpoint with our auditors on the top down approach to the DMA. It remains unclear what is the evidence needed to be able to top-down de-select some topics and select others as material in case there is disagreement between preparer and auditor on the 'common sense' applied to select and de-select.			
Survey	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	Much in favour of the clarifications of the gross approach. The fact that we need to maintain ongoing policies and actions in place to mitigate a potential risk/impact means that this is material, regardless of when the action was implemented. In the net-approach, we will end up with reporting on small matters that may be addressed in one year but not in the next because they are not salient to the business and do not comprise key risk areas for the company/industry. We experienced this in our last DMA (applying the net approach) where minor topics with very little relevance to the business/sector and limited impacts on people and the environment ended up as material. So please do not go to a net approach.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	Yes, much better with more flexibility. Especially the added provisions around inter-referencing and options to move tables to the appendix are welcome.			
Survey	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	In general, yes. A couple of comments, though: 1) Stakeholder engagement DRs are mentioned both in topical S-standards as well as in ESRS 2, so an overlap remains there. 2) Metrics are not mentioned as mandatory in the topical standards - but the rest of PATs are. This creates confusion as to what is mandatory.			
Survey	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	In general, yes. However, to reduce the number of datapoints, it seems that EFRAG has combined datapoints that used to be separated into larger datapoints. From a preparer's point of view, this makes it not more but less straightforward, as we now have to separate the datapoints ourselves. Paragraph 5 of ESRS 2 is an example hereof.			
Survey	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I would like to skip this question and provide my feedback in Part 3				
Survey	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland	22.E1.	Comments on deleted datapoints in ESRS E1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	GHG intensity should not be deleted. This can serve as a proxy for ghg efficicncy, and we were planning to pull it from reports for our scope 3 data improvement and use it as a supplier emission factor. If removed from reports, we either have to obtain the number manually or we will have to contact our suppliers. This will put a burden on the suppliers that could have been avoided if everyone included their ghg intensity numbers. Also, it is not a burden to add, because the revenue and the total GHG emissions are already calculated by companies.			
Survey	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Vereniging Milieudefensie	NGO	Netherlands	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	Chapter 3 is clearer and better organised. The improved definition of materiality of information in Section 3.1, namely the replacement of criterion of "significance" with "understandability" of impacts provides better guidance and is aligned with the CSRD and international sustainability due diligence instruments. It also clarifies how the materiality of information interacts with (fundamental) qualitative characteristics of information criteria from Chapter 2, and with the rules concerning aggregation and disaggregation of information (e.g. para 52 on "not obscuring"). Section 3.5. Practical considerations are particularly helpful to avoid unnecessary complexity in materiality assessment. However, Chapter 3 frequently conflates 'topics' with 'impacts, risks and opportunities' ('IROs'). Para 22 is confusing when it says that information may be presented "either at the topical level or at [IRO] level". Such a dichotomy is confusing and incorrect. While topics refer to broad thematic areas, IROs are entity specific. The CSRD, as well as IFRS, TCFD, and TNFD consistently focus on the latter. Overemphasising 'topics' risks leading to generic, boilerplate disclosures that lack relevance and specificity. Chapter 3 would be clearer if it keeps the focus on IROs and plainly explain that depending on their nature and context such IROs may be defined at a general level - often corresponding to topics - and/or that information on their management may be similarly aggregated. This should be clarified also in provisions on entity-specific disclosures in paragraph 23 (and in paragraph 10 in Chapter 1) In Chapter 3.3.2, para 37 fails to mention that the purpose of financial material assessment is to not just to identify materiality information but also determine the material risks and opportunities, as required by the CSRD. In this regard, the risks and opportunities are only mentioned in the middle of para 38, making the text incoherent.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Vereniging Milieudefensie	NGO	Netherlands	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	It is useful that Chapter 3 addresses the question of how prevention, mitigation and remedy of impacts shall be considered in materiality assessment, but the rules could be expressed in a more simple and understandable way. Para 34 uses a very complicated language to express a simple idea that actual impacts shall be considered as they occurred during the reporting period, and that their ex-post remediation is not relevant. We welcome and stress the importance of the clarification that the potential impacts which require significant ongoing preventative or mitigation efforts shall be considered gross. Without such clarification, it would be in theory be impossible for companies to report on how they manage such issues. In this regard, it would be helpful to refer to the materiality of information filters to provide companies with further guidance on how to distinguish such significant efforts from common practice and compliance measures. The table provided in Appendix C provides more detailed information, which it would be helpful to integrate directly into the main body to ensure clarity and consistency.			
Survey	Vereniging Milieudefensie	NGO	Netherlands	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The proposed changes are meaningful. We would like to bring the attention to para 113, which we find hard to understand: "113. If the description of the material impacts, risks and opportunities prepared in accordance with [Draft] Amended ESRS 2 IRO-2 is not presented alongside the respective policies, actions and targets, the undertaking shall make explicit which policies, actions and targets relate to which material impacts, risks, or opportunities, in accordance with paragraph 22." It is not clear to us what the reference to para 22 is meant to imply. Para 22 addresses the issue of appropriate aggregation or disaggregation of information on material impacts, risks and opportunities and their management. But it doesn't set any rules regarding the location of such disclosures depending (or not) on the level of aggregation.			
Survey	Vereniging Milieudefensie	NGO	Netherlands	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We have two critical concerns. First, the original DR in environmental standards concerning screening of sites in materiality assessment were replaced by an application requirement to ESRS 2 IRO-1. This in effect makes transparency on this aspect optional. Consideration of local context is a key element of an appropriate materiality assessment. This should be both recognised in Chapter 3 of ESRS 1, and in ESRS 2 IRO-1, which should include an explicit datapoint on how the undertaking screened its locations and value chains. We welcome that E standards provide a clearer reference on the importance of disaggregation of disclosures, but this can only be done well if locations are properly screened. Second, we strongly recommend adding an explicit reference to the disclosure of relevant, entity-specific metrics directly in S standards. The fact that S2, S3 and S4 do not include any metrics and the anticipated sectoral standards which would have provided such metrics will not be adopted, shift the expectations for disclosure of metrics for S topics to entity-specific disclosures. As highlighted by the Danish Institute for Human Rights, a leading National Human Rights Institute on business and human rights and reporting, adding the reference to metrics to disclosure requirements SX-4 on targets would improve consistency between the topical and the cross-cutting standards and acknowledge the common use and disclosure by companies of metrics relevant to their social sustainability impact management and progress. This addition would ensure that preparers better understand the ESRS expectations in this regard, whilst not adding any new obligations or datapoints.			
Survey	Vereniging Milieudefensie	NGO	Netherlands	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	support the proposed changes. We agree with the removal of 'may disclose' elements, because their status has been causing confusion. However, they do not need to be all removed to NMIG. Where they provide useful examples of disclosures, they could be included directly in the standards as "examples". This is particularly the case for the topics for which the reporting practice is evolving, such as Biodiversity and ecosystems. This would make it easier for first-time preparers to understand what kind of information is likely to be relevant and provide a basis for the standardization of metrics. Having to consult another document, such as NMIG, is adding an unnecessary hurdle. The language and therefore understandability of the standards have been considerably improved, however in ESRS 1 especially there is still much to be done in this regard.			
Survey	Vereniging Milieudefensie	NGO	Netherlands	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The standards are not clear in terms of what the combined effect of the reliefs is and how the reliefs are meant to interact. Interpreting and applying these reliefs independently of each other open doors to abuse and omitting material information, significant differences in reporting practice. Reporting of metrics is subject to a combination of undue cost and effort and lack of data quality reliefs. But the standards do not put these two reliefs in proper context and do not include any explicit requirement and timeframe for companies to improve the coverage and quality of data. This is exacerbated by the relief which unconditionally allows exclusion of joint operations. If the environmental metrics concerning such operations are material, then the standards should incentivise their eventual disclosure. The undue cost and effort and lack of data quality reliefs already provide sufficient flexibility in this regard. Similarly, there is a lack of coherence among the directions of the reliefs related to financial effects, i.e., information which is essential for understanding of the risks and company's ability to overcome them. The limitation related to the announced investment plans focuses the disclosures on effects which are easier to assess and therefore quantify, yet the standards also propose reliefs that enable omitting quantitative disclosures. We broadly agree with the relief provided in ESRS 1, para 90, which allows for calculation of metrics exclusion of activities that are not significant drivers of the IROs. However, the application of this option must be clarified for specific environmental and social metrics which are standardised in the ESRS. For instance, the GHG Protocol's completeness principle explicitly warns against misapplication of materiality criteria in this regard. Similarly, for S1 workforce metrics, such as characteristics of the employees and non-employees, such exclusions are not appropriate.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Vereniging Milieudefensie	NGO	Netherlands	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	These combined reliefs should clearly require the undertaking to improve the coverage and quality of the data needed to meet ESRS requirements. For the metrics concerning own operations and/or metrics standardised directly in the ESRS, this should be subject to clear time limitation. For other metrics, improvements over the years should be also explicitly required, subject to undue cost and effort relief.			
Survey	Vereniging Milieudefensie	NGO	Netherlands	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ability to estimate financial effects is critical for the undertaking's ability to integrate sustainability into its business strategy considerations, planning and risk management. It is also key for the determination of financial materiality, including in terms of overreporting topics as financially material. Resigning on this ambition is at odds with the objective of putting sustainability reporting on the same level as financial reporting, the integration of both, and ultimately overcoming the tragedy of horizons. We find Option 1 unnecessarily extensive, and lacking time limitation, but broadly acceptable. We disagree with the assertion made in the question that it "[d]ifferent from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources ". In this regard, the new proposed ESRS include the undue cost and effort relief which seems to account for such a situation. With respect to Option 2, we don't find it justifiable to go beyond the IFRS relief. One of the most strongly voiced arguments from stakeholders who called for simplification of ESRS was that, as a matter of principle, ESRS must be aligned with the IFRS except where CSRD or other EU legislation require otherwise. Abandonment of this principle seriously undermines prospects of building a global baseline which both the EU and the ISSB support, and which is an important part of building a level playing field for the EU companies.			
Survey	Vereniging Milieudefensie	NGO	Netherlands	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Vereniging Milieudefensie	NGO	Netherlands	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	should not go beyond those set in IFRS. Going further would undermine the objective of setting a global baseline for ESG reporting, which is important for achieving a level playing field for EU companies in a global context. The undue cost and effort relief outlined in ESRS 1, para 87-89, is a powerful relief, which addresses virtually all situations where the undertaking may encounter practical obstacles. Explicit emphasis on fair presentation, combined with the strengthened focus on the use of materiality of information filter, provide companies with an increased flexibility in determining meaningful content of their sustainability statements. It marks a further move away from compliance-based to principle-based approach. However, such changes imply increased responsibility for the undertaking. Implementing further reliefs would undermine this responsibility and open the doors to abuse.			
Survey	Vereniging Milieudefensie	NGO	Netherlands	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Vereniging Milieudefensie	NGO	Netherlands	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	The number of datapoints in each standard represent the minimum necessary to ensure cohesive disclosure requirements, and consequently basic comparability and quality of the actual disclosures. We have not identified any instance where ESRS would include exorbitant requirements, considered common practice and internationally recognised reporting standards and frameworks such as IFRS, GRI, or TNFD. ESRS are generally more concise and less demanding. Introducing further reductions (while keeping the coverage of all ESG factors as required by the CSRD) would create serious quality gaps between the ESRS disclosures and those based on the standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Vereniging Milieudefensie	NGO	Netherlands	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree with these changes, noting that the suggested changes do not add a new burden. This is particularly the case for the water-related metrics. In order to disclose the water consumption, the undertaking already has to calculate withdrawals and discharges, and such calculation and therefore the underlying data is subject to the assurance. Moving these implicit datapoints to the forefront as explicit data points makes the disclosure requirement clearer, compared to the previous ESRS where some of these datapoints were framed as "may disclosures". Whether or not these individual datapoints are to be disclosed is correctly subject to materiality of the information filter applied by the undertaking. We suggest that the obligation to disclose a biodiversity and ecosystems transition plan should be triggered by the identification of material impacts, dependencies, risks, and opportunities on biodiversity, rather than by the pre-existence of such a plan. Otherwise, the change from 'may' to 'shall' would have virtually no effect, as the vast majority of companies currently do not have a biodiversity transition plan in place and would therefore have nothing to report. We recommend clarifying that, where a biodiversity transition plan is disclosed, it should naturally integrate and reference the connections to the material topics covered by the other environmental standards. Biodiversity loss and recovery are also driven by local issues such as pollution (E2), water use and marine resource exploitation (E3), and resource extraction (E5), while circular economy approaches often form part of the solution space. Making this systemic relationship explicit would not introduce new reporting requirements, but could enhance coherence, support a more holistic understanding of impacts and responses, and prevent a siloed or overly narrow interpretation of the scope of a biodiversity transition plan.			
Survey	Vereniging Milieudefensie	NGO	Netherlands	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree with these changes, noting that the suggested changes do not add a new burden. E2-4 on secondary microplastics is not a new datapoint, as correctly pointed out in the Rationale above. We do not understand why it is included in this question, as such.			
Survey	Vereniging Milieudefensie	NGO	Netherlands	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	ESRS, being based on the materiality principle, the CSRD requirement to disclose impacts, risks and opportunities and their management, and the general principles of the Accounting Directive, has already been subject to a fair presentation regime. Making it explicit helps to clarify it. It provides companies with clarity on the discretion and judgement, as well as related safeguard, they are expected to exercise when applying the standards.			
Survey	Vereniging Milieudefensie	NGO	Netherlands	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	The global carbon budget is defined in absolute terms. For this reason, it remains essential that also financial institutions disclose absolute targets to assess how their strategies align with the economy-wide transition to net zero. Absolute targets are relevant for users of sustainability statements, for understanding the real-world climate impact of financed activities and for understanding the ambition level of financial insti. While intensity measures provide insights into efficiency, they can mask rising absolute emissions in growing portfolios or sectors. Absolute values, by contrast, give a clear signal of whether institutions are aiming for a fair contribution to the necessary 90–95% global reduction in emissions by 2050, with steep cuts by 2030. Both approaches rely on similar underlying data, and estimation challenges are not unique to the financial sector. Granting an exemption would also undermine fairness in a sector-agnostic standard. Other industries could equally argue for exceptions based on their own difficulties, reducing comparability across sectors. Moreover, absolute financed emissions are already recognised in existing standards and regulations: the SBTi financial sector net-zero standard, the UNEP FI/NZBA recommendations, and EU SFDR all require or encourage absolute emissions disclosure. Exempting banks would risk misalignment and reduce the usefulness of reported data for stakeholders, including asset owners who depend on it for their own disclosures.			
Survey	Vereniging Milieudefensie	NGO	Netherlands	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The new threshold is simpler and clearer, and therefore easier to apply. It also sets a clear cap. Any potential increase of breakdowns of the disclosed information is negligent in terms of added burden.			
Survey	Vereniging Milieudefensie	NGO	Netherlands	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree				
Survey	Vereniging Milieudefensie	NGO	Netherlands	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We are concerned about the concurrent effect of various reliefs. We are also concerned about the unintended confusion caused by a rather confusing explanation of the relationship between impacts, risks and opportunities on one hand, and sustainability topics on the other.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Vereniging Milieudefensie	NGO	Netherlands	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We disagree with the downgrading of the transparency on site/assets/activities screening from the level of datapoints in the E standards to an Application Requirement in ESRS 2.			
Survey	Vereniging Milieudefensie	NGO	Netherlands	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We do not think that the streamlining of the E1-1 Transition Plan for Climate Change Mitigation added value. If anything, more rather than less details and clarifications are needed. The glossary could retain the definition of net zero targets and related criteria, as use and reporting of such targets is a common practice. We have provided specific comments by paragraph. The 1.5°C alignment shall remain the central and non-negotiable reference for corporate climate targets. Allowing companies to refer alternatively to the EU Climate Law risks undermining scientific robustness and integrity, as it could open the door to selective interpretations and policy developments. Corporations should continue to set five-year targets beyond 2030 to ensure transparency and accountability in their transition pathways, as well as consistent performance measurement and alignment.			
Survey	Vereniging Milieudefensie	NGO	Netherlands	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We welcome the changes made, including the clarification and minor additions to the datapoints in the metrics section. They provide for greater clarity and do not add further reporting burden.			
Survey	Vereniging Milieudefensie	NGO	Netherlands	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We welcome the changes made, including the clarification and minor additions to the datapoints in the metrics section. They provide for greater clarity and do not add further reporting burden.			
Survey	Vereniging Milieudefensie	NGO	Netherlands	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Given the current state of art in this area, it would be helpful to include more guidance on how to set metrics and how to utilise the other reporting frameworks and standards such as the TCFD. The standard should also clearly require the disclosure of sites in/near biodiversity sensitive areas, rather than limiting it to those determined to be connected to material impacts only.			
Survey	Vereniging Milieudefensie	NGO	Netherlands	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We welcome the changes made, including the clarification and minor additions to the datapoints in the metrics section. They provide for greater clarity and do not add further reporting burden.			
Survey	Vereniging Milieudefensie	NGO	Netherlands	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We would recommend adding an explicit reference to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, that is the standards that lack any metrics. In S1, we have strong reservations about the newly suggested methodology for adequate wages outside of the EEA. It would lead to misleading disclosures and add burden for companies.			
Survey	Vereniging Milieudefensie	NGO	Netherlands	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We would recommend adding an explicit reference to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, that is the standards that lack any metrics. In S1, we have strong reservations about the newly suggested methodology for adequate wages outside of the EEA. It would lead to misleading disclosures and add burden for companies.			

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Survey	Vereniging Milieudefensie	NGO	Netherlands	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We would recommend adding an explicit reference to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, that is the standards that lack any metrics. In S1, we have strong reservations about the newly suggested methodology for adequate wages outside of the EEA. It would lead to misleading disclosures and add burden for companies.			
Survey	Vereniging Milieudefensie	NGO	Netherlands	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We would recommend adding an explicit reference to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, that is the standards that lack any metrics. In S1, we have strong reservations about the newly suggested methodology for adequate wages outside of the EEA. It would lead to misleading disclosures and add burden for companies.			
Survey	Vereniging Milieudefensie	NGO	Netherlands	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We particularly welcome the streamlining and alignment of the structure of this standard with the remainder of the standards			
Survey	Vereniging Milieudefensie	NGO	Netherlands	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Proposed revisions to ESRS E3 and E4 aimed at reducing reporting burden risk weakening the environmental integrity of sustainability disclosures. Key environmental aspects may be excluded, notably through the removal of mandatory reporting requirements in ESRS E4 related to the mitigation hierarchy, impacts on endangered species, and areas of vulnerable biodiversity. This could result in the loss of material information essential for assessing environmental performance. Similarly, changes to the definition of "status" under the Water Framework Directive (E3), and the removal of references to "ecological thresholds" in both E3 and E4, may reduce cross-border intercalibration and the use of comparable criteria across EU and EEA countries. This undermines the consistency and reliability of environmental data, which is critical for evaluating impacts, including those related to hydropower production. In addition, the use of Application Requirements (AR) to clarify reporting obligations is inconsistent. ARs are alternately used to explain how a requirement can be fulfilled, provide examples, or add interpretive guidance. In some cases, there is content overlap between the main disclosure requirement and its associated AR. For clarity and usability, all essential information—including alternative ways to meet the requirement—should be integrated directly into the disclosure paragraph.			
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	EFRAG recommends that the Commission does not incorporate this content into the delegated act. The Norwegian Environment Agency supports EFRAG's assessment. Furthermore, we believe that references to NMIG should be excluded from the reporting standards to avoid unnecessary confusion regarding additional reporting requirements or expectations beyond what is stated in the ESRSs. It must be made explicitly clear that NMIG is a historical reference document—not a voluntary supplementary standard. In our view, this distinction is essential to ensure clarity and prevent misinterpretation in the implementation of the ESRS framework.			
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	ESRS 1 introduces several reporting "reliefs." While some are reasonable—linked to what is material for understanding impacts, risks, and opportunities (IRO)—others allow companies to self-assess the availability of data or the cost of obtaining it. This opens the door for companies to opt out of reporting on the grounds that data is too difficult or expensive to collect. Additionally, companies may now estimate unavailable data or use proxies. While this may ease short-term reporting burdens, it risks discouraging companies from investing in systems and processes to generate reliable data. Over time, this could reduce the quality and consistency of sustainability disclosures. It must be clearly stated that material information must be reported, regardless of perceived difficulty or cost. The proposed reliefs should be reviewed to ensure they do not compromise the integrity of reporting. Excessive flexibility may result in incomplete or inconsistent disclosures, undermining the "fair presentation" principle and making it harder to compare data across companies and over time. Robust, comparable, and decision-useful sustainability information is essential for stakeholders, including regulators, investors, and civil society. We urge a careful reassessment of the proposed reliefs to safeguard the credibility of the ESRS framework.			
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	Companies may now estimate unavailable data or use proxies. While this may ease short-term reporting burdens, it risks discouraging companies from investing in systems and processes to generate reliable data. Over time, this could reduce the quality and consistency of sustainability disclosures.			
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	Additionally, companies may now estimate unavailable data or use proxies. While this may ease short-term reporting burdens, it risks discouraging companies from investing in systems and processes to generate reliable data. Over time, this could reduce the quality and consistency of sustainability disclosures.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	The inclusion of IFRS-based reliefs—"undue cost and effort" and "reasonable and supportable information"—in the proposed ESRS revisions aims to improve interoperability. These allow companies to use estimates or proxies when collecting specific data is disproportionately costly or burdensome. Furthermore, companies are only expected to use reasonably available information that can be supported by documentation, rather than striving for complete or "perfect" datasets where reliable sources are lacking. While alignment with the ISSB framework may offer positive synergies for businesses, and increased use of the materiality principle can foster greater ownership of reporting, we are concerned that these reliefs may undermine the consistency and transparency of sustainability disclosures. Allowing companies to self-assess what is "too difficult" or "too expensive" introduces subjectivity and may incentivize minimal compliance rather than robust data collection. Over time, this could erode the reliability of reported information and reduce comparability across companies and jurisdictions. We recommend a careful reassessment of these reliefs to ensure they do not compromise the integrity of sustainability reporting. Material information must be disclosed, even if data collection requires effort. Safeguards should be introduced to prevent misuse and ensure that reliefs are applied only in justified, well-documented cases.			
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	The Norwegian Environment Agency considers some of the proposed changes appropriate, while others may weaken the environmental integrity of reporting and reduce comparability across companies. The removal of the requirement to report a baseline year is one example that could negatively affect the ability to compare emissions data over time and across entities. We also note several changes—particularly regarding transition plans—that may lower the quality of corporate climate strategies. It is essential that Level 1 regulation(CSRD) includes a clear definition of what constitutes 1.5°C compatibility in a transition plan. Stakeholder feedback highlights the need for more guidance on assessing risks related to locked-in GHG emissions. We recommend considering the inclusion of OECD guidance (e.g., in AR 3 for paragraph 14) to strengthen the qualitative dimension of this assessment. The direct reference to the EU Taxonomy has been proposed for removal from ESRS E1. While we understand the rationale, we emphasize that the taxonomy defines what is considered environmentally sustainable. A credible transition plan should be aligned with these criteria. Removing this link may reduce the quality of corporate transition efforts. E1-4 (new E1-6): Targets related to climate change Paragraphs 36(c) and (d)—now paragraph 26—previously required reporting on base year and baseline value, updating the base year every five years after 2030, and setting emission reduction targets for at least 2030 (and preferably 2050). These requirements now appear to be removed to increase flexibility. However, this change may reduce the ability to assess whether emission reductions are real and comparable across companies. In order to compare data, the base year should continue to be updated every 5th year.			
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	22.E2.	Comments on deleted datapoints in ESRS E2	I partially agree and partially disagree	Clarification of substance-related reporting requirements It has been clarified that requirements related to substances, whether alone or in mixtures, apply specifically to the chemical sector. The reporting obligations have been significantly eased for companies that only use chemicals, with stricter requirements applying to manufacturers and importers. Only manufacturers and importers are required to report on both SVHC (Substances of Very High Concern) and SoC (Substances of Concern), while users are only required to report on SVHC. However, we note that the clarification under AR 6 for paragraph 18 does not align with which entities paragraph 18 is intended to apply to. Reporting requirements for the purchase and sale of articles containing SVHC have been separated out, referencing the 0.1% concentration threshold in REACH Article 33. These requirements apply to manufacturers, importers, and users of such articles. We question whether it is appropriate for this requirement to include companies that are merely users of articles containing SVHC. If the intention is to target companies assembling components into complex products, this should be made more explicit.			
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	22.E3.	Comments on deleted datapoints in ESRS E3	I partially agree and partially disagree	All references to water status under the Water Framework Directive (WFD) have been removed from the ESRS documents, justified by simplification and coverage in other sources. Previously, Application Requirements (AR 5–7) guided companies to assess environmental status and water risks from a catchment perspective, ensuring upstream/downstream effects were considered. These provisions are now generalized due to the exclusion of IRO from the topical standards. We recommend retaining water status as a specific metric, alongside the thresholds used to define targets. The WFD method is intercalibrated across EU/EEA countries and provides comparable criteria. Water status reflects the condition of aquatic ecosystems and is essential for assessing companies' environmental footprint. Metrics and Target E3-3 paragraph 24, which required companies to disclose ecological thresholds and methodologies, has been deleted and replaced by ESRS 2 §43(g). The new text asks whether targets are based on scientific evidence and how thresholds are considered, but lacks detail on boundaries or methods. Although the removal of "may" implies stricter expectations, the new formulation does not ensure comparability across entities. We propose reinstating the original paragraph to maintain clarity and consistency. For hydropower production, it is crucial to assess whether affected water bodies can meet WFD objectives for good ecological status or potential. While parameters like water abstraction are relevant, they are not sufficient. Achieving minimum ecosystem function and ecological continuity (e.g., migration) is key. The removal of references to water status weakens the ability to evaluate whether WFD goals are met, including cases with less stringent objectives under Article 4.5.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	22.E4.	Comments on deleted datapoints in ESRS E4	I partially agree and partially disagree	EFRAG proposes making the requirement for a "transition plan for biodiversity and ecosystems" mandatory, provided the undertaking has already developed such a plan. We support the proposal but recommend strengthening it by removing the conditionality. Limiting the requirement to entities with existing plans will not ensure access to standardized information. All relevant entities should be required to develop transition plans. Changes that may weaken environmental integrity Several previously mandatory disclosures in ESRS E4 have been removed. Eliminating key topics such as the mitigation hierarchy and impacts on endangered species may result in the loss of material information. These elements should remain mandatory. The removal of paragraph E4-4 §32(a) on ecological thresholds and its replacement with a general reference in ESRS 2 §43(g) does not ensure comparability across entities. We recommend retaining the original specification, including identification of thresholds, methodology, entity-specific considerations, and allocation of responsibility. Paragraph E4-4 §32(b), which required alignment of targets with the Kunming-Montreal Global Biodiversity Framework, the EU Biodiversity Strategy for 2030, and national policies, is also proposed for deletion. We consider this alignment important and not overly burdensome. The revised E4-5 §20 appears to omit key elements necessary for effective reporting. It should retain: Identification of specific activities impacting areas of vulnerable biodiversity Breakdown by impact, dependency, and ecological condition (including reference values) Information to identify responsible authorities While moving this content to the "metrics" section may be appropriate, the level of detail must be preserved to ensure meaningful biodiversity impact assessments.			
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	Paragraph E4-4 §32(b), which required alignment of targets with the Kunming-Montreal Global Biodiversity Framework, the EU Biodiversity Strategy for 2030, and national policies, is also proposed for deletion. We consider this alignment important and not overly burdensome.			
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	Norwegian Environmental Protection Agency	National supervisory authority & regulator	Norway	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree					
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree					
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	NMIG can play an important role in supporting consistent implementation of ESRS by providing methodological guidance and examples without embedding such content in the Delegated Act. Given that methods and external references evolve rapidly, it is sensible to keep this material outside of binding legislation, allowing for timely updates. At the same time, shifting from prescriptive datapoints to non-mandatory guidance requires a higher level of professional judgment and trust across the reporting ecosystem. Companies will need to explain the reasoning behind their disclosures, auditors will need to assess quality and relevance beyond formal box-ticking, and investors will need to interpret reports with greater discernment. In this sense, NMIG will serve as a test of maturity: its value lies less in providing definitive answers and more in enabling transparent, well-reasoned reporting decisions.			
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	Yes, I agree that the proposed amendments strike a good balance between burden relief and preserving transparency. The revised paragraphs 46–48, AR 19 and paragraph 65 in ESRS 1 are particularly important improvements. First, there is now a clear acknowledgement that resources are limited and that effective materiality assessment does not require mapping every possible impact across the entire value chain. Using reasonably available and business-relevant information – such as that already applied in strategy, risk management or due diligence – is sufficient. Starting with the most obvious topics, and then handling potential areas step by step with targeted analysis, is a pragmatic and intelligent process logic. It reduces administrative burden and shifts the focus to substance. Second, the clarification in AR 19 that quantitative scoring is not required in all cases is crucial. In many situations, a well-reasoned qualitative analysis is enough to conclude on materiality. This avoids unnecessary numerical scoring of issues where materiality is already evident, leading to more efficient and meaningful reporting. Third, paragraph 65 provides a realistic approach to value chain analysis. Allowing companies to rely on average, regional or sectoral information aligns with how hotspot analyses are already used in practice. Direct data should only be sought when risks are unclear and potentially significant. This creates a useful process structure: start broad with available data, prioritise likely and severe impacts, and go deeper only where necessary.			
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree					
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	I support Option 1. It offers the right balance between flexibility and accountability. Allowing companies to omit quantitative information under defined conditions recognises practical limitations, while still requiring transparency on the reasoning behind disclosures. This aligns with the overall direction of the amended ESRS: moving from exhaustive datapoint collection towards professional judgment, risk-based prioritisation, and the use of reasonable and supportable information. Option 2 would reduce comparability and risk undermining investor confidence, as it makes quantitative reporting entirely voluntary. By contrast, Option 1 maintains alignment with IFRS S1/S2 while ensuring that qualitative assessments can stand on their own where materiality is already clear, thus focusing efforts where they add most value.			
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3					

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	It is reasonable that these six datapoints have been made mandatory, as they cover areas where: Relevance is already established – water use (withdrawals and discharges) are fundamental indicators of resource consumption and local environmental impacts. Companies generally already have the data to report them, and they are essential for understanding the water balance and related risks. Decision-usefulness is high – a transition plan for biodiversity and ecosystems is considered central by users to assess how companies manage nature-related risks. The trend is clear: markets and policy developments increasingly expect such plans to exist and become standardised. Governance and accountability – datapoints on procurement team training and confirmed corruption incidents are directly linked to governance and compliance. They are important to show whether companies build capacity where risks are highest (e.g. in supply chains) and to provide a quantitative basis for tracking anti-corruption efforts. Overall, the change means that certain disclosures, which were already strongly expected, are now minimum requirements. This strengthens comparability and prevents companies from omitting critical datapoints out of convenience. At the same time, the selected datapoints are pragmatic: most companies already have the data or processes needed to report.			
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	I disagree that financial institutions should be exempted from disclosing absolute GHG emission reduction targets when they have only set intensity targets. While it is true that calculating absolute targets for portfolios requires multiple assumptions, complex estimations are common to all sectors and should not be a reason for exemption. Intensity targets capture efficiency improvements but may conceal rising total emissions, whereas absolute targets provide clarity on the overall climate impact. Both perspectives are necessary for a fair understanding of progress. Granting an exception only to financial institutions would create an unlevel playing field compared to other sectors. Given the central role of banks, insurers and asset managers in directing capital towards transition, maintaining transparency through both intensity and absolute targets is crucial for accountability and comparability.			
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I would like to skip this question and provide my feedback in Part 3				
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	I agree with the approach taken to integrate the SFDR PAI datapoints into the Amended ESRS. The revisions strike a sensible balance between reducing duplication and maintaining alignment with SFDR requirements. On the environmental side, removing datapoints that are outside ESRS scope, such as the indicator on marine resources, is a pragmatic choice. On the social side, consolidating multiple datapoints into a unified "human rights policy" and merging indicators on severe human rights cases increases clarity and reduces fragmentation. Importantly, while the overall number of datapoints has been reduced, the coverage of SFDR PAI has only been marginally affected, and the relevance and usability of the information has been strengthened. This ensures that preparers face less administrative burden while investors and other users still receive the information necessary to fulfil SFDR objectives. Overall, the amendments improve interoperability between SFDR and ESRS and enhance the consistency of sustainability reporting across frameworks. This is a well-balanced step: fewer datapoints, but with clearer structure and higher decision-usefulness.			
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	It is understandable why EFRAG has decided to delete AR 26 and the detailed examples of measurable biodiversity targets (e.g., habitat areas protected, restored areas, projects improving ecological integrity). The concern that such examples may quickly become outdated is valid, and shifting methodological guidance outside the Delegated Act is consistent with the overall simplification approach: binding requirements should focus on principles and datapoints, while methodological advice can be updated more flexibly elsewhere. However, there is a risk. For many companies, especially those without strong ecological expertise, concrete examples provide essential clarity and lower the threshold for setting meaningful targets. Without such guidance, reporting risks becoming too abstract and less comparable. A balanced way forward would be to ensure that methodological support – including examples of targets and indicators – is developed and published in parallel, for instance in NMIG or in a dedicated guidance document linked to ESRS E4. This would allow the legal requirements to remain stable, while providing preparers with practical and regularly updated tools. In summary, removing AR 26 can strengthen the long-term robustness of the standards, but only if it is accompanied by accessible, up-to-date guidance for companies.			
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	IVL Swedish Environmental Institute	Consultant (including software vendor)	Sweden	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	The amendments sufficiently simplify the DMA, reinforce the materiality filter, and strike an acceptable balance. The wording of Chapter 3 of ESRS 1 is clearer and easier to apply. The simplification reduces administrative complexity and should limit unnecessary disclosures while still meeting user needs.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The new guidelines provide useful clarification, but it is important that considering remediation, mitigation, and prevention should not require extensive new evidence gathering. Furthermore, the question of gross vs net impact remains variable dependent on the individual company.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The amendments provide flexibility that supports more concise reporting and better integration with other corporate reporting. This reduces duplication, granularity, and unnecessary disclosures, thereby limiting the reporting burden.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	The amendments strike an appropriate balance. The reduced prescriptiveness is welcome, as it lowers preparation effort. Changes to PAT are welcome. This should not be counteracted by future interpretative guidance that reintroduces complexity.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	The amendments improve clarity and accessibility. Clearer and less prescriptive requirements reduce the need for costly interpretation and specialist resources, thereby limiting reporting obligations.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	NMIG is useful when applied voluntarily, but it should remain clearly outside the mandatory framework. This ensures examples are available for reference without adding de facto reporting obligations.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	The burden reliefs are a positive step and the balance struck is acceptable. The changes reduce costs for preparers while still allowing stakeholders to receive core sustainability information.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	Allowing proxies and estimates where data quality is lacking is essential. This provides necessary flexibility, avoids costly data collection exercises, and reduces the risk of delay or excessive effort.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Qualitative disclosures on anticipated financial effects significantly reduce the burden compared to mandatory quantitative assessments, which are highly resource-intensive and speculative. The relief should remain in place and quantification left voluntary.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	The amended paragraphs 40–42 strike a workable balance. The disclosures meet user needs without requiring complex modelling. This simplification avoids excessive effort , but it may be difficult to provide meaningful information as the methodology can still be vague.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	The amendments improve interoperability with IFRS S1/S2 while also supporting simplification. This reduces duplication of effort for companies reporting under multiple frameworks, which is critical for lowering the reporting burden.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	The reduction in mandatory datapoints is a major improvement, cutting unnecessary effort while preserving key disclosures. The balance is appropriate, though further reductions could be considered in the future if uptake shows immaterial information is still reported.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	22.E1.	Comments on deleted datapoints in ESRS E1	I agree	The reduction in mandatory datapoints is a major improvement, cutting unnecessary effort while preserving key disclosures. The balance is appropriate, though further reductions could be considered in the future if uptake shows immaterial information is still reported.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	22.E2.	Comments on deleted datapoints in ESRS E2	I agree	The reduction in mandatory datapoints is a major improvement, cutting unnecessary effort while preserving key disclosures. The balance is appropriate, though further reductions could be considered in the future if uptake shows immaterial information is still reported.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	22.E3.	Comments on deleted datapoints in ESRS E3	I agree	The reduction in mandatory datapoints is a major improvement, cutting unnecessary effort while preserving key disclosures. The balance is appropriate, though further reductions could be considered in the future if uptake shows immaterial information is still reported.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	22.E4.	Comments on deleted datapoints in ESRS E4	I agree	The reduction in mandatory datapoints is a major improvement, cutting unnecessary effort while preserving key disclosures. The balance is appropriate, though further reductions could be considered in the future if uptake shows immaterial information is still reported.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	22.E5.	Comments on deleted datapoints in ESRS E5	I agree	The reduction in mandatory datapoints is a major improvement, cutting unnecessary effort while preserving key disclosures. The balance is appropriate, though further reductions could be considered in the future if uptake shows immaterial information is still reported.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	22.S1	Comments on deleted datapoints in ESRS S1	I agree	The reduction in mandatory datapoints is a major improvement, cutting unnecessary effort while preserving key disclosures. The balance is appropriate, though further reductions could be considered in the future if uptake shows immaterial information is still reported.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	22.S2	Comments on deleted datapoints in ESRS S2	I agree	The reduction in mandatory datapoints is a major improvement, cutting unnecessary effort while preserving key disclosures. The balance is appropriate, though further reductions could be considered in the future if uptake shows immaterial information is still reported.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	22.S3	Comments on deleted datapoints in ESRS S3	I agree	The reduction in mandatory datapoints is a major improvement, cutting unnecessary effort while preserving key disclosures. The balance is appropriate, though further reductions could be considered in the future if uptake shows immaterial information is still reported.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	22.S4	Comments on deleted datapoints in ESRS S4	I agree	The reduction in mandatory datapoints is a major improvement, cutting unnecessary effort while preserving key disclosures. The balance is appropriate, though further reductions could be considered in the future if uptake shows immaterial information is still reported.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	22.G1	Comments on deleted datapoints in ESRS G1	I agree	The reduction in mandatory datapoints is a major improvement, cutting unnecessary effort while preserving key disclosures. The balance is appropriate, though further reductions could be considered in the future if uptake shows immaterial information is still reported.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	23.	Six datapoints exceptionally moved from “may” to “shall” In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, “may disclose” datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The six datapoints moved from "may" to "shall" may be important, but each new mandatory requirement increases reporting obligations. Their inclusion should be reviewed carefully, and implementation timelines should allow sufficient flexibility. In particular, mandating biodiversity transition plans, even if conditional, can add a layer of complexity and ambiguity due to a lack of well defined procedures.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The four new mandatory datapoints address relevant issues, but they add to reporting burden. In particular, information on materials with unknown final destinations may be impractical to collect. These should either be phased in gradually or left as voluntary disclosures.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	25.	Emphasis on ESRS being a “fair presentation” reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	While fair presentation is an important principle, explicitly requiring it could create expectations for additional information beyond what is already mandated, increasing reporting effort. Any obligation should be narrowly defined to prevent excessive disclosures.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 (“when only setting intensity targets”), to disclose also the associated absolute values” (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking’s progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Complex estimates are common to all sectors, and there is not a plausible rationale to explicitly exclude financial institutions from disclosing climate absolute GHG emissions values targets when they have only set intensity targets. Both information types are needed for a proper understanding of the undertaking’s progress as well.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking’s employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	Any threshold change that could trigger an increase in the number of countries to report on should be approached with caution. However, it remains unclear to what extent this change could impact reporting burdens.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	The revised methodology for non-EU adequate wages is more practical and reduces reliance on unavailable or unreliable local data sources. This improves feasibility and lowers the effort required for compliance. Removal of reference to the transposition period is also welcome.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	While consolidating SFDR datapoints in ESRS 2 improves traceability, it still imposes additional requirements linked to other EU frameworks. Simplification should focus on limiting duplication and only requiring datapoints that are material, to avoid unnecessary reporting.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	AR 26 should be reviewed to avoid overly prescriptive disclosures on biodiversity targets. Suggested wording: "Undertakings may, where relevant, describe biodiversity and ecosystem targets, including scope, baseline, and timeframe." It would also be preferable to make the relevant methodology more concrete as biodiversity is still a relatively vague topic to report on.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	Deleting the voluntary adjusted gender pay gap datapoint is appropriate. It removes unnecessary burden while still requiring the unadjusted metric, which ensures comparability across entities without additional calculations.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	The replacement formulation is sufficient to protect SMEs. It reduces cascading data requests and avoids imposing disproportionate obligations on smaller companies in the value chain, supporting proportionality and lowering reporting costs overall.			
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Samsung Electronics	Preparer (non-financial preparing a sustainability report)	South Korea	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		General comments: - Strongly recommend EFRAG to maintain in its technical guidance to the EC the need for alignment between financial & non-financial reporting. If a company's group-level financial report does not include its subs, it should be replicated under sustainability reporting too. Financial holding-only parent companies should be exempted from consolidation. Although Level 1 element, EFRAG could well pass that recommendation to the EC. - DMA: Integrating actual/potential impacts is more efficient, reduces complexity in assessment/reporting. Also, from global company perspective, standardization with international frameworks e.g., ISSB is essential. Multiple frameworks create duplication/burden. Global consistency should be maintained. From global investor's perspective, consistent data aligned with international standards is important, as they conduct comparative analyses incl. companies outside the EU. Furthermore, a summary of DMA key processes & conclusions should suffice. Providing a detailed process & methodology for identifying, assessing, prioritizing impacts, as in the past, would be highly burdensome & impractical. - Financial effects disclosures: Guidelines are needed to avoid disclosure of commercially sensitive information. - Social metrics granularity: Mandatory should be the core metrics (employee status, safety, diversity) and the rest voluntary. Also, need for alignment of sustainability reporting with existing regulations is crucial to avoid duplication, and the preferred approach is group-level reporting as the default approach, whereas country-level would be opted only for high-risk regions. - Environmental reporting: EU-level common guidance is needed. On how to handle secondary microplastics & critical raw materials reporting, this should start with qualitative and expand to quantitative overtime. - Phased-in approach for disclosures: We support this as it allows time for preparation & adaptation. - Data quality & assurance: A minimum of three years is necessary for companies to prepare their reports & assurance, and EU guidelines should clearly define the limits on auditors' documentation demands.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We welcome the efforts made to simplify chapter 3 of ESRS 1. However, although practical considerations have been introduced, the section dedicated to the DMA still remains complex and burdensome. We find useful the introduction of the concept that "the undertaking is not required to assess every possible impact, risk and opportunity across all areas of its operations and throughout the upstream and downstream value chains to identify the topics", and we support the use of the notion of "reasonable and supportable information that is available without undue cost and effort". The following specification is also useful: "the materiality assessment regarding upstream and downstream value chain may be conducted without direct information from counterparts, using average regional or sectoral data or generally available information about the incidence of impacts, risks and opportunities in the given context". We also support further elements of simplification such as the possibility to not consider all time horizons or each individual assessment variable and the possibility of using qualitative rather than exclusively quantitative considerations in the materiality assessment.			
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	We believe that considering the assessment of "gross" impacts makes the outcome of the DMA less meaningful, contrary to the rationale for which this concept was introduced (as expressed in the Basis for Conclusions). In our view, the most appropriate solution is a "net" assessment of mitigation measures, since a more flexible approach is required. Moreover, we propose removing the Appendix C Table, as it represents an Application Requirement that is neither clear nor fully consistent with the other specific requirements, and therefore creates confusion. We also deem necessary clarifying the approach to risk assessment, in order to ensure connectivity with the risk disclosures already provided in the financial statements.			
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We appreciate the greater flexibility ensured by the new set of revised principles, particularly in terms of streamlining of the structure of the document, which has positive effects on clarity and conciseness. However, we believe that further improvements are necessary to enable companies to ensure connectivity within the overall set of financial statements.			
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We welcome the simplification of PATs and the main changes proposed. Nonetheless, ESRS 1 Paragraph 84(c) requires adjusting the base year of the target following major acquisitions or disposals, and this is inconsistent with the integration of investments or divestments in the business strategy to achieve the target. Moreover, regarding ESRS 2 AR 35, the disclosure on resources allocation (in particular, capital expenditure and operating expenditure) should be changed to "may".			
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We appreciate the improvements made. However, we believe it would be useful to clarify what is mandatory, in order to avoid confusion and potential issues also with auditors. For instance, more clarity could be achieved by removing expressions that leave room for interpretation or discretion, such as "shall consider".			
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We agree with EFRAG's recommendation that the NMIG guidelines should be excluded from the Delegated Act. The NMIG guidelines should be published instead as EFRAG guidelines, in order to avoid creating confusion with the mandatory content. In particular, to ensure that such guidelines are correctly interpreted as non-mandatory, they could clearly state that: i) their non-binding character remains clearly communicated and consistently understood by preparers and auditors; and ii) they cannot be used for audit purposes, which would be supported by their exclusion from the Delegated Act.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	Reliefs are essential, and this one in particular helps ensure that the data collected for reporting purposes are reliable and based on sound foundations, thereby supporting the quality of reporting and limiting potential negative effects (both legal and reputational) associated with the disclosure of unreliable data. Such reliefs may also be helpful in terms of engagement in the development and implementation of suitable methodologies to overcome the issue.			
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	We deem necessary allowing preparers to provide voluntary disclosure, both quantitative and qualitative. We do not support Option 1, since we do not agree with the mandatory inclusion of financial and forward-looking information that is not contained in the financial statements. Such information would need to be prepared without the necessary maturity, including in terms of methodologies, and would be subject to a high degree of uncertainty, with potential reputational and even legal risks. If the requirement were to be maintained, we believe it should be limited to qualitative information.			
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Change 1: In general, we consider essential ensuring alignment between different regulatory frameworks regulating the same matter. However, a case-by-case assessment of individual alignment proposals is necessary, as interoperability is not always applicable. This is primarily because the IFRS S refer to financial materiality (and not impact materiality) and to a single topic. We do not agree with alignment on fair presentation and anticipated financial effects. Change 3: With regard to the scope of application of E1 requirements on GHG emissions, greater flexibility is needed and there should be no obligation to follow the financial consolidation perimeter. Change 6: We support the option to include "may consider".			
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	From a simplification perspective, extending the requirement on the disaggregation of "total energy consumption from fossil fuels" to all companies appears to be an additional burden that is not properly justified. We support limiting the requirement to high climate-impact companies, as is currently the case.			
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	We do not agree with the introduction of fair presentation (replacing the compliance-based approach) because: (i) it is either not applicable or not definable considering the scope of sustainability reporting (impact materiality and multi-stakeholder approach) compared to the scope of financial reporting (financial materiality); (ii) It entails a significant increase in the responsibilities of the Board (and the Executive Officer in charge) and a correspondingly high reputational and legal risk. Ensuring completeness of disclosure for all relevant stakeholders entails a potentially infinite scope of information and does not add value in terms of comparability and/or materiality of the disclosure. As an alternative to removing fair presentation, a specific definition could be considered, different from the IFRS S definition but suitable and applicable to sustainability reporting. It would also be desirable for this principle not to apply to data and information that are not under the direct control of the organisation, such as value chain data and estimated data.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	For financial institutions, the absolute value of GHG emissions is neither useful nor meaningful information; it does not provide added value to the reader compared with a figure expressed in terms of intensity, which is better suited for comparability. Moreover, up to now financial institutions have not been required to disclose the absolute value of GHG emissions and our ESG Plan is therefore based on intensity-based GHG values. If the exemption was removed, this would amount to a new requirement for financial institutions, implying additional efforts. As such, this would run against the logic of reducing burdens and simplifying requirements.			
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	This provision entails an additional burden for those companies that must report the number of employees and the gender breakdown even for countries that are not necessarily material.			
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	AR 26 requires companies to disclose information on biodiversity impacts at a localised level, particularly for activities near protected areas or areas with high nature value. Not all companies have detailed data on habitats, species, or sensitive areas. Collecting precise information (by site, geographic coordinates, type of impact) can be extremely burdensome. Therefore, AR 26 should be accompanied by clearer guidelines, practical examples, or a phased approach based on risk or materiality.			
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	The unadjusted gender pay gap is not a representative indicator; therefore, it may be appropriate to replace this metric with the gender pay gap broken down by employee category. It would also be necessary to exclude from the calculation the role of General Manager if it coincides with the role of Chief Executive Officer. Indeed, although the General Manager is an employee, their status is inextricably linked to that of the CEO. For this reason, hiring and remuneration policies are not levers available to the company but are defined and approved by the Board of Directors. The calculation should be based on the annual pay level rather than the average gross hourly pay. Concerning the variable components of remuneration: •It is unclear which methodology should be used to measure them, i.e., whether to use the cash flow of the reporting period (which therefore refers to the previous period, and is affected by the pro-rata mechanism for bonuses of newly hired employees) or the forecasted amount (referring to the cost accrued in the reporting period, and therefore an estimate rather than an actual value). We consider cash flow to be the most representative value. •the "economic value" of benefits is not always easily and accurately calculable, since some benefits are available only to certain employees and can be used arbitrarily (e.g., family with children, mortgage coverage, etc.). We therefore recommend clarifying that the calculation should be based on the fixed component of remuneration only, while still maintaining other KPIs on the "accessibility" of benefits and the "coverage" of variable components.			
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	We do not agree with the inclusion of the concept of fair presentation, nor with the gross approach. The definition of the value chain remains vague and undefined for financial institutions. The relief provided in paragraph 72 on acquisitions and disposals is partially undermined by paragraph 73, which introduces a degree of discretionality, such as the definition of a "significant event", and therefore still requires an assessment. We propose eliminating paragraph 73. We do not agree with the provision to consider entity-specific disclosure as mandatory (ESRS 1 paragraphs 10-11 and AR 1-2), since it is not governed by any ESRS. From a simplification perspective, we consider such disclosure should be voluntary, since: i) the flexibility and level of discretionality regarding both the origin of the topic (DMA) and its content (absence of specific provisions and references to other frameworks such as GRI or IFRS sectoral guidance); ii) the lack of comparability between different undertakings, particularly in relation to fair presentation; and iii) the opportunity for disclosure is subject to management assessment.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	We consider that disclosure on AFE should be removed, as preparers are not ready to develop and implement methodologies capable of providing sufficiently reliable forward-looking data, which is often commercially and strategically sensitive. The requirement would result in disclosure of non-material data that is not useful to investors.			
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Under paragraph 26(a), we consider necessary introducing an exception for financial institutions from disclosing emission targets in absolute terms; we do not agree with the inclusion of the requirement to disaggregate energy consumption from fossil fuels (E1 paragraph 29).			
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	We do not agree with the removal of the term "severe" as a driver for incident reporting (S1 paragraph 46 (b)), as it runs counter to simplification. Regarding the gender pay gap (S1 DR15), we consider important clarifying that the calculation should be based on the fixed component of remuneration only, while still maintaining other KPIs on the "accessibility" of benefits and the "coverage" of variable components, due to the negative effects of the latter on the KPI calculation.			
Survey	Cassa Depositi e Prestiti (CDP)	Asset manager/Investor	Italy	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We recommend providing specific guidance for financial sector participants, on topics such as the calculation of Scope 3 GHG emissions and the definition of the value chain. Regarding the value chain, given the complexity of data collection and the certainty of its reliability, at this stage it would be appropriate to limit the related reporting requirements. Regarding E1-7 paragraph 28 (b), this requires a more precise definition of the methodology for calculating energy consumption from nuclear sources.			
Survey	FRANCE ASSUREURS	Association of financial institutions	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	France Assureurs commends EFRAG's significant efforts to simplify the DMA process and strengthen the materiality filter to only report on the most relevant topics. We welcome the following changes: -The top-down approach for the DMA to avoid unnecessary complexity. -The clarification of the relationship between IROs and topics to be reported. -The option to disclose at topical or IRO level to reflect how material matters are managed in practice. -The report of non-material topics if they are presented in a way that avoids obscuring material information However, we would like to stress the following points: -The simplification of the DMA could be reflected in the report. IRO-1-related disclosures could be reduced and simplified as they require very detailed and complex information for general users. -For simplification purposes, it should be clearly stated that if the undertaking has not experienced significant changes in terms of strategy or commercial position, its DMA does not have to be updated every year. -ESRS1§40(c) defines that material risks and opportunities may arise from changes in regulation addressing systemic risks. This requirement was not part of ESRS Set 1 and could lead to an extensive interpretation and include topics in the DMA that are not relevant to a sustainability report. -Prioritisation is more important than thresholds (that should only help determine and prioritise material topics). The severity assessment should not necessarily lead to scoring each characteristic separately but may be linked to threshold-based prioritisation (AR 5, AR 7) -Some paragraphs remain ambiguous or inconsistent between the bottom-up and top-down approaches, including: specify that the material assessment "shall be assessed based on [criteria]"(§31-32); "Scenarios/forecasts that are deemed likely assessed more likely than not to materialise, including based on conclusive scientific evidence" to assess risks and opportunities (AR 15)			
Survey	FRANCE ASSUREURS	Association of financial institutions	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	The current wording is overly complex and is therefore likely to give rise to divergent interpretations. Indeed, the net assessment proposed by EFRAG entails significant risks to comparability and is additionally very complex, which illustrates the insurmountable challenges of determining, through generalized provisions, when a net approach would be appropriate. Therefore, and to preserve comparability, we request that the gross approach be applied (to be reflected in paragraphs 34 to 36) and would support an additional, optional net assessment, provided that the gross approach is established as the mandatory baseline. Remediation and prevention measures would still be transparently captured under the Policies, Actions, and Targets (PAT) disclosures, thereby preserving fair presentation without compromising clarity, auditability, or comparability. Furthermore, we believe Appendix C creates confusion for preparers and we recommend removing it.			
Survey	FRANCE ASSUREURS	Association of financial institutions	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	France Assureurs welcomes the possibility of including an executive summary, as well as the emphasis on the use of appendices to separate more detailed or technical information, such as the disclosures related to the UE Taxonomy. This will improve the readability, the relevance and conciseness in the main body of the report. We also note positively the clarification of the 'connected information' concept in ESRS 1 – chapter 9, which helps reduce fragmentation and repetition across the sustainability and broader corporate reporting, thereby promoting better connectivity.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FRANCE ASSUREURS	Association of financial institutions	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	France Assureurs welcomes the proposed amendments aimed at striking a balance between the prescriptiveness of the requirements and preparation efforts, and the relevance and comparability of information. In particular: -We support the reduction of "shall datapoints" in PAT and the deletion of the requirement to disclose whether the undertaking plans to implement a PAT for material topics and the associated timeline. -We are in favour of the proposed simplification and clarification of MDR – now renamed GDR - and their link with PAT in topical standards, which will likely enhance the readability of the report and avoid redundancy of information in different parts of the sustainability statement. -We appreciate the improved alignment between PAT disclosures and IROs, including the flexibility to report at a higher aggregation level where appropriate. This change enables undertakings to reflect internal management practices more accurately, enhancing the usefulness of the reported information. In addition to the simplifications already made, we would recommend amending SBM-3 paragraph 22 which requires disclosing "how the undertaking has addressed or plans to address" material IROs. This seems redundant with PAT disclosures. We would also recommend softening the significance criteria in SBM-1 AR10, which currently require disclosure based on either representing 10% of turnover or being connected to material impacts. These criteria should be presented as indicative rather than prescriptive. As the objective of this disclosure is to provide a general understanding of the undertaking's business model and its connection to sustainability matters, rigid thresholds may result in disproportionate reporting efforts without necessarily improving the quality of information.			
Survey	FRANCE ASSUREURS	Association of financial institutions	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	France Assureurs supports the changes implemented by EFRAG. The elimination of "may disclose" datapoints from the standard helps to reduce confusion when preparing the report. The new articulation between DR and AR is also a welcomed proposal that enables undertakings to better navigate the standard and identify the mandatory disclosure requirements. However, "should/shall consider" wording should be amended as it is not clear if the related DR are mandatory or optional. Such references should either be replaced by "shall" only or "may" depending on the case, or otherwise clarified. Moreover, we note that some AR still include additional information – which could easily be part of the DR - and thus are not always limited to mandatory methodological guidance (e.g. AR 22 for para 51, AR 38 to par 111a, AR 28 for para 29, AR 8 for para 20). Finally, while we recognise the intent to improve the language of the standards, we call on EFRAG to implement changed terminology with care to avoid misinterpretation or misalignment with prior guidance used by preparers in the first reporting year. Simplification should not create excessive burden to comply with new obligations.			
Survey	FRANCE ASSUREURS	Association of financial institutions	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We highly support EFRAG's recommendation to not include NMIG in the upcoming delegated act. If the purpose of the NMIG is to provide for "how to report guidelines", it should not be legally adopted in a delegated act as this would reintroduce voluntary datapoints and bring confusion for preparers and auditors on how to interpret the guidelines. Indeed, it is of utmost importance that stakeholders, particularly auditors, do not interpret the NMIG as encouraging undertakings to report additional information, but rather that its scope is clearly understood as being limited to clarifications and illustrations. We are concerned that, if not clarified, the NMIG may be interpreted by stakeholders as a 'best practice' with which undertakings might be implicitly expected to comply. The following disclaimer should be added at the beginning of the NMIG: "These NMIG provide illustrative examples of how undertakings may disclose information required by ESRS disclosure requirements. They shall not be construed as an interpretation of the standards, nor as covering the full range of possible facts and circumstances, but only as one possible form of relevant disclosure among others." Also, a reduction in its volume would also enhance efficiency, reduce the burden, and provide greater clarity for undertakings wishing to consult it. Finally, we suggest clarifying how the application of the ESRS will be supported and interpretation uncertainties addressed in the future – whether through Q&A, non-authoritative implementation guidance such as the NMIG, or other means. Such prospective clarification is essential to facilitate implementation and reduce interpretative risks. In addition, it is important to clearly designate the body responsible for managing the NMIG.			
Survey	FRANCE ASSUREURS	Association of financial institutions	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	France Assureurs sides with the reliefs introduced. We support the introduction of the "undue cost or efforts" principle which responds to stakeholders' demands for proportionality. Further illustration on how to apply this concept would be useful to ensure consistent interpretation, particularly with auditors (e.g. interpretation on considering the relevance of information for users). However, it is of the utmost importance that the proposed reliefs are expressly compatible with the qualitative characteristics of the information. We welcome the introduction of flexibility regarding metrics, in line with the proportionality principle, especially regarding metrics that may not be estimated due to undue cost or effort, and for non-material activities that may be excluded from the calculation of certain metrics. Regarding value chain information, we welcome the removal of the systematic preference for direct data in the calculation of value chain metrics, which allows undertakings to use either direct data or estimates depending on practicability and reliability. However, we recommend clarifying that value chain information is required only for the identification of material topics as implied by ESRS1 paragraph 62, but not for the disclosure of metrics. We welcome the flexibility on including newly acquired subsidiaries, which reflects operational realities and provides clarity on consolidation timing. There is a general risk of conflict between the fair presentation principle and the reliefs proposed: it should be clear that applying a relief does not contradict fair presentation. We wish to stress that the application of one or more reliefs must remain consistent with the principle of fair presentation. It should be expressly stated that the use of relief does not contravene this principle. We oppose the idea that reliefs are dynamic and may become obsolete over time. The reliefs proposed should not be temporary, as they constitute one of the key elements of the ESRS simplification			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FRANCE ASSUREURS	Association of financial institutions	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We welcome the relief for lack of data quality for metrics to allow for partial data coverage. Nonetheless, we regret that this principle explicitly excludes GHG emissions (ESRS E1-6), when reliable data on scope 3 emissions remain difficult to collect especially for financial institutions. We would recommend extending – at least temporary - this relief to E1-6 to support realistic implementation. Finally, it seems that differing interpretations persist among stakeholders. As such, we call on EFRAG to clarify this relief and the interactions between ESRS1 section 7.3 and § 91, as well as with E1-6.			
Survey	FRANCE ASSUREURS	Association of financial institutions	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	We acknowledge the usefulness and relevance of anticipated financial effects; however, as of today, no mature and commonly accepted methodology exists among stakeholders, which prevents data comparability. In addition, anticipated financial effects significantly expose companies in the context of public reporting, and considerable uncertainty remains as long as it is unclear how the reliefs proposed by EFRAG will operate. From a forward-looking perspective, we call for the development of public methodologies that would enable stakeholders to assess these anticipated financial effects within a more standardized and comparable framework, and one that is less subject to debate with auditors. Pending a more stable environment, we would support option 2 that requires companies to disclose qualitative information, with quantitative information to be provided on a voluntary basis			
Survey	FRANCE ASSUREURS	Association of financial institutions	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	We wish to underline the current challenges in calculating anticipated financial effects for climate matters. At the same time, we recognize the importance of ensuring that such climate-related information matures rapidly. As such, we would support the option to prioritize quantitative information, while permitting their omission under certain circumstances (i.e., where no reasonable or supportable data is available), accompanied by a three-year transition period. Where the publication of quantitative information is not possible, the undertakings shall publish qualitative information. Should this option be adopted, we would like to stress out that only the requirements of E1-11 should apply and it should not be in addition to ESRS2 SBM-3 §23 and §24 (for instance, undertakings should not be required to disclose financial performance and cash flow). We would like to stress that the implementation of this option must consider sensitive information and business confidentiality. In addition, we support the inclusion of all reliefs granted by the ISSB, including those relating to 'skills and capacities' (currently excluded by EFRAG).			
Survey	FRANCE ASSUREURS	Association of financial institutions	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Although the integration of elements from the ISSB framework (fair presentation, reliefs, etc.) is a positive step towards interoperability, it is important to emphasize that, as interoperability is not the main objective of EFRAG's mandate, it should not be improved solely through amendments to existing requirements. In our view, the exposure drafts contain additional requirements introduced to increase interoperability with the ISSB (see E1-3§21, E1-3 AR 8 §20). Convergence efforts between EFRAG and the IFRS should continue. However, it should be acknowledged that certain differences between the two frameworks are acceptable, beyond the well-known divergence on materiality, especially where the ESRS have already integrated lessons learned from implementation. To address interoperability in a pragmatic manner, we support the ANC recommendation suggesting complementing the ESRS with dedicated ISSB interoperability guidance. This would enable undertakings wishing to align more closely with IFRS S1 and S2 to disclose additional datapoints, without creating extra burden for other undertakings. Such guidance would reintroduce, on an optional basis, the datapoints originally derived from IFRS S1 and S2 but removed from the current draft for simplification purposes.			
Survey	FRANCE ASSUREURS	Association of financial institutions	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	FRANCE ASSUREURS	Association of financial institutions	France	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	We support the reduction in the number of mandatory datapoints and the deletion of all voluntary datapoints in the ESRS. It illustrates EFRAG's efforts and willingness to respond to stakeholders' concerns around reporting complexity, excessive granularity, and operational burden for preparers. However, we would like to draw to EFRAG's attention that the use of several expressions like "is useful information" / "is a possible aspect to cover" may lead to uncertainty regarding the actual requirements for undertakings and should be clarified. We also consider that efforts in reporting burden reduction could have been further pursued, especially the reduction of "shall" DPs, which we would have expected to be the focus of the simplification. Finally, it is important to note that a 57% reduction in mandatory datapoint will not necessarily translate into a proportional decrease in report length or reporting burden. While we welcome the notable reductions in certain topical standards, significant concerns remain regarding newly introduced concepts and methodologies that may actually increase the reporting effort. Examples include the requirements on fair presentation, the distinction between gross and net impacts, and the mandatory general disclosures for all metrics relating to data types and sources — as well as, for environmental metrics, the disclosure of specific environmental conditions and characteristics of the area where the impact occurs.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FRANCE ASSUREURS	Association of financial institutions	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	As a general comment, we are not in favour of introducing new mandatory datapoints in the ESRS, as this goes against the simplification exercise and the mandate given to EFRAG by the European Commission. However, if those were to be adopted, we have the following comments: -On G1 §14 Business conduct confirmed incidents, the requirement to disclose details about the nature of incidents, which is potentially highly sensitive information (rather than just the number of incidents), appears to us to involve a legal risk (the risk of being subject to inspections and penalties by third countries) and an additional workload for preparers. -On G1 §10 Business conduct– Training of procurement team, we anticipate potential challenges in obtaining information on training programs for the identified targets. We therefore recommend that the distinction between targets be made optional.			
Survey	FRANCE ASSUREURS	Association of financial institutions	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	As a general comment, we are not in favour of introducing new mandatory datapoints in the ESRS, as this goes against the simplification exercise and the mandate given to EFRAG by the European Commission. However, if those were to be adopted, we have the following comments: -On E5-4 Percentage of total weight that are critical and strategic raw material §15c, it is very difficult to obtain this information from the insurer part -On E5-5 Percentage and/or total weight for which the finale destination is unknown, it is also very difficult to obtain this information - this information would therefore be subject to a high degree of uncertainty (via extrapolation).			
Survey	FRANCE ASSUREURS	Association of financial institutions	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We support the ambition of the "fair presentation", particularly its aim to reduce unnecessary disclosures and the documentation required to demonstrate omitted datapoints are not material. We remain vigilant about its implementation and interpretation by preparers and auditors. It is paramount that the use of reliefs does not contradict the fair presentation principle, as this would undermine the simplification exercise. It should be explicitly clarified that the use of reliefs in the ESRS (including phased-in provisions in Appendix C) is compatible with fair presentation in the sustainability statement, and that fair presentation does not contradict the exercise of reasonable and informed judgement in the DMA. Formalizing fair presentation may lead preparers and auditors to adopt conservative interpretations of "completeness," "accuracy," and "verifiability" to mitigate legal and assurance risks. This could increase reporting burdens without enhancing the usefulness or relevance of the disclosures. We do not support the introduction of "complete" (aligned to ISSB standards) among these principles, since it implies a degree of exhaustiveness incompatible with a limited assurance framework. ISSB standards are not regulatory frameworks, and do not bear the same audit consequences as the ESRS. We see challenges in applying fair presentation to inherently uncertain and forward-looking disclosures. Many sustainability metrics and narratives rely on estimates, evolving methodologies, or scenario analysis. Hence, "accuracy" and "verifiability" cannot be understood as demanding absolute precision. The current definition risks creating unrealistic expectations regarding what can be reported and assured. Fair presentation must be aligned with the limited assurance under CSRD, and the related audit procedures must be specified. It should be clarified that fair presentation does not imply disclosures must be "true" in an absolute or static sense. This safeguard is necessary to ensure preparers are not held to disproportionate evidentiary standards, especially when reporting on complex, forward-looking, or qualitative matters.			
Survey	FRANCE ASSUREURS	Association of financial institutions	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	France Assureurs agrees that financial institutions should be exempted from disclosing absolute GHG emissions targets when only intensity targets have been set, provided they disclose contextual information (evolution of sectoral investment and financing policies). This exemption is particularly relevant for insurers, given that their emissions are mostly indirect and do not significantly arise from direct operations. Estimating absolute emission targets in this context requires extensive assumptions and complex modelling across diverse portfolios, resulting in outputs with low reliability, poor comparability between different financial institution resulting in a limited added value for users. Translating intensity into absolute values could lead to reducing investment by avoiding high-emitting policyholders instead of supporting their transition, misrepresenting progress and hampering overall decarbonization efforts. Intensity targets make it possible to monitor sectors in transition and ensure that they do not lose funding. Nevertheless, we would not be opposed to the publication of absolute values in certain specific circumstances, such as when the financial institution has chosen to phase out of highly emissive sectors. It should also be noted that SBTI, in its latest publication, considers intensity targets to be relevant, as well as absolute value targets and portfolio alignment percentages			
Survey	FRANCE ASSUREURS	Association of financial institutions	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	This change would result in an increase in the number of countries to be reported on for these two disclosures, thereby creating an additional burden in preparing the information. The threshold of 50 employees is not relevant, as it may lead to the inclusion of countries that are not material in comparison with the rest of the group. Accordingly, the alternative condition of representing at least 10% of the group's total workforce should be retained. We also consider that the various tables presenting this information would become difficult to read.			
Survey	FRANCE ASSUREURS	Association of financial institutions	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	As a general comment, France Assureurs supports every initiative that aims to improve alignment between the CSRD, SFDR, and all other regulations that belong to the sustainable finance framework. Alignment is key for regulatory consistency. We advocate for the careful review undertaken by EFRAG and acknowledge that several deletions or consolidations of SFDR-related datapoints were justified, particularly where information was duplicated, could be derived from other disclosures, or lacked material relevance. We welcome the retention of IRO-2 paragraph 28f which requires a table of all datapoints that derive from other EU legislation, indicating where they can be found in the report or, if they are not material according to the DMA of the undertaking. Finally, it is important to take into account the forthcoming review of the SFDR, which may result in the removal of PAI indicators considered less relevant. If such indicators are no longer mandatory, this should be reflected in a streamlined set of corresponding ESRS datapoints for financial institutions. To ensure consistency over time, this could be achieved by establishing an explicit dynamic link between the ESRS and the SFDR PAIs, allowing the standards to evolve in line with future regulatory changes.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FRANCE ASSUREURS	Association of financial institutions	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We support the review of AR 26 in Amended ESRS E4, as it contributes to the overall simplification of the standard while maintaining a level of methodological guidance that can assist undertakings in defining relevant biodiversity- and ecosystem-related targets. However, we underline that the application requirements should retain sufficient flexibility and must not turn into mandatory expectations. AR 26 should remain illustrative and optional in nature. In this regard, guidance under AR 26 should also promote proportionality and scalability in reporting practices. We recommend that EFRAG refrain from integrating immature methodologies into the ESRS biodiversity reporting framework, including science-based approaches such as the Science Based Targets Network (SBTN). Instead, such methodologies could first be introduced in the NMIG, until they reach a sufficient level of maturity and harmonisation. At this stage, references could for example be made to the more mature Taskforce on Nature-related Financial Disclosures (TNFD) core global disclosure indicators, to illustrate aspects that biodiversity- and ecosystem-related targets may address. Finally, we express concern about excessive granularity in ESRS E4, particularly regarding site-specific disclosures, such as the location of material IROs (§20a).			
Survey	FRANCE ASSUREURS	Association of financial institutions	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	We regret the deletion of the voluntary datapoint on adjusted gender pay gap, which provided more meaningful information. Indeed, the adjusted basis offers a better understanding of pay equity within organizations, by accounting for relevant contextual factors (employee category, age, country etc.). While we support efforts to reduce complexity, we believe that optional datapoints with high relevance to key social topics such as pay equity should not be excluded entirely from the reporting architecture.			
Survey	FRANCE ASSUREURS	Association of financial institutions	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Regarding the positioning of PATs in ESRS 2, we understand that they have been grouped together to avoid repetition within each thematic standard. However, we would have preferred the structure of the standards to follow that of the sustainability statement, even if this resulted in certain requirements being repeated within each thematic standard. As it currently stands, contributors working on a thematic standard must remember to refer to ESRS 2, which is not intuitive and creates a risk of omission. At the very least, each thematic standard should include an explicit reference to ESRS 2.			
Survey	FRANCE ASSUREURS	Association of financial institutions	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Currently, when ESRS E1 is deemed immaterial, the justification required is very burdensome and therefore quite dissuasive. Under the EFRAG proposal (ESRS 2.28.b), it would suffice to explain the reasons for this conclusion, which appears much less dissuasive (assuming auditors take a pragmatic approach). From an investor perspective, it could create a risk that more companies will refrain from publishing E1, and consequently their GHG.			
Survey	FRANCE ASSUREURS	Association of financial institutions	France	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	« The simplifications proposed on ESRS S1 still raise significant implementation challenges on the following DR: S1-6; S1-9, S1-12, S1-13, S1-16. Notably, the current version of the DR related to non-employees (S1-6) and adequate wages (S1-9) are particularly complex to interpret leaving room for varying interpretations and divergent methodologies across companies (e.g. the non-employees number fluctuate depending on the project cycles, for adequate wages the proposed benchmark "ILO Convention No. 131" is not a universal legal standard, as it does not define a specific amount or a single methodology…). The requirements linked to these 5 S1 DRs create major operational challenges, in terms of data reliability, resource mobilization, auditability and comparability and should be clarified. »			
Survey	FRANCE ASSUREURS	Association of financial institutions	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		As regards policies, actions and targets (PAT), we would like EFRAG to clarify whether it is possible to communicate on their existence, even if not all the listed elements exist or have not been formalised (sort of partial alignment with the criteria). This is particularly necessary for policies, where the definition is too restrictive and not always well understood (for example, elements such as charters and agreements exist within the HR function and should be mentioned even if they do not meet all the criteria, while being transparent about these criteria not met).			
Survey	FRANCE ASSUREURS	Association of financial institutions	France	35.ESRS2_GOV-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	ESRS 2 DP GOV-1.21(d) is essential for financial institutions because it is a SFDR PAI datapoint, but its current wording is misleading and we have to read the SFDR requirement to understand what is expected. In order to better fit with SFDR, it should be clarified that the DP requires the % of women and % of men of board members – and not a ratio of female to male board members (which doesn't make any sense).	ESRS2	GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	
Survey	FRANCE ASSUREURS	Association of financial institutions	France	35.E1-6.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The concept of adaptation refers to the adaptation process of the undertaking to actual and expected climate change. This concept should be extended to what the undertaking does to enable other persons (legal entity or natural person) to adap (= case for insureurs).	E1	Disclosure Requirement E1-6 - Targets related to climate change	
Survey	FRANCE ASSUREURS	Association of financial institutions	France	35.S1-6.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We would like to point out that the newly introduced definition of "non-employees" based on national legislation (par.8 and AR 9) will result in additional complexity for multinational undertakings, who may have adopted a different approach (e.g., Group-level definition) in their reporting . We suggest aligning all S1 provisions with the approach of AR 23 for para. 36 (disability), that allows flexibility to undertakings on the definition to adopt (national legislation or Group-level.	S1	Disclosure Requirement S1-6 - Characteristics of non-employees in the undertaking's own workforce	
Survey	FRANCE ASSUREURS	Association of financial institutions	France	35.S1-13.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	AR 27 for para 40c : we would like to point out that the newly introduced definition of "work-related accidents" based on national legislation (par.8 and AR 9) will result in additional complexity for multinational undertakings, who may have adopted a different approach (e.g., Group-level definition) in their reporting . We suggest aligning all S1 provisions with the approach of AR 23 for para. 36 (disability), that allows flexibility to undertakings on the definition to adopt (national legislation or Group-level).	S1	Disclosure Requirement S1-13 - Health and Safety metrics	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	With regard to risk assessment within the double materiality process, we agree with the approach of leveraging the Enterprise Risk Management (ERM) processes already established within the company. Accordingly, it is our view that risks should be assessed net of mitigation measures, while retaining the voluntary option to also disclose the gross risk assessment. This approach would ensure consistency with the information reported in the Financial Statements (i.e. connectivity) and, where applicable, would allow companies to expand the disclosure should they deem it appropriate and relevant			
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We believe that the proposed changes have not achieved the goal of simplifying the Double Materiality Assessment process. In particular, the new guidance on the approach described in Appendix C for impact assessment introduces further complexity by differentiating between current and potential impacts, reporting periods, and the timing of remediation, mitigation, and prevention actions. It would be preferable to adopt a uniform principle of assessment on a gross basis of the actions taken. This approach would ensure greater clarity, reduce the risk of divergent interpretations, and enhance comparability between companies, while still allowing for the disclosure of measures taken in the dedicated sections of the standards.			
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	A2A believes that the document could be useful as additional, non-mandatory material, but only for further study and clarification of the DPs of the Exposures Drafts. We believe that the non-binding nature of NMIG has to be explicitly communicated and consistently understood by both preparers and auditors. Furthermore, we suggest separating the different types of information contained in the document: for example, if it concerns "clarifications" to the DP requests, then these should be included in the Delegated Act. There should be no implicit expectation that the examples provided must be followed or justified if not applied. If, on the other hand, it concerns voluntary DPs, then these should be excluded from the Delegated Act to avoid misunderstandings and confusion among preparers. In the end, an explicit statement confirming that NMIG cannot be used for audit purposes, along with its separation from the legislative text, would reinforce this distinction.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	In general, we welcome the introduced simplifications and understand the reasons behind the various reliefs provided, which help reduce the reporting burden. However, we believe it is essential that these measures do not result in a decline in the quality and completeness of the reported information. It is crucial to maintain an adequate level of standardization and rigidity of the standards to ensure transparency, comparability, and reliability of the data			
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We express our preference for Option 1. In our view, disclosure of financial effects related to climate risks should not be left on a purely voluntary basis. These risks are already frequently embedded in corporate risk assessment processes and are of increasing significance from a financial perspective. We therefore consider it appropriate that the omission of quantitative data be restricted to limited and well-defined circumstances, as foreseen in the proposed amendment. In addition, with regard to datapoint 41 (f) we note that establishing a reliable methodology for the identification of potential stranded assets is particularly challenging, and that the practical applicability of a 1.5°C pathway may raise some concerns. Considering that certain climate risk assessment tools already rely on comparable scenarios, we suggest amending requirement (f) by adding the words "or equivalent" after "climate change to 1.5°C", in order to allow for greater flexibility and consistency with existing approaches.			
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	We believe that all Application Requirements related to the quantification methodology should be retained within the text of the Disclosure Requirement. These guidelines are essential to provide a clear and consistent methodological reference for all companies, ensuring comparability and operational support in preparing anticipated financial information. Their inclusion helps balance the need for simplification with users' requirements for reliable and comparable information			
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	A2A operates in the EU, with more than 95% of its services and plants located in Italy, and therefore only applies ESRS as per CSRD. We selected "yes" because we agree with the fact that in Sustainability reporting, there is the need of more interoperability between Standards across Countries.			
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	22.S1	Comments on deleted datapoints in ESRS S1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	A2A believes that reducing qualitative DP is an acceptable balance between reducing the burden and preserving the information necessary to fulfill the objective of the EU Green Deal. However, we believe that some quantitative DP related to the Characteristics of the undertaking's employees (formerly S1-6), Diversity metrics (formerly S1-9), and Training skills development metrics (formerly S1-13) should be retained in order to: • highlight certain characteristics of the company's workforce and the organization's commitment to training and development; • avoid losing the reporting effort from previous years; • avoid losing data, which is especially useful when completing questionnaires that require public information. DP to be retained: • S1-6 DP50c: maintain the number of employees who have left the company (required for some questionnaires and in any case for calculating turnover); • S1-6 DP52 a and b: Maintain at least the breakdown between full-time/part-time and gender • S1-9 DP66b: Maintain the breakdown by age group S1-13 DP83b: Maintain the breakdown by gender			
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	A2A supports the introduction of the concept of "fair representation" because it allows for better alignment between the various Standards and therefore greater comparability between reports. Furthermore, we believe that using the concept of fair representation can move beyond the idea of sustainability reporting as a mere compliance exercise. However, we also believe it is necessary to introduce guidelines and methodologies for both the implementation of the concept of fair representation and for auditing/assurance activities.			
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The A2A Group operates primarily in Italy, with a limited number of employees abroad, no more than 50, and in any case, less than 10% of the workforce. We agree with the new threshold, although the change does not impact our reporting.			
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	The A2A Group operates primarily in Italy, with a very limited number of employees abroad (only 3 people outside the EU). Thus, we believe that this issue is not material for our Group.			
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We believe it is essential that all methodological guidelines related to the definition of targets and metrics in the field of biodiversity and ecosystems be maintained within the Disclosure Requirement. Biodiversity is an area characterized by high complexity and variability, so leaving wide discretion in defining metrics could compromise the comparability and reliability of information between companies. Maintaining clear methodological guidelines is therefore essential to support companies in defining consistent and comparable objectives and to ensure the usefulness of information for stakeholders.			
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	The A2A Group is partially in favor of the proposed changes, in fact it suggests making the disclosure of the gender pay gap by employee category voluntary, in order to: - highlight certain characteristics of the company's efforts to reduce gender pay gap; - avoid losing the reporting effort from previous years; - avoid losing data, which is especially useful when completing questionnaires that require public information			
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	The A2A Group agrees with the proposed changes because we believe that the effort required to collect data is greater than the value of the information.			
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We believe that the proposed change to the definition of the term "Recovery" in the new Standards could have a significant impact. Currently, in indicator E5-5, waste-to-energy is classified under "other recovery operations" within recovery waste. According to the new version, it would be reclassified under "other disposal operations" under disposal. This change could encourage companies to favor disposal instead of considering energy recovery of waste as a virtuous practice. We do not agree with this change and believe it is appropriate to maintain the current definition of recovery to properly value waste recovery activities, in line with the waste hierarchy established in the EU Waste Framework Directive (Directive 2008/98/EC).			
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	35.E1-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We believe it is important that, within the E1-1 Transition Plan disclosure requirement, the trajectory well below 2°C, in addition to the 1.5°C trajectory provided for by the Paris Agreement and the European Climate Law, be explicitly considered. This would allow companies to more accurately represent their transition plans in relation to different decarbonization scenarios that are still consistent with international and European objectives.	E1	Disclosure Requirement E1-1 - Transition plan for climate change mitigation	
Survey	A2A	Preparer (non-financial preparing a sustainability report)	Italy	35.E1-5.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We believe that all references to the EU Taxonomy should be maintained as mandatory requirements and not included in the NMIG. The interconnection with the data provided by Taxonomy is essential to ensure full connectivity between sustainability and financial information. Only a mandatory approach can ensure consistency, comparability, and reliability of the information provided to stakeholders.	E1	Disclosure Requirement E1-5 - Actions and resources in relation to climate change	
Survey	Finnwatch ry	NGO	Finland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Finnwatch ry	NGO	Finland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	We tentatively agree with the new guidance. Generally, we feel that DRs on companies' positive impacts could be completely cut from the standards as they add little value to users and companies have other channels to communicate them too.			
Survey	Finnwatch ry	NGO	Finland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We generally agree with that the amendments strike an appropriate balance, however, we do regret the deletion of disclosure requirements on metrics from the topical standards and would recommend adding them back.			
Survey	Finnwatch ry	NGO	Finland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We generally agree with the removal of "may disclose" datapoints. However, we note that others have suggested that some of their contents - especially when it comes to environmental standards - be included in the standard as examples. This sounds like a good idea, especially considering that reporting on certain environmental issues is new for many companies.			
Survey	Finnwatch ry	NGO	Finland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We have concerns in particular about the "undue cost and effort" relief as it gives companies a lot of discretion to not report on certain things and as such opens up possibilities for abuse. Some paragraphs under the related section are also worded in such a way that they are difficult to understand. They also potentially contradict international business and human rights standards. We also note that others have expressed concerns over combined impact of all the reliefs, and echo those concerns.			
Survey	Finnwatch ry	NGO	Finland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We prefer Option 1. The obligation to estimate and disclose the financial effects is needed in order to add credibility to other elements of reporting (e.g. climate transition plan). Without such estimate there may be an unobservable disconnect between the business model, planned measures and sustainability targets.			
Survey	Finnwatch ry	NGO	Finland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Finnwatch ry	NGO	Finland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Finnwatch ry	NGO	Finland	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	*This is a general comment that is not relevant to any specific standard.* In our view, the proposed changes do significantly simplify the reporting standards, cut a number of compliance/tick-the-box oriented datapoints and repetition - which are all welcome changes. Further reduction of mandatory datapoints would risk undermining the purpose and objectives of the sustainability reporting directive and the ESRS standards.			
Survey	Finnwatch ry	NGO	Finland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	We do welcome this addition. We do however note that alongside with other changes, it provides companies more flexibility and therefore responsibility over the content of their reporting. This is another reason why we are critical over the proposal to provide companies with e.g. undue cost and effort -relief.			
Survey	Finnwatch ry	NGO	Finland	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	*This is a general comment related to the question 33, not ESRS 1 only.* We have provided an answer only on the five standards we are more familiar with and which we also comment on in more detail in part 3 of this consultation.			
Survey	Finnwatch ry	NGO	Finland	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Finnwatch ry	NGO	Finland	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Finnwatch ry	NGO	Finland	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Finnwatch ry	NGO	Finland	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BIOFIN-EU, University of Limerick	Academia	Ireland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	To an extent, the DMA process is clearer with more explicit guidance as to where expertise may be sought. However, we have concerns that the reduction of burden may impact robustness, rather than merely simplifying. The margin for omission of information in the DMA based on the "undue cost or effort" principle could be detrimental to the quality of reporting.			
Survey	BIOFIN-EU, University of Limerick	Academia	Ireland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	In cases where the disclosure of the impact in future periods is not reported if fully remediated, we raise some concerns related to monitoring of the long-term success of remediation / mitigation activities. We propose introducing a timeframe for disclosure of mitigation actions pending review of success of such actions.			
Survey	BIOFIN-EU, University of Limerick	Academia	Ireland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	BIOFIN-EU, University of Limerick	Academia	Ireland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We welcome the clarity provided in this section.			
Survey	BIOFIN-EU, University of Limerick	Academia	Ireland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	BIOFIN-EU, University of Limerick	Academia	Ireland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E4	In the illustrative guidance for E4, we call for greater emphasis on the necessity for external expertise in assessing biodiversity-related IROs, particularly impacts. The removal of non-mandatory elements from the standard is a positive change, which should improve comparability.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BIOFIN-EU, University of Limerick	Academia	Ireland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The proposed amendments are sufficiently balanced. However, it is critical to retain the 'spirit of the law', in the sense that the aim of this Directive is to facilitate transformative change by EU businesses, rather than simply create an interoperable reporting system.			
Survey	BIOFIN-EU, University of Limerick	Academia	Ireland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	In relation to "undue cost or effort," we propose explicitly adopting the terminology from S1 para 34(a), i.e. "use all reasonable and supportable information…" to raise the threshold of the costs and efforts that companies can reasonably be expected to incur.			
Survey	BIOFIN-EU, University of Limerick	Academia	Ireland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	BIOFIN-EU, University of Limerick	Academia	Ireland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	BIOFIN-EU, University of Limerick	Academia	Ireland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Yes, however we would welcome the re-consideration of developing sector specific standards. This would reduce the burden of establishing (non)materiality across 12 standards for reporting entities, and streamline their data collection processes. In our view, this would have particular merit in relation to the environmental standards.			
Survey	BIOFIN-EU, University of Limerick	Academia	Ireland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	BIOFIN-EU, University of Limerick	Academia	Ireland	22.E4.	Comments on deleted datapoints in ESRS E4	I agree	We agree to the extent that the reduction has been focused primarily on the duplication of mandatory datapoints across topical and cross-cutting standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BIOFIN-EU, University of Limerick	Academia	Ireland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We solely comment on ESRS E4 and are in agreement in relation to this standard.			
Survey	BIOFIN-EU, University of Limerick	Academia	Ireland	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We recommend that a clear approach to setting and monitoring biodiversity targets be adopted, (similar to the use of the GHG protocol to guide emissions targets in ESRS E1). We suggest alignment with the UN-SEEA approach, as proposed by the EU-funded Transparent and Align projects.			
Survey	BIOFIN-EU, University of Limerick	Academia	Ireland	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The clarification of the DMA process and the reduction of datapoints does achieve the objective of simplifying the standards. However, the simplification process is an impediment to the success of the objectives of the EU Green Deal. The necessity to transform our economic model should transcend short term concerns around the costs and efforts involved in high quality sustainability reporting.			
Survey	BIOFIN-EU, University of Limerick	Academia	Ireland	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The clarification of the DMA process and the reduction of datapoints does achieve the objective of simplifying the standards. However, the simplification process is an impediment to the success of the objectives of the EU Green Deal. The necessity to transform our economic model should transcend short term concerns around the costs and efforts involved in high quality sustainability reporting.			
Survey	BIOFIN-EU, University of Limerick	Academia	Ireland	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The clarity on the interaction between E4 and ESRS 1 and 2 is a positive change. The removal of voluntary datapoints should improve understandability and comparability of reports. However, we propose greater emphasis on the need for external expertise to fully understand the nature of biodiversity-related IROs in order to meet the objectives of the EU Green Deal.			
Survey	German Chemical Industry Association - VCI	Business association (other than association of financial institution)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	German Chemical Industry Association - VCI	Business association (other than association of financial institution)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	German Chemical Industry Association - VCI	Business association (other than association of financial institution)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	VCI agrees that the proposed amendments, together with other changes introduced in the amended ESRS, offer a suitable degree of flexibility to enable more focused, relevant, and connected sustainability reporting. However, we primarily interpret these adjustments as clarifications of existing options rather than as substantial simplifications. From our perspective, they do not lead to a meaningful reduction in implementation efforts or reporting complexity.			
Survey	German Chemical Industry Association - VCI	Business association (other than association of financial institution)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	VCI considers the proposed Level 3 amendments to be a significant improvement. The revised structure and the clarified interaction between ESRS 2 and the topical standards notably enhance the overall readability and usability of the framework. Particularly positive are the simplification of the standards, the clear reduction in mandatory ("shall") requirements within the Policies, Actions and Targets (PAT) section resulting in lower complexity and workload as well as the shortened content and the elimination of redundancies. Moreover, the direct placement of Application Requirements (ARs) following the respective Disclosure Requirements (DRs) improves both structure and clarity. However, some concerns remain regarding the Non-Mandatory Implementation Guidance (NMIGs). The NMIGs should be removed so they do not lead to indirect obligations.			
Survey	German Chemical Industry Association - VCI	Business association (other than association of financial institution)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	VCI broadly supports the proposed amendments, as they significantly enhance the clarity and usability of the ESRS. The revisions make it easier for companies to identify mandatory content and apply the standards in a consistent manner. In particular, the new structure, especially the placement of mandatory Application Requirements directly beneath the corresponding Disclosure Requirements, improves the document's navigability and reduces the need to jump between sections. While these changes improve structure and readability, the overall scope of reporting obligations remains largely the same. Therefore, the simplification mainly facilitates orientation within the standards rather than easing the reporting burden itself. However, the texts are still very complex and there are still unclear definitions.			
Survey	German Chemical Industry Association - VCI	Business association (other than association of financial institution)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The NMIG's might become a de facto "state of the art" that auditors, regulators, or stakeholders expect companies to follow. This would lead to even more effort the companies have to put into their reports. Therefore, the NMIG`s should be deleted.			
Survey	German Chemical Industry Association - VCI	Business association (other than association of financial institution)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	VCI does not agree with the decision to exclude any relief measure for commercially sensitive information, as referenced in paragraph 70 of the [DRAFT] Basis for Conclusions (i.e. the potential inclusion of a similar provision in the Directive through the Omnibus legislative process). The ongoing legislative process should not prevent EFRAG from directly addressing this issue within the standards—especially after acknowledging that it is a "concern frequently expressed by preparers" (paragraph 82 of the Basis for Conclusions). We note that section 7.7 of the current ESRS 1 directly quotes Article 2 of the Trade Secrets Directive in paragraph 106, conditions (a)–(c), which provides clearer alignment with existing EU law compared to previous drafts. However, the current wording limits the scope to information "corresponding to intellectual property, know-how or the results of innovation," thereby excluding other types of commercially sensitive information protected under the Trade Secrets Directive. To ensure consistency and full alignment with the Directive, this qualifying language should be removed. Additionally, the ESRS could offer greater flexibility in this area, following the approach taken in the GRI Standards. GRI 1 allows "confidentiality constraints" as a valid reason for omission, provided the reporting undertaking explains the rationale. It should also be considered that the publication of detailed site-level data—including coordinates and types of processes carried out—may be subject to confidentiality, competitive concerns, or trade secret protections. Members also report confusion and uncertainty when disclosing confidential information, particularly in justifying omissions to auditors.			
Survey	German Chemical Industry Association - VCI	Business association (other than association of financial institution)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	VCI agrees that the proposed relief for lack of data quality on metrics strikes an acceptable balance between flexibility for preparers and preserving transparency. Additional clarification on the interpretation of "reasonable" effort would help ensure consistent and practical application across companies and sectors.			
Survey	German Chemical Industry Association - VCI	Business association (other than association of financial institution)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Option 2 preserves flexibility by allowing companies to voluntarily provide quantitative information where available and relevant, without creating a mandatory obligation. It encourages companies to provide clear narratives of expected financial implications instead of uncertain projections, which may not be comparable across firms. Also, Mid- and long-term financial effects are rarely available in reliable, comparable form; focusing on qualitative assessment supplemented by quantitative information only where meaningful is the more pragmatic approach. Quantitative projections would be highly subjective and could reduce comparability rather than improve it.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	German Chemical Industry Association - VCI	Business association (other than association of financial institution)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				
Survey	German Chemical Industry Association - VCI	Business association (other than association of financial institution)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	VCI acknowledges that the proposed amendments contribute to improved interoperability and support simplification goals, particularly through the focus on fair presentation and materiality. However, we believe further clarification is needed regarding the fair presentation principle and the definition of materiality—especially in terms of user relevance—to prevent overly broad or ambiguous disclosure requirements. Moreover, interoperability should not be interpreted as a one-sided alignment, where ESRS simply adopts the wording and provisions of IFRS S1 and S2. Instead, the ISSB should give due consideration to the feedback from European preparers of sustainability statements. This is particularly important with regard to the quantification of anticipated financial effects, which we believe should be removed entirely from the IFRS framework.			
Survey	German Chemical Industry Association - VCI	Business association (other than association of financial institution)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	German Chemical Industry Association - VCI	Business association (other than association of financial institution)	Germany	22.E2.	Comments on deleted datapoints in ESRS E2	I partially agree and partially disagree	VCI welcomes the proposed reduction in "shall disclose" data points under the materiality principle, as it represents a meaningful simplification and helps reduce the reporting burden, while still preserving the core information necessary to support the objectives of the EU Green Deal. However, we see further potential to eliminate data points that are either not relevant for financial users or not realistically collectible by companies. In this context, it is important to emphasize that reducing the overall length and complexity of the sustainability report is just as crucial as cutting the number of data points, given the significant variation in their complexity. Unfortunately, we do not anticipate a substantial reduction in reporting volume under the revised ESRS. While the number of data points has decreased, the underlying disclosure obligations largely remain unchanged. Some concerns persist, particularly with regard to environmental data points. Although simplifications have been introduced in certain areas such as financial effects and own workforce the environmental disclosures have only been partially streamlined. In many cases, requirements were not removed but merely merged or relocated, and in some instances, new obligations were added. We are also critical of the inclusion of Substances of Concern (SoCs) in the ESRS. These substances often overlap with existing categories such as Substances of Very High Concern (SVHC), leading to double counting and inconsistent data. Without a clear hazard category hierarchy, reporting on SoCs adds unnecessary complexity without delivering additional value. In global supply chains where only consumer articles are imported into the EU, chemical product information often differs from EU requirements. Suppliers outside Europe typically follow local chemical regulations, meaning EU-specific regulations are not legally recognized or applied. For the sake of simplification and consistency, SoCs should not be included as a general requirement for all stakeholders.			
Survey	German Chemical Industry Association - VCI	Business association (other than association of financial institution)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	The purpose of the simplification mandate is to reduce the number of data points to reduce the length of the report and to finally strengthen the meaningfulness of the report (and definitely not to increase the number of mandatory data points. Therefore, this is a step in the wrong direction. We therefore recommend to stick to the rule of no additional reporting obligations. Making E4 Biodiversity transition plans mandatory is not supporting its development but rather hindering development and innovation in this field. The decision to include Biodiversity TP information in reporting shall remain voluntary. Highlighting the training of procurement team within ESRS G1 is unnecessary detail and focus of one employee group. The addition shall be deleted.			
Survey	German Chemical Industry Association - VCI	Business association (other than association of financial institution)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	In general, we do not support the introduction of new data points, as they typically result in significant additional effort for reporting entities without a corresponding increase in decision-useful information. The cost-benefit ratio of expanding disclosure requirements must be carefully considered, and in our view, the current framework already places substantial demands on preparers. ESRS 1 provides the framework for preparation. Including a mandatory data point to state that ESRS 1 was considered will only increase the audit burden without improving the quality of sustainability statements. E2-4 secondary microplastics shall not be added as separate data point since only narrative information is available. E5-4 Addition of critical and strategic raw material shall be deleted. Reporting on "critical and strategic raw materials" is not about ESG/sustainability reporting. Reporting must not be used as vehicle for data collection related to the EU's geo-strategic interests. E5-5 Addition of "final destination unknown" shall be deleted as the stated goal of avoiding unreasonable estimations can be achieved without introducing new data points.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	German Chemical Industry Association - VCI	Business association (other than association of financial institution)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	The introduction of the concept of "fair presentation" raises significant concerns. While we acknowledge that this notion could enhance alignment with ISSB standards and offer reporting undertakings greater flexibility, we share the concerns expressed by some EFRAG SRB members. Specifically, it may impose additional obligations on companies, requiring not only compliance with the standards but also a demonstration that the reported information fairly represents the interests of all relevant stakeholders. This could also potentially increase the responsibilities of board members. The ESRS introduces impact materiality, which encompasses environmental and social dimensions beyond financial relevance. Applying a fair presentation requirement in this context risks exposing preparers to disproportionate legal, assurance, and reputational risks. Sustainability data is often forward-looking, qualitative, and based on judgment, lacking the evidentiary robustness of financial data. The absence of established practices and experience in applying impact materiality makes it difficult to define what constitutes a "complete and faithful" representation, thereby increasing uncertainty and inconsistency. Embedding fair presentation as a legal requirement may unintentionally trigger regulatory enforcement and audit complexity, without necessarily improving the quality of reporting. Assurance can already be effectively conducted using existing standards. Enforcement efforts should instead focus on the qualitative characteristics already embedded in the ESRS—namely relevance, comparability, verifiability, and understandability.			
Survey	German Chemical Industry Association - VCI	Business association (other than association of financial institution)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I would like to skip this question and provide my feedback in Part 3				
Survey	German Chemical Industry Association - VCI	Business association (other than association of financial institution)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	EFRAG itself has explained in a good way that the simplification has occurred by deleting irrelevant indicators or by merging information required into one datapoint when possible.			
Survey	German Chemical Industry Association - VCI	Business association (other than association of financial institution)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	If the disclosure specifications and application requirements for E4-4 (targets) have largely been removed as part of the simplification process, it becomes essential to provide clear and accessible guidance elsewhere. If ESRS Set 1, E4 AR 26 is indeed outdated, it should be urgently revised. This would enable companies to set biodiversity and ecosystem targets that reflect their specific material impacts—where such impacts exist—rather than requiring adherence to a one-size-fits-all approach. The primary objective must remain simplification and reinforcement of the materiality principle, rather than introducing more complex target-setting rules. We have identified two key risks associated with overly prescriptive guidance: -Biodiversity metrics remain methodologically underdeveloped. Unlike climate-related metrics, there is no universally accepted methodology. Therefore, flexible target-setting options are essential. -Detailed guidance risks undermining the Double Materiality Assessment (DMA) by creating a "checklist" mentality. This can pressure companies to report on issues that their own assessments have deemed non-material.			
Survey	Neuberger Berman	Asset manager/Investor	United States	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Neuberger Berman welcomes the clarifications provided on the double materiality assessment within the revised ESRS. The new guidance, which encourages a top-down approach centered on strategy, represents a positive step by reducing the burden of exhaustive bottom-up scoring. While we support this more pragmatic methodology, we recommend explicit recognition that companies should be able to refer to the SASB standards to identify industry-specific risks, opportunities, and outcomes (IROs) that are financially material as part of the double materiality assessment. We wish to emphasise the critical importance of maintaining a clear distinction between financial materiality—essential for investors' capital allocation decisions—and impact materiality. It is crucial that financially material information remains clearly presented and is not obscured by broader sustainability disclosures. The EFRAG draft simplified ESRS introduces the concept of non-obscuring information, which we support. However, enhanced alignment between ESRS and ISSB standards would be achieved if financially material disclosures intended for investors were required to be clearly identifiable and not obscured by other impact-related information reported to other stakeholders. This requirement is not yet explicitly included in the proposed changes. We encourage EFRAG to ensure that financially material information is kept distinct and accessible to investors, thereby supporting both robust interoperability and effective decision-making.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Neuberger Berman	Asset manager/Investor	United States	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Interoperability between the ESRS and ISSB standards is essential to ensure consistent, decision-useful sustainability disclosures for companies and investors. The ISSB's approach allows companies to exercise judgement in assessing sustainability-related risks, including how mitigation activities—planned or already in place—inform risk identification. This flexibility enables entities to consider both net and gross assessments depending on the circumstances, reflecting the complexity and specificity of real-world risk management. However, the new EFRAG proposal introduces mandatory, prescriptive guidance for impact materiality, dictating exactly how companies should consider mitigation, prevention, and remediation actions. By prescribing a fixed approach, EFRAG risks undermining the necessary judgement and flexibility that the ISSB standards encourage for financial materiality assessments. This rigidity may result in inconsistent identification and disclosure of sustainability-related risks, making it more difficult for companies reporting under both frameworks to reconcile their disclosures. We urge EFRAG to reconsider the prescriptive approach and instead align with the ISSB's principles-based methodology, which allows for professional judgement and is better suited to the realities of risk identification and reporting.			
Survey	Neuberger Berman	Asset manager/Investor	United States	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Neuberger Berman supports the proposed amendments aimed at enhancing the readability, conciseness, and connectivity of the ESRS standards. As users of sustainability information, we recognise the inefficiency and limited value of duplicating content in companies' annual reports, particularly regarding policies, actions, and targets. The reduction of duplicative indicators, clearer presentation of connected information, and use of appendices for detailed metrics are all positive steps that can improve the usability and accessibility of sustainability disclosures for report users. However, we caution that conciseness and simplification should not compromise interoperability with the ISSB's global baseline. The ISSB standards are increasingly recognised as the international benchmark for sustainability reporting. It is essential that the ESRS maintains alignment and does not fall below this baseline, as lowering the reporting threshold would risk creating further fragmentation and diminish the comparability of sustainability information across jurisdictions. Furthermore, to ensure sustainability reports remain useful for investors, we recommend that the ESRS strengthen the non-obscuring requirement. Specifically, financially material information presented to investors should be clearly identifiable and not obscured by disclosures intended for a broader stakeholder audience. This clarity is critical for effective capital allocation decisions and supports nteroperability. We urge EFRAG to balance the goals of simplification and conciseness with the need for robust interoperability and clear investor-focused disclosures, ensuring the ESRS continues to meet the needs of all users without sacrificing alignment with the ISSB's global standards.			
Survey	Neuberger Berman	Asset manager/Investor	United States	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree				
Survey	Neuberger Berman	Asset manager/Investor	United States	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	As noted previously, introducing reliefs in the ESRS that go beyond the scope of those provided in the ISSB standards—beyond what was agreed in previous interoperability guidance—is not advisable, as it risks lowering the reporting requirements for companies subject to the CSRD below the global baseline. The EFRAG draft simplified ESRS includes proposals for additional reliefs not present in the ISSB standards, such as those for acquisitions and disposals within the reporting period, as well as extensions of existing reliefs—for example, applying the undue cost and effort exemption to the disclosure of metrics related to an entity's own operations. Expanding or introducing new reliefs that are not aligned with the ISSB standards will create further complexity for companies that are required or choose to report under both frameworks. This divergence increases the reporting burden and makes it more challenging for companies to ensure consistency and comparability in their sustainability disclosures. In particular, the proposed relief for acquisitions and disposals during the reporting period may result in inconsistencies between the sustainability reporting boundary and the financial statements. This could complicate compliance with both ESRS and ISSB standards, and potentially disrupt the alignment and connectivity between sustainability information and financial reporting for users of ESRS disclosures.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Neuberger Berman	Asset manager/Investor	United States	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	Neuberger Berman firmly believes that disclosures of anticipated financial effects should be a mandatory element of sustainability reporting. Information about the expected impacts of sustainability-related risks and opportunities on a company's financial position, performance, and cash flows is essential for investors who rely on these disclosures to inform their capital allocation decisions and stewardship activities. We therefore support Option 1 in that it makes such qualitative and quantitative disclosures mandatory, but strongly recommend that EFRAG aligns the reasons for omission of quantitative information with those provided by the ISSB standards (i.e. when the company does not have the skills, capabilities or resources to provide that quantitative information). When disclosures on anticipated financial effects are optional, there is a significant risk that investors will lack access to material information necessary to assess how sustainability issues may influence the future prospects of a company. The absence of clear, quantitative data on these matters undermines the ability of investors to compare companies, evaluate management's strategy, and make informed investment decisions. Optional reporting introduces variability in the quality and completeness of sustainability disclosures, which can lead to confusion and reduce confidence in reported information. We are concerned that proposals to make disclosures of anticipated financial effects voluntary under Option 2 would lower the overall quality and comparability of sustainability reporting. Such measures could result in fragmented disclosures across companies and jurisdictions, making it harder for users to obtain reliable and consistent information. This risks diminishing the usefulness of sustainability reports and could ultimately impede the effectiveness of capital markets in directing resources toward companies that are best managing sustainability risks and opportunities.			
Survey	Neuberger Berman	Asset manager/Investor	United States	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We believe further steps are needed to ensure full interoperability between the ESRS and the ISSB standards. As the ISSB standards provide a global baseline for sustainability disclosures, we recommend adopting them as the foundation for CSRD reporting. This would streamline the reporting process, lower costs, and incentivise voluntary CSRD reporting by enabling companies to build on their ISSB disclosures and add CSRD-specific requirements on top, particularly on impact materiality. Without equivalence or alternative compliance mechanisms, companies will need to comply with both the CSRD/ESRS and ISSB standards. This dual compliance is inefficient and resource-intensive, running counter to the goals of simplification and cost reduction. We welcome the explicit reference to IFRS industry standards (i.e. SASB standards), which will help companies align their sector-specific material risks, opportunities, and outcomes (IROs) for the financial materiality component of the Double Materiality Assessment (DMA) . These can then be complemented by other frameworks for the impact materiality side of the DMA. Before EFRAG's recent proposals, the first set of ESRS and ISSB standards achieved a high degree of interoperability. We encourage EFRAG to uphold this level of ambition and not fall below the ISSB baseline. While simplifying reporting requirements is important, it should not result in the loss of financially material information valuable to investors. We are concerned that the draft simplified ESRS introduces amendments which may undermine interoperability. For example, making quantitative disclosures on anticipated financial effects voluntary, adopting reliefs similar to those in the ISSB standards but using different terminology, and introducing new reliefs beyond the ISSB framework, could all create inconsistencies.			
Survey	Neuberger Berman	Asset manager/Investor	United States	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	With the upcoming review of the SFDR and the potential changes to Annex I PAIs, it is essential that sustainability disclosures required by the SFDR are based on data that companies already report under the CSRD. In the interim, EFRAG should ensure that the ESRS continues to include all data points linked to the 14 mandatory PAIs. These indicators are vital for the effective implementation of the SFDR and must remain accessible to all users of sustainability reporting.			
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The table provides a useful overview. However the column titled 'How to assess and what to report in future years' may cause confusion, as each 'future year' will eventually become the current reporting year. Restructuring the table to reflect a more time-neutral approach could enhance clarity and usability.			
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	An executive summary at the beginning of the sustainability statement is valuable for stakeholders - providing a clear and accessible overview of the key messages, without having to navigate the whole report.			
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	It's positive that the 'may disclose' datapoints have been removed, as it was uncertain what their status and applicability was. We also appreciate language improvements which have enhanced clarity and readability.			
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We are deeply concerned that the NMIG risks creating confusion among preparers and auditors. The lack of clarity regarding whether NMIG content should be interpreted as optional, recommended, or expected may undermine consistency and legal certainty in sustainability reporting. To ensure a clear distinction between binding requirements and supporting materials, we strongly recommend that the NMIG not be included in the Delegated Act			
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We welcome the relief provided in ESRS 1 Para 91, which allows undertakings to report metrics based on partial data coverage where reliable data is only available for part of the reporting boundary/value chain. However we believe this relief should also apply to ESRS E1-6 GHG emissions which are currently excluded. Companies subject to CSRD should not be required to justify a broader scope or additional data collection efforts beyond what is already mandated by their climate commitments under internationally recognised standards. We request Para 91 be redrafted in more plain English in the interests of accessibility. Our understanding is that the intention of paragraph 91 is to clarify that both direct data and estimates can be used equally in reporting.			
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	We welcome the reduction in data points. However, the majority of the removed data points are qualitative in nature or fall under the category of optional "may" disclosures. The quantitative data points, which typically require the most resources to collect and report, remain largely unchanged. The qualitative data points, which typically require the most resources to collect and report, remain largely unchanged. Therefore while the total number of disclosures has been reduced by 68%, this does not correspond to a proportional reduction in the reporting burden for companies.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I would like to skip this question and provide my feedback in Part 3				
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree				
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	See answer to Q18.			
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The ESRS E4 Biodiver transition plan is critical, but the impact on the value chain is less clear.			
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	E2-4 Secondary microplastics. The requirement to report on the amount of secondary is not meaningful as long as no harmonised methodology has been developed at EU level. Current methodologies are costly and often unreliable. The upcoming Regulation on preventing plastic pellet losses to reduce microplastic pollution explicitly states that a standardised methodology is necessary and Art. 13 of the proposal sets out requirements for development of such a standard. This reporting requirement should be postponed until a harmonised methodology is in place at EU level.			
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We believe that clear and practice guidance for auditors is essential to ensuring consistent and effective implementation of this principle, without which, there is a risk the concept could be interpreted as a need to include additonal information beyond what is material. A balance is needed to ensure fair presentation enhances the quality of reporting without adding unnecessary complexity.			
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	The goal must be to reduce emissions per activity. However, this must not lead to a decline in the level of business ambition, for example, in lending to agricultural businesses.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	EFRAG should refrain from reintroducing the previous AR 26 or any revised application requirements that prescribe how measurable biodiversity targets should be expressed. Given that biodiversity target-setting is a rapidly evolving area, references to "latest trends" may quickly become outdated and risk reducing flexibility for undertakings.			
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Copa-Cogeca	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The ESRS must strive for greater coherence with existing environmental legislation to avoid double reporting, and reduced environmental burdens for companies. E.g. many quantitative data points (such as use of raw materials, water, chemicals, and energy; emissions to air, water and soil; and waste generation) are already required as part of environmental permits or must be made available on the Industrial Emissions Portal - therefore a 2nd review of this data should not be necessary. Moreover, building on existing business practices (such as leveraging certified ISO management systems which are internationally recognised) can significantly reduce the administrative burden for companies already applying them. Closer alignment of sustainability reporting with frameworks that rely on management systems (e.g. under the European accreditation regulation (EC) No. 765/2008) would streamline compliance and support broader EU policy objectives by reinforcing the role of verified sustainability data across regulatory domains. ESRS 1, Chapter 5 is of utmost importance and can even be further strengthened. We highly welcome that EFRAG highlights the possibility of using primary, secondary already existing data as well as estimates equally. It is also positive that EFRAG has focused on the "own operations" of undertakings. This could be strengthened even more to demonstrate that undertakings should first analyse their own operations before seeking information from the value chain.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Eumedion	Association of financial institutions	Netherlands	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	To better factor sustainability issues into the assessment of risks, institutional investors need qualitative, informative, comparable and assured corporate reporting, preferably delivered through an integrated report. The DMA is key in this respect. Qualitative and material sustainability information enables investors to make better informed long-term investment decisions (and is in turn also relevant for other stakeholders). Eumedion generally supports the proposed simplification and further guidance to diminish the reporting burden and enhance comparability and relevance of information. Notwithstanding our general support, Eumedion has concerns as to how the proposed top down strategy led approach - which provides businesses with a fair amount of flexibility in choosing how the DMA is performed - will affect the comparability of the disclosed information. In order to allow investors to make informed investment decisions taking sustainability information into account, it is necessary that the sustainability reports from different investee companies are based on a common approach. Such a common approach (and as a consequence comparable reports) can only be ensured if companies are required to perform the DMA in the same manner. Furthermore, it is important to note that the members of Eumedion are required by the EU Sustainable Finance Disclosure Regulation (SFDR) to report on the principal adverse impacts (PAIs) of their investment decisions on sustainability factors. For this, they rely in large part on the information disclosed pursuant to the CSRD. Inconsistent approaches may enlarge the data gap and create an extra burden for financial market participants to comply with their own reporting obligations stemming from the SFDR.			
Survey	Eumedion	Association of financial institutions	Netherlands	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	A materiality assessment on the basis of gross impact is in our view preferable over an assessment on the basis of net impact. First of all, this would be a simpler methodology as the analysis would be uniform, i.e. irrespective of when the impact occurred and whether it is an ongoing action. Secondly, users of the sustainability report would be better informed if, in the case of a (gross) negative impact both impacts and remediation measures are reported. Thirdly, the proposed approach does not align with the SFDR which requires that PAIs (e.g. GHG emissions) are reported on a gross basis. Furthermore, the starting point for reporting on strategic, operational, financial and compliance risks are all reported on a gross basis. There is no reason why the approach for sustainability risks should be different from all other risk analyses. The proposed method leaves too much room for interpretation, does not promote comparability or transparency and the simplification benefits (if any) do not weigh up against the diminished informational value for stakeholders.			
Survey	Eumedion	Association of financial institutions	Netherlands	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Eumedion	Association of financial institutions	Netherlands	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Eumedion	Association of financial institutions	Netherlands	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Eumedion	Association of financial institutions	Netherlands	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	Eumedion agrees that the amendments provide relief. The amended ESRS exposure drafts however also introduce reliefs that go beyond the reliefs included in the ISSB Standards (for example the introduction of a relief for acquisitions and disposals acquired in the reporting period). This will result in a higher degree of complexity for companies that intend to comply with both standards. Eumedion believes that the ISSB sustainability reporting standards should function as a starting point or global base line for review of European standards and building blocks can be added with additional specific disclosures for ESRS. Introducing additional reliefs is therefore not favourable. Eumedion does not support the relief under point 3 as there should always be a preference for direct data as this is the most informative. Estimations should only be used if direct data are not available. With regards to point 5, Eumedion suggests maintaining alignment with the ISSB standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Eumedion	Association of financial institutions	Netherlands	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	Eumedion agrees with the relief for lack of data quality on metrics but believes that the current proposal does not strike an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information. In order to restore that balance we believe that a time limit should be included.			
Survey	Eumedion	Association of financial institutions	Netherlands	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	As a general rule, Eumedion believes that alignment with international standards, in particular with the ISSB reporting standards, is the preferred option. Furthermore, such information is necessary for financial market participants to comply with their own obligations stemming from the SFDR, i.e. to providing information on how sustainability risks are integrated in the investment decision-making process and on principal adverse impacts of investment decisions on sustainability factors. Eumedion notes that the proposed changes in ESRS 2 do not fully align with IFRS S2 (the relief related to the skills, capabilities and resources available to the company). However, Eumedion assumes that the organisations which fall within the scope of the ESRS as amended, would not qualify for such relief.			
Survey	Eumedion	Association of financial institutions	Netherlands	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Eumedion	Association of financial institutions	Netherlands	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Eumedion has always been a strong proponent of alignment and interoperability between European and international sustainability reporting standards. Eumedion is pleased to see that the reference to the IFRS industry-based guidance and the SASB Standards as a source of possible disclosure when reporting entity-specific sector information is now a permanent feature. To enhance the level playing field for multinational companies and stimulate standardised information for investors, alignment and/or compatibility with international standards is essential. That is why Eumedion is pleased to see that EFRAG has aligned the language with the international standards as much as possible. With regard to point 7, the datapoint reduction resulting in the removal of the 7 voluntary datapoints does not have a material negative impact on interoperability. 3 of the datapoints regard information which is covered by other datapoints which are maintained and with regards to the remaining 4 datapoints the deletion is justified and interoperability guidance will be provided. With regard to point 4, a global baseline for sustainability reporting through reporting standards set by the International Sustainability Standards Board (ISSB) will reduce the reporting burden on companies, while at the same time contributing to addressing sustainability challenges on a global level. Eumedion believes that the ISSB sustainability reporting standards should function as a global base line or starting point for review of European standards. Eumedion strongly believes that the EU should follow the principle 'global reporting standards where possible, additional European reporting standards where needed'. Introducing additional reliefs as mentioned under point 4 in above question, is therefore not favourable as the ISSB reporting standards can be seen as the global baseline. Eumedion is not in favour of further reliefs.			
Survey	Eumedion	Association of financial institutions	Netherlands	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Eumedion	Association of financial institutions	Netherlands	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Eumedion	Association of financial institutions	Netherlands	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Eumedion	Association of financial institutions	Netherlands	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	Eumedion supports the amendment clarifying that ESRS is a fair presentation reporting framework, consistent with IFRS S1 and S2, and not a compliance framework. Adopting the fair presentation standard will bring foundational qualitative concepts from accounting, such as faithful representation and relevance, into the realm of sustainability reporting. While perhaps initially challenging for preparers and assurance providers, Eumedion feels that in due course, this will result in more meaningful, relevant and credible reporting and will lead to better decision-making by stakeholders. In this regard, efforts must be made in the near future to provide the necessary guidance, especially to assurance providers, in order to create a practical framework for applying the fair presentation standard.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Eumedion	Association of financial institutions	Netherlands	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Eumedion opposes this exception. Intensity targets do not provide the entire picture as a decrease in intensity does not necessarily mean a decrease in emissions. Both absolute and intensity targets are needed for a proper understanding of the progress on climate and its ambition. Especially taking into account the financial sector's catalytic role in addressing global GHG emission reduction, absolute targets for financial institutions remain crucial.			
Survey	Eumedion	Association of financial institutions	Netherlands	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	Eumedion agrees as this provides more information than the current threshold.			
Survey	Eumedion	Association of financial institutions	Netherlands	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	Eumedion	Association of financial institutions	Netherlands	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	Eumedion suggests maintaining all SFDR indicators. The burden relief realised by the very limited proposed deletions does not weigh up against the importance of fully aligning ESRS disclosures with SFDR requirements.			
Survey	Eumedion	Association of financial institutions	Netherlands	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Since it now appears that Biodiversity and Ecosystems AR has been removed entirely, Eumedion would strongly suggest to review AR 26 in Amended ESRS E4. Although Eumedion fully understands that biodiversity and ecosystems are still developing, there is a need for further guidance as otherwise undertakings will not report on these topics at all or not in a uniform manner.			
Survey	Eumedion	Association of financial institutions	Netherlands	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	Eumedion does not agree with the deletion of the voluntary datapoint in ESRS S1 on the adjusted gender pay gap and solely including the unadjusted pay gap disclosure requirement. Eumedion is in favour of including the adjusted pay gap indicator in order to serve stakeholder information needs. There is a strong correlation between the unadjusted pay-gap and the gender diversity distribution throughout the various levels in a company. Therefore, this is an important metric. However, the adjusted pay gap disclosure metric, which accounts for various factors affecting pay, also has a high relevance for stakeholders since it can showcase whether a company's equal pay policy is actually effective. Since this metric is currently not required by the SFDR, as a result both the CSRD/ESRS and the SFDR are inadequately serving stakeholder information needs. Eumedion is aware that under the new structure of the ESRS, many of the previous "may" metrics have been moved to NMIG. However the relevant paragraph of NMIG (NMIG35), does not provide for a voluntary datapoint of the adjusted pay gap. It only provides for giving context with regards to the unadjusted pay gap.			
Survey	Eumedion	Association of financial institutions	Netherlands	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	Although Eumedion supports simplification efforts, the Governance disclosure requirements have been trimmed down extensively. It is however unclear whether this will meet the objective of the CSRD in respect to the protection of SMEs since the language used and the framing of the question does not necessarily state that separate information should be provided on the payment practices with respect to SME's. Information should be provided on payment practices with respect to suppliers including SME's. The proposed metric does not provide sufficient information on payment practices with regards to SMEs in practice.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Danish Institute for Human Rights	NGO	Denmark	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Chapter 3 is improved compared with set 1. Three observations and one concern however: In emphasising materiality of information it is essential to ensure it is essential to safeguard paragraph (para) 21b. This element of the definition is critical to balance impact and financial materiality dimensions and ensure alignment with international standards on sustainability due diligence (incl. UN Guiding Principles on Business and Human Rights (UNGPs)). The UNGPs clarify the responsibilities of business to communicate about their negative impacts and how they are managing them in a manner that sufficiently allows externals to evaluate the adequacy of the business' efforts (UNGP 21). DIHR is against making some users 'primary' and caution against any dilutions or deletions of para 21b. DIHR further welcomes the emphasis on the interrelation between companies' DMA and sustainability due diligence, engagement with affected stakeholders and the relevance of the severity criteria. This is key to ensuring alignment with the UNGPs as well as interoperability with the EU Corporate Sustainability Due Diligence Directive (CSDDD). We caution against any dilutions or deletions of such content. DIHR welcomes appendix A, and notes the importance clearly emphasising it's status as a non-exhaustive list and making the connection to entity specific reporting. Not all human rights impacted by companies or covered by the CSRD and CSDDD are captured by the list. DIHR cautions against further weakening the importance of the annex and recommend making clear that the previous sub-sub-topics for Social are non-exhaustive. Finally, para 22 allows entities to present sustainability information at topical level. DIHR is concerned with possible over-aggregation, resulting in very high-level disclosures that may undermine 'understandability' (para 21b) and comparability. The original focus on IRO level disclosure should be maintained, allowing still some flexibility for how to describe IROs.			
Survey	Danish Institute for Human Rights	NGO	Denmark	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	DIHR largely supports the substantive content of paras 34 to 36 and appendix C. However, the drafting is not sufficiently clear and consistent. For example, the reporting year aspect is clear in the Appendix, but not in the main body paras. Further para 34 and 35 can be read to imply 'default net', whereas the table mostly instructs gross for potential impacts. A 'default net' approach is problematic as. if abused, it may lead to underreporting of negative impacts, undermine transparency objectives of the CSRD and hinder information access by users. Elements of 'the gross approach' are likely to be necessary for users to understand the undertaking's material impacts and how it identifies and manages them and hence critical to para 21 b. DIHR recommends that a) appendix C is the benchmark for further adjustments to principled descriptions in paras 34-36; b) the gross approach is kept when impacts require significant ongoing actions OR where there is not supportable evidence of the effectiveness of actions; c) that the terms 'gross and net' are avoided; d) that interrelation with severity and likelihood assessment is considered. Assessing likelihood also involves considering preventative and mitigating actions and it is not clear how this interplays with the new gross vs net consideration and finally that e) the interrelation between a net approach and allowing disclosure of non-material information is considered.			
Survey	Danish Institute for Human Rights	NGO	Denmark	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	DIHR generally supports the approach taken to implement Lever 2.			
Survey	Danish Institute for Human Rights	NGO	Denmark	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	DIHR welcomes the significant reduction in overlap across the cross-cutting and topical standards. DIHR further welcomes that the four part stakeholder structure for the social topics have been maintained. DIHR however shares two specific comments: First, to ensure full consistency across GDRs and related topical level reporting for social as it relates to metrics, 'metrics' should be incorporated in SX-4 on targets across the four social standards, thereby making this disclosure requirement about 'targets and/or metrics' rather than just about targets. Metrics are mentioned in S2-S4 objectives and the heading before SX-4 reads 'metrics and targets', but metrics are not included in S2-S4 DRs. The AR in GDR-M specifying that entity-specific metrics can be developed for S2-S4 is insufficient. Instead, making explicit reference to metrics directly in S DRs can a) improve consistency across ESRS 2 PATM and topical; b) compensate for the lack of predetermined metrics in S2-S4 and the unlikely provision of such by sector standards; c) recognize emerging trends observed for S2-S4 in year-1 reports on entity specific metrics (see also BCG State of Play report p. 31-32); and d) acknowledge the use by companies of metrics in their social sustainability impact management and monitoring efforts (oftentimes more common that use of targets). Inspiration can be found in approach taken to metrics in E4-5 para 21. Secondly, DIHR regrets the shift from the original disclosure requirement in environmental standards related to materiality assessment concerning site and asset-level screening to an AR in draft ESRS 2 IRO-1. Context matters for environmental impacts such as polluted water streams and related impacts on local communities. DIHR recommends the site or location specific aspect of DMA is brought in as a direct datapoint in IRO-1 ideally not relevant to E standards only, due to its relevance to communities - S3.			
Survey	Danish Institute for Human Rights	NGO	Denmark	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	DIHR only partially agrees with the deletion of all may-disclose datapoints. For the social chapters, some may-disclose datapoints were of particular relevance to capturing impacts and efforts related to vulnerable stakeholders such as non-employees or part time workers. Several of these stem from GRI standards and hence can be useful to retain for interoperability with impact disclosure frameworks. Such may-disclose datapoints or ones that provide an illustration of emerging good practice, should be included directly in the Standards as examples, rather than in the NMIG where they risk being overlooked.			
Survey	Danish Institute for Human Rights	NGO	Denmark	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	DIHR finds that the NMIG contains helpful guidance and is concerned that the 'non-mandatory' framing may undermine its usage. For social, so-called ID-177 is a very useful guidance document, now sitting at NMIG level. This and other key elements of NMIG should be given appropriate authoritative status ideally within the delegate act.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Danish Institute for Human Rights	NGO	Denmark	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	DIHR is concerned with the cumulative or compounded effect of the different horizontal reliefs introduced. It is not clear how the different reliefs interact with one another or with other new elements in the amended ESRS around fair presentation or materiality of information. For example, what is the interaction between 'undue cost and effort' and 'fair presentation'? It is important that the standards promote an appropriate balance. DIHR also recommends that proportionality is required in relation to the 'undue costs or effort' relief, i.e. that its utilization is proportionate to related sustainability impacts. DIHR encourages EFRAG to further analyse the boundaries of the individual reliefs, their interrelations as well as their cumulative effect and consider whether they, alone or together, go too far. Such analysis should among other things consider the ultimate effect on metrics-reporting by companies, including in light of the EC's instruction for the ESRS review to emphasize quantitative reporting over qualitative. Concretely the relief in Para 90 will be read to mean that non-employee reporting is only required if non-employees, are a significant part of your workforce. This is a concern given the vulnerability of non-employees and how in big companies even a 'non-significant' proportion of the overall workforce can be a lot of people. Using this relief on S1-5 is not appropriate. In addition, DIHR is concerned that the reliefs may in practice undermine the standards' scope covering impacts across both own operations and upstream and downstream value chain, where oftentimes some of the more severe human rights impacts are to be found, due to the different reliefs related to value chain metrics. Where reliefs will remain, DIHR recommends further inclusion of time limits on their use along with explicit emphasis on how progressive improvement over time is expected.			
Survey	Danish Institute for Human Rights	NGO	Denmark	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	As declared in response to question 17, DIHR is concerned with both individual and joint effect of the different reliefs introduced. This includes the relief for metrics with poor data quality, in particular its extension to also cover metrics for own operations. Companies are typically well-positioned to access data of sufficient quality and/or have sufficient influence to improve data quality within a reasonable time period. As such, we support the SRB members' suggestion to include a time limit on the relief incentivizing progressive improvement and temporary use of this relief and improving interoperability with IFRS in this regard.			
Survey	Danish Institute for Human Rights	NGO	Denmark	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Estimating financial effects is a key lever for incentivizing companies to integrate sustainability into business strategy, planning, risk management and decision making. It is also key to investors, other financial market participants and 'primary users' of sustainability information. At the same time, estimating financial effects can be a challenging task for companies and can be methodologically difficult. Rather than not requiring disclosures as a result, stressing the need to disclose on methodology and information uncertainty is recommended to address the latter point. Option 2 goes too far in both ruling out quantification and making it a voluntary disclosure requirement without having to meet any related conditions. Diluting 'financial effects' to this extent is at risk of undermining the fundamental CSRD objective of putting sustainability reporting on the same level as financial reporting and better integrating the two reporting disciplines. Interoperability with IFRS is another reason to go for option 1.			
Survey	Danish Institute for Human Rights	NGO	Denmark	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	DIHR is not supportive of introducing reliefs in ESRS that go beyond already existing IFRS reliefs. This is to support interoperability, avoid double reporting concerns and increase comparability. In addition it will be important to avoid starting a 'race to the bottom' between ESRS and IFRS as it relates to aligning reliefs across the standards. The switch from a compliance approach to one of 'fair presentation' marks a big shift and an overall reliance on business judgement. With it comes heightened responsibility on the companies to act in good faith. If not, the framework will lose its ability to underpin the necessary exchanges between preparers and users and ultimately the much needed factoring in of sustainability in business decisions. The many reliefs combined with unclarity of what fair presentation entails in an impact context, brings the risk that the standard opens itself to abuse by those not acting in good faith or those with limited faith in the value of the reporting exercise, thereby ultimately hindering the ability of the measure to achieve its stated sustainability objectives. Therefore the importance of the fair presentation principle needs to be stressed and underpinned and further reliefs than IFRS should be avoided.			
Survey	Danish Institute for Human Rights	NGO	Denmark	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Danish Institute for Human Rights	NGO	Denmark	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	DIHR supports the retained "shall disclose" datapoints while noting that the Amended ESRS offers a significant reduction. Given the materiality principle one could have kept more datapoints whilst emphasizing the 'if material' aspect, which on some accounts would have been preferable to the blanket deletion. The amended ESRS represents the minimum necessary to ensure meaningful reporting meeting users' needs, allowing comparability and underpinning needed analysis and dialogue on companies' sustainability impacts and efforts crucial for the CSRD objectives and the Green Deal.			
Survey	Danish Institute for Human Rights	NGO	Denmark	22.S1	Comments on deleted datapoints in ESRS S1	I partially agree and partially disagree	A number of S1 datapoints have been deleted without sufficient reasoning. We recommend that the following elements are reinstated: S1-8: age distribution S1-10: parental leave instead of just maternity leave as well as retirement S1-14: employees that took family related leave			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Danish Institute for Human Rights	NGO	Denmark	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	DIHR finds these to be justifiable exceptions.			
Survey	Danish Institute for Human Rights	NGO	Denmark	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	DIHR finds these to be justifiable exceptions.			
Survey	Danish Institute for Human Rights	NGO	Denmark	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	DIHR welcomes overall the increased and explicit emphasis on 'fair presentation'. It does however recognize that 'fair presentation' is less established in the context of reporting on impact materiality and auditing impact materiality reporting than in the context of financial reporting. This is not a reason to reassess the utility of the concept, but rather a reason to address this in guidance efforts aimed at both preparers and auditors.			
Survey	Danish Institute for Human Rights	NGO	Denmark	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Granting an exemption would undermine the sector-agnostic approach of the standard. Other industries could equally argue for exceptions based on their own difficulties. Absolute targets are needed to ensure robustness of targets and that information disclosed is understandable and comparable. It is further aligned with SFDR.			
Survey	Danish Institute for Human Rights	NGO	Denmark	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	DIHR supports this changed threshold and finds it both simpler than the previous version as well as an improvement in substance as some companies, due to their business models, were disclosing employee information on very few countries despite being present in very many/ having very large employment numbers. The set 1 approach in other words allowed (some) companies to only disclose a fraction of their total employees. Country level breakdowns are helpful contextual information for users that can qualify the reading and interpretation of the remaining S1 disclosures.			
Survey	Danish Institute for Human Rights	NGO	Denmark	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The methodology for calculation of non-EU adequate wages is problematic and needs amendment. As a national human rights institution, DIHR is critically aware of the challenges for the millions of workers living in poverty notably because of the failure of wages, including in many jurisdictions statutory minimum wages, to constitute adequate or living wages. Workers in and outside EU have a human right to an adequate standard of living, meaning sufficient remuneration to support themselves and their families in a life of basic dignity. The draft introduces unequal treatment of workers within and outside EU, disadvantaging non-EU workers. There are two main issues with the suggested non-EU methodology: oit incentivises use of legal minimum wage, oftentimes much lower than an adequate wage oit puts the task on each company to assess whether a certain wage in a certain country meets different add-on requirements Re the first point: The ILO Wage setting principles quoted in AR 22 are not a sufficient 'adequacy check', given they focus on the process of setting wages, rather than on the result of whether the wage is adequate or not. The latter is at the heart of the objective of S1-9. Instead, the drafting should refer to the ILO Principles for Estimating a Living Wage as the relevant benchmark for both statutory minimum wages or any other living wage estimates. Re the second point: the drafting should put the burden on the public authorities or the living wage data providers to provide evidence on alignment with the ILO Principles for Estimating a Living Wage rather than leave this task with individual preparers.			
Survey	Danish Institute for Human Rights	NGO	Denmark	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	DIHR welcomes and supports the approach taken in relation to SFDR datapoints relevant to the social standards, including to consolidate human rights policy reporting in ESRS 2. It would encourage future review of the SFDR PAIs to take into account the amended ESRS, thereby improving consistency across disclosure regulations further.			
Survey	Danish Institute for Human Rights	NGO	Denmark	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	DIHR agrees to make the unadjusted mandatory. DIHR however suggests to specify in AR or in the NMIG that adjusted pay gap can be an important additional entity-specific disclosure to contextualise and enable improved understanding of the unadjusted pay gap disclosures thereby encouraging this additional disclosure. In practice many companies report both.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Danish Institute for Human Rights	NGO	Denmark	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	DIHR recognizes EFRAG's efforts for the amended ESRS to strike a balance between simplification and meeting the core objectives of the European Green Deal. However, in ESRS 1 DIHR is concerned with the effects of the many different reliefs when read in combination with a switch from a compliance approach to a principles based approach. Not least where reliefs go beyond those in the IFRS standards. Robust anchorage of the fair presentation principle and its implications is key to ensuring a balanced approach.			
Survey	Danish Institute for Human Rights	NGO	Denmark	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Danish Institute for Human Rights	NGO	Denmark	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	For S1 DIHR has strong concerns on adequate wage methodology for non-EU employees and the related potential backstepping it can incentivize amongst companies otherwise committed to addressing concerns around in-work poverty as well as the potential greenwashing it may introduce by permitting companies to simply benchmark wages with minimum wages, including where these are not adequate. In addition, a number of S1 datapoints have been deleted without sufficient reasoning. We recommend that the following datapoints are reinstated in S1 metrics: S1-8: age distribution S1-10: parental leave instead of just maternity leave + retirement S1-14: employees that took family related leave			
Survey	Danish Institute for Human Rights	NGO	Denmark	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	For S1-S4 disclosures 1-4 DIHR could support the suggested amendments, but wants to flag that these standards are now very slim and that any further reduction of them risk rendering them hollow, undercutting their alignment with international standards on business and human rights and removing their utility to function as an envisaged disclosure vehicle for CSDDD. Furthermore, DIHR strongly recommends to include metric disclosure directly in standards S2-S4 disclosure requirement 4 on targets. This to ensure consistency with GDR-M and compensate for these being the only topical standards without predetermined metrics. Inspiration can be found in E4-5 para 21.			
Survey	Danish Institute for Human Rights	NGO	Denmark	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	For S1-S4 disclosures 1-4 DIHR could support the suggested amendments, but wants to flag that these standards are now very slim and that any further reduction of them risk rendering them hollow, undercutting their alignment with international standards on business and human rights and removing their utility to function as an envisaged disclosure vehicle for CSDDD. Furthermore, DIHR strongly recommends to include metric disclosure directly in standards S2-S4 disclosure requirement 4 on targets. This to ensure consistency with GDR-M and compensate for these being the only topical standards without predetermined metrics. Inspiration can be found in E4-5 para 21.			
Survey	Danish Institute for Human Rights	NGO	Denmark	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	For S1-S4 disclosures 1-4 DIHR could support the suggested amendments, but wants to flag that these standards are now very slim and that any further reduction of them risk rendering them hollow, undercutting their alignment with international standards on business and human rights and removing their utility to function as an envisaged disclosure vehicle for CSDDD. Furthermore, DIHR strongly recommends to include metric disclosure directly in standards S2-S4 disclosure requirement 4 on targets. This to ensure consistency with GDR-M and compensate for these being the only topical standards without predetermined metrics. Inspiration can be found in E4-5 para 21.			
Survey	Danish Institute for Human Rights	NGO	Denmark	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Verisure	Preparer (non-financial preparing a sustainability report)	Switzerland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	This point then is not clear anymore. How could ESRS 2 be subject to the filter of materiality now as the rest of the topical standards? 2. We agree with both perspectives suggested in the new paragraph 28 3. Paragraph 36. So, should this be understood as meaning that, depending on where the negative impact originates and how it is mitigated, we may change the very nature of the impact itself? This seems a bit confusing. 4. AR 18 for para. 48 (Practical considerations) - useful			
Survey	Verisure	Preparer (non-financial preparing a sustainability report)	Switzerland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	(Paragraph 48) Anticipated financial effects remain a problem. This is still a complicated issue for companies to report on, given the lack of information and a high degree of uncertainty.			
Survey	Verisure	Preparer (non-financial preparing a sustainability report)	Switzerland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	Major comment: 1. Paragraph 17. This point is still a problem in terms of disclosure - can we report goals regarding different pillars insted of a link to significant groups of products and/or services? 2. Paragraph 18. Value Chain's description tends to be broader - shall we guess we only have to report the main phases of the VC? 3. AR 7 for par. 17(b). what's the point of this? How would be this point audited?			
Survey	Verisure	Preparer (non-financial preparing a sustainability report)	Switzerland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	23 a - Even so, this is very complex information to disclose. From our point of view, it is better to remove it.			
Survey	Verisure	Preparer (non-financial preparing a sustainability report)	Switzerland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Verisure	Preparer (non-financial preparing a sustainability report)	Switzerland	22.E5.	Comments on deleted datapoints in ESRS E5	I agree	18 e. In case the undertaking cannot disclose this information because of unknown data from source of info (eg., recycling partners), what should we approach this?			
Survey	Verisure	Preparer (non-financial preparing a sustainability report)	Switzerland	22.S1	Comments on deleted datapoints in ESRS S1	I agree	23 d. is it possible to give different figures regarding the total number of employees during the FY?			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Dutch Authority for the Financial Market (AFM	National supervisory authority & regulator	Netherlands	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We partly agree. The AFM would like to place critical remarks in relation to the proposed revisions to the DMA process. 1In the AFM's view, ESMA justifiably notes that the draft revision introduces a confusing difference in describing materiality, beyond the double materiality perspective. The revision states that information is material for 'primary users of financial reports' (e.g. investors) if the information may be capable of affecting their decisions. This is the standard view of material information. Oddly, the revision provides a wholly different criterion for material information for 'other users of general purpose sustainability statements' differently, namely that the information enables an understanding of the material impacts, risks and opportunities (IROs). This second criterion for assessing materiality constitutes a different threshold for identifying materiality. We suggest to avoid creating an artificial and rather complex distinction between two different layers of materiality of information, as well as avoid a conceptual conflict between the notion of materiality of information and the notion of relevance in the qualitative characteristics of information. Both financial materiality and impact materiality can be assessed by the single criterion that the information presented has the ability to affect the decision-making by the users of the sustainability report, regardless of whether these users are investors or other types of stakeholders.			
Survey	Dutch Authority for the Financial Market (AFM	National supervisory authority & regulator	Netherlands	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	Dutch Authority for the Financial Market (AFM	National supervisory authority & regulator	Netherlands	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We partly agree. The AFM notes that improvements have been made in this respect. However, interactions between topics is not sufficiently explained. Such interactions are so common (not only within the E and S topical categories but also from E to S and vice versa), that we believe ESRS 1 or 2 should address such interactions. Currently - For the E standards it is not clear how the interaction should be approached and the interaction between E and S standards is very summarily and incompletely addressed (mostly restricted to E1 and S relating to 'just transition). We refer for instance to par 11 of ESRS E2 and par 10 of ESRS E4 – it is very unclear how this affects reporting. E2 – E 5 interact with social standards as well. Water flows and particles move (pfas has been detected in rainwater) and therefore E2 (pollution) does affect communities (and workers in the value chain, especially agriculture and mining. Biodiversity impacts (land use change, invasive species, threatened species) similarly affect communities. Products containing toxic materials may affect consumers. ESRS 1 or 2 should elaborate on these interactions.			
Survey	Dutch Authority for the Financial Market (AFM	National supervisory authority & regulator	Netherlands	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The AFM agrees in general that the proposed amendments improved the understandability, clarity and accessibility of the standards. We do however have two observations in this respect that we would like to share. Firstly, the AFM notes – as does ESMA – that some repetition is retained in the revised standard (e.g. in the application requirements AR 15 of S1-6 concerning the use of estimates, mandated by mandatory ESRS 1 requirements, when a company is not able to report exact figures on their non-employees, as well as in AR 39 of S1-16). Reminders can be useful, but not if they are placed seemingly 'randomly' throughout the standards. Placing a reminder about a general provision by a particular DR and not by many others to which the provision equally applies, can lead to confusion over where the provision can/should be applied elsewhere as well. We therefore recommend that either: i. an explanation is given why this general provision is particularly relevant to the particular DR's by which the reminder is placed; ii. the reminder is placed at the start of each topical standard; or iii. the reminder is removed completely. Secondly, again echoing ESMA, the AFM would like to see clarified the proposed par. 22-ESRS 1 which indicates that "information shall be presented either at topical or impacts level, risks and opportunities level, depending on what provides the most relevant information, such as reflecting their nature or the way they are managed". EFRAG should make clear unambiguously that the main aim is that companies provide material information on IRO's which pertain to different topical areas, rather than they simply report on sustainability topics related to material IROs. In general, identifying sustainability-related IRO's should be the starting point of sustainability reporting, regardless of the specific topics to which they may pertain.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Dutch Authority for the Financial Market (AFM	National supervisory authority & regulator	Netherlands	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We partly agree. In relation to Resilience to environmental risks: The AFM is of the view that the resilience of the company's operations and value chain to environmental risks is important for investors. Disclosure of resilience is included in ESRS E1 regarding risks associated with climate change, but a similar requirement is not present in other topical standards where they are relevant such as E3 (Water) and E4 (biodiversity and ecosystems). The AFM recommends that those topical standards also require a disclosure requirement on resilience.			
Survey	Dutch Authority for the Financial Market (AFM	National supervisory authority & regulator	Netherlands	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We agree with Option 1. The AFM supports quantitative reporting on anticipated financial effects. In par. 23 of ESRS 2 (SBM-3), ESMA offers 2 options concerning the reporting of anticipated financial effects of material sustainability impacts and opportunities. Only option 1 makes quantitative reporting on these effects mandatory (on condition of feasibility). The AFM strongly supports a requirement to provide quantitative information on anticipated financial effects, whenever feasible, and thus supports option 1. Quantifying this information is essential to investors. It is also necessarily for adequate alignment with ISSB standards. In our view, companies should start reporting quantitative information on these anticipated effects as soon as possible, as this is one of the key rationales of sustainability reporting from an investor's perspective. We therefore would not support any further delay of the application of such a requirement, beyond the delay already granted in the "quick fix" delegated act.			
Survey	Dutch Authority for the Financial Market (AFM	National supervisory authority & regulator	Netherlands	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	We agree. Echoing ESMA, the AFM express strong support for the newly included paragraphs 16 and 18 in ESRS 1 that emphasize the importance of fair presentation. The strengthened framework on fair presentation will be beneficial to the overall assessment of investors and users regarding the undertaking's sustainability-related impact, performance and risk-opportunity balance. It furthermore aligns with standard financial reporting practice and with the ISSB reporting framework.			
Survey	Dutch Authority for the Financial Market (AFM	National supervisory authority & regulator	Netherlands	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The AFM commends EFRAG for the simplifications it proposed while keeping most key elements crucial to the Green Deal objectives in place. We do however see two important elements which are currently missing in the revised ESRS, relating to the environmental topics E1-E5 and one element for potential (Social Standards) further simplification.			
Survey	Dutch Authority for the Financial Market (AFM	National supervisory authority & regulator	Netherlands	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Dutch Authority for the Financial Market (AFM	National supervisory authority & regulator	Netherlands	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The AFM does not support the removal of mandatory datapoints in relation to transition plans, as we are of the view that transition plan reporting is crucial to sustainable investors. Par. 14 of ESRS E1 describes the required disclosures regarding a company's transition plan. This is one of the crucial elements of sustainability reports from the view of investors and most other stakeholders. It should be well fleshed out as the risk of greenwashing is very present in disclosures concerning a transition plan. Therefore, the AFM supports ESMA's suggestions regarding: a.clarifying in 14.a. that targets, decarbonisation levers or actions and resources are all necessary elements of the disclosed transition plan. b.broadening 14.c. to include all key assumptions underpinning the transition plan. This will also help to improve interoperability with IFRS S1.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Dutch Authority for the Financial Market (AFM	National supervisory authority & regulator	Netherlands	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Moving beyond location-centered disclosure: The AFM considers the topical standards E2 – E4 to be overly focused on location-specific disclosure. While identifying source locations of for example pollution provides key information, restricting the disclosures to areas near biodiversity sensitive areas (and many requirements restricted to own operations) or stressing the importance of site locations, does not sufficiently take into account that impacts can be far reaching (e.g. due to water flows) and often occur within the value chain rather than within the own operations.			
Survey	Dutch Authority for the Financial Market (AFM	National supervisory authority & regulator	Netherlands	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Refer to previous comment on location centered approach			
Survey	Dutch Authority for the Financial Market (AFM	National supervisory authority & regulator	Netherlands	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Refer to previous comment on location centered approach			
Survey	Dutch Authority for the Financial Market (AFM	National supervisory authority & regulator	Netherlands	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Refer to previous comment on location centered approach			
Survey	Dutch Authority for the Financial Market (AFM	National supervisory authority & regulator	Netherlands	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The AFM would like to note that there is further room for simplification in the social topical standards. The AFM agrees with ESMA that certain reporting requirements within the topical standards can be further streamlined by eliminating duplications and requirements that are already covered by ESRS 2. We therefore would like to repeat verbatim ESMA's comments on this matter: "ESMA considers there is room for further simplification in S1-3 (Actions and resources related to own workforce), as ESRS 2, GDR-A seems sufficient to cover most information regarding a company's actions, and the associated resources, to manage the material IROs related to its workforce. As such, in S1-3 most of paragraph 19 could be removed to avoid adding narrative disclosures on top of those already envisioned by ESRS 2, GDR-A. However, ESMA suggests that the requirement to disclose how the company approaches situations where tensions arise between its actions to prevent, mitigate and remediate material negative impacts on its own workforce and other business pressures. The same consideration applies to S2-3 (Actions and resources related to value chain workers), paragraph 18, to S3-3 (Actions and resources related to affected communities), paragraph 16 and to S4-3 (Actions and resources related to consumers and end users), paragraph 15."			
Survey	Dutch Authority for the Financial Market (AFM	National supervisory authority & regulator	Netherlands	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Refer to previous comment on room for improvement.			
Survey	Dutch Authority for the Financial Market (AFM	National supervisory authority & regulator	Netherlands	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Refer to previous comment on room for improvement.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Dutch Authority for the Financial Market (AFM	National supervisory authority & regulator	Netherlands	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Refer to previous comment on room for improvement.			
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	Overall, we agree with the DMA simplifications albeit with key attention points. Given the high degree of judgement involved and potential audit difficulties, we recommend clarifying subjective terms such as "unless more investigation is necessary", "reasonable and supportable evidence", "unnecessary complexity", "limited" assessment may be "sufficient". We would also welcome further guidance in NMIG illustrating situations where a bottom-up complements top-down approach, helping to surface relevant issues that might otherwise be missed - especially in complex value chains or structures. While EFRAG's mandate does not concern assurance guidelines, they should align with revised standards and reflect process alleviations. We support placing materiality of information as a general filter. Nonetheless, we would welcome clarifications: -On the possibility to include non-material information when needed by "a specific user" (§108): how does this interact with the materiality filter and §21 (sustainability statement shall include material information), who qualifies as "specific user"? -on "general material information" (§49) and "general purpose sustainability statement". -On AR20 which introduces materiality presumption for ESRS 2 GDRs, conflicting with the principle that applies to the whole sustainability information. We suggest deleting AR 20. -On the application of §108, e.g. by encouraging listing within ESRS 2.IRO-2 table the non-material information and their location. Illustrations of "non-material disclosures that do not obscure material ones" could also be helpful. . The definition of positive impact (§ 37) fails to address actions on the undertaking's own negative impacts that go beyond legal compliance (e.g. offering attractive conditions to avoid staff shortages). We suggest clarifying that positive impact must be stakeholder-centric (e.g., remediation of third-party harm, community development with evidenced benefits on external parties, proactive initiatives such as subsidies, or impact-driven investments if material), rather than business-centric (internal improvements are risk mitigation).			
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We welcome EFRAG's effort to address the "gross versus net issue", an area where guidance is needed. However, Appendix C is complex. It contains inconsistencies, lacks clarity, opening varying interpretations. For example: -§34 excludes actions taken during the reporting period when assessing materiality of the impact, while Appendix C suggests otherwise. -Some people read that §35 appears to support a gross approach for potential negative impacts whereas Appendix C promoting a net approach. Others read the contrary. -The meaning of "significant ongoing actions" is unclear (eg. training people, equipment maintenance, compliance teams, etc.?). -The extent to which severity and likelihood of impacts should be reduced (for the actions to be considered) is not defined, and 'supportable evidence" requires high degree of judgement. -The interaction between (ongoing) actions and policies implemented through actions is vague. We recommend introducing a clear principle in the standard: the description of the impacts before taking into account remediation, prevention or mitigation actions is the basis for the materiality assessment and its related disclosures. This principle should apply to impact and financial materiality. We suggest being explicit on what constitutes mitigation vs prevention actions including whether time horizon (actions with long-term effects e.g. multi-year training programs, infrastructure upgrades) and value chain (actions beyond own operations) are considered in the remediation of negative impacts. The standard should clarify when a "net" approach would be appropriate, on exceptional basis, provided that such use is accompanied by transparency. Application requirements supporting this principle must be robust and field-test proof, and consistent with the core standard. Additionally, it should be clarified that indirect impacts from an actual should be considered even if the immediate negative impact is remediated. (e.g. an oil spill may be cleaned up, but ecosystems remain affected for years)).			
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	Overall, we agree with the flexibility provided for companies when preparing their sustainability statement. While we agree with the possibility of including an executive summary, we ask EFRAG to clarify whether such a summary is expected to provide a balanced, true and fair overview of the sustainability statement, or to reflect a management approach telling the company's ESG story ? Does the latter could imply that the summary may present only those identified material IROs that are managed or embedded in strategy, while allowing other material IROs - still relevant but not currently monitored by management - to be omitted? We welcome the flexibility in §105 on the structure of the sustainability statement. We however ask EFRAG to clarify what "separate sub-parts" of the sustainability statement means (as opposed to "appendices"). Appendices are helpful but guardrails are needed to ensure their appropriate use. Information included in appendices shall still comply with the qualitative characteristics of information. The standard should specify what type of information is best suited for the body of the sustainability statement versus appendix (or illustrative guidance in NMIG). Regarding section 9.2 of ED ESRS 1, we support keeping cross-referencing to financial statements mandatory, rather than optional as proposed. Ensuring a high degree of connectivity between financial and sustainability information is paramount for the quality of information reported. Making such referencing voluntary would weaken the concept of "connected information" and reduce clarity and readability of sustainability statements.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	Regarding point 1, we generally agree with the simplification of narrative information – especially with the shift from MDRs to GDRs and the transformation of most topical DPs on PATs into NMIG. ESRS 2 and topical standards are also now better articulated without unnecessary redundancies. We agree with points 2, 3 and 4. We have reservations concerning point 5. We agree with the flexibility to aggregate IROs based on their nature and the level at which they are managed, for reporting on specific DRs, for example PATs, strategy and business model. To ensure consistency, we recommend clarifying in the standard the distinction between: -The description of IROs stemming from the DMA, which should appropriately reflect the underlying characteristics of the IROs as implied by §28(a) which refers to a "concise description of IROs". The IRO is the cornerstone of reporting, and any chosen level of aggregation should not obscure a clear understanding of the IRO itself. -The reporting of those IROs under specific DRs (e.g. PAT, SBM), which may be aggregated when appropriate (i.e their management through PAT and SBM can be disclosed with a management-level view: one PAT can cover several IROs).We also suggest that EFRAG provide illustrative examples of how IROs may be aggregated, based on management level or nature – and clarify how to report on material IROs that are not yet embedded in strategy or management. Moreover, considering aggregation of information other than those related to IROs, we suggest clarifying in the standard that any disaggregation of a KPI should not replace the required consolidated KPI (generic principle of ESRS 1 aligning sustainability statement with consolidated group). Instead, it should serve as complementary. This ensures users receive both a complete overview and relevant breakdowns, without compromising consistency or comparability across sustainability statements.			
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We welcome the reorganization of the standards which clarifies the distinction between mandatory and non-mandatory content and removes ambiguous "may disclose" provisions. This improves readability and simplifies the structure. We support the reduction of mandatory Application Requirements in the main body and the transfer of illustrative content to the NMIG. Refer to our comment below on NMIG.			
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We overall agree with the illustrative content of NMIG, and its non-mandatory status. However, we seek clarification on the intended objective of the NMIG: is it meant to remain purely illustrative, or will it also address in the future implementation questions? Applying the standards in real-life scenarios will inevitably raise questions of interpretation and implementation. Existing guidance such as IG 1 on DMA and IG 2 on Value chain and EFRAG Q&As are widely relied upon in practice and regulators encourage their due consideration. Yet, their informal status creates uncertainty and limits enforceability. EFRAG should clarify both the NMIG's purpose and the due process for maintaining it. It is important to strike the right balance between clarity, responsiveness, and a clear and robust process to update the NMIG. We reaffirm that EFRAG is the legitimate body to provide interpretative guidance on the standards and this role should be formally entrusted to it. To ensure credibility and consistency, such interpretative guidance must also be developed through a clear and robust due process. The scope and legal status of such guidance - whether binding or not - must be explicitly clarified, as preparers and auditors need enforceable and reliable reference points. While most of the current NMIG content does not raise concern as it is illustrative, this may change should its scope evolves. Should future guidance include application or interpretative elements, its legal status will need to be reconsidered. Including such content in the Delegated Act would increase authority but reduce flexibility for updates. Finally, we recommend keeping definitions and methodologies within the core standard to ensure consistency and legal clarity.			
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	While it is up to preparers and users to indicate whether the proposed Amendments provide sufficient relief, we have concerns regarding the clarity and the consistency of the current proposals. EFRAG has indeed introduced several reliefs in ESRS 1 but how they will apply in practice and how they relate to each other raises many questions. First, we believe EFRAG should clarify how to apply the general "undue cost or effort" relief as the current proposal is conceptual and requires significant judgment from preparers, without auditors being able to assess its appropriate use. The boundaries of this concept are unclear, opening to varying interpretations. We recommend EFRAG list criteria to be considered to guide judgment, and clarify how they interact with those listed in FAQ 29 of the EC on the CSRD (2024) on what constitutes "reasonable effort" for reporting value chain estimates. We believe the undue costs or efforts should be also seen as a dynamic relief. While particularly relevant during the initial years of ESRS implementation, its use might be expected to gradually evolve over time as data-sharing practices improve and organizational maturity increases. Overall, the relief should be framed as a principle of last resort, supported by transparent documentation and subject to assurance. This will help maintain integrity of sustainability reporting while allowing for flexibility and progressivity. Besides, we recommend EFRAG explain the hierarchy, if any, between the different reliefs to clarify what corresponds to a practical application of the general "undue cost or effort" relief and what is an additional separate relief. This is necessary to understand under which specific circumstances each relief applies. It is also necessary to clearly state in ESRS 1 that using reliefs does not prevent the fair presentation of sustainability information. See also some further detailed comments in part 3.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	Consistently with the views expressed under question 17 above, we express concerns regarding the interaction of § 91 with the general relief relating to "undue cost or effort". In particular, it is unclear whether the relief for metrics presented under this paragraph and allowing to report only a partial scope is a practical application of the general relief presented under chapter 7.3 or not. It seems to refer more to "impracticability" which is a different concept from "undue cost or effort". It is therefore unclear under which circumstances such relief for metrics will be applicable. We suggest clarifying in the standard that the relief for partial scope disclosures is applicable when both direct and estimated data are not available without undue cost or efforts. It should not be used to justify the absence of information or to bypass the use of estimates. It is also unclear how this relief for metrics interacts with the relief on acquisitions granted under § 72 in ESRS 1. Does the relief allow deferral of the integration of acquired business even if the information is available without undue cost or efforts, or does it apply only if the information on acquisitions cannot be obtained without undue cost or effort? Besides, EFRAG should ensure that the relief, if any, applicable to the information on GHG emissions under DR E1-6, be presented in a clear and consistent way, which is currently not the case as the exception under § 91 contradicts § 87 (d). Under §87, the "undue cost or effort" relief seems to be, without further specifications, a general provision which would apply to all DRs, therefore including DR E1-6 GHG emissions. However, the relief in §91 on a partial scope explicitly states that this possibility is not available when reporting DR E1-6.			
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Our preference relies on the importance of preserving interoperability with IFRS SDS (cf. question 21) and promoting connectivity between financial and sustainability information (cf. question 13). In this context, we recommend: - ensuring full alignment with IFRS S1 and the related basis for conclusions, which allow to omit quantitative information when the undertaking does not have the skills, capabilities or resources to provide such information, which is, in our view, compatible in the European context. § AR 17 should also be redrafted to remove the illustration given under point (b) referring to business plans as it creates a difference with the wording under IFRS S1.38. Besides, the way this illustration is drafted refers primarily to the general "undue cost or effort" relief which is already recalled under AR 15 and which builds on the availability of reasonable and supportable information at the reporting date; - providing further examples in NMIG which could provide evidence on how to quantify anticipated financial effects. This would complement Option 1, helping to minimize complexity and enabling companies to better understand how to fulfill this requirement. We also suggest aligning this guidance with IFRS Foundation's educational material issued in August. We acknowledge the challenges for preparers of determining looking-forward (and thus uncertain) information and notably the difficulties in isolating the anticipated financial effects of a given material risk or opportunity. We therefore recommend making it clear that an undertaking has the possibility to report such effects at a higher level, consistently with the principles of ESRS 1 of aggregation/disaggregation, based on how the underlying material risk or opportunity is managed. Alternatively, it could be considered limiting Option 1 to climate-related anticipated financial effects for which the methodologies are the most mature, while applying Option 2 for other topics, at least for a limited period.			
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We acknowledge the efforts made by EFRAG to align ESRS language and structure with IFRS SDS, including the systematic review of common provisions and the adjustment of the GHG emissions reporting boundary. However, we have identified areas where interoperability could be further enhanced (see below and other questions on fair presentation, anticipated financial effects, etc.). In particular, we note that the decision to adopt the financial control approach as presented under chapter 5 of ESRS 1 as the default organisational boundary, with some exceptions (leased assets, JVs), and an additional "fair presentation" layer based on operational control, may create practical inconsistencies with existing corporate targets or disclosures already aligned with the GHG Protocol or IFRS S2. Interoperability is a critical objective to reduce duplication of effort, ensure consistency for users, and facilitate assurance all the more for EU companies that have activities in countries outside EU where IFRS SDS have already been endorsed or are likely to be endorsed in the future. Divergences in fundamental parameters such as the GHG emissions boundary can undermine comparability across jurisdictions, limit the usefulness of joint interoperability guidance, and lead to double reporting burdens for companies. We therefore recommend that EFRAG further assess the interoperability impacts of the revised GHG emissions boundary choice. Undertakings should be permitted to select and consistently apply the GHG Protocol organizational boundary approach without mandatory double reporting, while maintaining transparency through clear disclosure of the approach selected. Furthermore, it is important to consider consistency across the E standards if changes are made to the organizational boundary, and to revise the approach in light of the ongoing revision of the GHG Protocol.			
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	For all standards : Although the reduction in the number of datapoints such as the reported 68% decrease may seem substantial, it does not automatically result in a proportional decrease in the effort required from preparers or auditors. Many companies had not implemented all datapoints initially, and not all datapoints have the same level of complexity. More importantly, the core objective of sustainability reporting remains unchanged: to clearly articulate the company's sustainability strategy. Regardless of the number or granularity of datapoints, organizations must still undertake a deep exercise of translating their strategy into meaningful disclosures.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	Adopting fair presentation in preparing ESRS sustainability information may not necessarily enhance the effectiveness of the materiality filter. Fair presentation is sometimes confused with materiality, which highlights the need for a clear definition of fair presentation within the context of sustainability reporting. We do not believe that explicitly requiring to adopt fair presentation in preparing a sustainability statement would necessarily reduce the complexity of implementing ESRS as fair presentation comes in addition to compliance. A statement on ESRS being a fair presentation framework would first and foremost increase the entity's corporate responsibility. We recognize the difficulty of exercising judgement, especially for impact materiality where reporting practices are less established and because affected stakeholders could be fragmented. Besides, while the draft ESRS 1 and IFRS S1 are written in a fairly similar manner, in detail the description of what fair presentation requires for each reporting framework differs. Full alignment is indeed not achieved, particularly regarding IFRS S1.15 which implies the disclosure of additional information, where necessary, whereas the approach under ESRS 1 seems to be more restrictive, focusing – only indirectly – on entity-specific disclosures to complement the ESRS disclosure requirements. We therefore recommend strengthening the connection between fair presentation and the inclusion in the sustainability statement of entity-specific information by making an explicit link with § 10 of ESRS 1. EFRAG should also make it clear that such disclosures enhance – but not replace – the disclosure requirements in the ESRS, in order to achieve fair presentation. We also encourage EFRAG to develop illustrative guidance to further explain the concept of fair presentation, helping to avoid confusion with the materiality principle. Finally, we believe it is important to ensure consistency with the CSRD, which refers only to compliance at this stage.			
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We would like to draw EFRAG's attention to the following points: Our response is based on the current state of the market and the methodologies used by financial institutions that would need more time to mature. As methodologies are developing and value chain information are expected to become more available and reliable overtime, such disclosure relief for financial institutions seems acceptable in the context of simplification of cost and effort dedicated to sustainability reporting and disclosure requirements. Meanwhile, specific guidance for financial institutions would be useful to promote comparability of the information. It is also worth noting that the EBA guidelines published in January 2025 are not prescriptive regarding the disclosure of GHG emission reduction targets in absolute value. Furthermore, the provisions of Pillar III disclosures on ESG risks (prudential reporting) allow for the disclosure of targets in intensity value only (which is also the practice currently observed in the European banking market).			
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	Depending on the circumstances, this adjustment may either simplify or complicate reporting. We note that this change may result in some companies having to report information for additional countries. For example: depending on the geographical distribution of employees, this adjustment may either reduce or increase the number of countries for which detailed data must be disclosed. Illustration: A Group has 5,000 employees : 2,500 in country A, approximately 400 in each of countries B, C, D, and the remaining employees spread across many countries – each country having less than 50 total employees. Under the existing ESRS, the Group is only required to disclose country A resulting in very limited data by country. Under the amended ESRS S1, the Group would report for countries A, B, C, and D.			
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	The objective of the DR remains (S1.32) to "enable an understanding of whether or not the undertaking's employees are paid an adequate wage." While we acknowledge that EFRAG has tried to simplify the process to determine the benchmark for an adequate wage outside of the EU, the proposed methodology allows for the use of a statutory minimum wage established by legislation or collective bargaining agreements which is reviewed and takes into account the ILO wage setting principles. We are concerned that the statutory minimum wage in some cases may be less than an adequate wage. As such, the information provided may not meet the objective of the disclosure requirement and may not result in achieving a fair presentation. More information may be needed to be disclosed to ensure transparency in the methodologies and data used. In cases where the statutory minimum wage is used, we believe it is essential to ensure full transparency. In addition, in our opinion, the hierarchy, methods of calculation and collection of data remain complicated. This may result in a heterogeneity in methodologies used and incomparable information across companies. In the short term, further clarification and guidance are needed to aid companies in implementing this hierarchy. Over the longer term, we recommend that EFRAG provides a list of tools or works with ILO to develop a tool which provides the living wage by country.			
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	In general, we do not disagree with the way that the SFDR PAI have been incorporated into the amended ESRS. Regarding S1-13, the exclusion of other workers working on the entity's site from the count of fatalities due to ill-health may lead to an underrepresentation of the true impact of occupational health risks on these people. However, we understand that this information may be difficult to obtain and therefore do not disagree with the proposal to reduce the reporting burden.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	The adjusted amounts for the gender pay gap metric is an important additional information for users to understand comparability across companies who operate in different countries but does not replace the official unadjusted metric. Amended ESRS 1.51 requires the undertaking to "aggregate or disaggregate the reported information to reflect the level at which significant variations of material impacts, risks or opportunities arise, such as by topic, sector, subsidiary, country, location, water basin, site, asset or other appropriate level of aggregation/disaggregation." As such, it is our understanding that the additional "may datapoint" is not necessary. The company would still need to provide this information to comply with the disaggregation requirement if significant variations of IROs arise by country, etc. We note this principle is also applicable for the total remuneration ratio in S1-15.			
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	While we acknowledge the improvements brought to ESRS 1 regarding the reinforcement of the information materiality filter, the simplification of the DMA, the provision of several reliefs and the flexibility given to preparers in presenting sustainability information, we have identified several issues in the current draft which, if not solved before the delegated act enters into force, will limit the effectiveness of the proposed simplification measures and may create divergence in practice. We therefore urge EFRAG to amend its proposals notably on the so-called "gross vs net" approach as the current proposals bring more confusion than clarity. We also encourage EFRAG to provide additional application requirements especially regarding the general "undue cost or effort" relief to help preparers and auditors in exercising their judgment when implementing this critical simplification measure. Last but not least, as sustainability reporting under the ESRS is not as mature as financial reporting under GAAP, we encourage EFRAG to further explain what fair presentation means in practice. The coexistence of two sets of texts (ESRS and the EU Taxonomy) and two advisory bodies (EFRAG and the Platform on Sustainable Finance) complicates the application of simplifications for entities. Improved communication and coordination between these bodies are necessary to facilitate implementation and ensure regulatory consistency such as application of the same reliefs on acquisitions and disposals, and on partial metrics. Coordination and interoperability could also benefit other regulations and bodies, including on financial sector matters.			
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Overall, we welcome the simplification and restructuring work of ESRS 2 performed by EFRAG, in particular the emphasis put on relevant disclosures at an appropriate level of aggregation, the reduction of the overlaps between the different DPs as well as the revamping of the DRs and notably SBM-3, IRO-1 and IRO-2. In addition to (i) the restructuring of the architecture and interaction between ESRS 2 and topical standards (see question 14) and (ii) the relief for anticipated financial effects (see question 19), we have provided detailed suggestions and comments to further clarify the Standard in the Excel template.			
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We welcome the simplification of the disclosure requirements but note that critical concepts such as the minimum features of a transition plan, the treatment of net-zero commitments, and the organizational boundary for GHG emissions require further clarification to ensure consistent application and interoperability. The inclusion of overall strategy compatibility with 1.5°C (beyond compatibility of targets) is conceptually valuable but introduces practical challenges in the absence of agreed methodologies. DR E1-1 - Transition plan for climate change mitigation: Since the decarbonization plans of the financial sector mainly rely on supporting their investments and financing, it is necessary to adapt the requirements for these plans to be qualified as transition plans by the ESRS. Specifically, the obligation to present a significant expense and investment plan is generally either non-material or non-relevant for this sector.			
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We acknowledge the improvements made, particularly through consolidation and clarification of pollutant and microplastic disclosures. However, despite improvements, reporting on substances of concern and substances of very high concern remains insufficiently defined. The new requirements introduce ambiguities that could lead to inconsistent application and limit comparability.			
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	The simplified structure and requirements are welcome, and we did not raise detailed technical objections. That said, the overall robustness of disclosures will depend on the future development of methodologies to capture location-specific impacts and risks, which remain essential to decision-usefulness.			
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The revised draft moves in a positive direction. However, the lack of clear minimum requirements for transition plans and biodiversity offsets, the complexity of referencing alignment with the Kunming-Montreal Global Biodiversity Framework, and the removal of comparable indicators all reduce the feasibility and usefulness of disclosures at this stage.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We acknowledge the improvements made. However, concerns remain around the reliability and availability of upstream value chain data and the absence of clear definitions for concepts such as "sustainably sourced". These gaps could undermine the comparability and credibility of reporting, particularly for sectors with complex supply chains.			
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We overall welcome the simplifications and clarifications brought by EFRAG in the amended ESRS S1. However, we do note that new concepts and terminologies have been introduced into the amended standard for which further clarifications will be needed to ensure consistent and meaningful application by preparers as well as fair presentation of the information. In addition to our comments regarding the calculation approach to adequate wages outside of the EU (question 28), we have provided detailed recommendations and comments to further clarify the Standard in the Excel template.			
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We overall welcome the simplification and reorganization work of ESRS G1 performed by EFRAG, in particular the alignment of the structure with other topical Standards, which significantly enhances the readability and understandability of the Standard. Further clarifications could, however, be brought with respect to a targeted list of DPs in order to further reduce the complexity of implementing ESRS G1 and to ensure comparability in reporting. Detailed comments are included to that end in the Excel template.			
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	33.Glossary	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Compagnie Nationale des Commissaires aux Comptes	Auditor	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Given that the consultation period on the ESRS revision overlaps with the preparation of sustainability information for FY 2025, we ask EFRAG to urgently specify in the basis for conclusions which amendments represent clarifications of existing requirements and could reasonably be applied when implementing Set 1, and which amendments introduce new or different requirements relative to Set 1. Besides, since there will be no adoption of sector-specific standards, we urge EFRAG to consider some "quick fix" measures to address specificities of financial institutions: -The concept of "value chain" is fundamentally different, with downstream VC encompassing business relationships with clients, investees, and portfolio-related matters, whereas most material IROs arise from this. We draw EFRAG's attention to the need for further clarification regarding the scope of financial institutions' VC. -The notion of "net revenue" was clarified in Q&A 482, we recommend including it in the simplified ESRS in order to have a harmonized definition. -Since the decarbonization plans of the financial sector mainly rely on supporting their investments and financing, it is necessary to adapt the requirements for these plans to be qualified as transition plans by the ESRS. Specifically, the obligation to present a significant expense and investment plan is generally either non-material or non-relevant for this sector. -See detailed comment in 33) Overall feedback for ESRS E1. -The references to GHG Protocol and PCAF raise questions because the two texts contradict each other particularly on the scope to be covered in the calculation of financed emissions. We therefore reiterate the need to clarify the link between these texts. Besides, we reiterate the importance to clarify the "minimum" / mandatory scope for calculating financed and insured emissions, considering the fact that there is no mature methodology for certain types of assets and underwriting activities (e.g. guarantees).			
Survey	FNADE - French waste management association	Business association (other than association of financial institution)	France	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The new definition of "recovery" proposed under the European Sustainability Reporting Standards (ESRS) excludes energy recovery from waste, limiting recovery strictly to material loops such as reuse, repair, and recycling. This exclusion represents a major conceptual break and fundamentally downgrades waste incineration with energy recovery (Waste-to-Energy – WtE) in the waste hierarchy. Currently, WtE qualifies as a recovery operation (R1) under the EU Waste Framework Directive if efficiency thresholds are met. This status, recognized for over 15 years across EU Member States, allows WtE facilities to report themselves as recovery in sustainability disclosures. The ESRS definition would force their reclassification as disposal, contradicting EU law and undermining the established hierarchy that ranks energy recovery above landfill. The consequences of this exclusion are significant: - It disregards WtE's role in the circular economy, undermining EU and national targets for landfill reduction and waste recovery. - It creates regulatory inconsistency with the Waste Framework Directive, which explicitly includes energy recovery as a form of recovery. - It removes incentives for technological innovation in decarbonisation, hydrogen production, and carbon capture. - It sends a negative signal to investors, despite the urgent need for modernisation and efficiency upgrades in aging facilities. Maintaining WtE as recovery is essential. These facilities complement recycling by treating non-recyclable waste and sorting rejects, while producing renewable energy that replaces fossil fuels and strengthens energy security. They also recover valuable materials such as metals and bottom ash for reuse, contribute to public health by destroying pathogens, and align with circular economy principles that include both material and energy recovery. Excluding energy recovery from ESRS recovery would create legal contradictions, weaken environmental goals, and harm investment. Recognising WtE as recovery ensures consistency with EU law, supports the circular economy, and contributes to climate and energy objectives.			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We support the proposed updates to the ESRS and the increased flexibility in the DMA. We also welcome the optionality to conduct the DMA at a more detailed level. This is particularly relevant for companies also subject to the CSDDD, given the strong similarities between its impact assessment and the DMA. In the same vein, the two frameworks should be further aligned, especially on key concepts such as "value chain" and "chain of activities". This would enable companies to conduct a single assessment process, thus improving consistency and reducing duplication and administrative burden. We also call for clear guidance for auditors and assurance providers on how to assess streamlined reporting requirements, to ensure consistency and predictability. For example, there has been unclarity on efforts required to justify the materiality assessment, and more specifically the non-materiality of certain IROs. In our view, each undertaking should, based on its unique understanding of its strategy, business model and stakeholders' interests and views, determine which IRO is material and which is not. If well justified, this should be straightforwardly acknowledged by auditors. We are concerned by point 4, on the option to disclose non-material topics (ESRS 1, paragraph 108). If not properly designed, such flexibility may hinder data comparability and cause extra requests to companies. Hence, we recommend that additional nonmaterial disclosures be (i) limited in scope, (ii) relegated to annexes and (iii) evidently labelled as nonmaterial. This is to preserve the key benefit of a standardized main body of the report, which effectively supports the foundational CSRD objective of providing comprehensive and comparable information to stakeholders.			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	We consider the proposed guidelines overly complex and detailed, which risks making the materiality assessment unnecessarily burdensome. A more general, principle-based approach would be more appropriate and effective. We recommend that impacts (and risks) be reported before mitigation or corrective actions (i.e. a gross approach), with a subsequent explanation of how these will be addressed. This would provide greater clarity and ensure alignment with established enterprise risk management practices. Moreover, clearer guidance is needed to distinguish between actual and potential impacts, as the current proposal does not sufficiently clarify this important distinction.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We support the proposals to improve the readability, conciseness and connectivity of ESRS Sustainability Statements. The option to include an executive summary is particularly welcome, as well as the possibility to use appendices to separate more detailed information from key messages. The flexibility to choose the most suitable format for disclosures, rather than mandatory reporting table format, supports more relevant and concise reporting while reducing unnecessary burden and strengthening the connectivity with corporate reporting as a whole.			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We find it very important that the overlaps between the ESRS 2 and the topical standards have been addressed. Even if there still are some additional disclosure requirements in the topical standards, we find the proposed changes mainly beneficial. The current Minimum Disclosure Requirements (MDRs) have been too burdensome and detailed, leading to duplication and difficulties for preparers when applied under each topical disclosure. A simplified and more streamlined structure will make the standards more user-friendly and reduce the need to cross-check requirements across multiple locations. The complete removal of MDRs could also be considered as they do not provide substantial additional value. We also support the reduction of "shall" datapoints and the clearer articulation of PAT requirements. Importantly, the amendments allow narrative information to be disclosed at an aggregated level, rather than strictly at the IRO level, better reflecting how companies manage their impacts, risks and opportunities in practice.			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We support the proposed changes and welcome the clearer distinction of mandatory datapoints.			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	In theory, the principles of reducing mandatory requirements, providing greater flexibility and clarifying "how to report" with methodological guidelines and examples would be welcome. However, in the communication concerning the changes, it was emphasized that there are no voluntary disclosures, whereas some of the disclosures have been transferred to the NMIG document: it is unclear whether it contains only voluntary or mandatory disclosures. For example, some mandatory disclosures have comments in the "Log of Amendments": NMIG contains related guidance for the paragraph: how to treat this optional document since it refers to mandatory disclosures (Example: Log of Amendments E1 page 24, line 1)? If an organization decides to disclose the issues in the NMIG, how will it be audited and should the continuity of disclosure of the issues contained in the NMIG be maintained in the following years, if they have been shown once? More generally, we have strong concerns regarding the introduction of NMIG. The unclear legal status of such a document would create risk of inconsistent application and unnecessary challenges in discussions with auditors. To address any legal uncertainties regarding the NMIG, it should be explicitly stated that its use is entirely optional for preparers and that it has no legal binding nature. For this reason, we do not support the development of NMIG as part of the standards/delegated act.			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We overall welcome the proposed burden reliefs. It is important that the amendments emphasize prioritisation and materiality, which will help focus reporting efforts where they are most relevant. We also recognise that some of the reliefs may create challenges for data collection, especially for companies within the mandatory reporting scope. There should be contractual and practical arrangements to make these challenges manageable. We note, however, that such definitions as "undue cost or effort" or "lack of data quality", while potentially beneficial, remain open to interpretation and should therefore be clarified to ensure consistent application across companies.			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	Overall, we find the proposed amendments beneficial as they tackle the overcomplexity of current rules for defining and reporting information from a company's value chain. Especially in case the Omnibus I on CSRD will limit the ability of larger companies to request information from their value chain, it will be particularly burdensome for these companies to report all the currently required value-chain information. We also stress the importance of simplifying and better aligning value-chain definitions with financial reporting, to ensure consistency and reduce unnecessary reporting obligations. For example, the number of datapoints for which companies need to report value-chain information should be limited to only essential information, such as scope-3 emissions. However, we are concerned with the statement stipulating that "the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods": this statement assumes that, for all metrics, it is possible to improve the coverage and to reach a complete scope within a timeframe to be disclosed. This seems to contradict the notion of "undue costs or effort" that could apply to certain metrics for which complete coverage is out of reach. We suggest adding to this statement "if compatible with the undue costs or effort principle".			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	Although option 1 would be more aligned with IFRS, we disagree with this option since it would imply an excessive burden. We instead prefer Option 2 as it can relieve companies from the challenge of disclosing quantitative and commercially sensitive information. However, not being aligned with IFRS standards, Option 2 might also pose challenges of inconsistency and of duplication burden for companies that report under both frameworks. Hence, we call for a version of Option 2 that (i) mitigates inconsistency, (ii) avoids duplicate reporting of the same information, (iii) provides clear guidance on what constitutes an acceptable qualitative disclosure (examples, minimum elements, etc), (iv) encourages voluntary quantitative figures if material and reliable.			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	The disclosure requirements remain largely unchanged. Hence, we call for a further simplification, for example by removing the need to split of assets before and after actions. ESRS should also be structured so that companies applying them can also fulfil the IFRS reporting requirements.			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We appreciate EFRAG's clear effort to consider in detail the interoperability between the ESRS and IFRS standards. However, while numerous adjustments have been made to enhance alignment, notable differences still remain. It would be beneficial for all stakeholders if these remaining gaps were addressed. At least, even if full interoperability would not be reached, the ESRS should be designed in such a way that companies adhering to them would not need to consider additional data points when also reporting under IFRS. This recommendation of ours is also consistent with our response to Q25, on the risk of potential uncertainty associated with the fair representation concept (also in conjunction with the unclear legal status of the NMIG): we support it, provided it leads to an effective departure from the check-list mentality of the compliance approach, reducing the unnecessary reported information and the documentation needed to show that omitted datapoints are not material.			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We call on EFRAG to simplify the ESRS without adding new requirements or shifting "may" data points to "shall". In general, we believe no new mandatory disclosures should be introduced since it would increase the burden for companies with very limited benefits.			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	In general, we call on EFRAG not to introduce new mandatory datapoints, for compatibility with the simplification agenda and with the Commission's mandate. ES-4 might be especially challenging. Furthermore, we would like to point out that not all new terms introduced in the drafts have been defined, e.g., the term "thermal-based disposal" in ES-5 appears as a new concept without a clear definition: we call for allowing companies flexibility in interpreting "thermal-based disposal".			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We support the fair-presentation concept, but acknowledge that it may lead to some uncertainty. It is therefore important to understand, as stated in the question, that confirming the fair presentation concept should reduce the check-list mentality associated to the adoption of a compliance approach, and support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material.			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	This proposal would significantly increase the reporting burden. For nonglobal companies, it would trigger the new reporting of countries below the 10% threshold. For global companies, it would increase the number of countries for which to report detailed information.			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	Although it is a meaningful approach to refer to international references such as ILO principles, the proposed methodologies create remarkable concerns: (1) it is not clarified if wages defined by collective bargaining should prevail over those defined by legislation, or if any alignment with any of the two would be considered satisfactory; (2) we anticipate that an extensive workload could emerge from the following phrase "periodically reviewed/adjusted every two years and takes into account the ILO wage setting principles." Indeed, as the indicator covers the entire workforce, an assessment would have to be conducted in all countries of operation to check the fulfilment of these two new criteria. Furthermore, should a company operate in different sectors of activity, it might have several collective agreements to check within a single country. Ultimately, this could lead to hundreds of checks to be performed. Finally, for countries where an adequate minimum wage does not exist, which is the most critical issue met by issuers in 2024, the approach is too vague and will necessarily make information hardly auditable and comparable.			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	We agree with the proposed approach.			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	We agree with the proposal and support flexibility in the wording, as we do not endorse fixed metrics dictating what targets must include. We would like to emphasize that targets should focus on addressing material impacts rather than adhering to predetermined attributes or metrics, such as the size of areas restored. We would also welcome further review towards a more methodology- and framework-based approach to target setting.			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	We welcome that requirements are aligned with the Pay Transparency Directive, as long as companies are allowed flexibility in interpreting the calculation methods.			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	While qualitative information on payment practices is relevant to indicate how the protection of SME's is tackled within the company, the calculation of G1-6 metrics is overly complex for international groups operating with a great variety of payment standards. We therefore support simplification by deletion of the quantitative datapoints G1-6 paragraph 20 (a)(b).			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We welcome the simplification by removal of the sub-subtopics. However, we also call for allowing companies the flexibility to choose and motivate to which subtopics to limit the reporting. As a purely illustrative example, while we find it a logical simplification that Appendix A proposes the same subtopics for S1 and S2, companies should have the flexibility to assess that some subtopics may not be relevant for S2. It should be clarified that Appendix C is voluntary. While it is intended to help with definitions, in practice it can significantly hinder the "classification" of individual issues for explanations and formulations used in the list. We support the possibility to refer to other parts of the Statement when, for example, a single policy concerns multiple areas (to avoid the repetition experienced with the Code of Ethics and Code of Conduct for PB). We welcome that 3.2.22 enables presenting the information "either at the topic level or at the level of IROs, depending on what provides the most relevant information": we call for allowing companies a flexible interpretation of "relevant information".			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We find that, for example, the distinction between SBM and IRO topics and the changes related to BPT and GOV enhance the clarity of reporting requirements. However, we have some observations regarding specific points: (i) BP1/ 5(e): it should be specified that this refers to events occurred after the end of the reporting period but before the publication of the report, avoiding amendments to a published report; (ii) SBM-1, 17(a) and (b), ARs 7, 8, and 10: the new requirement concerning significant sectors is introduced: we call for allowing companies to a flexible interpretation of "significant sectors"; (iii) SBM-2, 20(c): we call for allowing companies to a flexible interpretation of "key stakeholders"; (iv) SBM-3: a new descriptive element has been added, which largely overlaps with and may result in duplication of SBM-1; (v) SBM-3, 23(b): without a methodology that ensures comparability without adding overburden and conflicts with the company's commercial interest, we support the possibility to assess impacts in qualitative terms; (vi) IRO-1/26(b): The description includes information on the scope of activities and value chain, indicating whether it focuses on specific activities, business relationships, geographical areas or other factors that cause an increased risk of negative impact. This may be a repetition of information from SBM-1; (vii) IRO-2/28(a): Once again requires the disclosure of information that has already been included in SBM-1, IRO-1, in particular regarding the links between the topics and the business model and value chain. we call for allowing companies to a flexible interpretation of the required content of the disclosure.			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We welcome the clarification provided regarding the GHG calculation methodology, as aligning it with the GHG Protocol improves transparency and consistency. The enhanced connection with other standards, particularly the harmonisation of GHG calculations across different reporting requirements, is a positive development. However, we note that certain requirements under RED II/III – for example, the biofuel distribution obligations – are not fully reflected in ESRS E1 GHG methodology. It will be important to ensure that double reporting is avoided and that the ESRS E1 requirements are consistent with other relevant regulatory obligations to minimise unnecessary duplication and administrative burden for companies. We also have comments on some specific points below. E1-8 – Gross Scopes 1, 2, 3 and Total GHG emissions; 44 now 32: disclosure is mandatory, but the explanation in the comments section [NMIG contains related guidance for paragraph 32] might cause confusion that the explanations in the document that are supposed to refer to non-mandatory disclosures are mandatory disclosures E1-8 – Gross Scopes 1, 2, 3 and Total GHG emissions; "c) Scope 3 GHG emissions from significant Scope 3 categories as a total and per category": we call for allowing companies flexibility in interpreting "significant categories".			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	As a general comment to reduced pollution data points to only relevant air, water and soil pollutants: we call for allowing companies flexibility in interpreting "relevant". E2-4 – Pollution of air, water and soil 16 (a): we note unclarity between point 16(a), referring to "amounts of any material pollutant emissions" and AR 2, indicating pollutants "from Annex II of Regulation (EU) 2024/1244 (Industrial Emissions Portal Regulation)"; we call for allowing companies flexibility in assessing which pollutants are relevant to its operations.			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	E3-4 – Water metrics, AR 1. "Water consumption shall be calculated using a water balance approach: it equals water withdrawal minus water discharges, adjusted for changes in water storage": we suggest some flexibility by introducing the possibility of justifying the nonperfect balancing of volumes in extensive portfolios with various variants of water circulation due to, e.g., water returned to cooling circuits, incomplete emptying of tanks in hydroelectric power plants, evaporation, etc.			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We welcome the changes introduced in ESRS E4. The removal of topic-specific Disclosure Requirements (DRs) helps to streamline the reporting process and reduces unnecessary repetition and overlaps within the standard. This simplification makes it easier for preparers to navigate the requirements and ensures that the focus remains on material information. In addition, the consolidation of site-level information under E4 SMB-3 with other site-related data in section E4-5 is a positive development. This integration not only reduces duplication but also provides a more coherent and structured presentation of site-level disclosures. Companies will benefit from a clearer and more consolidated framework for reporting site information, which supports consistency and comparability across the reporting entity. E4-5 – Metrics related to biodiversity and ecosystems change, AR8: we call for allowing companies flexibility in interpreting "near".			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	As a general observation, we would like to point out that not all new terms introduced in the drafts have been defined. For example, we call for allowing companies flexibility in interpreting "thermal-based disposal".			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We welcome the significant reduction of overlaps within ESRS S1. Removing redundancies improves the clarity and usability of the standard, making it easier for companies to prepare sustainability reports and for users to navigate and interpret the disclosed information. This simplification supports a more efficient reporting process and enhances the overall coherence of the sustainability statement. Moreover, we have the following comments on specific data points. DP 55a (now 25) Characteristics of non-employees in the undertaking's own workforce: it should be specified that contractors are not own workforce DP 97b (now 44b) Remuneration metrics: we call for allowing companies flexibility in interpreting the specific calculation of the median and which group of workers to include. DP 97a (now 44a); DP 98 (now moved to [NMIG 35]) Gender Equality and Diversity: we welcome that requirements are aligned with the Pay Transparency Directive, as long as companies are allowed flexibility in interpreting the calculation methods. DPs 93a, 93b Work-Life Balance: we call for allowing companies flexibility in interpreting the group representing the 100% base and the type of leaves included.			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We welcome the explicit reference to ESRS 2 within ESRS S2, as it reinforces the connection between general disclosure requirements and topical standards, contributing to a more coherent reporting framework. We also note the improved clarity regarding vulnerable stakeholders. This enhancement helps companies better identify and disclose impacts on stakeholders who may be most affected by their activities, supporting more targeted and meaningful reporting.			
Survey	Eurelectric	Business association (other than association of financial institution)	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We note that a significant number of disclosure requirements in ESRS G1 have been made non-mandatory and moved to the Non-Mandatory Illustrative Guidance (NMIG). We support the reduction of mandatory disclosure requirements as it provides companies with greater flexibility in how they present governance-related information, allowing them to focus on material issues while maintaining transparency. While this approach can help reduce reporting burden and improve usability, we have strong concerns regarding the introduction of a "Non-Mandatory Illustrative Guidance" (NMIG). The unclear legal status of such a document would create risk of inconsistent application and unnecessary challenges in discussions with auditors.			
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The amendments sufficiently simplify the DMA, reinforce the materiality filter, and strike an acceptable balance. The wording of Chapter 3 of ESRS 1 is clearer and easier to apply. The simplification reduces administrative complexity and should limit unnecessary disclosures while still meeting user needs. Details provided in Part 3.			
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The new guidelines provide useful clarification, but it is important that considering remediation, mitigation, and prevention should not require extensive new evidence gathering. Furthermore, the question of gross vs net impact remains variable dependent on the individual company. Details provided in Part 3.			
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The amendments provide flexibility that supports more concise reporting and better integration with other corporate reporting. This reduces duplication, granularity, and unnecessary disclosures, thereby limiting the reporting burden. Details provided in Part 3.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The amendments strike an appropriate balance. The reduced prescriptiveness is welcome, as it lowers preparation effort. Changes to PAT are welcome. This should not be counteracted by future interpretative guidance that reintroduces complexity. Details provided in Part 3.			
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The amendments improve clarity and accessibility. Clearer and less prescriptive requirements may reduce the need for costly interpretation and specialist resources, thereby limiting reporting obligations			
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	NMIG is useful when applied voluntarily, but it should remain clearly outside the mandatory framework. This ensures examples are available for reference without adding de facto reporting obligations.			
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The burden reliefs are a positive step and the balance struck is acceptable. The changes may reduce costs for preparers while still allowing stakeholders to receive core sustainability information.			
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	Allowing proxies and estimates where data quality is lacking is essential. This provides necessary flexibility, avoids costly data collection exercises, and reduces the risk of delay or excessive effort.			
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Qualitative disclosures on anticipated financial effects significantly reduce the burden compared to mandatory quantitative assessments, which are highly resource-intensive and speculative. The relief should remain in place and quantification left voluntary, especially in the context of lack of common standard of valuation of such metrics.			
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	The amended paragraphs 40–42 strike a workable balance. This simplification avoids excessive effort , but it may be difficult to provide meaningful information as the methodology can still be vague. Details provided in Part 3.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	The amendments improve interoperability with IFRS S1/S2 while also supporting simplification. This reduces duplication of effort for companies reporting under multiple frameworks, which is critical for lowering the reporting burden.			
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	The reduction in mandatory datapoints is a major improvement, cutting unnecessary effort while preserving key disclosures. The balance is appropriate, though further reductions could be considered in the future if uptake shows immaterial information is still reported.			
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The six datapoints moved from "may" to "shall" may be important, but each new mandatory requirement increases reporting obligations. Their inclusion should be reviewed carefully, and implementation timelines should allow sufficient flexibility. In particular, mandating biodiversity transition plans, even if conditional, can add a layer of complexity and ambiguity due to a lack of well defined procedures.			
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The four new mandatory datapoints address relevant issues, but they add to reporting burden. In particular, information on materials with unknown final destinations may be impractical to collect. These should either be phased in gradually or left as voluntary disclosures.			
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	While fair presentation is an important principle, explicitly requiring it could create expectations for additional information beyond what is already mandated, increasing reporting effort. Any obligation should be narrowly defined to prevent excessive disclosures.			
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Complex estimates are common to all sectors, and there is not a plausible rationale to explicitly exclude financial institutions from disclosing climate absolute GHG emissions values targets when they have only set intensity targets. Both information types are needed for a proper understanding of the undertaking's progress as well.			
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	Any threshold change that could trigger an increase in the number of countries to report on should be approached with caution. However, it remains unclear to what extent this change could impact reporting burdens.			
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	The revised methodology for non-EU adequate wages is more practical and reduces reliance on unavailable or unreliable local data sources. This improves feasibility and lowers the effort required for compliance. Removal of reference to the transposition period is also welcome.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	While consolidating SFDR datapoints in ESRS 2 improves traceability, it still imposes additional requirements linked to other EU frameworks. Simplification should focus on limiting duplication and only requiring datapoints that are material, to avoid unnecessary reporting.			
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	AR 26 should be reviewed to avoid overly prescriptive disclosures on biodiversity targets. Suggested wording: "Undertakings may, where relevant, describe biodiversity and ecosystem targets, including scope, baseline, and timeframe." It would also be preferable to make the relevant methodology more concrete as biodiversity is still a relatively vague topic to report on.			
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	Deleting the voluntary adjusted gender pay gap datapoint is appropriate. It removes unnecessary burden while still requiring the unadjusted metric, which ensures comparability across entities without additional calculations. Still, we believe that issuers should be allowed to report on adjusted pay gay, as this metric provides more insight into actual situation of the issuer, taking into account local and industry specificity.			
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	The replacement formulation is sufficient to protect SMEs. It reduces cascading data requests and avoids imposing disproportionate obligations on smaller companies in the value chain, supporting proportionality and lowering reporting costs overall. On the other hand, issuers do not differentiate between suppliers based on their size, which makes it difficult to extract data specific to SME only. Detailed comments in Part 3.			
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		PIIT welcomes the proposed simplifications in approach towards the DMA process, focused on usability and possibility to include this process in business and strategic planning. We appreciate the clarifications included regarding focusing on material topics only, a more quality-based approach towards the analysis, and more flexibility in terms of defining material matters – the ability to apply both, top-down and bottom-up approach. We support the need for sub SEBN's exclusion from the consolidated sustainability reporting obligation and as such, EFRAG's ESRS I Exposure Draft (page 15) call for coherent financial & sustainability reporting scopes thereby agreeing with the EFRAG proposal that if a subsidiary is not in a group-level financial statement, it should respectively not be included in its sustainability report (unless there is specific evidence mandating otherwise).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ShareAction	NGO	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	As a general comment, we feel this approach has been over simplified and is a retreat from the previously agreed impactful approach. However, we do see that Chapter 3 is clearer and better organised. The improved definition of materiality of information in Section 3.1, namely the replacement of criterion of "significance" with "understandability" of impacts provides better guidance and is aligned with the CSRD and international sustainability due diligence instruments. It also clarifies how the materiality of information interacts with (fundamental) qualitative characteristics of information criteria from Chapter 2, and with the rules concerning aggregation and disaggregation of information (e.g. para 52 on "not obscuring"). However, Chapter 3 frequently conflates 'topics' with 'impacts, risks and opportunities' ('IROs'). Para 22 is confusing when it says that information may be presented "either at the topical level or at [IRO] level". This is confusing and incorrect. While topics refer to broad thematic areas, IROs are entity specific. The CSRD, as well as IFRS, TCFD, and TNFD consistently focus on the latter. Overemphasising 'topics' risks leading to generic disclosures that lack relevance and specificity. Chapter 3 would be clearer if it keeps the focus on IROs and plainly explain that depending on their nature and context such IROs may be defined at a general level and/or that information on their management may be similarly aggregated. This should be clarified also in provisions on entity-specific disclosures in paragraph 23 (and in paragraph 10 in Chapter 1) In Chapter 3.3.2, para 37 fails to mention that the purpose of financial material assessment is to not just to identify materiality information but also determine the material risks and opportunities, as required by the CSRD. In this regard, the risks and opportunities are only mentioned in the middle of para 38, making the text incoherent.			
Survey	ShareAction	NGO	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We are concerned by the ESRS proposal to distinguish between potential negative impacts mitigated by past, completed actions (assessed on a net basis) and those requiring ongoing management (assessed on a gross basis). It is not clear why past actions or investments should automatically be considered more effective than ongoing management, particularly as many impacts require continuous oversight and mitigation to remain under control. For consistency and comparability, either both categories should be assessed on a net basis, or both on a gross basis. Introducing different treatments risks creating arbitrary distinctions that do not reflect the reality of impact management. Moreover, quantification in a double materiality assessment is already highly challenging. Expecting companies to calculate a "net" basis in an unbiased and verifiable manner adds further complexity and subjectivity. We therefore recommend a uniform approach across all potential impacts, with clear guidance to avoid inconsistent or biased reporting.			
Survey	ShareAction	NGO	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The proposed changes are meaningful. We would like to bring the attention to para 113, which we find hard to understand: "113. If the description of the material impacts, risks and opportunities prepared in accordance with [Draft] Amended ESRS 2 IRO-2 is not presented alongside the respective policies, actions and targets, the undertaking shall make explicit which policies, actions and targets relate to which material impacts, risks, or opportunities, in accordance with paragraph 22." It is not clear to us what the reference to para 22 is meant to imply. Para 22 addresses the issue of appropriate aggregation or disaggregation of information on material impacts, risks and opportunities and their management. But it doesn't set any rules regarding the location of such disclosures depending (or not) on the level of aggregation.			
Survey	ShareAction	NGO	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We welcome the removal of duplications between the cross-cutting and topical standards and support the strengthened focus on general disclosure requirements. Many PAT provisions in the topical standards served more as examples or guidance than datapoints, so streamlining is helpful. We also value the preservation of the five-part environmental and four-part social architecture, which provides a clear structure for preparers to navigate issues, engage colleagues internally, and organise disclosures. Retaining the architecture of standards E1–E5, with their specific metrics, is important; the framework should remain complete and equivalent across all standards. However, we have two critical concerns. First, the original disclosure requirement in the environmental standards on screening of sites during materiality assessment has been replaced with an application requirement to ESRS 2 IRO-1. This effectively makes transparency on this element optional. Considering local context is central to a robust materiality assessment. Chapter 3 of ESRS 1 and ESRS 2 IRO-1 should explicitly require disclosure of how an undertaking screens its locations and value chains. While we welcome clearer references in the environmental standards to the importance of disaggregated disclosures, meaningful disaggregation depends on proper site screening. Second, we strongly recommend explicitly referencing the disclosure of relevant, entity-specific metrics within the social standards. Currently, S2, S3 and S4 contain no metrics, and the sectoral standards that were expected to provide them will not be adopted. This shifts expectations for social metrics to entity-specific disclosures but without clear guidance. As highlighted by the Danish Institute for Human Rights, adding a reference to metrics in disclosure requirement SX-4 on targets would improve consistency between topical and cross-cutting standards, reflect existing company practice, and clarify ESRS expectations without adding new datapoints. These changes would strengthen transparency, ensure comparability, and make the standards more usable while maintaining their streamlined and practical intent.			
Survey	ShareAction	NGO	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We support the proposed changes. We agree with the removal of 'may disclose' elements, because their status has been causing confusion. However, they do not need to be all removed to NMIG. Where they provide useful examples of disclosures, they could be included directly in the standards as "examples". This is particularly the case for the topics for which the reporting practice is evolving, such as Biodiversity and ecosystems. This would make it easier for first-time preparers to understand what kind of information is likely to be relevant and provide a basis for the standardization of metrics. Having to consult another document, such as NMIG, is adding an unnecessary hurdle. The language and therefore understandability of the standards have been considerably improved, however in ESRS 1 especially there is still much to be done in this regard.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ShareAction	NGO	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The standards are not clear in terms of what the combined effect of the reliefs is and how the reliefs are meant to interact. Interpreting and applying these reliefs independently of each other open doors to abuse and omitting material information, significant differences in reporting practice. Reporting of metrics is subject to a combination of undue cost and effort and lack of data quality reliefs. But the standards do not put these two reliefs in proper context and do not include any explicit requirement and timeframe for companies to improve the coverage and quality of data. This is exacerbated by the relief which unconditionally allows exclusion of joint operations. If the environmental metrics concerning such operations are material, then the standards should incentivise their eventual disclosure. The undue cost and effort and lack of data quality reliefs already provide sufficient flexibility in this regard. Similarly, there is a lack of coherence among the directions of the reliefs related to financial effects, i.e., information which is essential for understanding of the risks and company's ability to overcome them. The limitation related to the announced investment plans focuses the disclosures on effects which are easier to assess and therefore quantify, yet the standards also propose reliefs that enable omitting quantitative disclosures. We broadly agree with the relief provided in ESRS 1, para 90, which allows for calculation of metrics exclusion of activities that are not significant drivers of the IROs. However, the application of this option must be clarified for specific environmental and social metrics which are standardised in the ESRS. For instance, the GHG Protocol's completeness principle explicitly warns against misapplication of materiality criteria in this regard. Similarly, for S1 workforce metrics, such as characteristics of the employees and non-employees, such exclusions are not appropriate.			
Survey	ShareAction	NGO	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	We are concerned that this clause could potentially become an excuse to omit critical data, weakening the transparency and comparability of sustainability information. We believe that companies should not be allowed to use poor data availability as a reason to avoid addressing Scope 3 emissions. While we are not necessarily calling for ESRS to impose explicit requirements on Scope 3 calculation methods, we believe it would be useful to highlight good practice — for example, starting with spend-based estimates and then engaging suppliers and customers to improve data quality over time. Companies have cited data gaps and cost concerns for years without presenting clear timelines for improvement or showing progress. Allowing open-ended relief on Scope 3 reporting would give companies excessive leeway and risk delaying meaningful action.			
Survey	ShareAction	NGO	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ability to estimate financial effects is critical for the undertaking's ability to integrate sustainability into its business strategy considerations, planning and risk management. It is also key for the determination of financial materiality, including in terms of overreporting topics as financially material. Resigning on this ambition is at odds with the objective of putting sustainability reporting on the same level as financial reporting, the integration of both, and ultimately overcoming the tragedy of horizons. We find Option 1 unnecessarily extensive, and lacking time limitation, but broadly acceptable. We disagree with the assertion made in the question that it "[d]ifferent from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources ". In this regard, the new proposed ESRS include the undue cost and effort relief which seems to account for such a situation. With respect to Option 2, we don't find it justifiable to go beyond the IFRS relief. One of the most strongly voiced arguments from stakeholders who called for simplification of ESRS was that, as a matter of principle, ESRS must be aligned with the IFRS except where CSRD or other EU legislation require otherwise. Abandonment of this principle seriously undermines prospects of building a global baseline which both the EU and the ISSB support, and which is an important part of building a level playing field for the EU companies.			
Survey	ShareAction	NGO	United Kingdom	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	ShareAction	NGO	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Reliefs should not go beyond those set in IFRS. Going further would undermine the objective of setting a global baseline for ESG reporting, which is important for achieving a level playing field for EU companies in a global context. The undue cost and effort relief outlined in ESRS 1, para 87-89, is a powerful relief, which addresses virtually all situations where the undertaking may encounter practical obstacles. Explicit emphasis on fair presentation, combined with the strengthened focus on the use of materiality of information filter, provide companies with an increased flexibility in determining meaningful content of their sustainability statements. It marks a further move away from compliance-based to principle-based approach. However, such changes imply increased responsibility for the undertaking. Implementing further reliefs would undermine this responsibility and open the doors to abuse.			
Survey	ShareAction	NGO	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ShareAction	NGO	United Kingdom	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	The number of datapoints in each standard represent the minimum necessary to ensure cohesive disclosure requirements, and consequently basic comparability and quality of the actual disclosures. We have not identified any instance where ESRS would include exorbitant requirements, considered common practice and internationally recognised reporting standards and frameworks such as IFRS, GRI, or TNFD. ESRS are generally more concise and less demanding. Introducing further reductions (while keeping the coverage of all ESG factors as required by the CSRD) would create serious quality gaps between the ESRS disclosures and those based on the standards.			
Survey	ShareAction	NGO	United Kingdom	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree with these changes, noting that the suggested changes do not add a new burden. E2-4 on secondary microplastics is not a new datapoint, as correctly pointed out in the Rationale above. We do not understand why it is included in this question, as such.			
Survey	ShareAction	NGO	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	ESRS, being based on the materiality principle, the CSRD requirement to disclose impacts, risks and opportunities and their management, and the general principles of the Accounting Directive, has already been subject to a fair presentation regime. Making it explicit helps to clarify it. It provides companies with clarity on the discretion and judgement, as well as related safeguard, they are expected to exercise when applying the standards.			
Survey	ShareAction	NGO	United Kingdom	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We recognise the complexity of recalculating absolute GHG values and acknowledge that financial institutions often use intensity-based metrics to track performance. However, the global carbon budget — and the 1.5°C pathway — are defined in absolute terms. Financial institutions must therefore disclose absolute targets alongside any intensity metrics to show how their strategies align with the economy-wide transition to net zero. Absolute targets are critical for users of sustainability statements and for understanding the real-world climate impact of financed activities. Intensity measures can provide insights into efficiency but risk masking rising overall emissions in expanding portfolios or sectors. Absolute values, by contrast, clearly show whether institutions are contributing to the 90–95% global emissions reduction required by 2050, with steep cuts by 2030. Both approaches rely on similar underlying data, and estimation challenges are not unique to finance. Granting an exemption would undermine fairness in a sector-agnostic standard. Other industries could cite comparable data challenges, reducing consistency and comparability. It would also risk misalignment with existing frameworks such as the SBTi Financial Sector Net-Zero Standard, UNEP FI/NZBA recommendations, and the EU SFDR, all of which require or encourage disclosure of absolute financed emissions. Asset owners and other stakeholders depend on these data to assess their own transition plans and disclosures. Transition plans themselves typically include absolute targets. Preventing financial institutions from reporting them would hinder the ability to evaluate whether plans are being implemented. Experience shows the shortcomings of relying solely on intensity: Targets may incentivise shifting to "green" assets rather than decarbonising existing ones. Portfolio growth, revenue shifts or share price changes can distort progress. Metrics like Implied Temperature Ratings remain complex and inconsistent. Only absolute emissions reductions reflect real-world decarbonisation. Removing this requirement would weaken the standard, reduce transparency, and create perverse incentives misaligned with the 1.5°C pathway.			
Survey	ShareAction	NGO	United Kingdom	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The new threshold is simpler and clearer, and therefore easier to apply. It also sets a clear cap. Any potential increase of breakdowns of the disclosed information is negligent in terms of added burden.			
Survey	ShareAction	NGO	United Kingdom	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The proposed change is discriminatory and adds unnecessary burden on companies. It should be addressed through revisions to paragraph AR 22. Workers have a human right to a living wage — remuneration sufficient to support themselves and their families with basic dignity. The ILO's 2024 position, as well as EU policy and law, reflect this. The ILO distinguishes between: principles for estimating living wages (what level is needed for a decent life), and principles for wage-setting (how legal minimum wages are negotiated). Legal minimum wages today fall below living wages in most countries, particularly outside the EU. However, under S1-9 the draft methodology directs companies to compare actual wages with: an adequate wage benchmark for EU employees, but legal minimum wages outside the EU if they are agreed in line with ILO wage-setting principles — which do not determine living wage levels. Only if no legal minimum exists may companies use living wage estimates. This creates four problems: a) It undermines the objective by tying reporting to lower legal minimum wages. b) It is discriminatory, applying a weaker standard to non-EU employees. c) It is complex, requiring companies to judge whether each country's minimum wage or benchmark aligns with ILO principles — a task beyond most companies' capacity. d) It undermines comparability, as companies with different workforce locations will report against different standards. We recommend two key changes: Require wages for all employees — EU and non-EU — to be measured against an adequate/living wage benchmark, not default to legal minimum wages. Allow companies to rely on publicly evidenced local legal minimums or living wage estimates aligned with ILO principles, avoiding the need for companies to make complex, subjective assessments themselves.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ShareAction	NGO	United Kingdom	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	The proposed simplifications to the social standards in the amended ESRS risk undermining the usefulness of SFDR's Principal Adverse Impact (PAI) indicators. Under the 2023 ESRS, human rights policies and incidents had to be reported separately for different stakeholder groups, offering a degree of granularity that aligned with PAIs. In the new draft, these disclosures are consolidated into cross-cutting indicators. While this may reduce duplication, it also risks producing generic, boilerplate statements that obscure how impacts affect workers, value chain actors, communities, or consumers. At a minimum, EFRAG should require disaggregation by stakeholder group to preserve decision-usefulness. The merger of "severe human rights cases" into a single indicator raises a similar concern. A single number does not reveal whether harms disproportionately affect supply chain workers or local communities, weakening the visibility of salient risks. Likewise, the removal of fatalities (previously S1-13) is particularly problematic. Workplace deaths are one of the clearest and most material social PAIs, and their deletion would strip SFDR reporting of one of its most concrete indicators of harm. Fatalities should remain a standalone datapoint or, at the very least, be explicitly included under severe incident reporting. Finally, the narrowing of scope for human rights incidents and the relocation of methodological explanations into voluntary guidance risk excluding recurring systemic issues such as harassment or discrimination, while also reducing transparency into how companies identify and prioritise risks. While streamlining can ease reporting burdens, it should not come at the expense of accountability. In sum, unless the draft is revised to retain fatalities, mandate stakeholder-specific disaggregation, and preserve methodological disclosures, the changes will dilute the ability of SFDR PAIs to provide investors with meaningful, comparable information on corporate human rights performance.			
Survey	ShareAction	NGO	United Kingdom	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Measurable targets related to biodiversity and ecosystems shall be set and disclosed according to the guidance and examples given by relevant global frameworks, such as SBTN (Step 3 - Measure, Set & Disclose Targets), TNFD (component P1 and P2 & Annex 5, sector guidance and guidance on Target Setting) & resources by World Economic Forum Nature-Positive Transitions.			
Survey	ShareAction	NGO	United Kingdom	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	Our proposal is to not include such datapoint, but instead provide a paragraph in the application requirements, explaining that the adjusted pay gap is an important entity-specific information, which is often necessary to contextualise and enable understanding of the information provided by the unadjusted pay gap. Further this AR could remind the undertakings that the unadjusted pay gap needs to be appropriately disaggregated. Unadjusted and adjusted perspectives on pay gap have different purposes. The unadjusted pay gap - appropriately broken down by countries or areas of operations in line with ESRS 1 - provides general context and the information on how the undertaking is affected by systemic drivers of gender inequality. The adjusted pay gap is primarily an entity-specific disclosure. It is particularly relevant for complex companies to better understand where and how the pay gap manifests, and what are the specific drivers of it. There is no one 'standardizable' way to adjust the pay gap calculation. Such adjustments must consider the undertaking's specific context and circumstances and avoid 'overadjusting'. If the calculation controls for every source of difference between males and females in the workforce, then it would obscure the pay gap and its causes. Therefore, including a datapoint - whether mandatory or voluntary - on adjusted pay gap in the standards is problematic, because it is impossible to provide a standardised methodology. On the other hand, for many companies' information on adjusted pay gap is likely to be material, and therefore such information should be provided.			
Survey	ShareAction	NGO	United Kingdom	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	The removal of paragraph 14 can be easily compensated by adding a reference to SMEs in the description of the topics in ESRS 1, Appendix A, and in ESRS G1, paragraph 4. The removal of datapoint originally located in para 33(a) concerning average days it takes to pay an invoice, does not seem to be necessary for the reduction of burden. The undertaking would still need to collect this data to be able to meet the other requirements, in particular the calculation of the % of its payment aligned with its standard payment terms (in para 20(a)).			
Survey	ShareAction	NGO	United Kingdom	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We are concerned about the concurrent effect of various reliefs. We are also concerned about the unintended confusion caused by a rather confusing explanation of the relationship between impacts, risks and opportunities on one hand, and sustainability topics on the other.			
Survey	ShareAction	NGO	United Kingdom	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We disagree with the downgrading of the transparency on site/assets/activities screening from the level of datapoints in the E standards to an Application Requirement in ESRS 2.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ShareAction	NGO	United Kingdom	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We do not think that the streamlining of the E1-1 Transition Plan for Climate Change Mitigation added value. If anything, more rather than less details and clarifications are needed. The glossary could retain the definition of net zero targets and related criteria, as use and reporting of such targets is a common practice. ESRS E2, E3, E5: We welcome the changes made, including the clarification and minor additions to the datapoints in the metrics section. They provide for greater clarity and do not add further reporting burden.			
Survey	ShareAction	NGO	United Kingdom	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	ShareAction	NGO	United Kingdom	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	ShareAction	NGO	United Kingdom	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Given the current state of art in this area, it would be helpful to include more guidance on how to set metrics and how to utilise the other reporting frameworks and standards such as the TCFD. The standard should also clearly require the disclosure of sites in/near biodiversity sensitive areas, rather than limiting it to those determined to be connected to material impacts only.			
Survey	ShareAction	NGO	United Kingdom	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	ShareAction	NGO	United Kingdom	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We would recommend adding an explicit reference to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, that is the standards that lack any metrics. In S1, we have strong reservations about the newly suggested methodology for adequate wages outside of the EEA. It would lead to misleading disclosures and add burden for companies.			
Survey	ShareAction	NGO	United Kingdom	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	ShareAction	NGO	United Kingdom	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ShareAction	NGO	United Kingdom	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	ShareAction	NGO	United Kingdom	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We particularly welcome the streamlining and alignment of the structure of this standard with the remainder of the standards.			
Survey	ShareAction	NGO	United Kingdom	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	We acknowledge that the process has been simplified and flows better. As the fundamentals have not been amended, the revised process will, however, not lead to a substantially different conclusion on IRO-assessment. We believe the standards must ensure a reporting focused on the principal (most severe) impacts and the most significant risks and opportunities. To achieve this, a revised materiality threshold must be adopted (ESRS 1.28), requiring disclosures only on impacts with significant effects and of risks and opportunities of strategic importance to the business model of the preparer. Only entity-specific sub-topics to ESRS topics shall be included, not new topics. In addition, the materiality of information (ESRS 1, section 3.1) should only require information that is indispensable for the understanding of the entity's IROs and clearly necessary for users' decision-making. Therefore, the link to decision making (decision-usefulness) needs to be strengthened and the needs of primary user groups' should be better explained. The user group for impact materiality (ESRS 1-4b) remains overly broad and should be limited to those (potentially) having a financial or social engagement with the undertaking, i.e. to primary user groups. If the above-mentioned changes to the DMA threshold, the materiality of information and strengthened focus on user-groups is not achieved, it may lead to extensive and unfocused sustainability reporting, essentially obscuring the reporting for the primary user groups. The section on materiality of information should also clarify how the "shall requirements" work together with decision-usefulness and understandability and allow for assessment of DR's in the light of the entirety of information provided for a given IRO, emphasizing relevance and a faithful representation without cluttering the reporting. Finally, the requirements on entity-specific reporting – both the DMA-level and metric level (ESRS1-10) – needs to be limited to avoid a de-facto reintroduction of the removed DRs.			
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	The proposed rules are complicated to comprehend, quite abstract and thus potentially challenging to apply in practice. Furthermore, the calculations and assessments of gross/net will be overly complex or even impossible for many undertakings. We are specifically uncertain about how to assess the severity and likelihood of potential negative impacts, especially those where mitigating actions are ongoing. It is difficult to assess and report on an impact/situation before mitigation actions are taken, when the actions are implemented, crucial for the operation and part of business as usual. Preparers would essentially have to assess a hypothetical situation. The description of gross/net should be amended, making it clear that the outset of the materiality assessment of actual impacts should always be based on the business as established and as it is operating throughout its normal operating businesses (e.g. including environmental approvals/rights to produce, H&S measures and other procedures and controls in places). Similarly, potential impacts, risks and opportunities should be assessed taking preventive and remediating actions into consideration when such are established and the entity has the ability and intention to activate those if/when relevant (for instance an internal fire brigade or a well-established system to quickly deal with minor oil-spills). Where mitigation has successfully taken place there is no real risk and thus, nothing to report on. Against this backdrop, we suggest deleting the proposed detailed rules on when mitigation activities can and cannot be taken into account. The preparers should be able to use the most meaningful and relevant assessment methodology provided it is explained in the sustainability reporting. In this regard, we note that ISSB leaves it to the preparers' judgment as to whether and how to consider risk mitigation activities.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We partially agree. The provided flexibility is appreciated and important to provide relevant and easily accessible information to the primary user groups. We have identified the following measures to further enhance the flexibility and the relevance: Structure of the reporting: We suggest providing flexibility in the order of the E, S and G-sections (ESRS.1-105) as this would allow preparers to present the information more logically based on its business model and provide enhanced readability and accessible information for the primary users. This is particularly important when the social aspects are the most important to the reporting entity. We support the introduction of appendices (ESRS1-105+110), but suggest, further flexibility in location of appendices and extensive tables, e.g., allowing for a part 2 of the sustainability report located after the financial section (provided this is allowed under national legislation) as this provide clarity in the reporting. Incorporation by reference: We believe the requirements on "incorporation by reference" (ESRS1-9.3) should be less granular for ESRS 2, allowing for DR-references to the relevant (sub)section in the management review, e.g., "ESRS2-GOV1 is incorporated in section xxx of the management report". The practical solution on identifying sections with different levels of assurance should be left to the preparers and auditors. This would support better integration of, e.g. strategy, business model and the governance-information with the counterparts in the management report. Non-material information: We support the possibility to provide non-material information (ESRS.1-108) to meet the needs of specific stakeholders, when clearly labelled as non-material information. However, we believe the requirement for non-material information to provide a faithful representation (ESRS.1-108(b)) should be deleted as this goes beyond relevant criteria for such information, and that the requirement (108(a)) on non-obscuring is sufficient.			
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We Partially Disagree We acknowledge the simplifications achieved by removing requirements on GOV, SBM and IRO, and certain details relating to PAT from the topical standards, but have noticed that the majority of requirements are maintained – some merely combined under one DR. Furthermore, the standards still require somewhat "generic" / boilerplate information regarding policies and targets. Consequently, we believe the sustainability reports will only be slightly reduced and the efforts on preparation are not considered to be reduced. In our opinion, the reporting should focus on the actions and targets, i.e. what the entity is doing to address the IROs and how it tracks progress as these are the key interests of most users. Furthermore, we would like to highlight that extensive descriptions of policies are not generally considered to support the need for relevant and comparable information. To facilitate better and more focused reporting, we encourage EFRAG to use the term AT or ATM and to separate reporting on Policies from the more specific actions, metrics and targets, thereby providing a more overarching approach to policies. In addition, we suggest that it's clearly stated that materiality on information apply to all DR, including the description of policies. Although the amendments provide a better structure and simplification, we believe there is a need for further significant reductions and enhanced focus on key aspects in the sustainability report why we suggest reducing/focusing the IROs to those most significant, and amending the materiality of information with strong focus on the key aspect of each IRO. EFRAG should (like GRI) frame the objective for each DR, thereby ensuring it's a description of the purpose, and not a separate datapoint. Finally, we believe there are some overlaps between GDR-T (ESRS2-43) and the requirements on GDR-M, and BP / description of accounting principles.			
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We Partially Agree We support that all "may"-disclosures have been eliminated, and the new structure where all the "shall-disclosures" are included in the main body of the standards as well as the intention that ARs should not include any mandatory requirements. However, the AR's still provide a mix of mandatory requirements, examples and guidance. We suggest all ARs are reviewed and that any mandatory requirements moved to DR's, and examples and guidelines to the NMIG. Some datapoints have been merged to improve the readability and understanding of the requirements although still requesting the same information. We support this, but suggest that the objective of a disclosure requirement is clearly described to support a more principles-based approach and to ensure it is evident how it supports the fair presentation and fulfil the decision-usefulness of users. Overall, the language of the standards has improved, with some new terms being introduced. We suggest ensuring that all new terms are defined in the standard or explained in the Basis for Conclusion to reduce any interpretation challenges. The term "shall consider" should be clearly defined, both in relation to the difference to the term "shall disclose" and in relation to the need for documentation of the consideration, hence how can "consideration" be measured or assured. Furthermore, "is expected to" should be defined, including a clarification that the term does not impose additional documentation requirements. To reduce the transition costs, we strongly encourage EFRAG to publish a new Excel sheet of datapoints as soon as possible, with a correlation table linking the previous and updated datapoints. We believe further clarification is needed on how the value chain cap and the scope of VSME (ESRS2-63) affect the requirements for entity-specific disclosures. Furthermore, we suggest a systematic review of ESRS1-5.1+5.2 as outlined in part 3 of this questionnaire.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We agree with EFRAG that the NMIG should not be part of the delegated act. We believe a NMIG-document can provide valuable and helpful information and implementation support, but it needs to be re-written to include other guidance issued by EFRAG (FAQ's, IG1-3). At the same time, the old versions of these documents (FAQ's+IG's) need to be removed as they should be incorporated into the revised ESRS and/or revised illustrative guidance document if still relevant. The NMIG in the current form is not ready for publication -The current version of the NMIG is a collection of the left-overs of set 1 as indicated in the introduction to the question. -The NMIG needs to be stripped from "EFRAG SRB intentions" as these should be part of the "Basis for conclusions" -To the extend the NMIG tries to explain the intention of a definition, clarification of the definition itself may be more relevant. -The illustrative guidance should include more diverse examples (and always minimum 2), to the extent possible based on best practice sustainability statements, illustrating – where relevant – more than one approach to ensure that the intention is conveyed, but without limiting options for the actual reporting. This will strengthen the "non-binding nature of the document". We encourage EFRAG to make use of for instance 10 "standard-companies" representing different industries and/or complexities in the analysis to ensure a structured variation in the examples and to better tease out the diversity in reporting challenges. This will also alleviate part of the pressure on sector guidance and allow for ongoing additions to the examples, which should be thought into the design. EFRAG should work on the NMIG after handing in the revised ESRS with an aim of publication alongside the adoption of the revised standards by the EU-Commission.			
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	We disagree as we do not find the overall burdens reliefs to be sufficient. We agree with the inclusion of the principles of undue costs and efforts, including the reliefs beyond IFRS S1 and S2. While we recognize the efforts made to reduce burden, we find that further burden reductions are possible while maintaining transparency in support of the EU green Deal. To ensure that the envisaged burden reductions are realized in practice, we would like to highlight our fundamental concerns iterated in Q11, 12 and 25 – including the application of materiality and the concerns regarding the scope of entity-specific information - as they also impact the elements highlighted here. We support the introduction of the "undue cost or effort" relief, as it will set a limit to the spending to prepare sustainability statements. The introduction of the "undue cost or effort" relief is therefore extremely relevant and necessary to achieve the needed simplifications. It is therefore important that the principle is applicable and consistent throughout the standards, also covering E1-6 (as also mentioned in Q18).We believe the "use of estimates" constitutes an important element (to be seen on equal footing as a source of reliable data) and should also be included by the undue cost and effort principle. We note that there seems to be some inconsistencies – or at least different nuances – due to the term being used slightly different in different parts of the standards. Finally, we would like to note that while we agree with the statement in ESRS1-89 that the assessment can change over time – and often will – there are instances where data is unlikely to become available in a foreseeable future. For comments regarding ESRS1-91, please refer to Q18.			
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We understand that this question addresses section 7.4 and ESRS1-91 in particular We support the relief proposed in ESRS1-91 and see no need for a time limit. Estimates shall meet the qualitative criteria of faithful representation, and QC9 clearly states that information can be accurate without being perfectly precise in all respects. For this reason, we suggest extending the relief to cover GHG emissions as well. The E1-6 exclusion is not justified and should be deleted. The incorporation of this relief is clearly positive, but it should be acknowledged that some data may be permanently unavailable, especially given the expected significantly reduced CSRD scope due to the omnibus, and that this is beyond the company's control. Therefore, there should not be a time limit to the relief. Furthermore, we believe this evaluation is not needed yearly, depending on the specific metrics and the nature/reasoning for data either not being available or for the use of estimates. We believe the principle in ESRS1-89 grasps this as it indicates that the assessment can change over time as circumstances change and hence the formulation of the last sentence in ESRS1-91 needs to be adjusted accordingly. Finally, the standards clearly state that they do not impose behavioral - or conduct requirements, only disclosure requirements. Hence, there is no requirement to cease cooperation if the counterparty cannot or will not provide data. The relief for missing data should be applied consistently regardless of the disclosure type.			
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	The Danish business community is deeply concerned about the requirement to disclose anticipated financial effects. Such information is highly dependent on estimates and a large variety of possible developments and outcome, which cannot be reliably projected and for this reason subject to significant uncertainty. Anticipated financial effects would therefore not provide reliable insights for investors or other users, due to their potential variability. Disclosing premature information on matters that are not yet actively incorporated in the entity's financial planning may involve a measurement uncertainty and thus lead to unprecise or even unreliable information that may not only mislead stakeholders but also expose companies to reputational and legal risks associated with misinterpretation. Furthermore, the Market Abuse Regulation (MAR) would require that the issuer continuously and upon any change to the disclosed financial effects communicates these to the market, leading to excessive and disproportionate burdens. We appeal for a thorough investigation and debate about what the requirement on anticipated financial effects in reality entails, involving not only the Commission but also ESMA, EBA and other relevant bodies. If the requirement to disclose anticipated financial effects remains, then Option 2 (qualitative information) is highly recommended.			
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	We disagree with most of the detailed disclosures on anticipated financial effects in the E1 standard. We generally believe, subject to our answer in Q19, that option 2 should also apply for climate-related anticipated financial risks and opportunities. Furthermore, we disagree with a significant amount of the detailed requirements and refer to our detailed answer on -ESRS E1 paragraph 40a, c and d; -ESRS E1 paragraph 40a, b, c, d and f; -ESRS E1 paragraph 42			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We believe that undertakings should be able to comply with both ESRS and ISSB global standards without major obstacles, if they wish to. Users should be able to compare ESRS Sustainability Statements with ISSB sustainability statements without understanding difficult technical differences. We therefore support aligning basic concepts and overlapping disclosure requirements. It is, however, important to take into consideration that ESRS applies to both listed and unlisted undertakings, where ISSB generally shows consideration to listed entities. We find that ESRS should provide minimum requirements to ensure it's appropriate and proportionate for the smallest entities within CSRD. In addition, the ESRS requirements should be within (a subset) of the IFRS-S requirements, and we suggest EFRAG provides guidance on additional (voluntary) information to be provided to gain full interoperability with ISSB standards. For this reason, we support option 2 for anticipated financial effects. The consolidation-requirements in ESRS differ from those in IFRS that may be difficult for users to understand. Ideally, such general concepts should be aligned. Even though we find it important to ensure an alignment between ESRS and ISSB Standards on how to understand fair presentation and "undue cost or effort", we believe the primary alignment of the ESRS-standards should be with other EU-legislation (which applies to all companies in scope) and secondary with ISSB. The EU-alignment is especially important for the topical standards and governance sections which is significantly governed within EU. EFRAG should provide guidance on the alignment when language in the standards is not identical. The "may"-reference in paragraph 11 referring to the IFRS industry-based guidance and GRI sector standards should be moved from the standards to the "basis for conclusions" as this is a voluntary "may". Keeping the reference in the standards will de facto endorse these standards through the back door.			
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	While we support the total reduction of disclosures by 68%, we see a need to stress that there is no 1:1 correlation between these numbers and the actual burden reductions for reporting entities. Based on our analysis and discussions with several of the largest Danish entities, their analysis and initial assessment of applying the amended standards, it is our conclusion that the draft standards will only result in very limited administrative burden reductions for reporting entities – only around 5-10 pct. The reduction in data points must also materialize in actual burden reductions, to ensure the Omnibus ambitions are met. We find that further burden reduction is possible while maintaining transparency in support of the EU green Deal and without impairing the needed data infrastructure to requirements for the financial sector in SFDR, CRR, Pillar 3 etc. We suggest considering further reduction in the mandatory datapoints for instance by removing granularity, in particular in S1. Furthermore, we suggest adding additional guidance to the assessment of materiality of information described in ESRS 1, section 3.1 or 3.6, making it easier for the preparer to deem information non-material taking the characteristics of the IRO into consideration, e.g. considering whether it is actual or potential, or material due to scale or scope being most important. This would be particularly relevant for the IROs that "only just" met the threshold set in accordance with ESRS 1, para. 28, and would – besides reducing the reporting burden – provide a more focused and decision-useful report. This also links to our comments relating to policies in Q14 that illustrate this point.			
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	22.S1	Comments on deleted datapoints in ESRS S1	I disagree	While we support the total reduction of disclosures by 68%, we see a need to stress that there is no 1:1 correlation between these numbers and the actual burden reductions for reporting entities. Based on our analysis and discussions with several of the largest Danish entities, their analysis and initial assessment of applying the amended standards, it is our conclusion that the draft standards will only result in very limited administrative burden reductions for reporting entities – only around 5-10 pct. The reduction in data points must also materialize in actual burden reductions, to ensure the Omnibus ambitions are met. We find that further burden reduction is possible while maintaining transparency in support of the EU green Deal and without impairing the needed data infrastructure to requirements for the financial sector in SFDR, CRR, Pillar 3 etc. We suggest considering further reduction in the mandatory datapoints for instance by removing granularity, in particular in S1.			
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We are of the opinion that the amended ESRSs should not introduce new "shall"-requirements and support the deletion of the "may" disclosures. We cannot support the six datapoints added as they would impose significant additional reporting burden in particular on E3 Water requiring a full water-balance calculation independently of the structure of the group and reason for water being material. Although, E4 Ecosystems and Biodiversity only require information on transition plans when such a plan is in place, we believe that it is too early to add such requirement to the standard as global frameworks and models to measure biodiversity and ecosystems are still being developed. Therefore, most entities would be able to make a reliable estimate of the baseline whereby defining a transition plan would be impossible. Lastly, we note, that datapoints added to the governance standard add complexity and might impose risk of self-incrimination or other legal risk. As described in our answer to question 22, we suggest adding additional guidance to the assessment of materiality of information described in ESRS 1, section 3.1 or 3.6, making it easier for the preparer to deem information non-material taking the characteristics of the IRO into consideration, e.g. considering whether it is actual or potential, or material due on scale or scope being most important. We believe, it's important to facilitate a better use of materiality on information; and in particular with the addition of new "shall" requirements its important the preparers have the ability to deem these (as well as other) information non-material when that is the case.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	Firstly, we want to highlight, that the imposed granularity in ESRS E5 in relation to detailed datapoints on inflow and outflow goes way beyond the elements mentioned in the question. We are of the opinion that the amended ESRSs should not introduce new "shall"-requirements and cannot support the datapoints added as they would impose significant additional reporting burden in particular on granularity of key resources/products in the inflow and outflow information required in ESRS E5. The datapoints required would be almost impossible to gather as the inflow/outflow does not only take place for each individual resource/products, but are complex components, e.g. when a resource inflow is embedded in semi-finished goods or a mix of several products. In relation to the two datapoints suggested to be added to E5-4 and E5-5, please note our comments provided in part 3 to this questionnaire on consistency between the definitions and terminology in ESRS E5 and the EU waste regulation. As described in our answer to question 22, we suggest adding additional guidance to the assessment of materiality of information described in ESRS 1, section 3.1 or 3.6, making it easier for the preparer to deem information non-material taking the characteristics of the IRO into consideration, e.g. considering whether it is actual or potential, or material due on scale or scope being most important. We believe, it's important to facilitate a better use of materiality on information; and in particular with the addition of new "shall" requirements its important the preparers have the ability to deem these (as well as other) information non-material when that is the case.			
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	25.	Emphasis on ESRS being a “fair presentation” reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We Partially Agree. We support the purpose of introducing the fair presentation concept, which should make it easier to leave out information that is not material and/or unreliable. The purpose, however, is not directly reflected in the incorporated rules nor clearly defined. Overall, in its current version, the concept seems to create an additional burden rather than simplification. The description and definition of fair presentation need to be amended to define a fair presentation of the sustainability report in its entirety for the topics covered by the CSRD, rather than a focus on a fair presentation of each individual IRO and its related disclosure requirements. This would require changes to ESRS 1, paragraph 16 and 18, and consequential changes to the definition of faithful representation in Appendix B. It must be made absolutely clear that fair presentation is used as an overall assessment to see if additional information is needed and to more easily leave out information which is found not-material and/or unreliable by the reporting undertaking in the assessment of materiality of information as defined in ESRS 1, section 3.1. We do not find this sufficiently clear in the current description and therefore recommend that EFRAG states this more clearly in the standards. We find that the current draft standards simply impose requirements on companies to ensure that their sustainability reporting meets a range of qualitative criteria. Thus, the interpretation of the "fair presentation" concept and the impact on the assurance process is unclear. The concept has to be elaborated preferably with reference to a revised materiality threshold focusing on strategically important matters ensuring that that sustainability report as a whole fairly present decision-useful information on the material sustainability matters to the users of the sustainability report. Please see our response to question 11 regarding user-groups.			
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 (“when only setting intensity targets”), to disclose also the associated absolute values” (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking’s progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We agree that financial institutions should be exempted from disclosing absolute GHG reduction targets. The reason is that financial institutions do not emit GHG to any significant extent. Therefore, financial institutions' targets aim at reducing emissions pr. invested/financed unit. Especially for insurers the estimation of absolute climate reduction targets would require extensive assumptions and be very complex, and provide a result with very limited value for users. Exempting banks from disclosing GHG emission reduction targets in absolute terms is needed. Over 90% of banks' GHG emissions typically stem from financing activities (Scope 3, Category 15), which means that their GHG emissions depend on companies and households that banks finance. Therefore, too many hypotheses are needed to calculate targets in absolute value, and the results are neither reliable nor comparable, because they ultimately depend on clients. Furthermore, the figures would reflect not only double counting but multiple counting of the same impacts and have no information value. For this reason, we strongly believe that banks should be exempted from disclosing GHG emission reduction targets in absolute terms. Intensity targets alone should be sufficient.			
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking’s employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	We believe that the requirement to disaggregate the metrics for characteristics of the undertaking's employees as now suggested to be for the top 10 largest countries with more than 50 employees is too detailed and removes the focus on material and substantial countries. Such a requirement would increase the reporting requirements compared with ESRS Set-1 and thereby contradict the purpose of the Omnibus. Furthermore, it will lead to additional reporting on more details than necessary for a fair presentation, undermining overall relevance. We suggest that the threshold of 10% is reintroduced or, alternatively, that the minimum number of employees is increased to match the threshold of the entities required to report under the CSRD. We also note that fair presentation would normally drive reporting at more aggregated levels, for instance regional, to provide more relevant information for the primary user groups and better align with the management approach that should also prevail in S1.			
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	We Partially Agree. Adequate wages is mainly a political subject. Therefore, disclosures on wages and wage-setting processes always needs to be seen in a national framework and in context of the national social dialogue. This is vital to ensure that local realities related to the cost of living and economic prospects are fully integrated, therefore the guidance and principles of ILO wage setting processes and principles on estimating a living wage are crucial. However, we believe that EFRAG and/or the EU-Commission needs to find practical solutions involving for instance databases that the reporting undertakings can rely on to promote comparability and consistency. We note that the OECD in 2023 published a policy insight "Living wages in practice" and would encourage EFRAG to invite OECD to provide their advice for a reporting basis that can lead to reliable and comparable principles.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	We would like to stress the importance and need for the data infrastructure being maintained and we find it positive that suggested changes etc. is communicated clearly to the EU-Commission to ensure consistency when the SFDR, CRR and other relevant regulations is to be updated to ensure the ongoing consistency in the infrastructure. To ensure the infrastructure is maintained in the future, we suggest incorporating a dynamic link between SFDR, CRR, Pillar 3 etc. and ESRS. This is especially relevant with the upcoming review of SFDR.			
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We Partially Disagree. We disagree with the proposal especially due to the maturity of measurement principles and the fact that these are still developing and expected to change and be further refined in the future. Instead, we suggest that EFRAG issue non-mandatory illustrative guidance which can be updated more frequently, adapting future developments in this area.			
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	We Partially Agree. Any disclosure on remuneration metrics on possible pay disparities should be fully aligned with the EU Pay Transparency Directive for the part of the company operating in EU. Therefore, companies should be able to use directly the information country by country they have supplied according to the directive as required in the national legislation implementing the directive. Furthermore, it is not feasible to try to spread an EU Directive globally and a disclosure of global unadjusted pay differences does not seem meaningful due to national differences across borders as wages and levels need to be seen in a national framework and in context of the national social dialogue. Having said this, we do not believe the number provides meaningful nor relevant information – and hence conflicts with the fundamental qualitative characteristics like relevance. Furthermore, as the number is already reported under the EU Directive to the public authorities, the reporting requirement essentially duplicates other reporting and should be deleted. If reporting on gender pay gap is retained, we suggest to revert to a more meaningful disclosure, like the adjusted pay gap.			
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	We agree with the amendments suggested, and that setting up a specific metric, uniformly applicable without undue costs and efforts (including the challenges for identifying the relevant datapoints in the global ERP-systems) was not proportionate. We agree with the PAT-approach that ensures that the topic – if material – is addressed and that the reporting undertaking can set the relevant targets			
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	As indicated in the above responses, starting in Q11, we believe ESRS 1 - and in particular the DMA process - while revised have not amended the fundamentals. We refer to the detailed comments in the other questions. Furthermore, we would like to highlight the importance of the need to delimit value chain reporting for financial institutions as well as resolving the issues for Investment Holding Companies. If no solution is provided at level 1, there is as a minimum a need for a general provision in ESRS 1 that allows financial institutions to adapt their sustainability reporting, including value chain reporting, to the specificities of financial institutions and that the issues around business model is addressed for the Investment Holding Companies to ensure that the qualitative criteria of relevance and reliability are satisfied for these types of entities.			
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	On the Acronyms and glossary of term "Incident": Partially agree The definition seems to be too narrow, as it only relates on the legal proceeding and complaints. The use of the term would generally be broader than this and include things that has happened "un planned" or even as accidents. This also seems to be thinking behind the use of the term in, e.g., ESRS E2 paragraph 16(a). We suggest broadening the definition.			
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Structure of ESRS 1: We have noted that ESRS 1, section 2, describes fair presentation and qualitative characteristics of information, while the materiality of (sub-section 3.1), determining the information to be reported (sub-section 3.6) and level of aggregation/dis-aggregation (sub-section 3.7) is included in section 3 on the double materiality. We suggest moving sub-sections 3.1, 3.6 and 3.7 to section 2 for clarity as all of these sections are inter-related and describe the requirements for the presentation of the sustainability report and elements to be included. Reference to EU regulations: We have noted that amended ESRS E2, AR2+3, refers to (EU) 2024/1244 (Industrial Emissions Portal Regulation), whereas the current ESRS 2 references (EC) No 166/2006. Regulation (EU) 2024/1244 apply from 1 January 2028 at which date it repeals (EC) No 166/2006. This possibly leaves entities with an amended E2-standard applicable from 1 January 2027 which references an EU-regulation applicable on a future date. We recommend that EFRAG considers how the standards respect current and future regulations, including any possible early adoption, and considers how this is effectively incorporated into the standards. EFRAG should include general guidance on this for entities to be able to plan for any future changes in the EU regulation. Furthermore, we observed that the draft amendments remove references to existing EU legislation and frameworks that previously provided some context for preparers. While we understand that the intention may be to simplify the standards, this poses a need for more guidance to alignment with existing EU frameworks. Greater consistency in definitions and scope - particularly in relation to current and upcoming EU initiatives - would support more coherent, comparable, and decision-useful reporting, while also helping to reduce the compliance burden for companies navigating multiple regulatory obligations. We suggest keeping reference in the ARs or in the NMIG.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	35.ESRS1_5.1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Partially disagree Sub-chapter 5.1 attempts in short to explain concepts from financial reporting on consolidation, including exemptions, and which assets, liabilities, income and expenses are usually considered as part of own operations. These paragraphs are neither accurate nor sufficient as accounting legislation on consolidation is complex. We encourage EFRAG to ensure consistency with legal provisions for financial reporting and provide more elaborated guidance on how to present consolidated sustainability statements within the remit of level 1 regulation. In addition, we encourage EFRAG to consider the description of consolidation in light of the issues for Investment Holding Companies, which – if not solved in Level 1 regulation – should be handled within ESRS.	ESRS1	5.1 Reporting undertaking and own operations	
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	35.ESRS1_5.2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Partially disagree Sub-chapter 5.2 needs to be reworked in its entirety, by removing things covered elsewhere, e.g. undue cost or effort, use of estimates, examples of data sources, and separating paragraphs clearly being AR, e.g. ESRS 1 paragraph 63- 65.	ESRS1	5.2 Inclusion of value chain information	
Survey	Danish National Funding Mechanism	(National) standard setter	Denmark	35.ESRS1_7.3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Partially agree Paragraphs are widespread on sources of information expected used, e.g. ESRS 1, paragraph-27, 47, and 62, and various paragraphs mentioning the undue cost or effort relief, e.g. ESRS 1, paragraph-47, 60, and 87-89. A gathering of these paragraphs in sub-chapter 7.3 may avoid different interpretations as to what applies when, e.g. whether data available in-house shall be used in ESRS 1, paragraph 65.	ESRS1	7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	
Survey	EFFAS e.V.	User Association	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	EFFAS welcomes the simplification of the DMA and recognizes the value of a top-down, outcome-oriented approach. At the same time, the framework should preserve a degree of flexibility, allowing companies to frame and present their assessments in ways that reflect their specific business model, provided that disclosures remain comparable, reliable and focused on matters material to business performance and long-term value creation. The ESRS double materiality model is unique in combining both perspectives: the financial materiality dimension, aligned with ISSB standards, and the impact materiality dimension, consistent with GRI. This dual architecture not only strengthens the relevance of European reporting but also offers a bridge for greater global convergence, ensuring that sustainability information is useful for both corporate accountability and capital markets. For investors, the ultimate value of DMA reporting lies in its ability to improve risk pricing, enhance the efficiency of capital allocation and reinforce investor protection. To deliver on this objective, companies should document in their DMA process the coverage of value chain information per material topics and explain transparently reasons for limited scope as well as the reasons for critical sector topics being considered as immaterial. On the other hand, quantitative datapoints must remain mandatory wherever available. DMA disclosures should become increasingly aligned with broader international standards (such as ISSB) as well as internal European regulations (including SFDR and the wider sustainable finance framework), and digitalisation should be leveraged to strengthen comparability while lowering compliance costs. In this way, DMA reporting can build confidence among both Amended ESRS Exposure Drafts – July 2025 Public Consultation institutional and retail investors—an explicit goal of the EU's Survey Savings and Investment Union.			
Survey	EFFAS e.V.	User Association	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	EFFAS supports explicit disclosure of both gross and net impacts, as the two perspectives provide complementary insights that are essential for investors and other stakeholders. Gross data establish a consistent baseline for comparability and reveal the magnitude of risks and externalities. Net data, in turn, captures the effectiveness of management actions and progress in mitigating those risks or creating positive outcomes. Both dimensions should be disclosed in quantitative and digitalised form, aligned with SFDR PAI indicators, and accompanied by clear information on scope boundaries, coverage and underlying uncertainties. This dual disclosure will enable investors to distinguish between structural exposures and managerial performance, thereby strengthening the decision-usefulness, comparability and reliability of ESRS reporting.			
Survey	EFFAS e.V.	User Association	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	EFFAS agrees in structuring the sustainability statement in four parts, as it should facilitate the reporting and reading of the summary in an orderly manner. Regarding point 107, it should be considered whether the requirements, including additional disclosures related to specific jurisdictions, legislation, and frameworks, might be useful for stakeholders. We understand the need for information to comply with materiality assessment, yet the guidance should be made more concrete to clarify which "specific" users it is directed toward.			
Survey	EFFAS e.V.	User Association	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The elimination of the requirement to disclose whether an undertaking plans to implement a Policy, Action or Target (PAT) for material topics, as well as the related timeline, significantly weakens the usefulness of disclosures for investors. From an investor perspective, it is not sufficient to know that certain material impacts, risks or opportunities (IROs) are not currently covered by a PAT. What matters is the forward-looking trajectory: whether management acknowledges gaps and intends to close them, and over what timeframe. Without this information, investors cannot distinguish between: - material topics that are genuinely deprioritised by management, and - material topics for which policies or actions are in development but not yet disclosed. This lack of clarity reduces transparency on the company's strategic intent, governance priorities, and capacity to manage material sustainability risks. It also impairs comparability across peers, since some companies may actively work toward covering all material topics with PATs, while others may not plan to address them at all.			
Survey	EFFAS e.V.	User Association	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EFFAS e.V.	User Association	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The proposed introduction of a general relief for cases of "undue cost or effort" may appear sensible from a practical standpoint. Yet from an investor's point of view, there is a real danger that companies could rely too heavily on this clause—particularly in relation to value-chain metrics—as a way to ease their reporting obligations. To keep this risk in check, the use of such relief should only be allowed under strict conditions. Companies should be required to explain why the exemption is justified, specify which parts of the information were excluded, and highlight any resulting material gaps. Without these safeguards, the quality, comparability, and usability of the reported data—both at the individual company level and for portfolio aggregation—would be undermined.			
Survey	EFFAS e.V.	User Association	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	Although we recognise the practical need for a relief mechanism that allows partial reporting when data quality is insufficient, the absence of a clear time horizon is problematic. Companies should not be given an open-ended option to rely on limited disclosures, as this removes any real incentive to expand the scope and enhance the robustness of their reporting over time. An indefinite exemption would effectively stall the natural progression—or "learning effect"—that sustainability reporting frameworks are meant to foster. To avoid this, the use of such relief must be bound by strict conditions. Firms should provide a transparent explanation of why the relief is applied, outline the decision-making criteria used, and commit to time-specific plans for expanding data coverage. Only with these safeguards in place can reporting retain credibility and comparability			
Survey	EFFAS e.V.	User Association	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	It is essential to adopt Option 1 for several reasons. First, Option 1 preserves the requirement to provide both qualitative and quantitative information, while offering pragmatic relief when reliable measurement is not possible or uncertainty is too high. This mirrors the IFRS relief in IFRS S1/S2, ensuring interoperability between ESRS and global standards. By contrast, Option 2 would create a fundamental disconnect with IFRS and undermine comparability for multinational investors. Second, conditional quantitative disclosures are necessary for the objectives of the SFDR and the European Commission's sustainable finance agenda. These frameworks seek to influence capital allocation by giving investors decision-useful data on the financial effects of sustainability matters. Under Option 2, companies could omit quantitative information entirely, leaving investors without a basis to assess exposure and resilience. This would send the wrong signal: that the EU is retreating from transparency rather than reinforcing it. It is hard to accept that a company can label a sustainability topic as material while providing no quantitative estimates of its financial effects. Material matters must meaningfully affect performance, position, or prospects, so management should have at least an approximate sense of magnitude or direction. Stopping at qualitative descriptions would undermine the credibility of materiality assessments, leave investors without key information, and create an inconsistency between identifying a topic as material and providing no measurable implications. Quantitative disclosures are essential to uphold both the integrity of double materiality and the usefulness of information for decision-making. Adopting Option 2 would risk reducing sustainability reporting to narrative alone, depriving investors of the hard data needed for portfolio construction, risk management, and stewardship. It would weaken the European reporting regime and reduce its impact on directing capital toward sustainable activities. For these reasons, Option 1 strikes the right balance between feasibility, global alignment, and investor usefulness.			
Survey	EFFAS e.V.	User Association	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	The current reporting requirements proposal is more understandable. The granularity of the former requirements were not providing sufficient added value for analytical work.			
Survey	EFFAS e.V.	User Association	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	EFFAS considers it a major step in the right direction to align ESRS-E1 and E2 with IFRS S1 and S2 to enhance interoperability while introducing simplified reporting. For users, requiring similar reporting information to IFRS S1-S2 implies more comprehensive and comparable information. We welcome particularly the alignment using the same language as frequently as possible. The double materiality approach should not be questioned.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EFFAS e.V.	User Association	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	EFFAS e.V.	User Association	Germany	22.S1	Comments on deleted datapoints in ESRS S1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	EFFAS considers quantitative indicators on wages, pay gaps and working conditions indispensable for risk analysis and integration into valuation models. Alignment with SFDR PAI indicators and the Pay Transparency Directive is critical to ensure consistency and comparability across jurisdictions. To enhance decision-usefulness, EFFAS recommends proportionate disaggregation of workforce data, for instance, focusing on the ten largest countries where companies employ more than 50 staff.			
Survey	EFFAS e.V.	User Association	Germany	22.S2	Comments on deleted datapoints in ESRS S2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	EFFAS calls for explicit coverage of ESG-linked remuneration for senior management under ESRS 2 Governance, extending beyond board members to ensure full alignment of incentives with sustainability objectives and in coherence with the governance duties established under the CSDDD. Finally, the adoption of the VSME standard for SMEs in the supply chain, supported by digital data collection, is essential to safeguard proportionality while maintaining interoperability and data reliability.			
Survey	EFFAS e.V.	User Association	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	To safeguard proportionality along the value chain, EFFAS recommends the introduction of a reporting cap, with the VSME standard serving as the reference framework for SMEs. At the same time, a set of minimum core metrics, such as accidents and supplier audits, should be preserved and fully integrated within ESAP, ensuring both reliability and accessibility for investors and stakeholders.			
Survey	EFFAS e.V.	User Association	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	EFFAS e.V.	User Association	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	EFFAS recognizes the importance of targeted reliefs to safeguard proportionality, but strongly supports Option 1, which combines quantitative and qualitative disclosures with the possibility of conditional omissions. This embedding will secure the convergence and harmonizing of different sustainability regulations.			
Survey	EFFAS e.V.	User Association	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	EFFAS e.V.	User Association	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		EFFAS regrets the reduced references to the EU taxonomy, particularly outside E1. Users need alignment between sustainability and financial reporting, and omitting taxonomy links (e.g., Capex, turnover) weakens evaluation of transition plans. EFFAS warns that SMEs may face disproportionate burdens if ESRS lack proportionality. The VSME standard should be the baseline for supply chain disclosures, supported by a clear value chain cap. This aligns with the CSDDD's principle of proportionality. At the same time, investors need a reliable minimum dataset to assess risks. ESRS disclosures should therefore align with SFDR PAI indicators and VSME datapoints, focusing on core metrics such as GHG emissions, energy, waste, pay gap, and accidents. This ensures reporting remains proportionate yet decision-useful, strengthening investor confidence and EU sustainable finance. EFFAS also urges that S4 extends the coverage of client satisfaction and fair sales practices. The amendments risk omitting a clear understanding of client engagement and preclude a better financial forecasting. EFFAS suggests providing guidance on value chain boundaries for financial institutions. Deferring this to Level 1 risks leaving banks, insurers, and asset managers with continued uncertainty over "own operations" versus "value chain." The sector-agnostic approach overlooks key differences: asset managers act on client instructions, while banks and insurers take risks on their balance sheets. Without clarity, disclosures will remain inconsistent and non-comparable, reducing their usefulness for investors and undermining capital allocation. Finally, granting financial institutions optional downstream reporting would create a double standard. Non-financial companies must report comprehensively, while financial institutions would face lighter requirements. Such asymmetry compromises comparability weakens the ESRS framework and risks undermining its integrity.			

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Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	It's important to remember that "simplification does not necessarily mean freedom and flexibility" for undertakings. Simplification should not result in a multiplication of choices for undertakings, because this impacts the comparability between undertakings for investors. Moreover, this does not facilitate discussions with auditors who still lack clear guidelines on the application requirement. The simplification exercise should not only focus on the production of reporting, but should also aim to remove outputs that are not useful to the undertaking's sustainability report. From an investor's perspective, we believe that a top-down approach to financial materiality is more significant for investor to ensure data comparability. For impact materiality, we believe that a bottom-up approach is more appropriate, as external stakeholders (e.g.: civil society) are best suited to identify real impacts.			
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	As investors, we have faced a lack of data from undertakings that, having implemented corrective measures, consider the impact is not material for them. The introduction of this guideline should therefore be accompanied by further clarification — in particular, distinguishing between raw data and the information investors are confronted with in terms of regulatory requirements, as well as any remedial measures to be implemented, in order to derive the net impact. AFG considers the "gross approach" to be preferable, as the "net approach" could lead to reduced transparency. Less ambitious entities may disclose minimal information and limit themselves to fulfilling only the minimum requirements. As a general principle, priority should be given to the assessment and reporting before remediation actions (i.e. prioritizing gross over net). This is particularly important for investors, as it allows them to perform their own assessment of both the effectiveness of the remediation actions implemented by reporting undertakings and the effective reduction of adverse or potential adverse impact. We believe that Appendix C should be removed and that the definition of the "gross approach" should be clearly defined and allow for comparability between undertakings' reporting. It is important for investors not to convert this into a potential financial impact, but rather to report the impact itself rather than the adverse impact (i.e gross value). Indeed, for financial impact, asset managers already have their own risk models to address it. It is all the more imperative to thoroughly understand where financial risks are concentrated and what offers the greatest long-term sustainability for stakeholders			
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	AFG supports the work carried out by the ANC on simplifying the ESRS in order to meet the European Commission's request to simplify, enhance the clarity, and improve the interconnection of the ESRS. Accordingly, the ANC initially proposed a reorganization of the structure to better reflect the process followed by companies in conducting the DMA. This was followed by a modification of the minimum level of analysis, prioritizing the DMA at the sub-topic level, and, if necessary, at the level of individual IROs. The ANC also worked on proposals to strengthen the principle of materiality and improve the alignment between ESRS 1 and 2 and the thematic ESRS. We support the introduction of an executive summary to enhance stakeholders' understanding and engagement. However, in line with the goal of simplification, this executive summary should not create additional reporting requirements for preparers. The key point that EFRAG must maintain is the removal of duplicate indicators (which we welcome) as well as simplification supported by guidelines to enable smoother discussions with auditors. Furthermore, we support the proposal from ANC to introduce a presentation rule requiring undertakings to directly reference the disclosure requirement (DR) numbers within their sustainability statement (e.g., in section headings or paragraph titles), without the need for a separate mapping table. This "visual tagging" approach is already used by many companies and facilitates comparability for users. Suggested wording: BP1 - §6 [new]: The undertaking shall indicate the disclosure requirement number in section headings or paragraph titles presenting the related information (e.g., "S1-1_Policies related to own workforce").			
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	This is not a matter specific for investors. However, it is important to us that some indicators are maintained. AFG supports the ANC's proposal regarding the simplification of ESRS indicators. As ANC we support the removal of the topic requirement from ESRS 2, as they create redundancies in sustainability statements in most cases.			
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We welcome the efforts made to simplify the indicators. However, we would like to draw your attention to two key points: - It is essential that certain indicators have more precise definitions to ensure greater clarity. There is a strong need to clarify and explicitly state that all "may disclose" indicators, which have been reorganized into AR or integrated into the NMIG document, are optional elements intended to provide clarification for mandatory indicators, and do not in any way constitute reporting obligations. This clarification is particularly important in discussions with auditors, who in the absence of specific guidelines to date, have interpreted these elements according on their own understanding, leading to differing interpretation of certain indicators between auditors and investors. - It should be noted that if an undertaking wishes to publish additional information, it is very much welcomed by investors, as it provides valuable input for our analyses and investment decisions. In particular, clearer guidance is needed to ensure better readability and smoother collaboration between auditors and preparers.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	AFG welcomes the simplification proposals and the creation of the Non-Mandatory Illustrative Guidance (NMIG). However, we wish to draw your attention to the following points: - The risk of overinterpretation that these NMIG may entail, whether by certain stakeholders or by auditors. - The risk that these optional standards may become, or revert to, mandatory requirements. The creation of this "category" of standards runs counter to the simplification objective. The EFRAG should take a more prescriptive approach to methodology to enhance comparability, rather than relying on optional guidance. Moreover, there is a lack of clarity regarding the practicality of these elements. AFG requests clarification on the intended final use of this guidance, its legal status, and a clear statement that these are non-mandatory standards, whose sole purpose is to clarify mandatory DP requirements, and that the Non-Mandatory Illustrative Guidance is not intended to become mandatory elements for preparers of sustainability reports.			
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	AFG recalls the importance of coordination between sustainable finance regulations, both as investors and as users and preparers of CSRD sustainability reports. Particularly between the SFDR Regulation and the CSRD Directive. As a reminder, under SFDR reporting obligations, and in particular within the framework of the PAIs, investors have a strong need for data provided by companies across all E, S, and G topics. If the ESRS are simplified and enable more companies (large, medium, and small) to publish information, this would further reduce reliance on data providers, who often use estimated data and methodologies that are not transparent. This dependency is particularly high with data providers, most of which are still non-European. We request a precise definition of the notion of "undue cost or effort" to ensure that it may not go too far at the expense of meaningfulness and comparability information (for example: for climate disclosures, do not allow to use the relief except for scope 3 GHG emissions. Or as for relief for lack of data quality, require undertakings to disclose whether and how the undertaking will try to collect the data in future period). Finally, we consider it essential to establish a deadline for the use of proxies. If companies are allowed to use proxies following this ESRS review. It is necessary and crucial that they be given a "cut-off date" for the use of estimated data, in order to encourage them to obtain raw data by implementing the necessary actions. This would allow both financial actors and data providers to have homogeneous and transparent data for end use. As investors, we believe that the perimeter of the sustainability report should be aligned with the financial reporting perimeter (i.e. financial consolidation). AFG support the wording proposal from ANC about this subject.			
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	AFG understands the rationale for simplification but is against this proposal. There is a need for a clear phasing-in schedule. Without such a timeline, investors will face the same lack of comparability between companies as they do today. Implementing this proposal would represent a step backwards and would deepen the lack of comparability and data consistency across companies. We recommend, at the very least, clearly defining the scope to avoid misleading outcomes and to improve comparability. Furthermore, this would disadvantage companies that produce a "full" report, as the published data would be less "favourable." Regarding the proposal for companies to specify the actions taken to improve the coverage of their calculation in subsequent periods, we request that companies also be required to indicate the timeframe by which they expect to achieve full (100%) coverage of the scope. The following wording would therefore be more appropriate: "actions taken to cover 100% of their activities," with the aim of aligning sustainability reporting expectations with the company's financial reporting. Once a company considers an activity to be material, it should provide a precise timeframe for obtaining the relevant data. Estimates should therefore be framed within a clear consumption limit, with a deadline and details of the actions planned to address the gap. Finally, we request the deletion of the provision stating: "no time limit is included for the use of the relief."			
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	As investors, it is essential for us to have high-quality, transparent and reliable quantitative data from undertakings, particularly on well-established topics. Such quantitative data doesn't necessarily have to be expressed in monetary terms, but should at least highlight how the business model is affected. The possibility of including topic-specific provisions within the ESRS could be considered. At the same time, we understand that this quantitative requirement might be difficult to implement for undertakings in absence of common methodologies. In this context, we could envisage to have a phase-in implementation starting with mature topics (e.g. climate) and continue with less mature topics, in order to encourage their integration and treatment. In view of all these considerations, we believe that quantitative data on anticipated financial effects of climate should be published by undertakings, provided that, as a prerequisite, a common methodology is established under the EU Regulation. We therefore call the European Commission to develop a harmonised methodology for calculating such anticipated financial effects. This work should be undertaken without delay to enable a timely quantification and disclosure of these effects. Lastly, we would like to reiterate our support for the extraterritoriality principle, to ensure that European undertakings are not penalized compared to non-European undertakings when publishing such information.			
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	We are aligned with this proposal and do not see any major concerns.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	To understand the undertakings' reporting, we believe that distinguishing between « NA », « 0 » and « not able to calculate » provides valuable information for investors to analyse and compare undertakings. AFG supports the ANC proposal about the integration of elements from ISSB framework is a positiv step towards interoperability. To address interoperability in a pragmatic manner, ANC recommends completing the ESRS with dedicated ISSB interoperability guidance. This would enable undertakings wishing to align more closely with IFRS S1 and S2 to disclose additional datapoints, without creating additional burden for other undertakings. Such guidance would reintroduce, on an optional basis, the datapoints originally derived from IFRS S1 and S2 but removed from the current draft for simplification purposes. Proposed wording: (outside of the standard): "If the undertaking aims to ensure interoperability with [IFRS S1 or S2] issued by the ISSB, it may disclose [relevant information]." It is recommended that EFRAG and the ISSB work together on updating the criteria mapping table in order to ensure consistent and up-to-date interoperability of the elements proposed in this consultation.			
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	General Comment: We welcome the simplification and reduction of ESRS indicators proposed by EFRAG. We particularly appreciate the effort to retain only quantitative indicators, as quantitative data from companies is a key element for investors, facilitating both the analysis and comparability of the companies assessed. We support the point of view of ANC that EFRAG has clearly engaged in a simplification effort, reflected in the reduced overall volume of the standards, improved readability, and a clearer distinction between may and shall provisions. Importantly, the key information required by investors to conduct ESG analyses remains available. The proposal strikes a reasonable balance between reducing the reporting burden and preserving the information necessary to meet the objectives of the EU Green Deal. We have duly noted the transfer of certain non-mandatory indicators to the NMIG document. However, we reiterate our position that it is essential to maintain a degree of standardisation for voluntary indicators to ensure sufficient consistency for companies wishing to go further in their sustainability reporting. We also emphasise the importance of clearly stating the non-mandatory nature of these illustrative guidance.			
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	We are not opposed to the inclusion of these criteria, provided that they are broadly agreed and we are aligned with technical suggestions from ANC about each KPI. With the exception of the ESRS G1 concerning Business conduct confirmed incidents: Mandatory reporting would pose risks to European companies' competitiveness. It could conflict with the right against self-incrimination guaranteed by the European Convention on Human Rights and expose EU companies to investigations by third-country authorities, such as the US Department of Justice, benefiting non-EU competitors not subject to similar obligations. In the joint statement on a US-EU framework for reciprocal, fair, and balanced trade, the EU is called upon to ensure that the CSRD and CSDDD do not impose undue restrictions on transatlantic trade. Introducing mandatory reporting of confirmed incidents risks creating an unlevel playing field, as US companies may be exempted from comparable constraints. Moreover, reporting confirmed incidents is not a reliable indicator of anti-corruption policy effectiveness. A low number of incidents could reflect strong preventive measures, while a high number may indicate a trusted reporting system, particularly through whistleblowing channels. A simple numerical count or brief description of an incident's "nature" cannot capture its context, resolution, or remedial actions.			
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	ESRS 2: Agree, without comments E2-4: Disagree: this indicator is for companies' specific approach. Not for a transversal approach. However we understand that this indicator addresses the objectives set by the European Commission regarding microplastics. E5-4: No comment. E5-5: Partially agree. It is already possible to obtain this information by subtraction. As investors, we are in favour of positive approach rather than a negative or punitive one. We are aligned if the objective is to have a 100% breakdown of waste destinations. In that case, the wording should be reviewed. Furthermore, is better to use "untracked" rather than "unknown".			
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	It is important to recall the risk of differing interpretations of the concept between undertakings and auditors. This matter falls more within the scope of accounting expertise. In this context, we reiterate our request for the establishment of Europeans guidelines for auditors, with the aim of facilitating exchanges and improving audit controls. AFG supports the ANC's position about fair presentation. ANC invites EFRAG and the European Commission to provide further clarification on the concept of fair presentation, in order to avoid divergent interpretations by preparers and auditors. Guidance is needed on how this principle will be applied by assurance providers and whether its inclusion may have implications for the ongoing simplification efforts. Specifically, ANC recommends clarifying: - The definition of fair presentation as a filter to taking into consideration the strategic specificities of the business model and activities of the undertaking; - The hierarchy between the use of reliefs and the requirement of fair presentation: confirm that applying a relief does not contradict the principle of fair presentation in general. - The audit procedures expected to ensure compliance with this principle.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We remind our support for the extraterritoriality and the necessity for France to keep her sustainable leadership on the world wide's vision. We support the proposal from ANC to introduce an exception in the AR for financial institutions' absolute climate reduction targets, allowing disclosure of intensity-based targets provided they disclose contextual information and the potential trend in absolute value. The intensity target is more representative than the absolute target for investors, especially when it comes to setting targets. An absolute result makes less sense for financial analysis. If Europe is the only continent requiring this information as an absolute target, it will be problematic for European investors, who are subject to KPI disclosure requirements under other regulations (e.g., SFDR). So we support the ANC proposal wording: AR X for §E1-6 §26a on target setting or Amendment to AR12 for para 26: "Financial institutions may disclose targets in intensity value with (a) a breaking-down per high-climate impact sectors for which it has set targets, (b) a concise indication on the trend of absolute emissions per target". Adaptation of concepts and lexicon, clarifications regarding (i) double materiality assessment and (ii) value chains considerations, links with sectorial regulations			
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	We agree with the proposed modification of the threshold			
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	The average wage can only be analysed on a granular basis. It is important to have a local view in order to understand practices, ideally corresponding to the top 10 countries in which the company operates. As investors, the concept of a "fair wage" is important. Nevertheless, we recognise the difficulty of establishing it on a global scale, as such an approach would lack relevance. So we support the ANC's proposal as a compromise, who propose a flexible model with mandatory transparency. Undertakings should be allowed to use either statutory wages or recognised living wage estimates, provided they disclose the methodology and country-level context. Given the novelty of this concept, companies should retain flexibility to select the most appropriate reference, while avoiding premature lock-in to a rigid framework. The ILO's work, although not yet fully comprehensive, could serve as a useful starting point.			
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	There is a clear need to ensure consistency between the sustainable finance framework and particularly between the ESRS and SFDR. The European Commission should ensure that the ESRS simplification are properly reflected in the SFDR disclosure requirements, particularly with regard to the PAI indicators.			
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We understand the proposed simplification, given that biodiversity remains a relatively less mature topic at this stage. We are therefore aligned with the proposed modifications. However, to ensure improvement on the topic of biodiversity, we believe this issue should be revisited in the coming years and we request the inclusion of a review clause. The purpose of this clause would be to confirm that the topic is currently insufficiently mature to provide the necessary data, while ensuring that these thematic indicators will be revisited in a few years' time (3 to 5 years) once progress has been made. This would also encourage companies to adopt a long-term perspective on the issue.			
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	As investors, we consider it more useful to have the data point broken down by both gender category and socio-professional category, in order to obtain both breakdowns without necessarily having them reported separately. The adjusted gender pay gap is more interesting for investor than unadjusted (refer to PAI indicators).			
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	We agree with the proposed simplification.			
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AFG (Association Française de la Gestion d'actifs)	Association of financial institutions	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		ESRS E1 on net zero targets: We note that the reference to net zero has been completely removed from the standard. This is regrettable, as prior to ESRS, there was a significant proliferation of net zero communications, each with varying levels of ambition. Such claims were also identified by ESMA in its greenwashing report as a prevalent issue. The inclusion of net zero in Set 1 provided a clear, uniform definition for all actors and led to substantial improvements in disclosure quality and better differentiation from neutrality claims. This concept and its definition should be maintained in the standard. Proposed wording: Add in glossary previous entry "Net-zero target" Retain current Set 1 E1-7 §60 with clarifications regarding removals vs offsets: "In the case where the undertaking discloses a net-zero target in addition to the gross GHG emission reduction targets in accordance with Disclosure Requirement E1-6, it shall explain the scope, methodologies and frameworks applied and how the residual GHG emissions (after approximately 90-95% of GHG emission reduction with the possibility for justified sectoral variations in line with a recognised sectoral decarbonisation pathway) are intended to be neutralised by GHG removals. Comparability with preceeding reporting periods: To ensure comparability over time, undertakings should be required to make available, on a dedicated section of their website, all the sustainability statements their prepared in application of the CSRD. Proposal for the presentation of sustainability statements: To offset the potential loss of comparability that may result from granting flexibility to reporting entities, we propose (aligned with the French Market Authority – AMF) a new numbering rule for the Disclosure Requirements to which the information relates. This approach, which reflects a good practice observed in financial reporting, would allow for more efficient retrieval of information.			
Survey	Stakeholder Reporting Committee (European Accounting Association)	Academia	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We welcome the efforts made to simplify the DMA process and believe that the proposed amendments represent progress towards greater clarity and usability. The alignment of ESRS with a "fair presentation" reporting framework is particularly valuable, as it supports a more principles-based approach and helps avoid a compliance or checklist mentality. The emphasis on using reasonable and supportable information contributes to proportionality and facilitates implementation for preparers, especially in the first reporting cycles. However, we believe that further refinements are necessary to ensure that simplification does not come at the expense of completeness or accountability. In particular, the objective of sustainability reporting (paragraphs 3–4) and the definition of materiality (paragraph 22) could be made more explicit by linking both decision-usefulness and accountability objectives for all stakeholder groups. Likewise, impact materiality assessment (paragraph 30) would benefit from a clearer connection to the decisions and actions that the disclosed information is meant to enable, ensuring parity with financial materiality assessment (paragraph 37). We are concerned that the relief clauses based on "information available without undue cost or effort" might be used strategically to avoid disclosing material impacts. We suggest rewording to "with reasonable cost or effort" and reconsidering paragraphs 87(d) and 89 to prevent under-reporting. Finally, with reference to the scope of ESRS, we strongly encourage EFRAG to propose to the EC to include within the scope of CSRD the same set of companies that are currently under the scope of NFRD (i.e., all companies with more than 500 employees). Not doing so consists deregulation rather than simplification. Overall, we agree that the amendments have moved the DMA process in the right direction, but additional clarifications—particularly on objectives, impact materiality and relief clauses —would reinforce the robustness of the framework without re-introducing complexity.			
Survey	Stakeholder Reporting Committee (European Accounting Association)	Academia	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We find the new implementation guidance provided in par. 34 and 36, and Appendix C useful. It may enable preparers to assess the materiality of their actual and negative impacts in an efficient and effective way. This in turn, is less likely to result in excessive reporting. We also agree that positive impacts should be assessed in their own right and should not be netted off against negative impacts. However, we would like to raise a concern regarding the treatment of prevention actions when a potential impact materializes. Under the current wording, no disclosure is explicitly required on prevention actions previously undertaken once an impact has occurred. Prevention actions are disclosed only for potential impacts, whereas actual impacts require disclosure of remediation actions. This approach may create a gap in reporting and make it difficult for stakeholders to understand the full sequence of actions taken by an undertaking over time. For example: • 2023: Firm A foresees a potential impact and discloses its prevention actions. • 2024: The potential impact remains, and prevention actions continue to be disclosed. • 2025: The potential impact occurs and becomes an actual impact. The disclosure now focuses exclusively on remediation actions, with no explicit link to the prior prevention actions. We suggest that Appendix C requires preparers to disclose relevant past prevention actions when an actual impact materializes, if decision-useful. This would not imply to restate all prior disclosures, but rather to provide sufficient context to illustrate the evolution from prevention to remediation We believe that comparability and the information characteristics set out in Appendix B should be recalled in Appendix C to ensure that these characteristics are maintained over time. Reinforcing these principles would strengthen the consistency of reporting across reporting periods and across undertakings and support stakeholders in making well-informed assessments.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Stakeholder Reporting Committee (European Accounting Association)	Academia	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	The reduction of anticipated financial effects reporting is necessary to comply with the requirement of reducing the number of disclosure points and decreasing the reporting burden of companies. Forward-looking financial effects are inherently hard to measure, subject to high estimation uncertainty; standard-setters explicitly recognize that in some cases quantitative information may not be decision-useful. Additionally, one can assume that (at least some) investors can use their own estimations for financial effects (e.g., expected carbon prices), drawing on internal carbon pricing and scenario analysis practices. This partially offsets the loss of some datapoints when disclosures are simplified However, the reduction of the disclosure requirements also decreases the benefits for users of sustainability disclosures. Additionally, connectivity between sustainability-related and financial information is important for both users and preparers, yet it remains an outstanding task (Michelon et al., 2025). Weakening forward-looking financial linkages risks widening the gap that connectivity aims to close. Empirical evidence also suggests that financial consequences are a key driver of decarbonization decisions. On the one hand, Hahn et al. (2025) find that financial benefits are an important driver of carbon-reducing investments. On the other hand, omitting related reporting requirements might lead to a disconnect of climate-related disclosure items and their financial effects, also for the reporting entities, especially if they consider ESRS as a check-box exercise. For these reasons, we support the EFRAG's decision to retain at least some of the requirements for anticipated financial effects, especially as they cannot be inferred from any other reported information. Additionally, we suggest that, considering the reduction of reporting requirements of anticipated financial effects (E1-11), it would be helpful and in line with connectivity to require at least an explicit but qualitative link to the anticipated financial effect. Hahn et al. 2025. Business Strategy and the Environment Michelon et al. 2024. ICAS			
Survey	Stakeholder Reporting Committee (European Accounting Association)	Academia	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Focus on ESRS E1:In general, we agree with the EFRAG's approach to achieve the required reduction in disclosure points through the omission of primarily voluntary, qualitative and "redundant" items, while keeping key disclosure points regarding scope 1, 2, 3 emissions, emission targets and climate-related risks. Some reductions occurred regarding emission intensities. While intensity measures are useful information for users of sustainability disclosures, the reductions focus on those intensity measures, which can be calculated using otherwise available information (e.g., emissions divided by revenues or total assets). We support keeping at least one sector-specific intensity metric because users benefit from both absolute and intensity views, consistent with TCFD guidance on Metrics & Targets. Regarding the transition plans, we welcome the explicit link to EU and international climate goals in the draft text. However, the clarification of the "compatibility with 1.5 degrees" and the resulting explicit connection to the Paris Agreement and the European Climate Law (§13 & §14) are useful to ensure consistency with the EU regulatory framework, and to limit discretion about the definition of "compatibility with 1.5. degrees", which fosters comparability between firms and across years. However, it would be helpful to further clarify the meaning of "compatibility with 1.5 degress". Scientific evidence (Bolton and Kacperczyk, 2021) supports preserving the core of E1: markets price emissions and climate risk, and credible climate disclosure can affect valuation and the cost of capital. Bolton, P., & Kacperczyk, M. (2021). Global Pricing of Carbon-Transition Risk (NBER Working Paper No. 28510). National Bureau of Economic Research.			
Survey	Stakeholder Reporting Committee (European Accounting Association)	Academia	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Comment on Q11 subquestions: Q11.1. To reduce heterogeneous interpretations, we recommend setting minimum criteria for selecting top-down vs bottom-up approaches. An operational note should require documentation of: (i) the initial universe of topics/IROs, (ii) severity/likelihood thresholds per topic, and (iii) sources of evidence and/or stakeholders consulted. This balances simplification with traceability. Q11.2. Regarding paragraph 21.a), we propose re-phrasing "general-purpose financial reports" to "general-purpose annual reports" and deleting "including financial statements and the sustainability statement." Q11.3. We recommend requiring a simplified table linking each material IRO to related disclosures/DPs, metrics/targets, and policies/actions. Q11.4. Specific users (e.g., rating agencies) might seek datapoints that are not reported. Firms may introduce a numerical threshold to determine material topics and this could result in certain issues being excluded from "material information" solely because their amounts are considered insignificant. Allowing organisations to include such "quasi-material" topics ensures that relevant information is not overlooked. Q11.5. This "statement of compliance," together with paragraph 109 — which allows firms to include an executive summary highlighting key messages about their material environmental, social, and governance impacts, risks, opportunities, and related management — enables the creation of a report in which the "compliance" sections and the more "strategic" parts are clearly distinguishable, thereby improving readability. Q11.6. We have reviewed the "Comment/Rationale" related to this change (revised paragraph 22) in the document LOG OF AMENDMENTS ESRS 1 GENERAL REQUIREMENTS and found the explanation particularly helpful. We suggest considering its inclusion directly in the standard to provide clearer guidance on what is expected. Q11.7. The text "This Appendix is an integral part of ESRS 1 and provides nonbinding guidance to support the application of provisions in this Standard" is confusing because ESRS 1 is mandatory but Appendix A that is an integral part of ESRS1 is not mandatory. Please clarify.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Universidad de Burgos	Academia	Spain	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	The proposed amendments do not achieve an acceptable balance between simplification and robustness of the DMA. While point (a) defines double materiality clearly, point (b) is imprecise. a)Point (b) is tautological: "Information is MATERIAL when: (…) it is necessary (…) to understand (…) MATERIAL impacts, risks and opportunities …" (emphasis added) b)Including "risks and opportunities" in point (b) is inconsistent with the notion of impact materiality. c)Point (b) refers to the "understanding" of sustainability reporting users, without reference to the implications of such understanding. d)Additionally, in para. 30 impact materiality correctly refers to "the identification of information that relates to the undertaking's material actual or potential, positive or negative impacts on people or the environment over the short, medium or long term (…) Business relationships are not limited to direct contractual relationships." Any framing of impact materiality based on decision-making is insufficient, as most stakeholders are not in a position to make any decision (e.g., nature). A possible framing for point (b) could rely on the notion of stewardship and due diligence. An alternative wording is suggested: "(b) it is necessary for the corporation to show to a broad range of stakeholders that it identifies and addresses actual or potential, positive or negative impacts on people or the environment" The greater focus on the "materiality of information" as a general filter shall not be used as a reason to omit information on a topic that was identified as material. Allowing disclosing information on non-material topics (para. 108) may introduce noise and allow cherry-picking, which may eventually bias the "fair presentation" that the ESRS are now expected to support. Emphasis on "Fair presentation framework" can encourage a broad judgment approach without a common minimum baseline, reducing consistency and increasing the risk of litigation/disputes due to reasonable omissions.			
Survey	Universidad de Burgos	Academia	Spain	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Universidad de Burgos	Academia	Spain	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Universidad de Burgos	Academia	Spain	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I disagree	The simplification of ESRSs and the reduction of disclosure requirements and data points are premature. Companies, auditors and consultants have already invested in the implementation of ESRSs. However, the untimely revision will waste the learning that could be obtained from this experience. No less important, in general, the loss of the knowledge and positive externalities generated by the preparation, analysis and use of sustainability information and the increase in social and environmental regulation costs (e.g., government monitoring in the absence of corporate self-reported information) will overshadow the putative administrative costs savings from the ESRS simplification. The re-architecture between ESRS 2 and thematic standards reduces enforceability and comparability because although minimum "Shall" requirements are maintained in ESRS 2, their simplification weakens the common baseline and opens the door to overly flexible interpretations across companies and sectors. The elimination of the obligation to declare PAT plans and timelines diminishes forward-looking guidance and monitoring capabilities. Additionally, this omission limits the capacity of information users to evaluate the commitment of reporting organizations in achieving their stated sustainability goals.			
Survey	Universidad de Burgos	Academia	Spain	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Universidad de Burgos	Academia	Spain	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	It is reasonable to include guidelines and examples on how to disclose datapoints in "Non-Mandatory Illustrative Guidance" (NMIG). However, the simplification proposal is depriving users of the sustainability report from crucial information to assess the due diligence of the company. For example, the policies to identify and manage actual or potential, positive or negative impacts on people or the environment, are crucial to assess due diligence. Therefore, it is paramount to perform an in-depth assessment to determine whether all disclosures currently presented in the NMIG should be made mandatory in the delegated act. While the NMIG may reduce implementation questions, encourage proportional innovation, and ease the burden on PAT narratives when rigid prescriptions fail, it could also reduce comparability. Without a minimum common ground, methodological heterogeneity hinders cross-sectional and time-series analyses. In this regard, the NMIG is useful if it complements—not replaces—a clear regulatory baseline that preserves consistency, traceability, and insurability.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Universidad de Burgos	Academia	Spain	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	The "undue cost or effort" principle is aligned with the goal of administrative simplification. However, the articulation of this "relief" in paragraph 89 ESRS1 is so imprecise that it may turn this set of standards into dead letter. The "undue cost or effort" principle risks transforming Directive (EU) 2022/2464 into a voluntary guideline. The limitation of considering resilience in terms of risks places an emphasis on financial materiality, overlooking how an organization's activities may also affect the resilience of the ecosystems in which it operates.			
Survey	Universidad de Burgos	Academia	Spain	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	The amendment is generally reasonable. But the "undue cost or effort" principle is too broad, as indicated in the response to question 19.			
Survey	Universidad de Burgos	Academia	Spain	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	Universidad de Burgos	Academia	Spain	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Thorough information on dependencies is increasingly important to motivate organizations and industries to tackle sustainability challenges. This amendment goes against the tide. This modification is not justified on the grounds of administrative simplification, as the costs of processing this information is minimal: this information is present in information systems and calculations are trivial. Instead, this modification appears to be proposed on the grounds of avoiding information that may impact corporate reputation, at the expense of resilience.			
Survey	Universidad de Burgos	Academia	Spain	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	IFRS and ESRS have different objectives and scope. Alignment with IFRS twists the notion of double materiality with the introduction of materiality as a filter and fair presentation, for example. As a result, ESRS is less aligned with the Green Deal. This greater alignment with the ISSB reduces the interoperability with other relevant sustainability reporting standards that companies have been applying for decades (such as the GRI).			
Survey	Universidad de Burgos	Academia	Spain	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Universidad de Burgos	Academia	Spain	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			
Survey	Universidad de Burgos	Academia	Spain	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Universidad de Burgos	Academia	Spain	22.E2.	Comments on deleted datapoints in ESRS E2	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			
Survey	Universidad de Burgos	Academia	Spain	22.E3.	Comments on deleted datapoints in ESRS E3	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			
Survey	Universidad de Burgos	Academia	Spain	22.E4.	Comments on deleted datapoints in ESRS E4	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			
Survey	Universidad de Burgos	Academia	Spain	22.E5.	Comments on deleted datapoints in ESRS E5	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			
Survey	Universidad de Burgos	Academia	Spain	22.S1	Comments on deleted datapoints in ESRS S1	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			
Survey	Universidad de Burgos	Academia	Spain	22.S2	Comments on deleted datapoints in ESRS S2	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			
Survey	Universidad de Burgos	Academia	Spain	22.S3	Comments on deleted datapoints in ESRS S3	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			
Survey	Universidad de Burgos	Academia	Spain	22.S4	Comments on deleted datapoints in ESRS S4	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			
Survey	Universidad de Burgos	Academia	Spain	22.G1	Comments on deleted datapoints in ESRS G1	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			
Survey	Universidad de Burgos	Academia	Spain	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	No substantial increase in administrative costs. Datapoints are relevant.			
Survey	Universidad de Burgos	Academia	Spain	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Datapoints are relevant.			
Survey	Universidad de Burgos	Academia	Spain	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	The notion of fair presentation is ambitious. It draws on financial reporting. Some ambition in this area is positive. However, it is inconsistent with the focus on limited assurance. Additionally, the application of fair presentation may dissuade companies from disclosing information on material topics, considering the inherent complexity and incompleteness of sustainability data.			
Survey	Universidad de Burgos	Academia	Spain	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Complex estimates are common to all sectors. The financial sector has a disproportionate effect on climate change. Absolute targets are essential for assessing progress on climate change, and banks are no exception in this regard. This exclusion is also at odds with other information on climate change required by financial institutions in other EU regulations (e.g. SFDR) and by banking supervising entities (Basel Pillar III).			
Survey	Universidad de Burgos	Academia	Spain	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	Thresholds are reasonable.			
Survey	Universidad de Burgos	Academia	Spain	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	Processing information about wages, considering notions such as living wages, is a significant concern for society. This modification is not justified on the grounds of administrative simplification, as the costs of processing this information is minimal: this information is present in information systems and calculations are trivial. Instead, this modification seems to be proposed on the grounds of avoiding information that may affect corporate reputation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Universidad de Burgos	Academia	Spain	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	The "consolidation" and reduction of DPs results in a loss of granularity and breaks the traceability necessary for the SFDR to inform investors. Merging eight DPs into a single "HR policy" in ESRS 2 limits the relevance of human rights, erases nuances by stakeholder group, and weakens operational alignment with UNGP/OECD. The single "severe cases" indicator fails to capture typologies, severity, remediation, or geography. Excluding "fatalities" from the scope of the PAI on lost days is a material setback. Investors require explicit visibility into fatalities, rates, and trends. Moving content to ESRS 2 (general) instead of maintaining it in ESRS S1–S4 reduces consistency between IROs and specific metrics and hinders insurability. The supposedly "marginal" reduction in coverage is, in fact, material for time series, benchmarking, and alignment with the SFDR Annex I tables; it increases the risk of cherry-picking and mapping gaps.			
Survey	Universidad de Burgos	Academia	Spain	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	AR 26 could be further reviewed to better reflect current developments (e.g., SBTN).			
Survey	Universidad de Burgos	Academia	Spain	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	Disclosing this information has enormous social benefits in terms of increasing gender equality. This modification is not justified on the grounds of administrative simplification, as the costs of processing this information are minimal: this information is present in information systems and calculations are trivial. Instead, this modification seems to be proposed on the grounds of avoiding information that may affect corporate reputation.			
Survey	Universidad de Burgos	Academia	Spain	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	This formulation will contribute to damaging SMEs. The increase in government regulation and monitoring costs (in the absence of corporate self-reported information) will overshadow the putative administrative costs savings from this unsophisticated simplification.			
Survey	Universidad de Burgos	Academia	Spain	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Some emission-intensity datapoints have been trimmed. While intensity indicators are valuable to users, the cuts mainly target metrics that can be derived from other reported figures (e.g., emissions relative to revenue or total assets). We advocate preserving at least one sector-relevant intensity indicator, since stakeholders need both absolute and intensity perspectives—aligned with TCFD guidance on Metrics & Targets. On transition plans, we welcome the draft's explicit alignment with EU and international climate objectives.			
Survey	Universidad de Burgos	Academia	Spain	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Some emission-intensity datapoints have been trimmed. While intensity indicators are valuable to users, the cuts mainly target metrics that can be derived from other reported figures (e.g., emissions relative to revenue or total assets). We advocate preserving at least one sector-relevant intensity indicator, since stakeholders need both absolute and intensity perspectives—aligned with TCFD guidance on Metrics & Targets. On transition plans, we welcome the draft's explicit alignment with EU and international climate objectives.			
Survey	Universidad de Burgos	Academia	Spain	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Some emission-intensity datapoints have been trimmed. While intensity indicators are valuable to users, the cuts mainly target metrics that can be derived from other reported figures (e.g., emissions relative to revenue or total assets). We advocate preserving at least one sector-relevant intensity indicator, since stakeholders need both absolute and intensity perspectives—aligned with TCFD guidance on Metrics & Targets. On transition plans, we welcome the draft's explicit alignment with EU and international climate objectives.			
Survey	Universidad de Burgos	Academia	Spain	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Some emission-intensity datapoints have been trimmed. While intensity indicators are valuable to users, the cuts mainly target metrics that can be derived from other reported figures (e.g., emissions relative to revenue or total assets). We advocate preserving at least one sector-relevant intensity indicator, since stakeholders need both absolute and intensity perspectives—aligned with TCFD guidance on Metrics & Targets. On transition plans, we welcome the draft's explicit alignment with EU and international climate objectives.			
Survey	Universidad de Burgos	Academia	Spain	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Some emission-intensity datapoints have been trimmed. While intensity indicators are valuable to users, the cuts mainly target metrics that can be derived from other reported figures (e.g., emissions relative to revenue or total assets). We advocate preserving at least one sector-relevant intensity indicator, since stakeholders need both absolute and intensity perspectives—aligned with TCFD guidance on Metrics & Targets. On transition plans, we welcome the draft's explicit alignment with EU and international climate objectives.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Universidad de Burgos	Academia	Spain	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Some emission-intensity datapoints have been trimmed. While intensity indicators are valuable to users, the cuts mainly target metrics that can be derived from other reported figures (e.g., emissions relative to revenue or total assets). We advocate preserving at least one sector-relevant intensity indicator, since stakeholders need both absolute and intensity perspectives—aligned with TCFD guidance on Metrics & Targets. On transition plans, we welcome the draft's explicit alignment with EU and international climate objectives.			
Survey	Universidad de Burgos	Academia	Spain	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Some emission-intensity datapoints have been trimmed. While intensity indicators are valuable to users, the cuts mainly target metrics that can be derived from other reported figures (e.g., emissions relative to revenue or total assets). We advocate preserving at least one sector-relevant intensity indicator, since stakeholders need both absolute and intensity perspectives—aligned with TCFD guidance on Metrics & Targets. On transition plans, we welcome the draft's explicit alignment with EU and international climate objectives.			
Survey	Universidad de Burgos	Academia	Spain	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Some emission-intensity datapoints have been trimmed. While intensity indicators are valuable to users, the cuts mainly target metrics that can be derived from other reported figures (e.g., emissions relative to revenue or total assets). We advocate preserving at least one sector-relevant intensity indicator, since stakeholders need both absolute and intensity perspectives—aligned with TCFD guidance on Metrics & Targets. On transition plans, we welcome the draft's explicit alignment with EU and international climate objectives.			
Survey	Universidad de Burgos	Academia	Spain	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Some emission-intensity datapoints have been trimmed. While intensity indicators are valuable to users, the cuts mainly target metrics that can be derived from other reported figures (e.g., emissions relative to revenue or total assets). We advocate preserving at least one sector-relevant intensity indicator, since stakeholders need both absolute and intensity perspectives—aligned with TCFD guidance on Metrics & Targets. On transition plans, we welcome the draft's explicit alignment with EU and international climate objectives.			
Survey	Universidad de Burgos	Academia	Spain	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Some emission-intensity datapoints have been trimmed. While intensity indicators are valuable to users, the cuts mainly target metrics that can be derived from other reported figures (e.g., emissions relative to revenue or total assets). We advocate preserving at least one sector-relevant intensity indicator, since stakeholders need both absolute and intensity perspectives—aligned with TCFD guidance on Metrics & Targets. On transition plans, we welcome the draft's explicit alignment with EU and international climate objectives.			
Survey	Universidad de Burgos	Academia	Spain	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Some emission-intensity datapoints have been trimmed. While intensity indicators are valuable to users, the cuts mainly target metrics that can be derived from other reported figures (e.g., emissions relative to revenue or total assets). We advocate preserving at least one sector-relevant intensity indicator, since stakeholders need both absolute and intensity perspectives—aligned with TCFD guidance on Metrics & Targets. On transition plans, we welcome the draft's explicit alignment with EU and international climate objectives.			
Survey	Universidad de Burgos	Academia	Spain	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Some emission-intensity datapoints have been trimmed. While intensity indicators are valuable to users, the cuts mainly target metrics that can be derived from other reported figures (e.g., emissions relative to revenue or total assets). We advocate preserving at least one sector-relevant intensity indicator, since stakeholders need both absolute and intensity perspectives—aligned with TCFD guidance on Metrics & Targets. On transition plans, we welcome the draft's explicit alignment with EU and international climate objectives.			
Survey	Universidad de Burgos	Academia	Spain	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Some emission-intensity datapoints have been trimmed. While intensity indicators are valuable to users, the cuts mainly target metrics that can be derived from other reported figures (e.g., emissions relative to revenue or total assets). We advocate preserving at least one sector-relevant intensity indicator, since stakeholders need both absolute and intensity perspectives—aligned with TCFD guidance on Metrics & Targets. On transition plans, we welcome the draft's explicit alignment with EU and international climate objectives.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ANSA	Business association (other than association of financial institution)	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	These modifications make the DMA process easier and improve the effectiveness of material information. However, we believe it is feasible to reduce the complexity of double materiality assessment, and efforts should be made to clarify this concept. More generally, Chapter 3 is not clear enough, and we have identified various issues. For example, it is still not easy in practice to distinguish between financial and impact materiality within the impacts, risks and opportunities.			
Survey	ANSA	Business association (other than association of financial institution)	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The approach is, in fact, quite complex. Moreover, while the gross approach to potential impacts might result in excessive reporting, it will be simpler for companies, particularly those in specific sectors. Otherwise, if the remediation measures already in place are reducing the impact materiality, it will result in an incomplete presentation of the impact of some companies, particularly those operating in hazardous sectors.			
Survey	ANSA	Business association (other than association of financial institution)	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	Introducing a summary could be beneficial if it does not create a new standardised obligation for companies. The proposed amendments provide an appropriate level of flexibility and improve connectivity with corporate reporting. Financial reporting is often the purpose for which they are used, and they are then checked by the financial auditor. Reference to other documents generated by other regulatory obligations may also be considered.			
Survey	ANSA	Business association (other than association of financial institution)	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The right direction for improvement is to enhance the connection between the PAT disclosure and the IRO description. It will also be beneficial to allow disclosure at a higher level of aggregation than the material IROs. This is because the management of IROs at an aggregate level could better reflect the most important issues that the company must deal with globally.			
Survey	ANSA	Business association (other than association of financial institution)	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	ANSA welcomes the proposed measures, which will make sustainability statements more concise and understandable. However, further improvements that lead to a clear understanding of what the auditors might require are welcome.			
Survey	ANSA	Business association (other than association of financial institution)	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Most importantly, the NMIG must not be part of the delegated Act, as its role is merely to illustrate some cases. Furthermore, it is important to limit interpretations, Q&As, etc., which consume a lot of energy and complicate the understanding of the standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ANSA	Business association (other than association of financial institution)	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	While all these reliefs are important, they must be compatible with the idea of fair representation.			
Survey	ANSA	Business association (other than association of financial institution)	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	ANSA	Business association (other than association of financial institution)	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	We would highlight that if a company is able to provide quantitative information on the financial effects, but has not included these figures in its financial accounts, the legal compliance of these accounts may be called into question. Projections of costs in the nuclear industry are made with a high degree of uncertainty, often more than 50 years into the future. Therefore, we strongly recommend option 2. More generally, in order to reduce unpredictable risks for companies, a qualitative rather than a quantitative description of the impacts should be required.			
Survey	ANSA	Business association (other than association of financial institution)	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	These steps are welcome, as they will reduce the duplication faced by multinational companies operating within multiple frameworks. However, many of the ESRS standards are not sufficiently aligned with existing international standards. From the outset of the standard-setting process, interoperability with the ISSB and other standards must be a core design principle. It is particularly important to eliminate additional EU reporting requirements for sector-specific sustainability matters.			
Survey	ANSA	Business association (other than association of financial institution)	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	ANSA	Business association (other than association of financial institution)	France	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	Simplification is one issue to consider, but it must also take into account information that is not too complex to provide, but which could threaten the company's future.			
Survey	ANSA	Business association (other than association of financial institution)	France	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	Simplification is one issue to consider, but it must also take into account information that is not too complex to provide, but which could threaten the company's future.			
Survey	ANSA	Business association (other than association of financial institution)	France	22.E2.	Comments on deleted datapoints in ESRS E2	I partially agree and partially disagree	Simplification is one issue to consider, but it must also take into account information that is not too complex to provide, but which could threaten the company's future.			
Survey	ANSA	Business association (other than association of financial institution)	France	22.E3.	Comments on deleted datapoints in ESRS E3	I partially agree and partially disagree	Simplification is one issue to consider, but it must also take into account information that is not too complex to provide, but which could threaten the company's future.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ANSA	Business association (other than association of financial institution)	France	22.E4.	Comments on deleted datapoints in ESRS E4	I partially agree and partially disagree	Simplification is one issue to consider, but it must also take into account information that is not too complex to provide, but which could threaten the company's future.			
Survey	ANSA	Business association (other than association of financial institution)	France	22.E5.	Comments on deleted datapoints in ESRS E5	I partially agree and partially disagree	Simplification is one issue to consider, but it must also take into account information that is not too complex to provide, but which could threaten the company's future.			
Survey	ANSA	Business association (other than association of financial institution)	France	22.S1	Comments on deleted datapoints in ESRS S1	I partially agree and partially disagree	Simplification is one issue to consider, but it must also take into account information that is not too complex to provide, but which could threaten the company's future.			
Survey	ANSA	Business association (other than association of financial institution)	France	22.S2	Comments on deleted datapoints in ESRS S2	I partially agree and partially disagree	Simplification is one issue to consider, but it must also take into account information that is not too complex to provide, but which could threaten the company's future.			
Survey	ANSA	Business association (other than association of financial institution)	France	22.S3	Comments on deleted datapoints in ESRS S3	I partially agree and partially disagree	Simplification is one issue to consider, but it must also take into account information that is not too complex to provide, but which could threaten the company's future.			
Survey	ANSA	Business association (other than association of financial institution)	France	22.S4	Comments on deleted datapoints in ESRS S4	I partially agree and partially disagree	Simplification is one issue to consider, but it must also take into account information that is not too complex to provide, but which could threaten the company's future.			
Survey	ANSA	Business association (other than association of financial institution)	France	22.G1	Comments on deleted datapoints in ESRS G1	I partially agree and partially disagree	Simplification is one issue to consider, but it must also take into account information that is not too complex to provide, but which could threaten the company's future. This includes all information related to organisational strategy weaknesses and difficulties in implementing appropriate business conduct.			
Survey	ANSA	Business association (other than association of financial institution)	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The improvements are not sufficient. It is also important to keep the question open to ensure compliance with SFDR when the modifications will be made.			
Survey	ANSA	Business association (other than association of financial institution)	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	ANSA	Business association (other than association of financial institution)	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	The concept of 'fair representation' used here is entirely different from the concept used in the context of financial matters. This should be clearly stated here. Otherwise, given the numerous reliefs and phasing-in, and the restricted information likely to be obtained by SMEs in the value chain, auditors will not be able to provide any assurance, even limited, on the non-financial reports.			
Survey	ANSA	Business association (other than association of financial institution)	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	ANSA	Business association (other than association of financial institution)	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	We believe it is important to keep the possibility of amending these issues open, given that we are strongly calling for SFDR requirements to be simplified and reduced.			
Survey	ANSA	Business association (other than association of financial institution)	France	31.	ESRS S1 DR1S: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	ANSA	Business association (other than association of financial institution)	France	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	When it comes to payment practices, it is important to consider the relevant metrics in order to allow for greater flexibility and adaptability. Given the thresholds, companies involved often have thousands of suppliers, including many different categories, sectors of activity and countries with different rules and practices. Therefore, a 'one size fits all' approach with uniform payment terms and classifications is not feasible. This means that communicating detailed figures will need to be adapted, which may result in significant differences between supplier categories. Lastly, it is also essential to define exactly when the payment period begins.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ANSA	Business association (other than association of financial institution)	France	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Although EFRAG has proposed measures to enhance the protection of business secrets, the ESRS should be simplified and rationalised further to safeguard business secrecy, particularly in an international context. Companies should not be required to disclose information that compromises business secrecy and is detrimental to their interests.			
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Our members broadly welcome the proposed amendments as an important step towards simplification. At the same time, several issues remain that should be clarified. Positive aspects: •Materiality filter: Stronger focus on materiality reduces the reporting burden. •DMA flexibility: Both bottom-up and top-down approaches allows practical implementation. •Fair presentation: Emphasis on fair presentation rather than a checklist helps avoid excessive documentation. •Streamlined topic list lowers complexity and risk of overreporting. •Clarity on sub-topics: AR 21 / para. 50 provides decisive clarification that only material sub-topics need to be reported. •Documentation relief: Excluding DMAs for obviously (non-)material topics and consolidating sub-sub-topics further reduces effort. •Link to IROs: Clearer connection between IROs (Impacts, Risks, Opportunities) and topics improves usability. Remaining concerns: • •The definition of when information is material is very broad. Not only are primary users not further defined but point (b) „users of general purpose" opens the discussion on what constitutes material information (especially against the fair presentation principle) even further. •Appendix A: oAR 16 should be clearly communicated as "Appendix A." oAdding topics (e.g. "water storage") contradicts simplification. oMerging S1 and S2 is problematic, as S1 is far more often material than S2. oSub-topics remain overly detailed in places; further simplification would be desirable. •Risk analysis linkage: In some cases, results of risk analysis cannot be clearly reconciled with reporting requirements, as sub-topics do not always map neatly.			
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	New Paragraphs provide helpful clarifications, but significant concerns remain about complexity and feasibility in practice. Positive aspects: •The guidance on distinguishing actual vs. potential impacts is useful and welcomed. However 3.3.1 (35) lacks clarity in several areas, creating potential confusion for firms. For example: What defines a "significant" mitigation or prevention action, and when is it not considered significant? Clearer definitions and concrete examples are needed to avoid unnecessary and lengthy discussions with the auditor about interpretations. •The clarification that remediation measures may be considered when assessing risks is a positive step, as it may reduce material risks and the related reporting effort. •Allowing consideration of actions that reduce the severity or likelihood of potential negative impacts reflects company practice and is in line with established risk management approaches. Concerns and challenges: •The gross approach for potential impacts with ongoing mitigation may lead to overreporting. •The guidance adds significant complexity to the DMA process, especially for smaller or less mature reporters. Current software tools cannot meaningfully map these requirements, creating practical difficulties for companies and auditors. •Appendix C attempts to address the gross vs. net issue, but in practice it requires companies to assess each negative impact in detail. This is unlikely to simplify reporting and may not be feasible beyond manual solutions. We therefore recommend to delete Appendix C. •. Further considerations: •Excluding compliance with legal and regulatory requirements as a "positive impact" risks undervaluing the strategic role of regulation. For many companies, regulatory frameworks are not merely minimum standards but central guides for sustainable action. •It is unclear whether globally valid guidelines remain acceptable as a mitigating factor under ESRS 1.36.			
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Our members broadly agree that the proposed Amendments provide an appropriate level of flexibility to support more relevant and concise reporting and enhance connectivity with corporate reporting. Positive aspects: •Executive summary & appendices: The explicit option to provide an executive summary and use appendices (e.g. for taxonomy data) improves clarity, structure, and readability of reports. •Flexibility: The amendments reduce unnecessary detail in the main report and allow companies to focus on key messages, avoiding duplication and fragmentation. •Connected information: Clearer guidance strengthens connectivity with other elements of corporate reporting and avoids repetitive disclosures. •GDRs: The adapted logic for presenting GDRs (general disclosures) is seen as very positive. It allows GDRs at topic level, summarized for certain IROs or for individual IROs, with flexibility to adjust the level of detail to company-specific circumstances. This should be maintained. •Governance standard (ESRS-G): The restructuring and summarization of data points (e.g. G1-2 qualitative vs. G1-4 quantitative) provides for more concise and practical reporting. Remaining concerns / open questions: •PAT duplication: The need to avoid duplication in the Performance and Target (PAT) section must be consistently recognized in the design of disclosure requirements. •Climate methodology (ESRS E1 AR 5, para. 18): It is unclear whether companies are expected to conduct a climate scenario analysis when disclosing the methodology used to assess the impact of hazards and transition risks. Greater clarity is needed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Our members generally consider that the proposed amendments strike a good balance between simplification and the need for relevant, comparable information. Positive aspects: •Simplification: •Clear reduction of "shall" requirements in PAT lowers complexity and workload. •Deletion of topical specifications in GOV, SBM, and IRO simplifies the structure without major content loss; there should be no exceptions to this deletion. •Shortened standards and avoidance of duplication are highly welcomed. •Listing ARs directly after DRs improves readability and structure. Flexibility & pragmatism: •The new "undue cost or effort" clause is very positive, allowing companies to gradually expand databases without disproportionate burden. •Aggregation options reflect real management practice and increase efficiency. •Improved linkage between PAT and IROs enhances consistency and usability. •Absence of timeline explanations avoids unnecessary rigidity. Remaining concerns: •Sub-topic clarity: oRisk analysis results cannot always be clearly reconciled with reportable content; sub-topics should be reflected more explicitly in the topical standards or in a clear mapping table of DRs to sub-topics. oSome combinations (e.g. anti-corruption & bribery with animal welfare and complaints procedures) appear inconsistent and should be corrected (notably in G1). •Scenario/resilience analyses (ESRS E1): It must remain permissible to report that such analyses are not conducted; companies should not be indirectly obliged. •Phase-ins and NMiGs: Data points with planned phase-ins should be omitted or voluntary. NMiGs must remain voluntary in practice, with no indirect obligation created. •Formulation of PAT: Reformulating PAT as ARs risks confusion rather than simplification.			
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Our members generally agree that the proposed amendments significantly improve clarity and accessibility of the ESRS. The changes make it easier for companies to identify mandatory content and apply the standards consistently. Positive aspects: •Removal of "may disclose" provisions: Eliminating these optional elements improves clarity, avoids confusion, and ensures a clearer distinction between mandatory and voluntary disclosures. •Structure and usability: Relocating mandatory ARs under their related DRs enhances readability and transparency. •Language improvements: Revised wording supports better understanding and fosters consistent application across companies. •Transparency: The clearer separation of mandatory and voluntary requirements increases accessibility for both preparers and users of sustainability reports. •Simplification: The removal of duplicate data requirements, the shortening of standards, and the exclusion of non-mandatory data points from the NMiG make it easier to determine reporting obligations. Remaining concerns: •E2-19 vs. AR7 scope: There is still a lack of clarity regarding whether disclosures should cover only Substances of Very High Concern (SVHCs) or also Substances of Concern (SoCs). Alignment is needed to avoid inconsistent interpretations and reporting burdens. •However, while the structure and readability have improved, the overall reporting requirements remain largely unchanged. As such, the simplification primarily supports better orientation within the standards rather than reducing the reporting burden itself. •Moreover, we would like to flag that new mandatory disclosures have been added – clearly against the request of the EU commission and the aim of the revision to reduce reporting burden. Additional mandatory data points should be avoided.			
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Our members welcome the development of a Non-Mandatory Implementation Guidance (NMIG), but stress the importance of a clear definition of its purpose and legal status. We support keeping NMIG as a voluntary, illustrative tool that helps preparers but does not introduce implicit requirements. To ensure legal certainty and practical usability, the NMIG should remain outside the delegated act and its non-mandatory nature must be consistently emphasized Positive aspects: •We support that non-mandatory data points have been moved to NMIG, ensuring that the ESRS itself focuses strictly on mandatory content. •The NMIG can provide helpful illustrative examples that support understanding and application without creating additional obligations. Key conditions: •Legal status: The NMIG's non-binding nature must be clarified as soon as possible. It must not become a de facto "state of the art" that auditors, regulators, or stakeholders expect companies to follow. •Separation from ESRS: To avoid confusion, NMIG should remain clearly separate from the mandatory ESRS. Companies must be able to fulfill all reporting obligations by following ESRS alone. •No negative consequences: Non-compliance with NMIG must not result in disadvantages or be interpreted as a lack of compliance with ESRS.			
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Positive aspects: •Undue cost or effort: The introduction of this principle is welcomed. •Value chain metrics: Allowing the use of estimates as well as direct data is a practical measure that reduces reporting burdens while maintaining relevance. •Scope reliefs: Exclusion of non-significant IRO activities and joint operations improves both feasibility and focus. •Resilience and financial effects disclosures: Limiting these to announced plans and qualitative information avoids speculative reporting and concentrates efforts on meaningful content. Remaining concerns: •Room for interpretation: A clear mention of any room for interpretation for the reporting company would facilitate cooperation between the reporting company and the auditor. Some CSRD definitions, such as the definition of "employee" ("according to national law or practice"), leave a lot of room for interpretation. •Supply chain reporting: Further simplification is necessary. Companies should report on their own targets, actions, policies, and metrics. Supply chain data should only be required insofar as it directly relates to the company's own commitments. Companies should not be obliged to collect detailed data from suppliers or customers. •Subsidiary thresholds: Relief measures should also apply to smaller subsidiaries (e.g. under 50 or 20 employees), which face similar challenges as SMEs in gathering sustainability data. •For large multinational companies to use the „undue cost or effort" principle might become quite challenging, as it also states that (1) Information needs of users needs to be considered and (2) the assessment of what constitutes undue cost or effort depends on the undertaking's specific circumstances. •we have some reservations regarding the newly proposed relief for acquisitions and disposals. We recommend removing paragraph 73 of ESRS 1 and retaining only paragraph 72. Paragraph 73 introduces an additional differentiation for major acquisitions and disposals, which unnecessarily complicates the application of the relief.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	Positive aspects: •Pragmatic reporting: The relief allows companies to report despite data limitations, which is especially valuable in complex value chains. •Continuous improvement: Requiring disclosure of actions to improve data quality ensures accountability and gradual enhancement over time. •No fixed time limit: Not setting a rigid deadline is reasonable, as data availability and maturity differ widely across sectors and supply chains. The requirement to disclose improvement measures already creates implicit pressure to strengthen data quality. •Alignment: The approach supports consistency with IFRS S1/S2 and significantly reduces the implementation burden without undermining credibility. •Undue cost or effort: The principle provides important flexibility for dealing with initial data gaps and enables gradual database expansion without disproportionate costs. Remaining concerns: •Interpretation risks: There is still potential for disagreement with auditors on what constitutes a "reasonable" effort to improve data quality. Clearer guidance could reduce uncertainty and ensure consistent application. •Realistic expectations: ESG data, particularly from extended value chains, will never reach the same level of precision as financial data. Standards should recognize these inherent limitations to avoid undue burden. •It is also important to note that many Wave 1 undertakings will benefit only to a limited extent from this relief. In many cases, data collection approaches—often based on workarounds—have already been agreed upon with auditors and implemented. Continuing with these established methodologies may require less effort than reassessing and justifying the application of the new relief •Regarding the relief proposed in paragraph 92: We suggest extending this relief to include relevant metrics under ESRS S1 and potentially also ESRS E1. This would promote consistency across reporting requirements and further reduce complexity in cases where operational control is limited. The reason for excluding these two standards from the relief is not apparent to us.			
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Reasons for preferring Option 2: •A qualitative-only requirement keeps reporting practical, especially for companies with limited methodologies or resources. •Avoids undue burden: Quantitative disclosures of long-term financial effects would often be speculative, uncertain, and resource-intensive, especially for family-owned or privately held companies. •Option 2 preserves flexibility by allowing companies to voluntarily provide quantitative information where available and relevant, without creating a mandatory obligation. •Focus on clarity: Encourages companies to provide clear narratives of expected financial implications instead of uncertain projections, which may not be comparable across firms. •Alignment with practice: Mid- and long-term financial effects are rarely available in reliable, comparable form; focusing on qualitative assessment supplemented by quantitative information only where meaningful is the more pragmatic approach. •Comparability: Quantitative projections would be highly subjective and could reduce comparability rather than improve it. Critical observations: •Some members noted that the discussion reflects broader uncertainty about the purpose of these disclosures. In their view, financial reporting in annual reports already provides sufficient quantitative information, and sustainability reporting should not duplicate speculative forecasts. •Some ZVEI stakeholders argue that complete deletion of the requirement would also be acceptable, as this information has limited relevance for many non-listed companies. •The underlying data is often unclear, and the risks cannot be reliably isolated due to a lack of mature and established methodologies, making any form of disclosure - whether narrative or numeric - legally risky and prone to misinterpretation. Such information lacks comparability and does not offer decision-useful insights to report to users from our point of view. Moreover, IFRS already define when future risks must be reflected in financial reporting, e.g. through recognition and measurement criteria. Sustainability reporting should not override or extend these principles through financial disclosure requirements in the sustainability statement.			
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Our members agree that the proposed Amendments strike a reasonable balance. Clearer guidance on relief provisions and greater stability of the standards are essential, ensuring that simplification measures do not come at the expense of consistency and comparability. Positive aspects: •Interoperability with IFRS S1/S2: Alignment of materiality and fair presentation principles with ISSB standards is a step toward global comparability. •Consolidation boundary: Adopting the financial consolidation boundary while allowing optional disclosure on an operational control basis reflects the logic of both the GHG Protocol and IFRS, improving consistency. •Reliefs and flexibility: Incorporation of IFRS-style reliefs, particularly the "undue cost or effort" clause, balances alignment with practicality for preparers. Remaining concerns: •Clarity of "undue cost or effort": While welcomed in principle, this concept remains vague and risks disagreements with auditors. Clearer definitions or guidance are needed to avoid inconsistent application and potential disputes.			
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				

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Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	Reduction in mandatory datapoints lowers complexity and is valuable for companies with limited resources. Prioritization of quantitative over narrative information strengthens comparability and efficiency. Remaining concerns: Alignment with VSME standard: In some cases, the VSME still asks more questions than CSRD materiality reporting requires. A clearer comparison and alignment between ESRS and VSME datapoints is needed.. •Environmental datapoints: While simplifications were introduced for certain areas (e.g. financial effects, own workforce), the environmental datapoints have only been partially streamlined. Some "deleted" requirements were merely merged or shifted, and new requirements were added. •Substances of Concern (SoCs): We strongly question the effectiveness of including SoCs in ESRS. These substances overlap with existing categories such as SVHC, leading to double counting and incomparable data. Without clear hazard category ordering, reporting on SoCs adds complexity without added value. For simplification and consistency, SoCs should not be included for all stakeholders. The deletion of datapoints primarily affects how requirements are presented, not what is required, as especially duplicative requirements are deleted. This means that preparers will still need to collect and disclose a substantial amount of data, and the core reporting obligations are largely preserved. •Reclassification of mandatory data points: Many previously mandatory ("shall") disclosures have been shifted to Application Requirements (AR) or Non-Mandatory Implementation Guidance (NMIG). Since companies will still be audited against these, the preparation effort remains high. Our experience shows that auditors also use existing guidance documents in audits •Unaccounted changes in ESRS 1: ESRS 1 does not contain data points and is therefore excluded from the reduction calculation. Nevertheless, it includes the highest number of new and amended paragraphs across all standards. Even if these changes aim to reduce burden, they often require additional effort—such as adapting the DMA process or applying new principles like "fair representation."			
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	23.	Six datapoints exceptionally moved from “may” to “shall” In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, “may disclose” datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We strongly disagree with the introduction of new mandatory datapoints that have not undergone comprehensive testing by "Wave 1" companies. Adding untested requirements at this critical stage poses a significant liability to the strength, coherence, and successful implementation of the final CSRD. It directly contradicts the stated simplification mandate and risks undermining the very objectives of relevant and reliable sustainability reporting. •We particularly disagree with the disclosure of nature of corruption and bribery incidents since this information can be sensitive. We thus invoke ESRS 1 7.8 number 98: "The undertaking is not required to disclose classified information or sensitive information even if such information is considered material." •ESRS E3: It should be made explicitly clear that these metrics are only to be reported if the corresponding sub-topics ("water discharges" and "water withdrawal") have been assessed as material as part of the DMA. Otherwise, these requirements could entail effort without creating added value for the reader. •ESRS E4: In any case, it should be maintained that reporting on the transition plan is only required once the transition plan has been implemented and published. The introduction of such a transition plan should remain voluntary. •ESRS G1 10 (c): In our view, this data point does not necessarily create significant added value, as the focus on the procurement team does not necessarily appear relevant. How responsibilities are assigned within the company can be individual. Therefore, the focus should continue to be on the important key positions in terms of compliance training. •ESRS G1 14: The metrics relating to anti-corruption and anti-bribery are comprehensible and ok. However, it should be made clearer that only those metrics are to be reported for sub-topics that have been assessed as essential in the context of the DMA.			
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	In general, we strongly disagree with the introduction of new mandatory datapoints that have not undergone comprehensive testing by "Wave 1" companies. Adding untested requirements at this critical stage poses a significant liability to the strength, coherence, and successful implementation of the final CSRD. It directly contradicts the stated simplification mandate and risks undermining the very objectives of relevant and reliable sustainability reporting. Positive aspects: •Relevance of new datapoints: The additional datapoints are useful as they address critical issues of sustainability, always under the condition that materiality applies (except for ESRS 2 General Disclosures – BP 1, which is always mandatory). •Critical raw materials (E5-4): Treatment of critical raw materials as a separate disclosure is reasonable if – and only if – they are assessed as material. This preserves proportionality. •Waste reporting (E5-5): The newly added "destination unknown" category is welcome as a pragmatic exception. Where companies are able to define all waste destinations, this datapoint will simply be "0," which is both feasible and transparent. Remaining concerns: •Data availability challenges: Obtaining reliable data on microplastics and critical raw materials remains very difficult for companies at the end of the value chain. Without clearer guidance, the exception may not provide sufficient relief in practice. •Waste reporting clarity: It is unclear how "destination unknown" differs in practice from "waste directed to disposal" under paragraph 18(d). Further clarification is needed to avoid inconsistent reporting.			

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Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	The amendments contribute to a more effective and relevant materiality filter overall, but the concept of fair presentation requires clearer definitions and practical guidance to avoid disputes, ensure consistent application, and safeguard auditability. Without these clarifications, the risk remains that simplification could lead to inconsistent reporting rather than improved relevance. Positive aspects: •The simplification and stronger risk-based approach are welcome and will reduce reporting burden by focusing on genuinely material topics. •Internal costs and efforts can be reduced, while the amendments provide clearer guidance for companies subject to ESRS. •The principle of fair presentation is positive in theory and helps avoid excessive reported information. Concerns and limitations: •Financial adequacy: Without clearer definitions, there is a risk of oversimplified or even misleading reporting, as well as disputes with auditors. •Auditor diligence: Applying fair presentation consistently will be challenging, and it may become more difficult for auditors to demonstrate due diligence. •Interpretation risks: Non-finance employees are often less familiar with this principle, which could lead to uncertainty and inconsistent application. Additional elaboration in sector-specific standards would help reduce room for interpretation. •Added value: In practice, the principle may not provide significant additional benefit, as disclosures are already strongly determined by the outcomes of the materiality analysis itself. •The definition of when information is material is very broad. Not only are primary users not further defined but point (b) „users of general purpose" opens the discussion on what constitutes material information (especially against the fair presentation principle) even further, as anybody could be a user and might not „feel fairly representative". The "fair presentation" concept needs a precise definition to avoid subjectivity and minimize audit burden.			
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	Our members recognize both advantages and drawbacks of the proposed change to the threshold for country-by-country disclosure.. Clearer guidance on definitions (especially regarding ESRS S1-6) is necessary to ensure consistent application and to avoid undermining the simplification objective. Positive aspects: •The new approach of reporting for the top 10 largest countries (with >50 employees) is more practical and easier to handle for many companies. •Using a percentage-based approach supplemented with a breakdown of the top 10 countries provides meaningful detail without requiring a disproportionate reporting effort. •Much of this information is usually available in existing HR systems, so for many companies the change will not create additional data collection challenges. Concerns and limitations: •For some companies, the new threshold will in fact require disclosure for a larger number of branches than before. This may increase workload and run counter to the simplification objective. •It remains unclear how to deal with ESRS S1-6 ("significant driver") and how to define significance transparently. The criteria for excluding or including datapoints on non-employee characteristics lack clarity and risk inconsistent application. •We disagree with the assertion that the change to the threshold for country-by-country disclosure in ESRS S1-5 and S1-7 will result in a "limited burden" due to the easy accessibility of information. While the intent to gather more granular data is understandable, this change will, in many cases, significantly increase both the reporting requirements and, crucially, the audit scope. Additionally, this extra level of detail may not always be relevant.			
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	Our members see the proposed changes as a step forward but highlight important areas where clarification is still required to ensure consistent application. While the proposed methodology is a reasonable starting point, clearer definitions, prioritization of data sources, and explicit guidance on subnational agreements and EU benchmarks are essential. This will ensure that reporting on adequate wages is both feasible for preparers and reliable for users. Concerns and remaining questions: •It remains unclear how to deal with subnational agreements outside the EU. Clearer examples or guidance are needed to ensure companies can apply the methodology consistently. •More detailed information is required on which benchmarks should be used for calculating adequate wages within the EU, especially in cases where national or sectoral agreements differ. •Without such clarifications, the comparability of wage disclosures across companies and regions will remain limited.			
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	If the disclosure specifications and application requirements for E4-4 (targets) have largely been removed from the application requirements for companies when setting biodiversity and ecosystem targets as part of the simplification process, then it is imperative that clear guidance be provided elsewhere. If ESRS Set 1, E4 AR 26 is truly outdated, then it urgently needs to be revised.			
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	Our members have differing perspectives on the deletion of the voluntary datapoint on the adjusted gender pay gap. Overall, while some simplification is achieved by deleting the voluntary adjusted datapoint, this comes at the expense of comparability and meaningful interpretation. Concerns about deletion: •An adjusted gender pay gap provides more meaningful and fair insights, as it takes into account the function, role, or qualification of employees. Without such adjustment, unadjusted figures may promote misleading conclusions or reinforce structural discrimination. •Deleting the voluntary adjusted datapoint risks reducing comparability and nuance, especially in industries with specific role- or qualification-based differences. •The overall aim is to provide transparency on whether a company pays an equal wage for the same type of work, no matter the gender (i.e. equal pay for equal work). While the adjusted gender pay gap compares gender pay gap based on the same job type, the unadjusted pay gap only compares men and women overall. Depending on the industry, this can lead to a distorted picture. Additionally, including benefits in the calculation further distorts the pay gap as they are managed individually by the respective countries independently of gender. Arguments for deletion: •Reporting only the unadjusted pay gap is consistent with other EU directives and avoids creating parallel or conflicting reporting obligations. •While the unadjusted figure can be open to misinterpretation, aligning with existing legislation ensures coherence and limits additional reporting burdens.			
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	Our members acknowledge that the revised formulation continues to provide some level of transparency on payment practices, but important concerns remain regarding the protection of SMEs. Positive aspects: •Even without clause 33(a), companies are still required to disclose standard payment terms and the percentage of invoices aligned with these terms. This ensures a degree of visibility on payment practices that affect SMEs. •This disclosure helps identify whether companies have consistent policies in place regarding payment periods. Concerns: •The omission of clause 33(a) is problematic, as it removes explicit transparency on how long suppliers actually wait to be paid. SMEs, in particular, are vulnerable to late payments and often lack the bargaining power to enforce fair practices. •The deleted requirement would have provided a more detailed and concrete picture of payment behavior by disclosing the average payment time. Its absence risks weakening protections for SMEs. •While average payment time is influenced by company-specific cycles (e.g. weekly or bi-weekly runs), it nevertheless offers valuable information on whether small suppliers face structural disadvantages. •Disclosing information of the standard payment terms by "main category of suppliers, including SME's" (as also suggested in the NMIG) is not possible. The standard payment terms generally do not make any differentiation between supplier types. Additionally, for multinational companies with thousands of suppliers globally, a categorization of suppliers into SMEs and Non-SMEs is not possible. •the definition of SMEs depend on different national legislation and includes several parameters in "and" combination			
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The proposed structural changes are received positively and are welcomed as it results in a clearer representation and reduced complexity compared to the original distribution of requirements. Also the removal of the operational control concept is considered a relief for many companies as it reduces the documentation effort. However, a number of key issues remain: •The proposed changes in reporting on financial resources related to the transition plan and actions increase the reporting burden. The proposed formulation seems to indicate that the complete financial and investment planning needs to be disclosed and the ranges of short-, medium and associated long-term CapEx/OpEx are an extension of reporting requirements, going against the aim of reducing the reporting requirements. Not only are future financial resources always anticipated, but the requirements go beyond anything that is required in financial reporting. •Changes in reporting on climate scenario analysis (i.e. application requirements for climate-related physical and transition risks) indicate rather behavioural obligation instead of being only reporting requirements •More clarity on how to treat leasing in GHG emission reporting would be appreciated. •As intensity values are frequently asked by Ratings and Rankings, we would suggest keeping the KPI.			
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	S1-DR10 Social Protection This disclosure requirement requires international companies to collect data about the legal situation in all countries where they have employment. What is understood by e. g. maternity protection and parental leave is assessed very differently depending on the country and region. It cannot be ruled out that, for this reason, the legal situation for social security is assessed differently by various reporting companies in each country. To ensure the comparability of the data, information on the legal situation in each country worldwide should be made centrally available to companies. On this basis, companies should then report whether they compensate for insufficient social security in a country where they have employees through their own accompanying measures. S1-DR15 Remuneration Metrics 44b) In international companies, the annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees is significantly influenced by the distribution of the workforce around the world. In European companies, top managers and CEOs who might be those "highest paid individuals" in many cases tend to be located in Europe whereas e.g. production lines might be located in low cost countries. Even if the workers in those countries might be paid a fair wage, and even if the "highest paid individual" might receive just an average remuneration, this ratio might indicate a severe disproportion although the remuneration for all employees is adequate. In a company with employment exclusively in Europe, however, the same figure might be an indicator for an improper high remuneration of the top earner. So this KPI is not comparable for different companies and should be omitted.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Defintion of key materials (15 a) is not necessarily a simplification, since it has to be aligned with auditors and implemented in the IT infrastructure			
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	1.The requirements demand information on expected durability, repairability, and the share of recyclable materials. A critical issue here is that the reference to using established assessment systems (such as those from the ESPR or PPWR) has been removed. Without standardized and regulatory-anchored methodologies for measuring these criteria, there is no reliable basis for reporting. This inevitably leads to company-specific, subjective assessments that are not comparable across different companies. As a result, the informative value of the data is significantly weakened. Recommendation: The disclosure requirement should be explicitly linked to the development and application of the relevant standards under ESPR and PPWR. Until these standards are finalized, objective and comparable reporting is not feasible. 2.The new requirement (17d) to disclose the share of recycled materials in key products raises questions about scope and added value. This KPI essentially captures the same information already reported through the accounting of resource inflow (in ESRS E5-4, 15(d)). The share of recycled materials used in production is logically reflected in the finished products. Therefore, separate data collection and disclosure for resource outflow is redundant. Disclosure for individual product streams (key products) requires complex tracking and allocation, which involves a significant administrative burden. This effort is disproportionate to the informational gain, as the core information is already captured elsewhere. Recommendation: This requirement (17d) should be removed to avoid duplicate reporting. The meaningful information about the use of recycled materials is already sufficiently covered by the disclosure obligations on resource inflow.			
Survey	ZVEI e.V.	Business association (other than association of financial institution)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	S1-DR10 Social Protection This disclosure requirement requires international companies to collect data about the legal situation in all countries where they have employment. What is understood by e. g. maternity protection and parental leave is assessed very differently depending on the country and region. It cannot be ruled out that, for this reason, the legal situation for social security is assessed differently by various reporting companies in each country. To ensure the comparability of the data, information on the legal situation in each country worldwide should be made centrally available to companies. On this basis, companies should then report whether they compensate for insufficient social security in a country where they have employees through their own accompanying measures. S1-DR15 Remuneration Metrics 44b) In international companies, the annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees is significantly influenced by the distribution of the workforce around the world. In European companies, top managers and CEOs who might be those "highest paid individuals" in many cases tend to be located in Europe whereas e.g. production lines might be located in low cost countries. Even if the workers in those countries might be paid a fair wage, and even if the "highest paid individual" might receive just an average remuneration, this ratio might indicate a severe disproportion although the remuneration for all employees is adequate. In a company with employment exclusively in Europe, however, the same figure might be an indicator for an improper high remuneration of the top earner. So this KPI is not comparable for different companies and should be omitted.			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Overall, we support the proposals on clarifying and simplifying the materiality assessment concept while preserving some key parts (consideration of own operations and the value chain, links with sustainability due diligence processes and engagement with stakeholders for identifying the material aspects). To improve usability, we recommend repurposing EFRAG's work on sector-specific standards into sectoral guidance. This guidance would help companies identify data points expected to be material for each sector and provide voluntary sector-specific data points that companies could choose to disclose. §22: we recommend a more explicit distinction between the concepts of reporting at topical level or at IROs level. Topical information is generally broader and thematic while IROs information is more entity-specific. We suggest highlighting that the latter should be the focus of the disclosures, and providing a mapping table that would help to cross-reference between the topics and the connected IROs. §29: to create positive feedback loops, we encourage requiring from preparers to disclose whether, and to what extent, they considered input from users on their previous sustainability reports. §48: we would recommend that the ESRS flag topics which are highly likely to be material for any company: climate change, own workforce, and business conduct. We strongly suggest that a company deeming either of these topics not to be material should be required to provide a detailed explanation of how the materiality assessment led to this conclusion – similarly to the current ESRS requirements on the topic of climate change. §51: in some instances, aggregation of information is relevant to avoid excessive and irrelevant details. However, when locational specificities are present, disaggregation is necessary. The explanation of why the company is providing aggregated/disaggregated information should be added as a specific data point in Chapter 3 of ESRS 1, and in ESRS 2 IRO-1.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	§34-35: Overall, we support the clarifications related to negative impacts and the efforts to distinguish the actual negative impacts from prevention, mitigation and/or remediations measures. Detailed information on measures taken and results of such actions are significant and can give an insight on future company performance. We agree that negative impacts should be considered regardless of any attempts at remediation/mitigation during or after the reporting period, and that only remediation/mitigation measures that led to an evidenced reduction of the severity and/or likelihood of the impact should be considered in materiality assessments. We also support the precision that if the undertaking needs to maintain significant ongoing mitigation and/or prevention actions, the impact shall be assessed without considering these. However, the proposed wording used to explain this is confusing and should be simplified. In particular, the use of the "gross vs net" term in the context of impact materiality assessment may create confusion for some stakeholders as this concept is usually used for risk identification. To resolve these, we'd suggest clarifying the difference between the impact materiality assessment described in the standards from a risk assessment and avoid using or referencing the "gross vs net" concept. §36: we agree with the clarification that the assessment of positive impacts must be conducted in their own right – rather than actions offsetting the negative ones. The specification that the reporting should focus on the company's business activities, products, and services, and no other types of activities e.g. philanthropy, is also welcome.			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Overall, we agree that the changes proposed by EFRAG are likely to improve readability. §114: EFRAG's proposal regarding connected information related to monetary amounts or other quantitative information presented in the financial statements is concerning from a user perspective. Making these cross-references to financial statements voluntary would restrict the ability for investors to identify how the impacts, risks and opportunities disclosed in the sustainability statement affect the financial performance of companies. We would encourage to maintain all such cross-references as mandatory, also in line with the stated requirement for preparers to provide information enabling users of sustainability reports to understand the connections with the financial statements (§111). §109: an executive summary would be helpful for data users to quickly get an overview of the reports' content. The ESRS should explicitly mention that this summary should present a fair view of the reported information, meaning highlighting the positive aspects of the sustainability report but also covering the material risks, challenges, and negative impacts of the undertaking. To ensure this and improve comparability across reporting entities, EFRAG should provide an indicative template for this executive summary. §110: having detailed data in appendices can also make the standards clearer, under the condition that the data will be digitally tagged for machine-readability and cross-referenced in accordance with §107-110. It is important that greater flexibility does not impede investors' ability to find and compare information.			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We agree with the overall approach of simplifying and shortening the standards by removing duplications between ESRS 2 and topical standards, as it can reduce burden while maintaining much of the necessary content. We also support the renaming of the minimum disclosure requirements to general disclosure requirements. AR 24 for §28 a: we agree that disclosing IROs and PATs at the level at which the IROs are managed can simplify the standards. AR 27 for §30: we underline that it is essential that companies provide a detailed explanation as to why PATs would not be developed for material risks and impacts. Additionally, we strongly encourage maintaining the disclosure related to whether companies plan to develop PATs in the future and the timeline for this development. This information provides useful insights as to whether companies consider these IROs as less critical compared to others, or whether their absence constitutes an oversight from the companies.			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Overall, the standards have become more readable, and many of the editorial changes in the language of the standards contribute to clarity. The decision to have the mandatory application requirements (ARs) close to the disclosure requirement to which they belong makes the standards easier to apply. The more consistent use of "topics" / "sub-topics" as wording throughout the ESRS also facilitates comprehension and navigation across the standards. We agree that distinguishing clearly between mandatory and voluntary data points by using different documents can simplify the reporting and prevent accidental overreporting. On the other hand, the voluntary data points are also likely to receive less attention in a separate document, which might lead to less reporting. However, on the content side, some of the ESRS data points that were voluntary were considered as useful by investors, so that we believe they should be included in the guidance (see our response to Question 22). To further facilitate usability by preparers, users and auditors, we would recommend the following adjustments: -Make more explicit in ESRS 1 that ARs attached to a DR are mandatory and covered by assurance requirements. This should be done at the beginning of every block of AR and would remove any possibility of misinterpretation. -Establish individual IDs for every data point and ARs to ensure that they can be referenced more easily and for use in digital tagging.			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We support EFRAG's efforts in reducing the number of ESRS data points by repurposing some of the formerly mandatory and voluntary data points under this non-mandatory illustrative guidance. We would recommend that the NMIG is included in the text of the Delegated Act to clarify its status as official ESRS guidance. However, this inclusion should take the form of an annex with a clear disclaimer explicitly stating that the NMIG has been designed for guidance and illustrative examples only, and that non-compliance with them does not need to be justified. Similarly, we believe preparers (and indirectly users) would benefit from more sector-specific guidance. For this, the work already conducted by EFRAG in preparing sector-specific standards could be re-purposed and help companies report in a more standardised and comparable way. This sector-specific guidance could take the form of an update of the NMIG, including sector-specific recommendations.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	While we understand the rationale to provide limited reliefs to companies throughout the ESRS, we see a risk that the proposed reliefs could compromise data availability, quality and comparability if abused by reporting companies. Particularly, the reliefs on undue cost and effort, lack of data quality, use of estimates in the value chain and joint operations on which reporting companies do not have operational control, might, if taken together, lead to serious gaps in reporting. As they apply horizontally and, so far, with little limitations, they are likely to have a major impact on the reliability of sustainability reports and further decorrelate them from financial statements. This would restrict the ability for investors to identify how the IROs disclosed in the sustainability statement affect the financial performance of companies which is critical to determine financial materiality. Additionally, this could lead to regulatory liability for financial market participants that need this information to comply with their own disclosure requirements, such as SFDR. We believe it is crucial to establish incentives ensuring companies strive to make this data available to users. Time limits and clearer obligations to improve the quality and availability of data over time should be explicitly required in the ESRS. This should include actions undertaken and how they will improve the data for the next reporting period. In the meantime, companies should need to be transparent about the origin and the quality of the estimates that they use.			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	See response to Q.17. While we understand the rationale to provide limited reliefs to companies throughout the ESRS, we see a risk that the proposed reliefs could compromise data availability, quality and comparability if abused by reporting companies. In particular, the proposed relief for "undue cost or effort" is broadly defined and risks being misused. For investors and other users of sustainability data, ensuring that the information is comparable and reliable is essential. Allowing such reliefs without safeguards, such as clear requirements and timelines for improving the data, disclosure of actions taken, indications of whether improvements are expected in the next reporting period, and transparency around the quality of estimates, could undermine the overall credibility of the reporting framework. This is especially the case when the reporting data points are linked with other mandatory disclosure rules for investors, e.g. the ones necessary for compliance under SFDR, where reliefs such as partial scope of calculation should be avoided (See also our response on question 17).			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We are concerned with the suggestions to water down the disclosures on anticipated financial effects. Quantitative anticipated financial effects are one of the core pieces of information for investors and are essential for assessing financial materiality. In the development of the ESRS, it has been a priority to provide investors with this data, which is a fundamental requirement for managing the risks in their portfolios. We acknowledge that there can be challenges connected to producing this information, however the effort is worth the benefit for a company, its investors and the wider economy. Understanding these often-existential risks is necessary for resilience both at the level of the enterprise, and the economy as a whole. While Option 1 offers broad reliefs, we believe it could be a workable compromise in the spirit of simplifying the ESRS for preparers, subject to the caveats mentioned previously (see response to Q.17-18). Of the two suggested options, Option 1 is the only one to maintain the credibility of the ESRS – clearly establishing the expectation to provide quantitative data to users, while granting adequate reliefs for reporting companies when they encounter legitimate challenges to do so. Option 2 would entail a complete removal of the quantitative disclosures and leave companies able to choose the data to provide based on convenience rather than materiality or relevance, thus leading to critical loss of data and creating information gaps for investors that would undermine the consistency and reliability of the standards. Option 2 would also introduce reliefs that go beyond the ISSB standards, which would mean more effort for companies that report under both the ISSB and ESRS frameworks, and difficulties for investors that want to compare reports between both regimes. Option 1, while not being entirely aligned with the ISSB standards, would mitigate this fragmentation.			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Quantitative anticipated financial effects are one of the core pieces of information for investors, and should remain a priority in the ESRS (see also our response to Q.17-19). This is especially important for the topic of climate, which is a key material topic for nearly all companies and users of sustainability data. Investors in our network highlighted that these disclosures are particularly relevant for them, and that they see limited to no space for simplification there. The removal of the different time horizons (short, medium and long-term) for climate physical and transition risks disclosures throughout these data points reduces the granularity of the information provided and its relevance for investors. Furthermore, datapoints related to the monetary amounts and percentages of assets and revenues at material physical and transition risk are important for investors and lenders to assess an undertaking's exposure. Finally, the proposed deletion of the disclosures related to scenario analysis would restrict important information enabling investor to assess the consequences of anticipated financial effects and take decisions accordingly. We welcome the efforts made to align with the ISSB standards and maintain some core disclosures, but it is important that diverse data points that are needed by a wide range of EU investors need are also maintained.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We strongly support maintaining interoperability between the ISSB's IFRS S1/S2 and the ESRS. However, some of EFRAG's proposals related to additional reliefs for preparers run the risk of widening the divergence between both sets of standards. As the introduced reliefs are already significant and should be subject to strict conditions (see our responses to questions 17 to 20), we agree with not adding the abovementioned IFRS reliefs. While we are not opposed to the references to SASB Standards and IFRS Industry-based Guidance, we strongly recommend repurposing EFRAG's existing work on the sector-specific standards in the form of guidance. Sectoral guidance which is well-adapted to the needs of ESRS preparers could be a source of simplification for reporting companies (see response to question 11). Deletion of 7 "shall" data points that were aligned with ISSB standards: some of the deleted data points that were aligned with the ISSB standards are valuable to investors, so we suggest reintroducing them: •ESRS 2 General disclosures- IRO-1, paragraph 53 (e) (disclosure on how IROs are integrated into overall risk management) has been highlighted by investors in our network as key information to assess data quality and the maturity of a company's practices regarding sustainability risks. It also overlaps with the TNFD framework, which means its deletion would create additional interoperability problems. •E1 Climate change (53 amended, gross GHG emissions intensity) has been highlighted by members of our network as a particularly useful disclosure. It is not only aligned with the ISSB standards, but also GRI standards, and provides data for SFDR, Pillar 3 and the Benchmark Regulation. •ESRS 2 GOV-2 - Integration of sustainability-related performance in incentive schemes is regarded by investors as particularly valuable information. Its inclusion would also improve alignment with GRI standards.			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	22.E1.	Comments on deleted datapoints in ESRS E1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	We consider climate-related data points to be essential for informed investment decision making. While most of the critical data points needed by investors in E1 have been maintained, we call for maintaining E1.IRO-1_15 paragraph 21 on the use of climate scenario analysis to identify transition risks and opportunities, which is flagged as an essential indicator by many investors. Eurosif conducted a broad consultation exercise across its members and partners to identify which data points investors consider as essential to maintain. The following deleted datapoints were also highlighted as relevant due to their usefulness for investors, because they are required by other applicable EU disclosure requirements, or because they are already present in the ISSB standards and should be maintained for interoperability purposes: Mandatory data points: E1-1_1216 g E1.SBM-3_05 AR 7b E1.IRO-1_0120 a, AR 9 E1.IRO-1_0220 b E1.IRO-1_05AR 11 b E1.IRO-1_0920 c E1.IRO-1_14AR 12 d E1-3_02AR19d E1-3_05AR21 E1-4_1934 c E1-4_20AR 25 a E1-4_21AR 25 b E1-4_24AR 30 c E1-5_1840 E1-5_1941 E1-5_2042 E1-5_2143 E1-6_06AR 52 E1-6_3255 E1-6_33AR 55 E1-6_34AR 55 E1-6_35AR 55 E1-7_09AR 58e E1-7_12AR 61 E1-7_16AR 62 c E1-7_17AR 62d E1-7_18AR 62 e E1-7_19AR 64 E1-8_0163 a E1-8_0363 b E1-8_0663 d E1-8_0763 d E1-8_0863 d Voluntary data points: Not all of the 13 voluntary (may) data points deleted from ESRS E1 were included as illustration in the NMIG. As climate data has been consistently highlighted as a priority by investors, we recommend introducing them at least in the NMIG.			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	22.E3.	Comments on deleted datapoints in ESRS E3	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The following deleted datapoints were highlighted as relevant due to their usefulness for investors: Mandatory data points: E3.IRO-1_02 8b			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	22.E4.	Comments on deleted datapoints in ESRS E4	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Eurosif conducted a broad consultation exercise across its members and partners to identify which data points investors consider as essential to maintain. The following deleted datapoints were highlighted as relevant due to their usefulness for investors: Mandatory data points: E4.IRO-1_02 17 b E4.IRO-1_03 17 c E4.IRO-1_14 19a E4.IRO-1_15 19a E4-6_0145 a Voluntary data points: The following voluntary data points were removed but are already present in TNFD, and should be maintained for interoperability purposes. E4-3_13AR 20 d E4-3_14AR 20 e E4-5_12AR 34 c			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	22.E5.	Comments on deleted datapoints in ESRS E5	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Eurosif conducted a broad consultation exercise across its members and partners to identify which data points investors consider as essential to maintain. The following deleted datapoints were highlighted as relevant due to their usefulness for investors: Mandatory data points: E5-5_14 38 b			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	22.S1	Comments on deleted datapoints in ESRS S1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Eurosif conducted a broad consultation exercise across its members and partners to identify which data points investors consider as essential to maintain. The following deleted datapoints were highlighted as relevant due to their usefulness for investors: Mandatory data points: S1-6_13 50 d S1-6_16 50 e Voluntary data points: S1-6_0851 S1-14_08 89 S1-14_09 89 S1-14_10 90 S1-16_07 99			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	22.S2	Comments on deleted datapoints in ESRS S2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Eurosif conducted a broad consultation exercise across its members and partners to identify which data points investors consider as essential to maintain. The following deleted datapoints were highlighted as relevant due to their usefulness for investors: Voluntary data points: S2-4_17AR 37			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	22.S3	Comments on deleted datapoints in ESRS S3	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Eurosif conducted a broad consultation exercise across its members and partners to identify which data points investors consider as essential to maintain. The following datapoints were highlighted as relevant, but were deleted due to changes in the double materiality assessment. While some of their aspects is preserved in other datapoints / overall DMA guidance, we would encourage more explicit mentions of these data points e.g. in the NMIG: Mandatory data points: S3.SBM-3_01 9 S3.SBM-3_03 9 a i-iv S3-4_1035 Voluntary data points: S3-3_21AR 21			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	22.S4	Comments on deleted datapoints in ESRS S4	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Eurosif conducted a broad consultation exercise across its members and partners to identify which data points investors consider as essential to maintain. The following datapoints were highlighted as relevant, but were deleted due to changes in the double materiality assessment. However, we would encourage a more explicit mention of e.g. in the NMIG: Mandatory data points: S4.SBM-3 10 a Voluntary data points: S4-2_22 22			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	22.G1	Comments on deleted datapoints in ESRS G1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Eurosif conducted a broad consultation exercise across its members and partners to identify which data points investors consider as essential to maintain. The following deleted datapoints were highlighted as relevant due to their usefulness for investors: Mandatory data points: G1-1_1010 g G1-2_0215 a Voluntary data points: G1-5_04 AR 12 a G1-5_05AR 12b			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Several of the voluntary data points made mandatory are identified as relevant by investors according to feedback from our members and partners. We support in particular the data points related to biodiversity transition plans, total water withdrawals/discharges, as well as the number and nature of confirmed incidents of corruption or bribery. ESRS E4 Biodiversity and ecosystems: we suggest adopting a "comply or explain" approach for companies that consider biodiversity material but do not implement a biodiversity transition plan. The explanation should detail the reasons behind the decision, and whether and if so when such a plan will be implemented in the future.			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We support the proposed additional mandatory data points.			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	We support the explicit clarification of ESRS being a fair presentation framework. This would both promote further interoperability with the ISSB standards, of which the fair presentation principle is a cornerstone, ensure that reporting companies faithfully represent their sustainability-related risks, impacts and opportunities, and limit the burdens of a compliance-based approach.			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Both absolute and intensity-based targets are necessary to present an accurate reflection of undertakings' decarbonisation trajectories and the environmental and economic impact of the decisions a financial institution takes. Absolute metrics provide a clear, real-world representation of companies' actual impacts and are complementary to intensity-based metrics. While we acknowledge providing absolute metrics can be challenging, these challenges are not specific to the financial sector, and we do not consider this a justification for a dedicated exemption. Keeping the absolute targets would also improve consistency between different pieces of EU legislation, as this information is required under the SFDR. Furthermore, not including absolute emissions would create further fragmentation internationally, as SBTi also requires financial institutions to set absolute reduction targets for scope 1&2.			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	We support this development, which introduces a clearer threshold that helps comparability across companies.			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	A methodology should be chosen that ensures disclosures are comparable and reliable, for example not distorted by minimum wages that are below living wages in some countries. Adequate wages for workers from countries outside of the EU could be provided by the EU and updated annually, to serve as a reference point for reporting companies, ensuring comparability. It should be defined based on the ILO methodology to estimate a decent wage.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	While we appreciate the efforts to maintain the data points required under SFDR, some of the changes in the revised ESRS may create additional challenges for investors. It might become more difficult to find the relevant information in the sustainability reports and may induce additional challenges to calculate the metrics for SFDR. The removal of intensity-based data points from the ESRS may therefore create issues in complying with SFDR, given that financial institutions will have to identify the relevant ESRS data points in the sustainability reports and calculate themselves the corresponding SFDR indicators. Furthermore, different calculation methods may result in inconsistencies between the metrics disclosed by companies, hindering comparability. For this reason, we would recommend that intensity metrics – in particular indicator 3 on Gross GHG emission intensity – be maintained in the ESRS. Finally, the shift of indicators related to non-respect of UN GPs and OECD Guidelines on Multinational Enterprises to a footnote in another indicator may jeopardise the capacity of users to gather this information, which is required under a number of legislations including SFDR, BMR, but is also a basic information required for investors' exclusions policies.			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	E4 – 4 target disclosure specifications have been highlighted as being particularly important for investors, so we strongly support their reinstatement in the revised ESRS. In any case, E4 AR 26 should also be maintained and specify minimum criteria for these targets – e.g. measurable, time-bound, geography specific, and verifiable. It should indeed include stronger links to science-based frameworks, for example the SBTN or Kunming-Montreal Global Biodiversity Framework for target definition and TNFD for related disclosures. Companies could also refer to sectoral guidance, e.g. based on EFRAG's work on sector-specific standards that we support including in the ESRS (see response to question 11). Similarly to climate transition plans, biodiversity action plans could include details on restauration or renaturation strategies on protected areas including the methodologies of reference and progress updates and should avoid the use of biodiversity offsets. Given that the state of scientific research and methodologies on measuring biodiversity IROs evolve rapidly, we would encourage to include further regular reviews of these data points.			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	Despite being a voluntary ESRS data point, adjusted gender pay gap is an information often required by investors and is among the data points considered as essential by Eurosif's members and partners. Adjusted pay gap allows additional insights into pay-related equity and gender-related dynamics that go beyond structural workforce factors, and as such it is a relevant information for many investors. In consequence, we would support maintaining both the unadjusted and adjusted gender pay gap in the final revised ESRS, which have complementary uses.			
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Eurosif - the European Sustainable Investment Forum	User Association	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The ESRS play a crucial role in enabling investors to allocate capital in line with their clients' sustainability preferences, support the green transition, and manage their own exposure to sustainability-related risks and impacts. A key strength of the ESRS lies in its double materiality perspective and its coverage of environmental, social, and governance topics. We welcome that these key components have been maintained fundamentally while simplifying the standards. We welcome many of EFRAG's suggestions on ESRS simplifications, including changes in structure and double materiality assessment, removal of duplications, and shifting some of the voluntary data points as non-binding guidance. We reiterate our strong support for introducing sectoral guidance based on EFRAG's existing work on sectoral standards. The 57% reduction of the initial ESRS set 1 data points proposed by EFRAG is significant. We would like to stress that the EFRAG proposals should be considered as the absolute minimum necessary for investors to make informed investment decisions. We strongly caution against further data points cuts, which would jeopardise the relevance and credibility of sustainable corporate reporting across the EU. Eurosif conducted a broad consultation exercise across its members and partners to identify which deleted data points investors consider as essential to maintain - these are highlighted in the response to Q.22. Additionally, some key issues remain. Importantly, clear requirements for disclosing quantitative and qualitative disclosures on anticipated financial effects are essential for the credibility and effectiveness of the ESRS from a user perspective. Interoperability with ISSB standards is also essential to maintain. Some modifications of the datapoints corresponding to the SFDR PAIs are also likely to create issues for investors and complexify regulatory compliance.			
Survey	Nordic Swan Ecolabel	Other - please specify (required)	Sweden	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	(please note that the reply above doesn't necessarily reflect our opinion but an option has to be chosen in order to fill out this free text section) Nordic Swan Ecolabel recommends consistency between the VSME standard and the ESRS standards. In the VSME standard there is a clear reference about how to report when an undertaking is in possession of an environmental label or certification (please see formulation "B1 Basis for preparation, point 25 in VSME standard: If the undertaking has obtained any sustainability-related certification or label, it shall provide a brief description of those (including, where relevant, the issuers of the certification or label, date and rating score"). Nordic Swan Ecolabel believes such a reference should be included in the ESRS standards. The formulation could be included in the introductory paragraphs of the standard where the basic information about the undertaking is described. This could be in ESRS 2 SBM-1, paragraph 17. The reference should focus on officially recognized ISO 140024 type I ecolabels as these ecolabels provide a detailed environmental analysis equivalent to the sustainability materiality assessment that is demanded in the DMA of the ESRS standard. Type I ecolabels set strict requirements for the undertaking (product or service) throughout the whole life cycle and work as an independent third party as the ecolabel certifies that the undertaking lives up to these requirements. Please also note that Type I ecolabels hold a special role in the Empowering Consumers Directive (2024/85) by demonstrating "excellent environmental performance".			
Survey	Toulouse Business School	Academia	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	The proposed amendments did not achieve an acceptable balance between simplification and robustness of the DMA. While point (a) in the definition of double materiality is clear, point (b) is imprecise. a)Point (b) is tautological: "Information is MATERIAL when: (…) it is necessary (…) to understand (…) MATERIAL impacts, risks and opportunities …" (emphasis added) b)The inclusion of "risks and opportunities" in point (b) is inconsistent with the notion of impact materiality, as illustrated in different parts of the same ESRS 1 (e.g., paragraphs 3 and 30). c)Point (b) refers to the "understanding" of sustainability reporting users, without reference to the implications of such understanding. d)Additionally, in paragraph 30 impact materiality correctly refers to "the identification of information that relates to the undertaking's material actual or potential, positive or negative impacts on people or the environment over the short, medium or long term Business relationships are not limited to direct contractual relationships." Consequently, any framing of impact materiality based on decision-making is insufficient, since many of the stakeholders are not in a position to make any decision. The greater focus on the "materiality of information" as a general filter (point 2) can help organisations in performing their DMA, however, the assessment of the materiality of information shall not be used as a reason to omit information on a topic that was identified as material. The possibility of providing disclosures at the topic or at the IRO levels (point 6), indistinctly breaks the traceability between impacts, risks, opportunities, and their corresponding metrics, complicating insurability and cross-sectional comparability. Allowing the disclosure of information on non-material topics, although it shall be provided "without obscuring" material information, it may introduce noise and allow cherry-picking practices that may eventually biased the "fair presentation" that the ESRS are now expected to support.			

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Survey	Toulouse Business School	Academia	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Under the current text, there is no explicit requirement to report on preventive measures taken in prior periods when an impact has already occurred. If an impact materializes during the reporting period despite prior preventive efforts, those actions do not have to be disclosed. The standards only require disclosure of preventive measures for potential impacts, while for actual impacts, disclosure of remedial actions is required			
Survey	Toulouse Business School	Academia	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Toulouse Business School	Academia	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I disagree	The simplification of ESRSs and the reduction of disclosure requirement and data points is premature. Companies, auditors and consultants have already invested in the implementation of ESRSs. However, the untimely revision will waste the learning that could be obtained from this experience. No less important, in general, the loss of the knowledge and positive externalities generated by the preparation, analysis and use of sustainability information and the increase in social and environmental regulation costs (e.g., government monitoring in the absence of corporate self-reported information) will overshadow the putative administrative costs savings from the ESRS simplification. The re-architecture between ESRS 2 and thematic standards reduces enforceability and comparability because although minimum "Shall" requirements are maintained in ESRS 2, their simplification weakens the common baseline and opens the door to overly flexible interpretations across companies and sectors. The elimination of the obligation to declare PAT plans and timelines diminishes forward-looking guidance and monitoring capabilities. Additionally, this omission limits the capacity of information users to evaluate the commitment of reporting organizations in achieving their stated sustainability goals.			
Survey	Toulouse Business School	Academia	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Toulouse Business School	Academia	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	It is reasonable to include guidelines and examples on how to disclose datapoints in "Non-Mandatory Illustrative Guidance" (NMIG). However, the simplification proposal is depriving users of the sustainability report from crucial information to assess the due diligence of the company. For example, the policies to identify and manage actual or potential, positive or negative impacts on people or the environment, are crucial to assess due diligence. Therefore, it is paramount to perform an in-depth assessment to determine whether all disclosures currently presented in the NMIG should be made mandatory in the delegated act. While the NMIG may reduce implementation questions, encourage proportional innovation, and ease the burden on PAT narratives when rigid prescriptions fail, it could also reduce comparability. Without a minimum common ground, methodological heterogeneity hinders cross-sectional and time-series analyses. In this regard, the NMIG is useful if it complements—not replaces—a clear regulatory baseline that preserves consistency, traceability, and insurability.			
Survey	Toulouse Business School	Academia	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	The "undue cost or effort" principle is aligned with the goal of administrative simplification. However, the articulation of this "relief" in paragraph 89 ESRS1 is so imprecise that it may turn this set of standards into dead letter. The "undue cost or effort" principle risks transforming Directive (EU) 2022/2464 into a voluntary guideline. The limitation of considering resilience in terms of risks places an emphasis on financial materiality, overlooking how an organization's activities may also affect the resilience of the ecosystems in which it operates.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Toulouse Business School	Academia	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	The amendment is generally reasonable. But the "undue cost or effort" principle is too broad, as indicated in the response to question 19.			
Survey	Toulouse Business School	Academia	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	Toulouse Business School	Academia	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Thorough information on dependencies is increasingly important to motivate organizations and industries to tackle sustainability challenges. This amendment goes against the tide. This modification is not justified on the grounds of administrative simplification, as the costs of processing this information is minimal: this information is present in information systems and calculations are trivial. Instead, this modification appears to be proposed on the grounds of avoiding information that may impact corporate reputation, at the expense of resilience.			
Survey	Toulouse Business School	Academia	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	IFRS and ESRS have different objectives and scope. Alignment with IFRS twists the notion of double materiality with the introduction of materiality as a filter and fair presentation, for example. As a result, ESRS is less aligned with the Green Deal. This greater alignment with the ISSB reduces the interoperability with other relevant sustainability reporting standards that companies have been applying for decades (such as the GRI).			
Survey	Toulouse Business School	Academia	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Toulouse Business School	Academia	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	No substantial increase in administrative costs. Datapoints are relevant.			
Survey	Toulouse Business School	Academia	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Datapoints are relevant.			
Survey	Toulouse Business School	Academia	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	The notion of fair presentation is ambitious. It draws on financial reporting. Some ambition in this area is positive. However, it is inconsistent with the focus on limited assurance. Additionally, the application of fair presentation may dissuade companies from disclosing information on material topics, considering the inherent complexity and incompleteness of sustainability data.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Toulouse Business School	Academia	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Complex estimates are common to all sectors. The financial sector has a disproportionate effect on climate change. Absolute targets are essential for assessing progress on climate change, and banks are no exception in this regard. This exclusion is also at odds with other information on climate change required by financial institutions in other EU regulations (e.g. SFDR) and by banking supervising entities (Basel Pillar III).			
Survey	Toulouse Business School	Academia	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	Thresholds are reasonable.			
Survey	Toulouse Business School	Academia	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	Processing information about wages, considering notions such as living wages, is a significant concern for society. This modification is not justified on the grounds of administrative simplification, as the costs of processing this information is minimal: this information is present in information systems and calculations are trivial. Instead, this modification seems to be proposed on the grounds of avoiding information that may affect corporate reputation.			
Survey	Toulouse Business School	Academia	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	The "consolidation" and reduction of DPs results in a loss of granularity and breaks the traceability necessary for the SFDR to inform investors. Merging eight DPs into a single "HR policy" in ESRS 2 limits the relevance of human rights, erases nuances by stakeholder group, and weakens operational alignment with UNGP/OECD. The single "severe cases" indicator fails to capture typologies, severity, remediation, or geography. Excluding "fatalities" from the scope of the PAI on lost days is a material setback. Investors require explicit visibility into fatalities, rates, and trends. Moving content to ESRS 2 (general) instead of maintaining it in ESRS S1–S4 reduces consistency between IROs and specific metrics and hinders insurability. The supposedly "marginal" reduction in coverage is, in fact, material for time series, benchmarking, and alignment with the SFDR Annex I tables; it increases the risk of cherry-picking and mapping gaps.			
Survey	Toulouse Business School	Academia	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	AR 26 could be further reviewed to better reflect current developments (e.g., SBTN).			
Survey	Toulouse Business School	Academia	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	Disclosing this information has enormous social benefits in terms of increasing gender equality. This modification is not justified on the grounds of administrative simplification, as the costs of processing this information are minimal: this information is present in information systems and calculations are trivial. Instead, this modification seems to be proposed on the grounds of avoiding information that may affect corporate reputation.			
Survey	Toulouse Business School	Academia	France	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	This formulation will contribute to damaging SMEs. The increase in government regulation and monitoring costs (in the absence of corporate self-reported information) will overshadow the putative administrative costs savings from this unsophisticated simplification.			
Survey	Toulouse Business School	Academia	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Toulouse Business School	Academia	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Toulouse Business School	Academia	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Toulouse Business School	Academia	France	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Toulouse Business School	Academia	France	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Toulouse Business School	Academia	France	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Toulouse Business School	Academia	France	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Toulouse Business School	Academia	France	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
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Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Toulouse Business School	Academia	France	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
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Survey	Toulouse Business School	Academia	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Some emission-intensity datapoints have been trimmed. While intensity indicators are valuable to users, the cuts mainly target metrics that can be derived from other reported figures (e.g., emissions relative to revenue or total assets). We advocate preserving at least one sector-relevant intensity indicator, since stakeholders need both absolute and intensity perspectives—aligned with TCFD guidance on Metrics & Targets. On transition plans, we welcome the draft's explicit alignment with EU and international climate objectives.			
Survey	SPOLCHEMIE - Spolek pro chemickou a hutní výrobu	Preparer (non-financial preparing a sustainability report)	Czechia	35.ESRS1_1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	•Standards must be clear, simple, unambiguous, and limit flexibility of interpretation. •We support launching with a minimalist version of ESRS for at least the first two years, and only tighten requirements later based on evaluation and evidence. •The ESRS (as any other main regulation) should be established by EU regulation, not directive or delegated acts, to minimize divergent interpretations. •The lifecycle of the ESRS (as any other main regulation) should be: define baseline scope, then after a predetermined period (e.g. 3–5 years) perform an evaluation, and only then adopt amendments. •We oppose inclusion of voluntary disclosure allowances within the mandatory standard text; instead, any burdensome provisions should lead to specific reduction proposals. We propose creation of Non Mandatory Illustrative Guidance (NMIG) as a separate, supporting instrument and not legally binding provisions. Note: Section on double materiality do not work and cannot be filled in. 3. Double materiality as the basis for sustainability reporting Impact materiality is currently too subjective, due to missing binding methodology and threshold definitions. •The scale and detail of disclosures may vary widely across companies depending on the auditor, undermining cross market comparability. •We propose a centralized database of examples (material vs non-material) to support internal methodology and audit dialogue. •Some areas are already regulated at national level or internally well managed, with no prior negative impact; such areas often get classified "not material," even though residual risks may exist (e.g. many topics in ESRS S1). •We recommend eliminating financial materiality for non listed entities: lack of public demand, absence of standard tools/methods, and sensitivity of financial data make consistent, valuable disclosure impractical. •Alternatively, companies should be allowed to state that no financial materiality assessment has been performed, even at reputational risk, rather than forcing weak estimations.	ESRS1	1. ESRS Standards, reporting areas and drafting conventions	
Survey	SPOLCHEMIE - Spolek pro chemickou a hutní výrobu	Preparer (non-financial preparing a sustainability report)	Czechia	35.ESRS1_1.1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	•Entity-specific disclosures (user defined IROs) should not be mandated as part of the main standard - these risk greenwashing or misunderstanding. •The entity-specific approach introduces risks to comparability and may foster strategic reporting manipulation. •If such disclosures are permitted, they must be distinctly segregated in a separate section or annex, so they do not distract from benchmarkable indicators	ESRS1	1.1 ESRS standards, reporting areas and entity-specific disclosures	
Survey	SPOLCHEMIE - Spolek pro chemickou a hutní výrobu	Preparer (non-financial preparing a sustainability report)	Czechia	35.ESRS1_4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Due Diligence Requirements •Remove or delay the value chain due diligence obligation until a robust methodological framework is established. •In its current form, the requirement risks producing low-quality, fragmented, and subjective disclosures, lacking effective audit or control mechanisms. •The governance and oversight of due diligence must be aligned with G1 governance requirements.	ESRS1	4. Due diligence	
Survey	SPOLCHEMIE - Spolek pro chemickou a hutní výrobu	Preparer (non-financial preparing a sustainability report)	Czechia	35.ESRS1_7.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	•Reporting should rely on existing monitoring and metrics, not on expanded narrative requirements. •The standards themselves should restrict flexibility and interpretation to maintain consistency and comparability. •Disclosures must enable benchmarking and consistency across firms and sectors; qualitative narrative content alone adds limited value. •Avoid overly broad narrative "contextual" demands; requirements should focus on comparable metrics and limited necessary explanations.	ESRS1	7. Preparation and presentation of sustainability information	
Survey	SPOLCHEMIE - Spolek pro chemickou a hutní výrobu	Preparer (non-financial preparing a sustainability report)	Czechia	35.ESRS2_GOV-3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	In accordance with ESRS 2 (GOV-3) and Chapter 4 of ESRS 1, CSRD/ESRS does not provide a legal basis for the obligation to perform due diligence, but only for its disclosure. Full liability may arise only upon implementation of CSDDD.	ESRS2	GOV-3 - Statement on due diligence	

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Survey	SPOLCHEMIE - Spolek pro chemickou a hutní výrobu	Preparer (non-financial preparing a sustainability report)	Czechia	35.E1-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We oppose a mandatory improvement plan or future roadmap, as these require speculative projections. •Requirements for net zero planning should be deferred until a clear, sector-appropriate methodology and toolset is available. •Imposing net zero obligations prematurely may be impractical or even destructive for some sectors whose business models cannot adapt rapidly. We suggest to postpone or eliminate net zero planning requirements until: •A clear methodology is defined. •Feasibility across sectors and production models is evaluated. •Avoid financially damaging expectations on industries without viable transition paths. We suggest to postpone or eliminate net zero planning requirements until: •A clear methodology is defined. •Feasibility across sectors and production models is evaluated. •Avoid financially damaging expectations on industries without viable transition paths.	E1	Disclosure Requirement E1-1 - Transition plan for climate change mitigation	
Survey	SPOLCHEMIE - Spolek pro chemickou a hutní výrobu	Preparer (non-financial preparing a sustainability report)	Czechia	35.E1-8.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	•Scope 3 emissions must not be compulsory, due to the unreliability of supplier data in non EU jurisdictions (e.g. China, India), immature methodology, and risk of incomparability. •If Scope 3 remains mandated, the European Commission should provide a centralized emissions factor database to enforce uniformity for non-EU suppliers. The requirement under Disclosure Requirement E1-8 is currently unrealistic due to the quality and availability of input data.	E1	Disclosure Requirement E1-8 - Gross Scopes 1, 2, 3 emissions	
Survey	SPOLCHEMIE - Spolek pro chemickou a hutní výrobu	Preparer (non-financial preparing a sustainability report)	Czechia	35.E2-4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Plastic Items & Material Definitions •We request a clear legal definition of "plastics" or "microplastics", explicitly clarifying whether it includes or excludes thermoset materials and other materials.	E2	Disclosure Requirement E2-4 - Pollution of air, water and soil	
Survey	SPOLCHEMIE - Spolek pro chemickou a hutní výrobu	Preparer (non-financial preparing a sustainability report)	Czechia	35.S1-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Many S1 topics are actively managed with no past negative impacts. Under current logic, these may be excluded from reports, even though material in principle. Clarification is needed on how to handle low-probability but high-stakes risks.	S1	Disclosure Requirement S1-1 - Policies related to Own workforce	
Survey	SPOLCHEMIE - Spolek pro chemickou a hutní výrobu	Preparer (non-financial preparing a sustainability report)	Czechia	35.G1-4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	•The argument for excluding financial materiality for non-listed entities is grounded in the sensitivity of certain financial data and the risk of competitive harm if minimal disclosures are forced. •Governance frameworks should allow for safeguards around sensitive data and permit entities to decline financial assessments under certain conditions, while still ensuring accountability. •Also valid for G1-5 and G1-6.	G1	Disclosure Requirement G1-4 - Metrics related to Incidents of corruption or bribery	
Survey	Sonae - SGPS, S.A	Preparer (non-financial preparing a sustainability report)	Portugal	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E4	We do not support the removal of the ESRS E4 biodiversity and ecosystems metrics metric specifications from the mandatory requirements. This is problematic because standardization is more limited at present than with other metrics. Specifying metrics (now in Non-Mandatory Illustrative Guidance (NMIG) 18-20) within the Standard would give companies the information they need to select and report practical, credible and comparable metrics and would support alignment with the TNFD disclosure metrics. If this does not occur, at the very least, it is important that (i) the NMIG stays attached to the Standard in some form and (i) a process is in place for ensuring updates are made on a timely basis, particularly for guidance on topics where data/tools for reporting are evolving rapidly.			
Survey	Sonae - SGPS, S.A	Preparer (non-financial preparing a sustainability report)	Portugal	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We support the simplified standards aligning with core elements of TNFD and encourage EFRAG to continue striving to maintain alignment with other international standards and frameworks, including ISSB and GRI. Improving the interoperability between the requirements in ESRS and the ISSB Standards, to enable companies to use the ISSB Standards as a starting point and 'top up' with specific impact disclosures to achieve compliance with the CSRD/ESRS, is important.			
Survey	Sonae - SGPS, S.A	Preparer (non-financial preparing a sustainability report)	Portugal	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We recommend maintaining the disclosure specification on key relevant nature-related targets, ensuring alignment with key relevant frameworks particularly SBTN and the Global Biodiversity Framework			
Survey	Sonae - SGPS, S.A	Preparer (non-financial preparing a sustainability report)	Portugal	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We welcome the ESRS being simplified in a way that maintains the double materiality approach of the Corporate Sustainability Reporting Directive (CSRD), covering environmental, social and governance topics. This principle of double materiality is vitally important for the reported information to be meaningful for users. It is also essential for the EU to respect its international engagement under the UN CBD Global Biodiversity Framework Target 15.			
Survey	Sonae - SGPS, S.A	Preparer (non-financial preparing a sustainability report)	Portugal	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We welcome the simplification effort mainly targeting unclear or duplicative requirements, maintaining essential disclosures on environmental metrics and ask EFRAG to maintain that approach in the simplification process. We also welcome alignment with the draft global consensus metrics on the state of nature, convened by the Nature Positive Initiative. This is important for ensuring metrics are credible, practical and aligned for companies. We highlight the importance of maintaining and reinforcing alignment with TNFD on nature-related financial risks, opportunities and impacts considering the entire value-chain. We recommend maintaining key relevant nature-related location/site based metrics (in line with key relevant frameworks such as TNFD, SBTN and others) in the standard.			
Survey	Sonae - SGPS, S.A	Preparer (non-financial preparing a sustainability report)	Portugal	35.E4-5.	Do you agree with the amendments of this chapter?	I disagree	The option to report metrics only for locations relevant to existing sustainability targets should be removed or made additional. In order to align with the double materiality concept in ESRS 1 and throughout the standards, metrics should be reported for locations that are material for biodiversity and ecosystems.	E4	Disclosure Requirement E4-5 - Metrics related to biodiversity and ecosystems change	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Double materiality is essential and must remain at the heart of the ESRS framework and European Union sustainability regime for corporate reporting to be credible and useful. The principle of "materiality of information" is concerning since it introduces a further filter for companies to not report information. For example, it represents a step backwards from ID-177, which says that most S1 metrics must be reported if S1 Own Workforce is material. It is essential to maintain the principle of fair presentation in the reporting standards. It is positive that the revision of the AR 16 list of topics has maintained all of the sub-subtopics for S1 + S2. These are based on the list of social topics in the CSRD and should all be maintained. The emphasis on aggregation (as opposed to disaggregation) is concerning, as disaggregated information (both site-specific and country-specific) is key to understanding the distribution of IROs.			
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	It is important that companies report not just their net impact – the gross impact should be reported, and the recommended text preserves this principle.			
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The proposed changes are helpful. However, para 113 is difficult to understand: "113. If the description of the material impacts, risks and opportunities prepared in accordance with [Draft] Amended ESRS 2 IRO-2 is not presented alongside the respective policies, actions and targets, the undertaking shall make explicit which policies, actions and targets relate to which material impacts, risks, or opportunities, in accordance with paragraph 22." Para 22 addresses the issue of appropriate aggregation or disaggregation of information on material impacts, risks and opportunities and their management, without setting any rules regarding the location of such disclosures depending (or not) on the level of aggregation.			
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The Exposure Draft removes duplications between the cross-cutting and topical standards. The preservation of the 4-part architecture in the social standards is important to respect the distinctiveness of different affected stakeholder groups. However, we have two critical concerns. First, the original DR in environmental standards concerning screening of sites in materiality assessment were replaced by an application requirement to ESRS 2 IRO-1. This in effect makes transparency on this aspect optional. Consideration of local context is a key element of an appropriate materiality assessment. This should be both recognised in Chapter 3 of ESRS 1, and in ESRS 2 IRO-1, which should include an explicit datapoint on how the undertaking screened its locations and value chains. We welcome that E standards provide a clearer reference on the importance of disaggregation of disclosures, but this can only be done well if locations are properly screened. Second, we strongly recommend adding an explicit reference to the disclosure of relevant, entity-specific metrics directly in S standards. The fact that S2, S3 and S4 do not include any metrics should not imply that entity-specific metrics for S topics should not be disclosed.			
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The "may" (voluntary) data points should not be eliminated. In many cases they are "shall" in GRI standards, so it is important to keep them to align with GRI standards. Also, many of them were originally proposed as mandatory by EFRAG to the EC. The first wave of reports show that many companies have reported some "may" data points. Retaining them would help ensure standardization/comparability between company reports. Almost all of the datapoints for non-employee workers are voluntary, thus most datapoints for this vulnerable group of workers has been lost. Also, important datapoints on full time versus part time workers has been eliminated.			
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	It is concerning that mandatory guidance in the Set 1 ESRS has been downgraded to "non-mandatory". Mandatory guidance is key to ensuring comparability and completeness of sustainability reporting. At a minimum, Non-mandatory Implementation Guidance (NMIG) should be included in the Delegated Act, and ideally called Mandatory Implementation Guidance. A major point of concern is that ID-177, which provided guidance that most S1 metrics should be reported if S1 Own Workforce is material, has now been downgraded into NMIG. Instead, EFRAG should preserve and promote the guidance that most S1 metrics shall be reported.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	As a whole the reliefs go too far, overshooting the balance between cost/effort and transparency. There is a danger of enabling green/social washing. The relief for "undue cost or effort" is too vague thus leaving too much room for interpretation. The relief for direct data for value chain reporting is too extensive, as direct data is key for transparency. The relief for reporting on operations which are not "significant drivers of IROs" also opens up too much leeway for interpretation.			
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	These combined reliefs overshoot the balance between transparency and cost/effort and risk enabling green/social washing. At a minimum, there should be a time limit introduced for these reliefs on value chain metrics			
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ability to estimate financial effects is critical for the undertaking's ability to integrate sustainability into its business strategy considerations, planning and risk management. It is also key for the determination of financial materiality, including in terms of overreporting topics as financially material. Reporting on financial effects is crucial to achieving the objective of putting sustainability reporting on the same level as financial reporting and integrating both. The European Union has recognised the value of a double materiality approach to corporate reporting which requires disclosure of both material environmental and social impacts, risks and opportunities as well financially material data, It is important to keep the requirement on businesses to analyse and understand the financial effects of their business model. This will ensure investors have access to credible data as well as providing the underpinning for future business planning			
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	ESRS reliefs should not go beyond those set in IFRS. The principle of fair presentation needs to be protected to provide transparency on all material IROs. As noted in the response to question 15, it is also important to consider interoperability with GRI when considering changes to the ESRS, rather than only considering ISSB's standards.			
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	22.ESRS2	Comments on deleted datapoints in ESRS 2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The reduction in the number of mandatory and voluntary datapoints goes far beyond striking an acceptable balance. As mentioned above, the voluntary datapoints should be maintained to provide alignment with GRI, which is currently in the process of strengthening its labor standards, as well as guidance and standardization for companies reporting more than just the mandatory datapoints. An explicit quantitative goal of 50%+ reductions was never set by the European Commission for EFRAG. A number of S1 datapoint metrics have been eliminated which should be reinstated: •S1-5 Employees: gender breakdown for zero-hour employees •S1-8 Diversity: age distribution; •S1-10 Social protection: reinstatement of retirement •S1-12: Training and development: gender breakdowns, •S1-13 Health and safety: fatalities from ill-health for non-employees and other workers on site; •S1-14 Work-life balance: employees that took family related leave;			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Adding a datapoint on training of the procurement team is needed to support the implementation of human rights in the supply chain. The addition of a datapoint on confirmed incidents of bribery is needed to improve transparency on the effectiveness of bribery/corruption policies and measures.			
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Agree that the following mandatory datapoint should be added: ESRS 2 General disclosures – BP 1 the undertaking shall state that the general requirements of ESRS 1 have been applied for the preparation of its sustainability statement			
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	The "fair presentation" principle is essential to reduce the risk of green/social washing, as it emphasizes the full disclosure of all material impacts, risks and opportunities and their management. It is not understandable why this principle is under attack, as it is included as one of the general principles of the Accounting Directive			
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	It is essential that financial institutions disclose absolute targets to assess how their strategies align with the economy-wide transition to net zero. Absolute targets are relevant for users of sustainability statements and for understanding the real-world climate impact of financed activities. While intensity measures provide insights into efficiency, they can mask rising absolute emissions in growing portfolios or sectors. Granting an exemption would also undermine fairness in a sector-agnostic standard. Other industries could equally argue for exceptions based on their own difficulties, reducing comparability across sectors. Moreover, absolute financed emissions are already recognised in existing standards and regulations: the SBTi financial sector net-zero standard, the UNEP FI/NZBA recommendations, and EU SFDR all require or encourage absolute emissions disclosure. Exempting banks would risk misalignment and reduce the usefulness of reported data for stakeholders, including asset owners who depend on it for their own disclosures.			
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The "top 10" threshold for reporting country-level data on employment, collective bargaining and social dialogue is a major improvement over the current 10% employment threshold. An analysis of the first sustainability statements from Wave 1 companies shows that the current 10% threshold results in country-level disclosures on as little as 21% of total employees. More country-level information is needed to understand the distribution of impacts across countries, as well as whether employment thresholds for specific labour rights have been exceeded. The new threshold does not require additional effort/cost by companies, since they must gather country-level data anyways to calculate the global figures. Furthermore, it does not result in extra datapoints, since the information currently is (and can be under the revised ESRS) reported as one table.			
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	An analysis of the first year ESRS reports shows that most companies are simply reporting that they pay minimum wages, whereas the intention (as outlined in the ESRS Basis for Conclusions) is that companies should be enabled to disclose commitments to paying a wage "sufficient to support themselves and their families in dignity" as well as the extent to which they do this. This shows that the methodology for non-EU countries needs to be changed. Furthermore, the new ILO agreement on a methodology for living wages needs to be taken into account. While the proposed new methodology takes a step forward in both regards, two key changes are needed: •The methodology for reporting on 'adequate wages' should measure actual wages against an adequate/living wage for all employees, not only those within the EU. In particular, for employees outside the EU, the methodology should allow employees' actual wages to be measured: oA) against the local legal minimum wage only when this is set in line with the ILO principles on estimating living wages; or oB) against living wage estimates that are set in line with ILO principles on estimating living wages. •Companies should be able to rely on local legal minimum wages or living wage estimates when the authorities or organisations that set them provide public evidence of their alignment with the ILO principles for estimating living wages. Furthermore, the transitional provision for the EU needs to be reinstated, as not all Member States have transposed the Adequate Minimum Wage Directive.			
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	The new, simplified framework makes it easier for companies to report on these SFDR-related matters in a way that corresponds to how their policies are set. For users, this consolidation makes it easier to locate the relevant information. However, the SFDR datapoints are very helpful and should only selectively be amended			
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	The unadjusted gender pay gap should be kept as mandatory, since the methodology for calculating it is clear. The adjusted pay gap figure as voluntary. In practice many companies are reporting both figures, which is useful for improved transparency. However, since the methodology for calculating the adjusted figure is not standardized, the unadjusted should be kept mandatory.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS 1: As detailed above, cumulative impact of the various reliefs is concerning.			
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS 2: The improved language on DMA is welcomed, including on the engagement with workers' representatives.			
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS S1: The proposed "top 10" threshold for the reporting of country-level information for employee headcount, collective bargaining and social dialogue is a significant improvement over the current 10% employment threshold. Country-level information needs to be reported in more detail, and on other metrics as well, in order to have more transparency on the distribution of impacts across countries. In the metrics, voluntary datapoints need to be reinstated as well as the datapoints on gender breakdowns, workforce age distribution, etc. detailed above need to be reinstated. The proposed new methodology for adequate wages outside of the EU also needs attention, and the transition language for EU member states needs to be reinstated, since the Adequate Minimum Wage Directive has not been implemented in some Member States. We would also like to reiterate our longstanding demand for including franchise workers in the S1 definition of own workers, as well as the need for sector-specific standards to supplement the Set 1 sector-agnostic standards.			
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS S2: We are concerned that the loss of many specific datapoints related to workers in the value chain will mean that disclosures about material impacts, risks and opportunities become more generic and have less information about the specific stakeholder groups because specifications about the level of granularity have been deleted. Many of the points that are being deleted from ESRS S2 had originally been included because they reflected effective practice in relation to improving supply chain labour rights, for example, AR 6 awareness of the impacts on value chain workers from an undertaking's strategy or business model, AR 20 illustrating how the perspectives of value chain workers have informed specific decisions or activities of the undertaking and AR 25 which looks at retaliation and whether workers can use grievance mechanisms confidentially.			
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS S1, S2, S3, S4: An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts			
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		ESRS S1, S2, S3, S4: An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Datamaran	User (analyst, data provider, rating agency, etc.)	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	Datamaran	User (analyst, data provider, rating agency, etc.)	United Kingdom	35.ESRS1_2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	ESRS 1 16 now clarifies that the ESRS are a "fair presentation" standard. In accounting jargon, fair presentation frameworks are different from compliance-based standards as they focus on faithful representation, key characteristics of quality of the information, and management judgment rather than a detailed checklist of rules. In other words, in a fair presentation system, substance takes precedence over form. This is probably music for the ears of all those companies that went through the implementation of ESRS and have been vexed by auditors applying a very literal interpretation of the requirements, in particular on the DMA (I'm looking at you, auditors asking for IROs for each AR16 sub-sub topic). However, despite Patrick de Cambourg's opinion, slapping the label "fair presentation" on top of the standards (it is literally header 2 in ESRS 1) doesn't change the fact that the ESRS are still full of very specific and detailed requirements, including on the DMA process. The concern is that this inherent contradiction could potentially lead to even lengthier debates with auditors. ESRS should embrace a "fair presentation" regime. Take a principle-based approach with less detailed requirements (see the next points for more details).	ESRS1	2. Fair presentation and qualitative characteristics of information	
Survey	Datamaran	User (analyst, data provider, rating agency, etc.)	United Kingdom	35.ESRS1_3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The Revised ESRS 34-35 seek to clarify how to take into account prevention, mitigation, and remediation measures when assessing negative impacts. Specifically, they indicate when assessment can be done on a net (taking into account mitigation/prevention actions) or gross (without taking into account mitigation/prevention actions) basis. In this effort to provide clarification, however, the Revised ESRS ends up adding yet another layer of analysis, as reporting companies will need to determine the assessment basis on their negative impacts. To quote one of the practitioners in our Harbor community: "Now another dimension is added on top of the standard DMA exercise". An additional point of concern in this approach is the ambiguity of the formulation "significant ongoing mitigation and/or prevention actions". Determining what mitigation and prevention measures qualify as "significant" and "ongoing" clearly requires a judgment call, and it is very likely to generate long internal debates on what those characteristics mean, as well as raise questions from assurance providers. ESRS should reconsider the Gross vs. Net debate. Overworked rules risk generating time-consuming disputes internally and with auditors. A blanket rule, assessing all impacts on a gross basis, would simplify matters while allowing exceptions where companies provide justification.	ESRS1	3. Double materiality as the basis for sustainability reporting	
Survey	Datamaran	User (analyst, data provider, rating agency, etc.)	United Kingdom	35.ESRS1_3.1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	While condition a) is effectively borrowed from the IFRS standards and thus relies on well established understanding of what "general purpose financial reports" are, who "primary users" are (i.e. investors and capital lenders), and which "decisions" it refers to (buy, hold, or sell equity or debt), b) is instead venturing in uncharted waters. Who are the "users of general purpose sustainability statements"? Are those different from the "affected stakeholders"? What are "general purpose sustainability statements"? And finally, most importantly, the test is predicated on a much broader and generic basis - "understand the undertaking's material impacts, risks and opportunities and how it identifies and manages them" - compared to the more specific "information that could reasonably be expected to influence decisions". Arguably, the universe of information useful to "understand" IROs is much broader than the information "expected to influence decisions", significantly diminishing the effectiveness of this new materiality of information filter, as it will be rather simple for auditors to insist that a piece of information is necessary to "understand" an impact, a risk, or an opportunity. It is unclear why the Revised ESRS departs from this well-established criterion in condition (b) under ESRS 1 21. A clearer test would be: "Information is material when omitting, misstating, or obscuring it could reasonably be expected to influence decisions that primary users of general-purpose sustainability statements make, including decisions about the undertaking's material impacts, risks, and opportunities."	ESRS1	3.1 Materiality of information as a general filter for reported information	

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Survey	Datamaran	User (analyst, data provider, rating agency, etc.)	United Kingdom	35.ESRS1_3.5.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Given their abstraction, the effectiveness of those principles dressed as practical considerations remains a question mark, especially considering the overreaching attitude auditors adopted in providing assurance to Wave 1 CSRD statements. ESRS 1 48 and related application requirements then introduce measures through which "the undertaking may avoid unnecessary complexity". The formulation based on "may" rather than "shall" already downgrades those measures to optional ones, which some auditors may interpret as: "only certain companies may use the lighter process described in ESRS 1 48, and there have to be companies out there that, in light of their complexity, reach, size, must do more than that". Similarly, AR 17 does nothing to remove the ambiguity: "The undertaking may adopt a top-down or a bottom-up approach to perform its materiality assessment." This is really puzzling, considering the follow-up comment: "Adopting a top-down approach may be more pragmatic and reduce the complexity of the process, and is expected to lead to the same outcome of the materiality assessment as the bottom-up approach." If that is the case, why on earth is the bottom-up approach still in the standards? Its presence, together with the "may" based language of these provisions, leaves a back door open to auditors to ask for a bottom-up approach whenever they deem it appropriate. More worryingly, one practitioner highlighted to me that certain auditors may even interpret this AR as a stress test, asking the reporting company to conduct both the top-down and bottom-up approaches and check that the results effectively match. Additionally, AR 18 is worded in a highly problematic way. While a) and b) are welcome clarifications that can be used to effectively push back on certain auditors' literal interpretation of the standards, making those 2 measures conditional on the ambiguous "unless more investigation is necessary" reduces their reach.	ESRS1	3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	
Survey	We Mean Business Coalition	NGO	Switzerland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We support making the "materiality of information" the principal focus of the assessment. However, we suggest the following improvements: •Clarify the objective of the DR to explain why certain information should be reported. For financial effects, ESRS could mirror ISSB standards, which add: "[…] for users to understand the financial effects of […]". •Specify who the users are (particularly "other users") and what types of decisions they make, as this would help define relevance and user objectives. •Safeguard against the misuse of "undue cost or effort" as a justification for omitting material information. •Revise para. 37 to reflect that the purpose of financial materiality assessment is not only to identify material information but also to determine material risks and opportunities, as required by the CSRD. In this regard, risks and opportunities appear only midway through para. 38, making the text incoherent. •Ensure that the relief in para. 65 does not result in disregarding already available data. •Finally, we recommend deleting AR 18 and AR 19, as they may undermine the design of a proper materiality assessment process. See also reply to Q12			
Survey	We Mean Business Coalition	NGO	Switzerland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	It is helpful that Chapter 3 addresses how prevention, mitigation, and remediation of impacts should be considered in materiality assessments. However, the rules could be expressed more simply and clearly. In 2024, many preparers attempted to connect their DMA with their ERM, which proved challenging due to the differing treatment of gross versus net risks. Yet, this connection is crucial: it maximises the relevance of using the DMA as input to the ERM and strengthens coherence between financial and non-financial reporting. At the same time, ongoing remediation must be considered, so that risks are not underestimated in the DMA if only net risks are applied. We believe EFRAG has made similar considerations but arrived at a somewhat complex solution. We therefore suggest a clearer distinction between: •permanently installed remediations (e.g., filters on water discharge facilities), and •remediations requiring continuous performance and maintenance (e.g., safety procedures). Permanently installed remediations could follow the logic of Appendix C (in simplified form), whereas remediations requiring continuous performance and maintenance should not be considered in the DMA. For better coherence between DMA and ERM, and hence more clarity for the report user, we further suggest adding a bridge-explanation, as financially material elements identified in the DMA may not appear in the ERM due to ongoing remediations. These should be clarified and explained to users in a separate note. We also call for clarification on: •whether potential impacts should be assessed before mitigation, prevention, or remediation measures; •whether the cases in Appendix C apply only to own operations or also to the value chain; •the distinction between positive impacts and actions (i.e., a positive impact as the consequence of a positive action).			
Survey	We Mean Business Coalition	NGO	Switzerland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We agree with the intention of the Executive Summary, but we would like some clarifications: -how to ensure fair presentation of IROs and avoid greenwashing; -where these sections should be incorporated (inside or outside the sustainability statement). We suggest clearly stating that these sections are not part of the sustainability statement because: (1) they are not foreseen in the CSRD; (2) they do not have to adhere to ESRS rules; and (3) they represent information that may be useful to certain users, but not to all ESRS users. This clarification would avoid repetition, establish the correct status, and simplify future issues with digital tagging and, in particular, assurance. We would also like to draw attention to para 113, which we find difficult to understand. In particular, it is not clear what the reference to para 22 is meant to imply. Para 22 addresses the issue of appropriate aggregation or disaggregation of information on material impacts, risks, and opportunities and their management. However, it does not set any rules regarding the location of such disclosures, whether or not they are aggregated. We also recommend reinstating the requirement in ESRS 1 para 114 to cross-reference the sustainability statement with the financial statements. The proposed optionality impairs connectivity and contradicts Articles 19a/29a of the CSRD. For regulators, investors, and other stakeholders, this cross-reference is essential. Without it, users' ability to understand the links between the two statements is reduced. Moreover, the current proposal creates divergence with ISSB standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	We Mean Business Coalition	NGO	Switzerland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We welcome the removal of duplications between the cross-cutting and topical standards and support the stronger emphasis on general disclosure requirements. Many PAT provisions in the topical standards had the character of examples or guidance rather than datapoints, so their removal is appropriate. We also welcome the preservation of the five-part and four-part architecture of the environmental and social standards, respectively. This structure is important in providing preparers with a clear framework and language to navigate the issues, communicate internally with colleagues, and organise their disclosures on social matters. The environmental standards similarly provide an architecture that supports this type of navigation, and we appreciate that it has been retained, including the specific metrics under standards E1 to E5. We believe the architecture should be complete and equivalent across all standards. We recognise that these changes may result in less comparable information in the short term. However, we accept this as a necessary trade-off to reduce reporting burden. Looking forward, we suggest that EFRAG and the European Commission help develop reporting practice guidelines on these elements in order to strengthen comparability over time.			
Survey	We Mean Business Coalition	NGO	Switzerland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We support the proposed changes and strongly agree with the removal of the "may disclose" elements, as their status has caused significant confusion. The language—and therefore the overall understandability—of the standards has already been considerably improved. However, we suggest the following additional improvements to further enhance clarity: -clarifying when an undertaking is considered "connected" with an impact; -deleting the last sentence of ESRS 1.59, as it gives the impression of being a relief; -avoiding the use of outdated language such as "shall consider." In particular, for GHG we suggest rewording to: "should apply GHG Protocol (version 2004), except where it contradicts other provisions of ESRS."			
Survey	We Mean Business Coalition	NGO	Switzerland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	First and foremost, we support the NMIG not being part of the ESRS DA. We suggest finalising this guidance at a later stage to incorporate guidance from feedback received from this consultation as well as the final DA after the EC's revision and adoption. However, we also suggest that EFRAG clarify the legal role of the original supporting materials (e.g., the Q&As published for the original ESRS) and, for example, either retire or supersede them. It is also important to bring order to the due process of this ecosystem by clarifying the legal status and hierarchy of all guidance, as well as the due process followed—particularly for updates of these documents. There is no need to replicate the legal complexity created for the EU Taxonomy by the Platform and the EC with their endless FAQs; this should certainly not be a model to aim for.			
Survey	We Mean Business Coalition	NGO	Switzerland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Overall, we would have preferred that the reliefs were designed with one of the primary users – capital providers (the very reason for the Green Deal is to move capital) – in mind, rather than focusing mainly on preparers' wishes. Several of the proposed reliefs risk making reporting harder to use, or even useless, for capital providers. On #4 •We do not support para. 90, as it impairs connectivity with financial reporting and reduces usability, since the data loses its financial context. •Para. 91 should be replaced with a stricter relief: allow preparers to report metrics only at segment level (see IFRS 8). This preserves financial context, peer comparability, and usefulness. Excluding random subsidiaries would make the data context-free and unusable. •Para. 92 should be deleted. It would force companies to maintain two consolidation trees, both subject to assurance, creating cost without benefit. Joint operations should follow IFRS 11 – data included pro rata as in revenue and cash flow – to ensure comparability and enable integrated analyses. If oil & gas firms wish to report by operational boundaries, they may do so additionally, but for others it would create unusable, context-free data. Operational boundaries were a GHGP mistake 20 years ago – and remain so. On #5 We do not support omitting the most important information for capital providers: the quantitative and monetised value of climate risks. The CFA Institute's comment letter on the IFRS S1 exposure draft (Aug. 2022) stressed that qualitative data alone is insufficient. The EBA's 2025 guidance also requires banks to capture clients' climate risks in risk profiles – consistency is essential. On #7 We do not support this relief, as it weakens connectivity with financial statements (IFRS 3 and 5) and creates divergence from ISSB standards.			
Survey	We Mean Business Coalition	NGO	Switzerland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We do not support para 92 and suggest deleting it. We also recommend that the ESRS align more closely with the ISSB on this matter. We further call for that phase-ins must always be with a maximum number of years and with demands for providing clear plans on how to address data gaps. At a minimum, companies should explain why certain data is missing, as this ensures transparency. Ideally, companies should also provide estimates and disclose the assumptions used in those estimations. Finally, we also refer to our suggestion in Q17 to use segments as the lowest consolidation level – and hence the ability for the preparer not to report on a given KPI in the other segments and HQ. This would maintain comparability with financial reporting and ensure that users and peers can realistically make use of the reported data.			
Survey	We Mean Business Coalition	NGO	Switzerland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	If we have to choose, we support option 1, as it better aligns with the ISSB standards. However, overall, we do not support the relief from providing quantitative and monetized information about risk impact. This is the most crucial information for capital providers, as also defined by the FSB in the original TCFD, and it is even explicitly included in the California Act. We do not understand why the EU should suddenly become the least useful ESG framework on this cornerstone part of the reporting.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	We Mean Business Coalition	NGO	Switzerland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	E1, 40(a): The monetary amount of risk to physical assets is important, but the percentage of assets is not. We also do not support reporting the risk value before considering adaptation actions. The real risk is not only the assets' book value – it also includes the cost of addressing the loss of useful assets, e.g. buying or leasing replacements or outsourcing operations. The monetary amount should be disaggregated by these purposes. E1, 40(b): This information is of no use to capital providers. Multinational companies hold assets across thousands of locations, some mobile by nature. Reporting this level of detail would be excessively lengthy and ultimately useless. It is not "need-to-have" information for capital providers – or anyone else. E1, 40(c): No use. E1, 40(d): The relevant metric is not revenue but anticipated lost profit from activities linked to physical assets at risk. E1, 41(a): Acceptable, except it should not be presented before considering mitigation actions. Quantification and monetisation of risk should also cover mitigation costs, disaggregated by purpose. E1, 41(b): No use. E1, 41(c): No use. What matters for capital providers is insight into the book value of loans and mortgages at risk if pledged assets are exposed. These include not only real estate but also vessels, rigs, trucks, and other equipment. E1, 41(d): Unclear. If this refers to contingent liabilities, we may agree. See IAS 37. Is the assumption that the incident is considered remote and thus excluded under IAS 37? E1, 41(e): As with physical risks, the focus should be on anticipated lost profit, not revenue. Including coal, oil, and gas activities here appears inconsistent – a financial risk is a financial risk. E1, 41(f): Acceptable. E1, 42: This conflicts with prudent financial reporting. A company should not monetise potential opportunities.			
Survey	We Mean Business Coalition	NGO	Switzerland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	We do support increased interoperability between ESRS and ISSB, and most of the proposed interoperability solutions are acceptable. However, one element is fundamentally flawed from a user perspective: operational boundaries. These were introduced 20 years ago in the GHG Protocol, yet remain poorly defined and, from an integrated reporting perspective, entirely useless. Operational boundaries break the connection between emission data and financial data. They provide no link to revenue, cash flow, or production. As a result, GHG disclosures lack context: you cannot say that for a given level of revenue, production, or cash flow, a company emits a given amount of GHG. This makes it impossible to develop integrated KPIs, since financial and GHG data are not measured on the same basis. For capital providers—one of the primary users of annual reports—this information is therefore meaningless. From a preparer's perspective, operational boundaries also create more work, not less. They require companies to maintain and assure two separate consolidation trees within their systems. Completeness of data within operational boundaries becomes nearly impossible to validate, as there is no contextual anchor (such as fuel costs) to confirm that the reported consumption data is reasonable and complete. To maintain comparability both across companies and with financial reporting, we recommend that it be mandatory for all companies—including oil and gas—to report GHG emissions based on financial boundaries. If a company wishes, it may provide supplementary reporting using operational boundaries (whatever definition is applied), should it identify users with an interest in such data. But this should under no circumstances be mandatory.			
Survey	We Mean Business Coalition	NGO	Switzerland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	We Mean Business Coalition	NGO	Switzerland	22.ESRS2	Comments on deleted datapoints in ESRS 2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	OK			
Survey	We Mean Business Coalition	NGO	Switzerland	22.E1.	Comments on deleted datapoints in ESRS E1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	OK			
Survey	We Mean Business Coalition	NGO	Switzerland	22.E2.	Comments on deleted datapoints in ESRS E2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	OK			
Survey	We Mean Business Coalition	NGO	Switzerland	22.E3.	Comments on deleted datapoints in ESRS E3	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	OK			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	We Mean Business Coalition	NGO	Switzerland	22.E4.	Comments on deleted datapoints in ESRS E4	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	We recommend including TNFD's core metrics in the biodiversity requirements, if this topic is considered material for the company			
Survey	We Mean Business Coalition	NGO	Switzerland	22.E5.	Comments on deleted datapoints in ESRS E5	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	OK			
Survey	We Mean Business Coalition	NGO	Switzerland	22.S1	Comments on deleted datapoints in ESRS S1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	OK			
Survey	We Mean Business Coalition	NGO	Switzerland	22.S2	Comments on deleted datapoints in ESRS S2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	OK			
Survey	We Mean Business Coalition	NGO	Switzerland	22.S3	Comments on deleted datapoints in ESRS S3	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	OK			
Survey	We Mean Business Coalition	NGO	Switzerland	22.S4	Comments on deleted datapoints in ESRS S4	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	OK			
Survey	We Mean Business Coalition	NGO	Switzerland	22.G1	Comments on deleted datapoints in ESRS G1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	OK			
Survey	We Mean Business Coalition	NGO	Switzerland	23.	Six datapoints exceptionally moved from “may” to “shall” In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, “may disclose” datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	We Mean Business Coalition	NGO	Switzerland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	We Mean Business Coalition	NGO	Switzerland	25.	Emphasis on ESRS being a “fair presentation” reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We do not express a preference for explicitly requiring the adoption of "fair presentation" in preparing ESRS sustainability statements, as we do not believe it is EFRAG's mandate to define how assurance should be concluded. Under the CSRD, the European Commission must adopt, through delegated acts, a limited assurance standard by 1 October 2026. That EU standard should set the expectations for practitioners conducting assurance engagements on sustainability reporting prepared in accordance with the ESRS. Moreover, we do not see how introducing "fair presentation" would reduce the reporting burden. Nonetheless, if the notion of fair presentation is maintained, we recommend addressing the following points more clearly: •Provide a stronger link with materiality and entity-specific information •Add the objective of the standard and of the report •Link with users' objectives and information needs •Consider including a definition of "fair presentation" in the Glossary These additions would help achieve better alignment with IFRS S1, which already addresses all these elements. Finally, we encourage further clarification—ideally through an Application Requirement—on what "fair presentation" means in practice. This would help preparers, auditors, and users apply the concept consistently and avoid unnecessary complexity.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	We Mean Business Coalition	NGO	Switzerland	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Requiring financial institutions, and any other company for that matter, to adopt targets they do not have would go beyond the CSRD mandate. In addition, it would conflict with the approaches of both SBTi FINZ and PCAF, which explicitly allow financial institutions to set intensity-only targets—and many currently only do so.			
Survey	We Mean Business Coalition	NGO	Switzerland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	We do not recommend using arbitrary thresholds. Instead, we suggest that the split be based on segment reporting (IFRS 8), as this provides the financial context needed to make the S-data useful. At the same time, we recommend treating GDPR restrictions as the minimum safeguard for how granular S-information can be. It must never be possible to identify or infer characteristics about individuals.			
Survey	We Mean Business Coalition	NGO	Switzerland	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	We Mean Business Coalition	NGO	Switzerland	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Apendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	We Mean Business Coalition	NGO	Switzerland	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	We recommend revisiting to allow for including SBTN elements and likewise, if this topic is considered material for the company.			
Survey	We Mean Business Coalition	NGO	Switzerland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	We recommend allowing the inclusion of the gender pay gap, not least because reporting on it is mandatory in some jurisdictions outside of EU.			
Survey	We Mean Business Coalition	NGO	Switzerland	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	We Mean Business Coalition	NGO	Switzerland	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See previous replies			
Survey	We Mean Business Coalition	NGO	Switzerland	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See previous replies			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	We Mean Business Coalition	NGO	Switzerland	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	We Mean Business Coalition	NGO	Switzerland	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	We Mean Business Coalition	NGO	Switzerland	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	We Mean Business Coalition	NGO	Switzerland	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	We Mean Business Coalition	NGO	Switzerland	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	We Mean Business Coalition	NGO	Switzerland	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	We Mean Business Coalition	NGO	Switzerland	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	We Mean Business Coalition	NGO	Switzerland	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	We Mean Business Coalition	NGO	Switzerland	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	We Mean Business Coalition	NGO	Switzerland	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	We Mean Business Coalition	NGO	Switzerland	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	For the glossary, we recommend aligning as far as possible with the ISSB – with the exception of operational boundaries, which should not be included in the ESRS.			
Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	EPRA welcomes the streamlining of the DMA. EFRAG's clarified requirements align with our own approach: in 2024, we introduced a materiality process tailored to listed real estate and based with the original sector agnostic ESRS. We believe the ESRS should remain high level, while ensuring clarity and consistency.			
Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	EPRA fully supports the simplification of the ESRS. For over a decade, our Sustainability Best Practices Recommendations (sBPR) have been the most widely adopted sustainability reporting framework within the listed real estate sector in Europe and its going beyond. They combine qualitative and quantitative KPIs with a sector-specific materiality process, ensuring comparability and transparency. We therefore welcome EFRAG's general approach: a simplified, high-level ESRS complemented by sector-specific market led initiatives such as the sBPR.			

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Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	EPRA agrees with the restructuring of ESRS 2 and the move toward a more principles-based approach. Since 2011, the EPRA sBPR have provided detailed disclosures for real estate companies, covering environmental, social, and governance aspects. These go beyond the general ESRS framework, showing why it is appropriate for ESRS to remain simplified in architecture. EPRA would be pleased to engage with EFRAG, should the sector specific ESRS discussion comes back on the table.			
Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2				
Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	EPRA strongly supports interoperability between ESRS and global standards. From the very outset of both the ISSB and ESRS initiatives, interoperability has been highlighted as a priority. However, the lack of concrete alignment to date represents a significant missed opportunity. Ensuring interoperability is essential to reduce the reporting burden for corporates over the next 5–10 years. For the listed real estate sector, consistency with the EU Taxonomy is particularly critical, as it is deeply embedded in investment and financing decisions.			
Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	EPRA supports reducing the number of mandatory datapoints. This will lower administrative burden while allowing sector frameworks to provide the necessary depth. The EPRA sBPR already include a comprehensive set of KPIs for listed real estate, widely used by both preparers and investors. Maintaining this balance ensures efficiency without sacrificing meaningful information.			
Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	EPRA (European Public Real Estate Association)	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		EPRA (the European Public Real Estate Association) promotes, develops, and represents the European listed real estate sector. With more than 290 members across the full spectrum of the industry (including companies, investors, and stakeholders) EPRA represents over EUR 930 billion of real estate assets and 95% of the market capitalisation of the FTSE EPRA Nareit Europe Index. In 2011, EPRA launched its Sustainability Best Practices Recommendations (sBPR), largely based on the GRIs, have since become the most widely adopted framework for sustainability reporting within the European listed real estate sector and beyond. The sBPR combines both qualitative and quantitative KPIs with a sector-specific materiality assessment process, ensuring comparability and transparency across companies. Recommendations were added that are aligned with the sector-agonistic ESRS . While we support simplification, we stress that the EPRA sBPR already deliver the level of granularity required by the real estate sector since 2011. We encourage EFRAG to maintain close engagement with EPRA if the sector-specific ESRS for the real estate sector are developed, to ensure alignment with existing practices. EPRA stands ready to share its expertise and experience in sustainability reporting to support this process.			
Survey	Oesterreichs Energie (association of Austrian electricity companies	Business association (other than association of financial institution)	Austria	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		ESRS1 ESRS 1 amend: („necessary for users […] to understand the undertaking's material impacts, risks and opportunities…", vgl. ESRS 1.21(b) amend, S.14). According to this proposal, the significance of information depends on whether a user considers it necessary to understand the company's key reporting objectives. However, there are no clear assumptions about user groups (e.g., their prior knowledge) or criteria for determining when information is considered necessary for them. This could mean that this unclear requirement for the materiality of information does not lead to a limitation, but potentially to an indefinite expansion of reporting requirements. There should be clearer guidance on materiality analysis to distinguish between actual and potential impacts, as the current proposal does not sufficiently clarify this important distinction. ESRS2 EFRAG is consulting on two options (p.26). The quantitative disclosures on the expected financial effects required under option 1 are subject to considerable uncertainty. Furthermore, such quantitative information is often not available in companies and does not generally play a significant role in internal management, which is why we prefer option 2. ESRSE1 The items subject to disclosure requirements should include: "financial and investment planning" (ESRS E1.14(a) amend, p. 8). The obligation to disclose "financial and investment planning" would lead to an expansion of the existing disclosure requirements and increase the reporting burden. ESRS E1 currently requires "explanation and quantification of the undertaking's investments and funding" for the relevant measures. ESRSS1 Own Workforce S1–7 (p.85) The proposal does not contribute to simplification but increases the reporting burden, especially for non-global companies, so it would be advisable to maintain the current requirements. General comments Non-Mandatory Illustrative Guidance The unclear legal status of the planned NMIG document could lead to inconsistent application and unnecessary challenges with auditors, so it should not be part of the standard/delegated act.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	ENNHRI welcomes chapter 3 as a simpler and clearer foundational chapter overall and share related observations below. First, ENNHRI welcomes the revised definition of information materiality in particular paragraph (para) 21b. This element of the definition is critical to balance impact and financial materiality dimensions and ensure alignment with international standards on sustainability due diligence (incl. UN Guiding Principles on Business and Human Rights (UNGPs)). The UNGPs clarify the responsibilities of business to communicate about their negative impacts and how they are managing them in a manner that sufficiently allows externals to evaluate the adequacy of the business' efforts (UNGP 21). We caution against any dilutions or deletions of para 21b. Second, ENNHRI welcomes the emphasis and clarity in Chapter 3 about the interrelation between the DMA and companies' sustainability due diligence, engagement with affected stakeholders and the relevance of the severity criteria. These are key to ensuring alignment with the UNGPs as well as interoperability with the EU Corporate Sustainability Due Diligence Directive (CSDDD). We caution against any dilutions or deletions of such content. Third, para 22 allows entities to present sustainability information at topical level. ENNHRI is concerned that this can result in over-aggregation of IROs resulting in very high-level disclosures that may hinder the 'understandability' emphasized in para 21b and undermine comparability. For example, there is a vast difference between reporting meaningfully on e.g. a company's health and safety or gender equality IROs that risks disappearing at 'topic' level. ENNHRI recommends that the topical level disclosure option is deleted and the original focus on IRO and/or sub-topic level disclosure is maintained. Finally, ENNHRI welcomes appendix A, and notes the importance of framing it as a non-exhaustive list as not all human rights impacted by companies or covered by the CSDDD are captured by the list.			
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	ENNHRI welcomes the attempt to clarify the so-called gross vs. net issue. In the first wave reports, lack of clarity on this aspect hindered comparability and led to divergence. ENNHRI largely supports the substantive content of paragraphs 34 to 36 and appendix C. However, the current drafting is not sufficiently clear and may lead to confusion, misinterpretation or a default 'always net' approach. In particular, paras 34-36 seem to not fully be consistent with Appendix C. For example, the temporality aspect between reporting years is clear in the table but not in the main body. We recommend full clarity and consistency across main body and the table in the final version, using Appendix C as the benchmark for adjustments to paras 34-36. In para 35 we support the nuance that potential impacts, which require significant ongoing preventative or mitigation efforts, shall be considered on a gross basis. This is relevant to many human rights impacts including those in companies' value chains and is aligned with the ongoing and iterative nature of sustainability due diligence required by international standards. The nuance is key to prevent companies from self-assessing prevention and mitigation efforts to be so efficient that they don't need reporting on, where this is not the case. The reverse risks hollowing out CSRD transparency objectives. It is key to preserve the basic logic of asking companies to tell users about their impacts and what they are doing about them, and then letting users consider whether this is considered adequate. In our understanding this element of para 35 is linked to para 21b and a gross approach is likely to be necessary for users to understand the undertaking's material IROs and how it identifies and manages them. We caution against any dilutions or deletions of this element of para 35.			
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	ENNHRI welcomes the reduction in overlap and redundancy across the cross-cutting and topical standards. It has two specific comments. First, to ensure full consistency across GDRs and related topical level reporting as it relates to metrics, ENNHRI recommends including 'metrics' to disclosure requirements SX-4 on targets across the four social standards, thereby making it about 'targets and/or metrics' rather than just targets. Metrics are mentioned in S2-S4 objectives and the heading before SX-4 reads 'metrics and targets', but metrics are not included in S2-S4 DRs and hence risk falling off the radar unless explicitly captured there. In addition to heightened consistency, making explicit reference to disclosure of metrics on an entity specific basis directly in S standards, where relevant, can a) compensate for the lack of predetermined metrics in S2-S4 and the unlikely provision of such in sector standards, b) recognize emerging trends observed for S2-S4 in year-1 reports on entity specific metrics (see also BCG State of Play report p. 31 and 32), and c) acknowledge the common and increasing use by companies of metrics in their social sustainability impact management and monitoring efforts (oftentimes more common that use of targets). ENNHRI appreciates the AR in GDR-M specifying that entity-specific metrics can be developed for S2-S4, but find it insufficient to address the points addressed above proportionately. Secondly, ENNHRI regrets the demotion of the original disclosure requirement in environmental standards related to materiality assessment concerning site and asset-level screening to an application requirement in ESRS 2 IRO-1. Context matters for environmental impacts such as polluted water streams and related impacts on local communities. ENNHRI recommends the site or location specific aspect of DMA is brought in as a direct datapoint in IRO-1 ideally not relevant to E standards only, due to its relevance to S3.			
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	ENNHRI only partially agrees with the deletion of all may-disclose datapoints. For the social chapters, some may-disclose datapoints were of particular relevance to capturing impacts and efforts related to vulnerable stakeholders such as non-employees or value chain workers. Such old may-disclose datapoints or ones that provide an illustration of emerging good practice disclosures, should be included directly in the Standards as examples rather than in the NMIG.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	ENNHRI agrees that NMIG contains helpful support material and supports its issuance in the format and status deemed most helpful to support companies' implementation efforts.			
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	ENNHRI is concerned with the cumulative or compounded effect of the different "reliefs" introduced, especially when considered in combination with the emphasis on 'fair presentation' as opposed to compliance, a new approach to materiality of information, fewer datapoints, and less granularity in the standards overall. It is not clear how the different reliefs interact with one another or with other key elements in the amended ESRS. For example, what is the interaction between 'undue cost and effort' and 'fair presentation' or 'materiality of information' considerations? Whilst these elements were introduced with a simplification purpose, ENNHRI is not convinced the end result is real simplification for companies or that it will bring the necessary clarity to exchanges between preparers and auditors. In addition to balancing 'undue cost and effort' with 'fair presentation' ENNHRI recommends that proportionality is required in relation to the 'undue costs or effort' relief, i.e. that their utilization is proportionate to related sustainability objectives. ENNHRI encourages EFRAG to further analyse the definitions of the individual reliefs, their interrelations as well as the cumulative effects of the different reliefs and consider whether they, alone or together, go too far. Such analysis should among other things consider the ultimate effect on metrics-reporting by companies, including in light of the European Commission's instruction for the ESRS review to emphasize quantitative reporting over qualitative. In addition, ENNHRI is concerned that these reliefs may in practice undermine the standards' scope covering impacts across both own operations and upstream and downstream value chain, where oftentimes some of the more severe human rights impacts are to be found, due to the different options not to report on value chain metrics. Where reliefs remain, ENNHRI recommends further inclusion of time limits on their use along with explicit emphasis on how improvement over time is expected.			
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	As declared in response to question 17 ENNHRI is concerned with individual and joint effect of the different reliefs introduced. This includes the relief for metrics with poor data quality in particular, its extension to also cover metrics for own operations, where companies are typically well-positioned to access data of sufficient quality and/or have sufficient influence to improve data quality within a reasonable time period. As such, we support the SRB members suggestion to include a time limit on the relief incentivizing progressive improvement and temporary use of this relief.			
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Estimating financial effects is a key lever for incentivizing companies to integrate sustainability into business strategy, planning, risk management and decision making. It is also a key to investors and other financial market participants. At the same time, estimating financial effects can be a challenging task for companies and can be methodologically challenging. Disclosing on information uncertainty is recommended to address the latter point. In striking a balance between such considerations ENNHRI finds that Option 2 goes too far in both ruling out quantification and making it a voluntary disclosure requirement without having to meet any related conditions. Diluting 'financial effects' to this extent is at risk of undermining the objective of putting sustainability reporting on the same level as financial reporting and better integrating the two reporting disciplines.			
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	ENNHRI is not supportive of introducing reliefs in ESRS that go beyond already existing IFRS reliefs. This is to ensure maximum interoperability and thereby facilitate implementation and increase comparability, while avoiding starting a 'race to the bottom' between ESRS and IFRS as it relates to aligning reliefs across the standards. The switch from a compliance approach to one of 'fair presentation' marks a big shift and an overall reliance on business judgement. With it comes heightened responsibility on the companies to act in good faith. If not, the framework will lose its ability to underpin the necessary exchanges between preparers and users and ultimately the much needed factoring in of sustainability in business decisions. The many reliefs, on top of the emphasis on fair presentation, brings the risk that the standard opens itself to abuse by those not acting in good faith or those with limited faith in the value of the reporting exercise, thereby ultimately hindering the ability of the measure to achieve its stated sustainability objectives.			
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	ENNHRI supports the retained "shall disclose" datapoints while noting that the Amended ESRS offers a significant reduction. Given the materiality principle one could have kept more datapoints whilst emphasizing the 'if material' aspect, which on some accounts would have been preferable to blanket deletion. The amended ESRS represents the minimum necessary to ensure meaningful reporting meeting users' needs, allowing comparability and underpinning needed analysis and dialogue on companies' sustainability impacts and efforts crucial for the CSRD objectives and the Green Deal.			
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	ENNHRI welcomes overall the increased and explicit emphasis on 'fair presentation'. It does however recognize that 'fair presentation' is less established in the context of reporting on impact materiality and auditing impact materiality reporting than in the context of financial reporting. This could be addressed in guidance efforts aimed at both preparers and auditors.			
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	ENNHRI supports this changed threshold and finds it a pragmatic simplification and an improvement for both preparers and users.			
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	Methodology for calculation of non-EU adequate wages is ENNHRI's biggest technical and substantive objection to amended Social standards . As national human rights institutions, ENNHRI's members are critically aware of the challenges for the millions of workers living in poverty notably because of the failure of wages, including in many jurisdictions statutory minimum wages, to constitute adequate or living wages. Workers in and outside EU have a human right to a living wage, meaning sufficient remuneration to support themselves and their families in a life of basic dignity. The draft introduces unequal treatment of workers within and outside EU, disadvantaging non-EU workers by directing companies to compare wages paid with legal minimum wages aligned with the ILO's wage-setting principles and only when there are no legal minimum wages which apply a living wage benchmark. There are two main issues with the suggested non-EU methodology: oit incentivises use of legal minimum wage, oftentimes much lower than an adequate wage oit puts the task on each company to assess whether a certain wage in a certain country is adequate or not The ILO Wage setting principles quoted in AR 22 are not the right reference point, given they focus on the process of setting wages, rather than on the result of whether the wage is adequate or not. The latter is at the heart of the objective of S1-9. Instead, the drafting should refer to the ILO Principles for Estimating a Living Wage as the relevant benchmark for both statutory minimum wages or any other living wage estimates. In addition, the drafting should put the onus on the public authorities or the living wage data providers to provide evidence on alignment with the ILO Principles for Estimating a Living Wage rather than leave this as a burden on individual companies.			
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	ENNHRI welcomes and supports the approach taken in relation to SFDR datapoints relevant to the social standards. It would encourage future review of the SFDR PAIs to take into account the amended ESRS, thereby improving consistency across disclosure regulations further.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	ENNHRI suggests to specify in Application Requirement or in the NMIG that adjusted pay gap can be an important additional entity-specific disclosure to contextualise and enable improved understanding of the unadjusted pay gap disclosures.			
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ENNHRI recognizes EFRAG's efforts for the amended ESRS to strike a balance between simplification and meeting the core objectives of the European Green Deal. However, in ESRS 1 ENNHRI is concerned with the cumulative or aggregate effect of the different reliefs when read in combination with a switch from a compliance approach to a principles based approach and including where reliefs go beyond those in the IFRS standards.			
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	For S1 ENNHRI has strong concerns on adequate wage methodology for non-EU employees and the related potential backstepping it can incentivize amongst companies otherwise committed to addressing concerns around in-work poverty. For S1-S4 disclosures 1-4 ENNHRI could support the suggested amendments, but wants to flag that these standards are now very slim and that any further reduction of them risk rendering them hollow, undercutting their alignment with international standards on business and human rights and removing their utility to function as an envisaged disclosure vehicle for CSDDD. Furthermore, ENNHRI strongly recommends to include metric disclosure directly in standards S2-S4 disclosure requirement 4 on targets. This to ensure consistency with GDR-M and compensate for these being the only topical standards without predetermined metrics.			
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	see answer to S1			
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	see answer to S1			
Survey	ENNHRI - European Network of National Human Rights Institutions	NGO	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	see answer to S1			
Survey	Arup	Consultant (including software vendor)	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	1.We welcome TNFD's proposal to consolidate the current nature-related standards (E2-E5) into a single, integrated nature standard and to (i) ensure a structured materiality assessment for nature-related issues; (ii) elevate reference to 'dependencies' on nature; and (iii) streamline and prioritize the number of quantitative nature-related data points. We call on EFRAG to make note of it and apply as possible. Consolidation must not dilute clarity — transition plans, offsets and targets need consistent definitions, assurance expectations and value-chain scope. Topic annexes should preserve key metrics, definitions and boundary rules.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Arup	Consultant (including software vendor)	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Arup	Consultant (including software vendor)	United Kingdom	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E4	4.We do not support the removal of the ESRS E4 biodiversity and ecosystems metrics metric specifications from the mandatory requirements. This is problematic because standardization is more limited at present than with other metrics. Specifying metrics (now in Non-Mandatory Illustrative Guidance (NMIG) 18-20) within the Standard would give companies the information they need to select and report practical, credible and comparable metrics and would support alignment with the TNFD disclosure metrics. If this does not occur, at the very least, it is important that (i) the NMIG stays attached to the Standard in some form and (i) a process is in place for ensuring updates are made on a timely basis, particularly for guidance on topics where data/tools for reporting are evolving rapidly. If these remain in NMIG, they should stay attached to the standard and be subject to a formal update process to ensure companies can report credible, comparable metrics aligned with TNFD.			
Survey	Arup	Consultant (including software vendor)	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	2.We support the simplified standards aligning with core elements of TNFD and encourage EFRAG to continue striving to maintain alignment with other international standards and frameworks, including ISSB and GRI. Improving the interoperability between the requirements in ESRS and the ISSB Standards, to enable companies to use the ISSB Standards as a starting point and 'top up' with specific impact disclosures to achieve compliance with the CSRD/ESRS, is important. We recommend explicit cross-references to TNFD LEAP and SBTN guidance, and that transition plans, offsets and targets have consistent definitions, assurance expectations and value-chain scope.			
Survey	Arup	Consultant (including software vendor)	United Kingdom	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	3.We welcome the simplification effort mainly targeting unclear or duplicative requirements, maintaining essential disclosures on environmental metrics and ask EFRAG to maintain that approach in the simplification process. However, we note that the revised double materiality assessment (DMA) process, which is now more top-down and based on "reasonable and proportionate evidence" and "fair presentation", risks deprioritising biodiversity and ecosystems if organisational awareness or data availability is weak. We recommend EFRAG add guardrails to ensure that data scarcity alone is not a valid reason to deem ESRS E4 non-material, and that explicit assessment of dependencies is required. We also welcome alignment with the draft global consensus metrics on the state of nature, convened by the Nature Positive Initiative. This is important for ensuring metrics are credible, practical and aligned for companies.			
Survey	Arup	Consultant (including software vendor)	United Kingdom	35.E4-5.	Do you agree with the amendments of this chapter?	I disagree	The option to report metrics only for locations relevant to existing sustainability targets should be removed or made additional. In order to align with the double materiality concept in ESRS 1 and throughout the standards, metrics should be reported for locations that are material for biodiversity and ecosystems. We also recommend retaining site-level specificity rather than broad "location" terminology to preserve decision-useful granularity.	E4	Disclosure Requirement E4-5 - Metrics related to biodiversity and ecosystems change	
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The proposed revisions to the ESRS provide useful clarifications and promote a more strategic and less compliance-oriented approach towards the DMA. In this context, the reinforcement of the materiality filter and the possibility to follow a top-down approach are major improvements. Other positive elements include: i) the deletion of sub-sub-topics which led to overly granular analysis, ii) the clarification that sub-topics shall not be seen as an exhaustive list, iii) the ability to evaluate materiality at a broader level and without covering all time horizons and iv) the possibility to disclose information at topical level. We believe that the possibility of including information about non-material topics contributes as well to greater flexibility, as long as the information remains relevant and does not become prominent in the sustainability statement. We are however concerned that the Exposure Draft does not sufficiently address the most critical issue in its "practical considerations", which is the level of effort required to justify the results of the double materiality assessment, and more specifically the non-materiality of certain IROs. In our view, each undertaking should be in a position to determine which IRO is material and which is not based on its unique understanding of its strategy, business model and stakeholders' interests and views, unless there are concrete elements that contradict this assessment. Although the notion of "undue cost and effort" supports this vision, the Exposure Draft misses the opportunity to better frame the role of the auditors when reviewing the DMA and, consequently, to avoid lengthy reviews. Finally, we are concerned that the importance given to "disaggregation" might have a counter-productive effect. Instead of ensuring that the undertaking focuses on what matters at the appropriate level, there is a risk of unnecessarily increasing the number of IROs.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	In our view, the so-called "Gross vs Net" debate is a critical issue as it fundamentally alters the results of DMA, which is the cornerstone of the sustainability reporting. The coexistence of different approaches seriously compromises the comparability of the information disclosed and the revision of the ESRS shall eliminate these discrepancies. In this context, we welcome the EFRAG's initiative in addressing this topic in the exposure draft. However, the approach described in the Exposure draft is not straightforward. While trying to accommodate different views, we are concerned that it is overly complex and will consequently lead to further debates about interpretation. Annex C, in its current form, should therefore be removed from the standard. Indeed, we understand that the proposed approach mixes gross and net assessments in different contexts which will complexify the work with the auditors and the evidence to be provided to them, and reduce comparability between companies. Furthermore the net approach also diverges from the one used in the vigilance plan (prepared under the French Duty of Vigilance Law), which is based on a gross approach. By contrast, the ESRS hybrid model risks creating confusion and duplication, especially when companies must reconcile both frameworks within their Universal Registration Document. If only one approach is to be retained, we believe that a purely "net approach" would not be adapted to the way the ESRS are designed and would make it difficult to disclose information on prevention, mitigation and remediation measures appropriately. We therefore strongly favor and recommend to withheld a "gross approach".			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The clarifications concerning the possibility to include executive summaries, to use appendices and the stronger link established with the overall corporate reporting are very much welcome enhancements that will improve the quality and the conciseness of the sustainability statement. The option to include non-material information, if presented clearly, is also a good step to maintain continuity for stakeholders without engaging in complex and lengthy discussions with auditors.			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We fully support the rationalization measures that improve the overall structure of the ESRS. The redundancy between certain disclosure requirements in ESRS 2 and the topical standards, and the complexity of navigating between disclosure and application requirements, were major shortcomings. In our view, the Exposure draft does succeed in addressing these issues, which represents a significant improvement. Regarding PAT, we also welcome the simplification of the requirements in the absence of PAT. These changes are expected to significantly reduce one aspect of the reporting burden, although doubts remain on the real extent of datapoint reduction since many data points have been moved from the topical standards to the horizontal standards and/or merged with other requirements.			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We agree that deleting all "may disclose" data points makes the set of standards much easier to understand. However, in some cases, this has led EFRAG to propose making mandatory data points that were voluntary as per Set 1. The purpose of the ongoing simplification for which EFRAG was mandated by the Commission, is not to introduce mandatory data points and we therefore oppose this. The relocation of the AR right below the related DR however is very useful and provides far more clarity. Furthermore, editorial changes are overall very positive when it comes to clarity, conciseness and consistency (within the ESRS and with other regulations).			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	During the first reporting exercise, companies' experience with the EFRAG Q&A and implementation guidance has demonstrated that these documents were often used by auditors as a binding reference, rather than for illustrative purposes as originally intended. While the NMIG may be a useful tool, it must be made clear from the outset that it is not a collection of former requirements, but rather a flexible tool to support companies in preparing their sustainability statements. Use of the NMIG should be entirely optional and non-binding. Therefore, the NMIG should remain outside the standards (i.e. the delegated act), and its non-binding legal status should be explicitly clarified. More generally, it should be made explicit that all documents other than the directive and the delegated act do not constitute binding references, but are merely guidelines (including EFRAG Q&As and implementation guidelines).			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We welcome the proposed reliefs (reasonable effort, scope exclusions, use of estimates…) which are useful in reducing the reporting burden. While we appreciate the clarification that the starting point for reporting is the scope of the consolidated financial statements, we believe that the Exposure draft should go further in this direction by deleting ESRS E1 AR 19 which identifies circumstances in which additional information must be disclosed based on the operational control boundary. Indeed, this would reinforce connectivity between financial and sustainability information and provide a clear scope to be considered, both for preparers and their auditors.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	This relief provides useful flexibility, allowing partial scope reporting when data is missing, which will be instrumental to improve the quality of the data. However we consider that the relief should not be time-limited, and be expanded by removing ESRS 1 § 91, which stipulates that "the undertaking shall disclose the action it has taken to increase the coverage and quality in future reporting periods". This requirement fails to consider situations where a metric covers a large yet uncomplete scope and for which reaching full scope is not feasible. To this end, we recommend maintaining full transparency on the covered scope, while deleting the aforementioned requirement. This would enable each company to decide, on a voluntary basis, whether or not to disclose or not the actions taken to increase the coverage and quality.			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	We believe that Option 2 strikes the right balance between transparency and feasibility, especially during the initial reporting cycles. This approach is consistent with the principle of proportionality embedded in the CSRD, as well as with the need to provide meaningful, decision-useful information without imposing disproportionate burdens to preparers. We therefore support Option 2, provided that clear guidance is given on what constitutes an acceptable qualitative disclosure, including examples and minimum elements.			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	Provided that quantitative information is disclosed on a voluntary basis (option 2 as presented in response to question 19), we consider the proposed reduction in data points to be a clear step forward and the remaining requirements to be acceptable. However, it is important that their interpretation remains aligned with prudential expectations for lenders. Qualitative or range-based narratives should be allowed wherever figures would be speculative.			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	We welcome EFRAG's ongoing efforts to align the ESRS with the ISSB standards (IFRS S1 and S2). Strong interoperability is essential to ensure that sustainability disclosures prepared under the CSRD can also meet global investors' expectations and avoid the duplication of reporting efforts. In our view, the current Exposure Draft represents clear progress. The terminology and architecture are now closer to IFRS S1/S2 and many data points in ESRS E1 either mirror or reference the corresponding requirements in IFRS S2. This facilitates "single set of data / multiple lenses" reporting. Nevertheless, we see room for additional improvements: 1) Ensuring that all climate-related financial disclosure elements in IFRS S2 (e.g. financed emissions, use of carbon credits, resilience analysis) are clearly cross-referenced in ESRS E1 or, where appropriate, explicitly scoped out to avoid interpretative gaps. 2) Providing an interoperability mapping (in an appendix or as on online tool) that shows, datapoint by datapoint, how ESRS requirements correspond to IFRS S1/S2. 3) Where the ESRS include EU-specific concepts (e.g. double materiality, EU Taxonomy links), clarify how these complement rather than contradict ISSB disclosures. 4) Promote a "building-block" reporting approach, allowing undertakings to prepare a single set of disclosures that can be used for both CSRD and ISSB purposes, with only limited additional work required for EU-specific needs. Finally, we encourage EFRAG and the ISSB to maintain an ongoing dialogue and synchronize future amendments, so that, once implementation has started, preparers do not face diverging requirements.			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	Any simplification of the already highly complex framework should be achieved without introducing new requirements or moving "may" datapoints to "shall" datapoint, that also exceed the Commission's mandate given to EFRAG. In our view, the benefits to users are very limited while the reporting burden on companies is increased. At a time when companies are consolidating their understanding of the existing reporting framework, introducing of new mandatory elements is highly inappropriate and creates uncertainties related how the information will be audited. Consequently, we strongly oppose the move to make these six datapoint mandatory, and suggest including them in the relevant NMIG.			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	Any simplification of the already highly complex framework should be achieved without introducing new requirements that also exceed the Commission's mandate given to EFRAG. In addition, the newly proposed datapoints related to ESRS 2, E2-4 and E5-4 raise serious concerns as, amongst others, these metrics referring to concepts that are either not available, or not clearly defined or subject to continued evolution and therefore creating uncertainty and low quality data points. By adding new concepts and related metrics, the proposed revision fails to deliver the expected reduction of the reporting burden and we therefore disagree with these datapoints becoming mandatory.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We recognize the importance of presenting the ESRS as a "fair presentation" framework, aligned with IFRS S1 and S2. This emphasis could strengthen the materiality filter and help reduce unnecessary disclosures and avoiding a purely compliance-driven or checklist-based approach. It also reflects the underlying spirit of simplification pursued by the amendments. However, we share significant concerns about this concept being introduced without further amendment and required clarifications. Should this happen, we believe it would have a very negative effect as auditors would add a layer of "fair presentation" to their compliance review, resulting in an increased burden on preparers. This should be avoided at all costs. Firstly, the term "fair presentation" is not clearly defined in the ESRS. References to IFRS are vague, and other international standards (e.g. ISSA) interpret fair presentation differently. Without clarification, there is a significant risk that preparers, auditors and regulators will have divergent interpretations. Secondly, there is a concern that "fair presentation" might be applied hierarchically, enabling auditors to challenge simplifications or to reopen debates on omitted datapoints, thereby undermining the intended relief. In conclusion, while we support the objective of reinforcing the relevance and proportionality of reporting by introducing the "fair presentation" concept, it is key to define this concept in such a way as to prevent any ambiguity, ensure consistent application, mitigate audit risk and preserve the intended simplifications. This should provide the necessary legal clarity that the 'fair presentation' would replace a compliance-driven approach, rather than be added to it.			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	We believe that the previous requirement, which focused on countries accounting for at least 10% of the total workforce, was better suited to large groups. Indeed, the previous requirement was designed in such a way that a company should provide details for a maximum of 10 countries. However, with the proposed amendment, all large groups would now have to provide details for 10 countries. This change affects several datapoints and represents a significant increase in the number of metrics to be disclosed. In conclusion, we do not support changing the current threshold. Furthermore, should the threshold be revised, we would recommend to set it at 500 employees instead of 50. For large groups, this would better reflect countries of significant importance.			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadequwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	Although it is a meaningful approach to refer to international references such as ILO principles, the proposed methodology creates many concerns as we anticipate that an extensive workload could result from the following phrase "periodically reviewed/adjusted every two years and takes into account the ILO wage setting principles." As the indicator covers the entire workforce, an assessment would have to be conducted in all countries of operation to check the fulfilment of these two new criteria. Furthermore, if a company operates in different sectors of activity, it may have several collective agreements to review within a single country. Ultimately, this could lead to hundreds of checks to be performed. Finally, in countries where an adequate minimum wage does not exist, which is the most critical issue met by preparers in 2024, the ILO principles are too vague and will necessarily make information difficult to audit and compare. To overcome the absence of a clear database of adequate wages, we recommend limiting the quantitative information to employees for whom a minimum wage is defined by regulation or by collective bargaining. For those operating in contexts where no adequate wage is clearly defined, we recommend disclosing a qualitative information explaining how the preparer ensures alignment with the ILO's principles.			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	The coverage of SFDR PAIs remains broadly intact and relevance has improved. It is important to ensure that any remaining SFDR linkages are explicit and that overlaps between ESRS 2 and topical standards are avoided			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	This application requirement is essential for a better understanding and should be aligned with the target setting.			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	31.	ESRS S1 DR1S: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	We agree with the conclusion of the EFRAG SRB to keep the unadjusted gender pay gap as the mandatory metric and to delete the voluntary datapoint on the adjusted gender pay gap. However, we regret that the opportunity was not seized to revise more profoundly this metric. Indeed, producing the gender pay gap is very complex and significant discrepancies were observed in the 2024 sustainability reports, limiting its usefulness to users. A critical issue with respect to the Gender pay gap is the lack of clarity concerning the types of remuneration to be taken into account when calculating the metric. While the total remuneration ratio comes with a detailed list of types of remuneration, the gender pay gap seems vaguer. This results in some companies calculating the gap using only basic salaries, while others use a broader definition of remuneration. In this context, we observe that the information disclosed for 2024 is not comparable between companies and that auditors' expectations of this metric vary considerably.			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	While qualitative information on payment practices is relevant to indicate how the protection of SME's is tackled within the company, the calculation of G1-6 metrics is overly complex for international groups operating with a great variety of payment standards. We therefore support the deletion of the quantitative datapoints G1-6 § 12 (a)(b).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We greatly appreciate the proposed relief introduced with respect to the lack of quality of metrics and the importance given to the materiality filter which gives a prominent role to the preparer's judgement. However, we believe that the DMA process should be further simplified, giving predominance to the preparer's own judgement, thus limiting extensive and unreasonable audit works, as experienced by wave 1 companies in 2024.While insisting on disaggregation in the DMA, we recommend clarifying that disaggregation is intended as a way to expand the materiality filter and, ultimately, focus on important information, rather than increase granularity. To this end, we strongly advocate adding an explicit statement to ESRS 1, clarifying that exhaustive "site by-site" data points should never be expected from preparers, who should only focus on significant sites. Finally, we consider that the Gross Vs Net debate is not adequately addressed in the exposure draft, notably due to the complexity of Annex C which should be deleted.			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We are very supportive of all changes introduced in ESRS 2, providing a much clearer framework and much more efficient links between ESRS 2 and the topical standards. The proposed GDRs also provide valuable revisions as compared to the previous MDRs.			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We consider the revision of ESRS E1 missed an opportunity to provide greater flexibility with regard to E1-10 by not allowing preparers to avoid report on carbon pricing when such a scheme is solely for internal use. Furthermore, it is crucial to clarify which option is retained with respect to anticipated financial effects in order to comment on those r related to climate change. We believe that E1-11 is too complex to produce reliable data in the context of "option 1" (cf Question 18) and would put companies at risk. Consequently, we strongly believe that E1-11 should not include any mandatory quantitative information. Finally, AR19 raises questions as it introduces operational control boundaries. For the sake of clarity and to ensure information auditability, we strongly recommend using the financial control boundary for all metrics, including scope 1 and scope 2 emissions.			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Overall, the changes introduced in ESRS E2 are editorial and structural changes that enhance the standard's conciseness and clarity. We however consider the introduction of new quantitative datapoints, especially for complex information such as primary and secondary microplastics, to have failed to deliver the expected simplification and this should be removed.			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We welcome all changes introduced, that enhance the standard's clarity. We however disagree with the addition of new quantitative datapoints on water withdrawal and discharges, as these additions fail to deliver the expected simplification and should therefore be removed.			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Overall, we support the changes introduced to ESRS E4. However, we believe that § 12 should be further clarified to avoid divergent interpretations among auditors and preparers, as it is not clear what is intended by the sentence "if the undertaking and its place has made public a biodiversity transition plan".			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Apart from the very positive changes found throughout the ESRS (AR relocation, deletion of redundancies with ESRS 2, editorial revisions, etc.), we do not consider that ESRS E5 has been substantially simplified. As far as quantitative information is concerned, we regret that no synthesis has been proposed and that the reporting burden has increased with the introduction of new datapoints related to waste produced, which should be removed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	ESRS S1 includes many complex quantitative information. In this respect, we regret that the Exposure draft did not meaningfully simplify this standard. In S1-5, as stated in response to question 27, we disagree with the new threshold for reporting metrics at country level, as this creates the need to disclose additional information and increases audit risks. In S1-6, we regret that non-employees included in ESRS S2 instead of S1. This would better reflect preparers' organization, access to data and contractual arrangements. If non-employees remain in S1, we believe the quantitative metrics should become voluntary and be included in the NMIG, as they would, in most cases, be impossible to obtain without incurring significant costs and effort. In S1-9, there is a lack of precision with regard to countries where no minimum wages have been set, as covered by question 28. In S1-10, we recommend removing the rate related to unemployment coverage, as this is primarily the responsibility of public institutions in the countries in which the company operates. In S1-11, we recommend adding a relief to cover potential legal constraints at a local level that prevent preparers from collecting or disclosing information on people with disabilities. In S1-13, we strongly oppose the disclosure of data for non-employees and on-site workers. Finally, we urge for a profound revision of S1-16, whereby quantitative metrics should only cover "confirmed cases" rather than all "incidents", as this notion remains vague. In case the notion of incidents is maintained, one should revert to the original wording of "severe incidents". Without this limitation, less relevant information may be reported, creating confusion about which incidents to disclose and undermining the simplification objective. Focusing on severe incidents is essential to keep reporting meaningful, proportionate, and aligned with relevance and efficiency principles.			
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	ENGIE	Preparer (non-financial preparing a sustainability report)	France	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Despite the useful simplification elements, we consider that the standard ESRS G1 should be improved by : -Deleting new requirements related to procurement team training on business conduct (G1-2) -Deleting requirements related to the number and nature of confirmed incidents of corruption and bribery -Deleting quantitative metrics on payment practices as this is too complex to collect for international groups with thousands of suppliers and operating in dozens of countries.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We support a simplified DMA process, strengthened information materiality filter and clearer articulation of Impacts/Risks/Opportunities-topic relations but major issues remain: •The concept of information materiality is still insufficient to allow for a more principles-based application of the ESRS. In particular, paragraph 21(b) poses practical challenges. It is almost impossible to determine what information is 'necessary' for users, as it is a subjective criterion. Some users deem highly detailed information necessary to understand an undertaking's IROs. Others find such information obscure relevant facts and deem it 'necessary' to provide concise disclosures. It will be impossible to justify the 'necessary' evidence to auditors in practice. Also, sub-paragraph (b) introduces differences to the IFRS, which complicates interoperability. We suggest deleting paragraph 21 (b) and the definition in ESRS 21 (a) for the primary user should apply to all the other users. The description of when information is material should be aligned with the one in IFRS S1. •We note the lack of amendments to ESRS2 IRO-1, which would have allowed for less prescriptive disclosure requirements. •Appendix A should be relocated to the NMIG, as it provides non-binding guidance to support the application of provisions. Some of the wordings in chapter 3 are still not sufficiently clear, e.g.: •Para. 22: If the provided options refer only to the presentation of IROs this will lead to a lack of comparability between reports of different companies. The presentation in tables/overviews etc. should be preferred on IRO level. This should be clearly stated in chapter 3.2. •Para. 34: Please give a definition of how many previous periods need to be included in the identification of actual impacts is missing. AR16 is now confusing as there is no clear differentiation between sub-topic and former sub-sub-topic. Please clarify.			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	ESRS 1 Para. 34/35: The new guidelines introduce three additional layers for the assessment of actual and potential impacts, that were not present in ESRS set 1. We expect a significant increase in reporting burden through these additional layers, as they require supportable evidence and will be subject to auditor scrutiny. This would particularly penalize wave 1 companies that have already gone through a comprehensive materiality assessment process, methodology, and governance setup. As such, the introduction of the new guidelines is clearly against the European Commission mandate for simplification. EFRAG´s approach also seems to differ from how IROs are managed, e.g. in bank's risk report in which a risk is material after considering mitigating actions. We suggest removing the new guidelines on gross vs. net completely, i.e. paragraphs 34/35 and Appendix C of ESRS 1, and giving the market practice time to evolve. ESRS 1 AR 9 should be deleted accordingly as its purpose is to name the existence of Appendix C. We recommend that credible mitigating and remediating actions (e.g. implemented/decided policies) always be taken into account to provide useful information to users. The clarification on net risks is missing. To be in line with financial reporting and risk management, this should be considered from a „net" perspective. We ask EFRAG to provide clarification. ESRS 1 Para. 36 This section states that, while an undertaking cannot state a positive impact, e.g. for implementing actions to prevent human rights violations along the value chain (because they are mitigation actions and also required by law), it could at the same time report a positive impact, because with these actions, the company helps to mitigate negative impacts of its upstream suppliers on these human rights topics. This doesn't seem to make sense. Please delete this part.			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We welcome the increased flexibility introduced by the proposed amendments to the ESRS Sustainability Statement. The option to include an executive summary and the emphasis on using appendices to separate detailed information from key messages are helpful steps toward improving readability and structure. We urge that this be permitted in a free format. However, we primarily view these changes as clarifications of existing options rather than substantial simplifications. From our perspective, they do not significantly reduce implementation effort or reporting complexity. We also note that EFRAG has introduced additional obligations regarding the connections within the sustainability statement and between the sustainability statement and other corporate documents (ESRS 1, paragraphs 11 and 113). While these obligations require only reasonable and sensible information, they still represent an additional reporting burden, which would penalize first movers. The ESRS should allow corporates to decide how information is represented and where it is placed, while ensuring completeness and compliance with disclosure requirements.			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Restructuring the architecture and clarifying the interaction between ESRS 2 and the topical standards enhance the standards' overall readability. Reducing the number of mandatory data points for policies, actions, targets (PATs), and removing overlapping topical specifications contribute to a clearer, more accessible framework. The shift toward a principles-based approach, as well as the ability to report PATs at a higher aggregation level, reflects a pragmatic and proportionate response to the challenges identified during the initial application. However, some prescriptive disclosure requirements on PAT level have been introduced that we do not agree with. This information would not add value to decision making. These specifically pertain to ESRS2 GDR-M, paragraph 41. Firstly, paragraph 41 (a) now requires, for each metric, information on data types and sources used as input to the calculation. While these disclosures are still subject to the concept of information materiality, providing information on data types and sources is not relevant for most metrics and certainly does not add additional value to users of sustainability statements. We therefore suggest deleting 'data types and sources used as input to the calculation' from the prescriptive requirements of the provision. Secondly, paragraph 41 (b) introduces new requirements for all environmental metrics regarding information on the specific environmental conditions and characteristics of the area where the impact is occurring. Such information is often not available, also is it nearly impossible to determine the area where the impact is occurring with precision – as such the required information would by highly judgmental, subject to significant uncertainties and therefore likely to not meet the criterion of faithful presentation. 41 (b) also creates additional requirements that were not present in set 1 by advocating such information for all environmental metrics, which also includes value chain metrics. We therefore suggest deleting subparagraph 41 (b) entirely.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We agree that the proposed amendments will improve the clarity and accessibility of the ESRS. The removal of "may disclose" data points and the clearer distinction between mandatory and non-mandatory content make the standard more structured and comprehensible. The structure has become simpler by moving the "may" provisions to the non-mandatory illustrative guidance, incorporating the application requirements into the standards, and eliminating redundant reporting in ESRS 2 and the topic-specific standards. The revised layout, especially the relocation of the mandatory application requirements under the relevant disclosure requirements, makes the legal text easier to follow and reduces the need to navigate back and forth within the document. However, our remaining concerns include: •EFRAG should delete all the unclear terms like "shall consider" "may present", "may implement", "may include" and other ambiguous terms that still are in the text to avoid confusion and misunderstandings with the auditors. (e.g., ESRS 1.114, 1.115). •ARs are intended to constitute mandatory requirements, and that all guidance or illustrative examples should be moved to the NMIG. •Expressions in certain ARs such as "shall consider" create ambiguity, as it is unclear how "consideration" can be measured or audited, and such phrasing risks prescribing behavior in contradiction with ESRS 1 paragraph 5. Please clarify. •Changes to established terminology should be approached with caution, given that many undertakings are already preparing or reporting under the original ESRS. The consistent use of "material IROs" should be ensured across the standards, avoiding references to "material topics," and wording should not alternate between "adverse" and "negative" impacts. •We also would like to point out that new mandatory disclosures have been added which is clearly against the EU Commission´s request of the EU Commission and the revision´s aim to reduce reporting burden. Please delete all additional mandatory data points.			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We consider the introduction of Non-Mandatory Illustrative Guidance (NMIG) a useful addition to the ESRS framework. NMIG can serve as an orientation tool, especially for preparers in the early stages of implementation, by illustrating how disclosures might be structured or interpreted in practice. However, it is crucial that both preparers and auditors understand and uniformly interpret the non-binding nature of NMIG. The examples provided should not be taken as a basis for expectations or justifications if they are not applied. Otherwise, the intended simplification effect could be undermined by new uncertainties. There could also be perceived pressure to align with the illustrative content. The revised standards also introduce the new term "can", e.g AR4 "biodiversity and ecosystem scenario analysis can inform the identification […]". As "can" is a voluntary requirement the EFRAG should transfer it to the NMIG. In general, EFRAG should refrain from introducing new terminology in the revised standards. We strongly recommend deleting the voluntary disclosure requirements in the NMIG to avoid discussions with auditors about adherence. We support EFRAG's proposal to not include the NMIG in the delegated act.			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We welcome the burden relief as it reduces the complexity and effort associated with ESRS reporting. The "undue cost or effort" relief provides preparers with a practical basis to justify omissions or limitations (e.g. towards the auditors), when collecting data would require disproportionate resources. However, it may increase the burden of proof if auditors challenge whether sufficient effort has been made to fulfill reporting requirements. We also appreciate the removal of the preference for direct data in value chain metrics and allowing estimates. However, the relief introduced through para. 91 of ESRS 1 is not applicable to GHG emissions. GHG emissions accounting/calculation is the one metric area generally most subject to high measurement uncertainties, often unavailable and unreliable direct or estimated data, and high cost and effort requirements. In the way paragraph 91 is phrased, full coverage would be required, irrespective of cost and effort considerations or the reliability of estimates. We call for removing the exclusion of this concept for GHG emissions. Paragraph 91 specifies that in certain cases the respective metric can only be "partially estimated". There might be cases where the metric cannot be estimated or needs to be estimated entirely. We therefore suggest rephrasing the wording to "(…), but the corresponding metric can currently only be entirely, partially, or not estimated at all." The amendments made to the anticipated financial effects (AFEs) do not solve the issue of data availability and reliability, as assumptions for this data point will vary widely. Any comparison between companies would be misleading. All data points on AFEs should be deleted. We welcome the proposed relief for acquisitions. However, the one-year timeframe for integrating a subsidiary for sustainability reporting purposes could be unrealistic. We ask for greater flexibility to disclose metrics once the subsidiary is fully integrated.			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We consider the proposed relief to be a practical and necessary addition. It acknowledges the real-world limitations that many preparers face, especially in complex areas such as value chain reporting. The relief helps companies improve their data collection processes and quality, before reporting metrics externally. It ensures that data collected for reporting purposes is reliable and robust. Forcing the collection of weak data does not contribute to high-quality reporting or comparability. It also increases the risk of legal issues related to the disclosure of unreliable metrics and may lead to a distorted or misleading representation of actual information. It is also important to note that many Wave 1 undertakings will benefit only to a limited extent from this relief. In many cases, data collection approaches – often based on workarounds – have already been agreed upon with auditors and implemented. Continuing with these established methodologies may require less effort than reassessing and justifying the application of the new relief.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	The concept of "anticipated financial effects" is not an established and standardized concept. ESRS 2 does not give any guidance or insights on how to calculate the financial effects. E.g. it remains unclear what the basis for the calculation of the financial effects should be (planning data or the data from the last financial year) or which granularity is required regarding the effects on financial position, financial performance and cash flows. Generally, the reporting on anticipated financial effects will lead to tremendous additional effort for preparers without any expected added value for users or preparers. The underlying data is often unclear, and the risks cannot be reliably isolated. This makes any form of disclosure, whether qualitative or quantitative, legally risky and prone to misinterpretation. Such information lacks comparability and does not provide useful insights for decision-making purposes. Neither Option 1 nor Option 2 would yield comparable information. Estimates would be required either way as in case of doubt you must substantiate the qualitative information asked for in Option 2 for the auditor. Furthermore, the International Financial Reporting Standards (IFRS) already define when future risks and related current and anticipated financial effects must be reflected in financial reporting, e.g., through recognition and measurement criteria. Sustainability reporting should not override or extend these principles through financial disclosure requirements in the sustainability statement. We disagree with both proposed options. However, as we strongly support interoperability, we suggest that EFRAG and ISSB jointly examine what a meaningful, uniform, and practical definition and methodology should look like, as the disclosure requirement is currently not conceptually mature and therefore not ready for implementation. Qualitative, clear risk and opportunity reporting based on financial reporting could be a first step in this direction.			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Please delete the requirements on anticipated financial effects or at least make them entirely voluntary. We support connectivity between financial and sustainability reporting, particularly regarding the assumptions and parameters used in both areas. However, currently there is no feasible methodology that can link climate-related risks or opportunities specifically to financial metrics, such as assets, liabilities, or revenue. In our view, such linkages should only be pursued when they are methodologically sound and practically feasible. Otherwise, even qualitative disclosures carry significant legal uncertainty and risk of misinterpretation. Furthermore, comparability across undertakings is severely limited due to the absence of clear guidance on the level of detail required for qualitative disclosures. Also, the information required in E1 goes beyond IFRS S1 and S2 leading to an uneven level playing field if European companies are required to disclose this information. Capital market participants typically rely on standardized models and data sources that are not meaningfully enhanced by inconsistent, company-specific disclosures. The actual use of such granular data is questionable and does not justify the immense effort it would require from companies. If banks or other financial institutions require information on anticipated financial effects, they should be provided through enhancements to financial reporting requirements not through disclosures within the ESRS framework. According to AR 16 of ESRS 1, the risk management system is defined as a key source for sustainability reporting. Therefore, anticipated financial effects should be derived from this source to ensure consistency and consolidate all relevant information. If the anticipated financial effects remain, we suggest adding a relief to the detailed datapoints that allow omission when there is no reasonable and supportable information derived from the reporting undertaking's business plans to be used as input in the calculation of anticipated financial effects.			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	To avoid double reporting, reporting according to the ESRS should also accommodate the ISSB standards. Therefore, we propose that companies should be allowed to use IFRS S1 & S2 as a starting point and add those requirements that are needed to comply with CSRD/ESRS e.g. to cover the impact requirements. Alternatively, the ISSB and the EU should work together on resolving the remaining major differences between IFRS 1 & 2 and the ESRS to pave the way for mutual recognition of the standards. Some of the critical areas that need to be addressed are the following among others: •Regarding IFRS S1, we see interoperability issues with the amended ESRS implementation of information materiality. •Regarding IFRS S2, firstly, the requirements concerning financial and operational control (E1 AR 18. For para. 32/ E1 AR 19 for para. 32/ E1 AR 20 for para 32) diverge significantly from IFRS S2, where undertakings have the flexibility to choose their preferred approach. This dual approach may result in inconsistent reporting and interpretation, necessitating careful review to ensure clarity and uniformity. •The deviations related to the requirements around anticipated financial effects continue to be a concern. Please refer to the response in question 20 for further details. •The inclusion of anticipated financial effects considerations to perform the resilience analysis (E1 AR 8 for par. 20) is another critical area that does not align with IFRS S2. This new consideration, not included in the original ESRS, introduces complexity and additional burdens for undertakings. •ESRS requires companies to report on Energy consumption and mix metrics, while IFRS S2 doesn't. Otherwise, an Interoperability Guidance to include a data point-by-data point comparison is necessary. This would allow every undertaking operating globally in Europe to claim compliance with IFRS S1 and S2, in addition to ESRS.			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	We welcome the improved organization and consolidation of the ESRS requirements. The changes made may reduce the effort required for data collection, documentation, and coordination with auditors. However, many changes seem cosmetic without altering the underlying substance of the disclosure requirements. We do not anticipate a significantly reduced reporting volume under the amended ESRS, as the scope and complexity of the disclosures remain largely unchanged. Major concerns remain: •Regarding newly introduced concepts and methodologies that may increase the reporting effort. •The simplification and reduction of datapoints have also been accomplished by merging, rephrasing, and restructuring many disclosure requirements and datapoints. This represents significant additional effort for Wave 1 undertakings as each change requires a re-assessment of already conducted standard interpretation. It also led to unclear and primarily descriptive paragraphs, such as ESRS 1 paragraph 27 and AR 20 related to paragraph 49, on assessing the undertakings' materiality. •We expect an increase in effort related to the new datapoints e.g. of E5 as well as through the changes in S1. •Expressions like "is useful information" (e.g., ESRS 2, AR 32) or "is a possible aspect to cover" (e.g., AR 33) continue to appear. These formulations may lead to uncertainty regarding the actual requirements for undertakings. We call for fewer mandatory indicators but that are clearly defined by the ESRS for everyone. Please delete: •Anticipated financial effects (in ESRS 2 & E1), reduction in reporting on the DMA (IRO-1) •Data points that aim to describe the "how" (e.g. ED ESRS 2. AR4, ED ESRS 2.25, ED ESRS 2.26, ED ESRS E1.AR5 und AR6, ED ESRS E1.18) •All new requirements, such as S1 breakdowns due to the changed country breakdowns. Further examples can be found in the Log of Amendments in column 3, marked as "NEW."			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	The simplification approach should not result in the introduction of new mandatory data points, nor should it convert voluntary data points to mandatory ones. We acknowledge that the number of datapoints moved from "may" to "shall" is limited and that the selected disclosures are aligned with existing disclosure objectives. However, sometimes changes are not always quite clear / identifiable. Amendments to the wording might result in datapoints being mandatory based on the reformulations. Example: S1-3 new para. 19 (b); E1-2 AR5 for para 18. We believe that the principle of not increasing reporting requirements should be applied consistently. Even if the data points themselves are not technically new or complex, their change in status to mandatory will require additional interpretation, internal coordination, and alignment with auditors—especially during first-time implementation. This effort should not be underestimated. We therefore recommend sticking to the rule of no additional reporting obligations. Making reporting on existing E4 Biodiversity transition plans mandatory is not supporting its development but rather hindering development and innovation in this field. The decision to include Biodiversity transition plan information in reporting shall remain voluntary. Also, some of the revised disclosure requirement will result in more extensive reporting obligations, for instance, there is now a reporting obligation on "human rights incidents" (previously "severe human rights incidents"). Please add "severe" again. Highlighting the training of procurement team within ESRS G1 is unnecessary detail and focus of one employee group. Please delete the addition.			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We do not support the introduction of new data points, as they typically result in significant additional effort for reporting entities without a corresponding increase in decision-useful information. The cost-benefit ratio of expanding disclosure requirements must be carefully considered, and in our view, the current framework already places substantial demands on preparers. Please delete: ESRS 2 General Disclosures: ESRS 1 provides the framework for preparation. Including a mandatory data point to state that ESRS 1 was considered will increase the audit burden without improving the quality of sustainability statements. E2-4: Secondary microplastics shall not be added as separate data point since only narrative information is available. E5-4: Addition of critical and strategic raw material shall be deleted. Reporting on "critical and strategic raw materials" is not about ESG/sustainability reporting. Reporting must not be used as vehicle for data collection related to the EU's geo-strategic interests. Next to reporting effort, we also see the risk of disclosing sensitive information. E5-5: Addition of "final destination unknown" shall be deleted as the stated goal of avoiding unreasonable estimations can be achieved without introducing new data points. 25) Emphasis on ESRS being a "fair presentation" reporting framework			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We welcome the introduction of the fair presentation concept, familiar from financial reporting. The shift in focus toward materiality, away from viewing sustainability reporting as merely a compliance exercise, is viewed positively. This clarification reinforces the purpose of the standards, which is to support relevant, decision-useful sustainability reporting rather than checklist-driven compliance. Having fair presentation could make it easier for companies to tailor their IRO/DMA reporting to their business model. § 105 should be deleted or rephrased so that the structure of the Sustainability Statement fits with the concept of fair presentation and allows an undertaking to tell the story of its material sustainability-related IROs and how it manages these. By emphasizing fair presentation, the ESRS framework encourages preparers to exercise professional judgment and focus on disclosures that genuinely contribute to transparency and accountability. This can help reduce unnecessary reporting and documentation efforts, particularly when justifying the omission of non-material datapoints towards the auditors. However, there is a risk that the auditors misinterpret it, so under fair presentation an omission of datapoints is almost impossible. Therefore, it is essential that EFRAG and the auditors reach a common understanding in this regard. Also, in financial reporting, the primary user is the investor, to whom fair presentation is directed. It is necessary to define a primary user also for sustainability reporting. Since the goal of the Green Deal is to allocate capital to sustainable companies, investors should be identified as the primary users. We suggest that EFRAG should clarify the meaning that fair presentation is not only adding information (as interpreted by auditors) but also omitting it due to the DMA or information materiality filter. The "fair presentation" concept needs a precise definition to avoid subjectivity and minimize audit burden. It should be aligned with/the same as in IFRS S1.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	The disclosure of absolute values alongside GHG emissions intensity targets presents significant challenges for financial institutions due to the following reasons: Fail to comply with qualitative characteristic of information: Estimating absolute emissions associated with an intensity target involves assumptions about portfolio composition, production capacity, market shares, and emission intensity, leading to unreliable results and unmeaningful disclosures. On top of that, absolute emissions associated with an intensity target may capture total impact but fail to consider business growth, potentially creating an unlevel playing field if exceptions are made only for financial institutions. We agree with the exception for financial institutions due to the unique role they play in facilitating sectoral transitions.			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	We strongly disagree with the proposal to change the threshold for the disclosure to the TOP 10 countries as this would lead to a burden increased specifically when considering the disclosure for S1-7 social dialogue (former s1-8). This does not fulfill the intent of the European Commission to reduce the burden for companies as data and IT systems are not available to collect this information and make it more complicated In practice, we have seen that for this KPI, companies only collect data from 95% of their employees, while the remaining 5% is estimated. This approach was efficient and practical considering the old thresholds. However, the new threshold will increase the complexity and effort of data collection because many countries have one or two large entities and numerous small entities that so far have not been included in the data collection. We suggest changing back to the old threshold or reducing the threshold to the TOP 5 countries.			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	In general, alignment with the existing International Labour Organization (IlO) declaration does make sense. S1-9 AR 22: "Stand alone Reference in a) to the EU Directive 2022/2041 is understandable as it was already in the requirements before and therefore an agreed change. The new approach under b) should be rejected for the following reasons: •How should companies ensure that statutory minimum wage is set based on the ILO principle? •How should companies ensure that the authorized institutes apply the ILO principles? ILO principles suggest that minimum wages should be set based on workers' needs, but companies do not control how governments set these wages. Companies cannot ensure that national authorities or institutes use ILO methodologies. •iii) Who should estimate based on the ILO principle? It is highly desirable to have access to a reliable and consistent source for living wage data. Are there such sources available? Outside the EU, wage-setting mechanisms vary widely. Some countries lack statutory minimum wages or have weak enforcement, making alignment with ILO principles difficult. Due to activities in large numbers of countries and territories, companies are unable to meet/ensure the new requirements for ILO compliance of all local minimum wages used and queries to local authorities. These represent new, additional reporting burdens. We suggest that outside the EU, it should still be permissible to use benchmarks provided by external consulting companies.			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	We propose that the SFDR data points in the ESRS should not be mandatory for companies. They only should be obliged to report them if they are material. Removing some of the SFDR datapoints is clearly appropriate. The ESRS simplification will need to be coordinated with the review of the SFDR. Both the CSRD and the ESRS mark the boundary of corporate sustainability reporting. All information that financial companies are obliged to report under the SFDR or the regulatory framework governing the banking sector need to be derived from the sustainability reports of corporates subject to CSRD/ESRS disclosures. CSRD/ESRS and SFDR are interdependent parts of the same reporting ecosystem and should be closely aligned. The same goes for the prudential requirements of the banking sector. Although the SFDR does not address listed companies as such, they are indirectly required to not only cater to the reporting obligations of financial companies but also to report data points under the SFDR due to capital market requirements (ratings and direct investor dialogues). It is therefore essential that any future changes to the SFDR reflect current developments within the reporting ecosystem. To maintain a balanced ecosystem, the objective of substantially reducing reporting data points is to be reflected in the SFDR review. These reflections should also be incorporated into the framework governing bank disclosures e.g. the banking supervisory reporting requirements set out in the Capital Requirements Regulation (EBA-Guidelines on the management of ESG risks).			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	AR 26 is a special feature of E4. It is presented as a separate AR (26) due to the significant number and diversity of biodiversity drivers, including land use, pollution, invasive species and climate. In other standards the corresponding requirements are integrated, often within the AR of the relevant disclosure requirements for metrics and targets (E1, E5, S1 and S2). The basic requirement is to present the methodology and data sources in a way that makes the information traceable, verifiable and comparable. Due to the intended simplification, we would recommend that the same requirements apply to E4 as to the other topical standards, rather than there being any specific requirements for E4. For financial institutions, biodiversity targets are rather connected to portfolio alignment, sector inclusion, engagement targets, or impact reduction based on metrics disclosed by investees, emphasizing the shift of capital flows rather than direct operational control. Therefore, any guidance included in a revised AR 26 on target setting will struggle to capture the diverse requirements across sectors. Given this disparity, we suggest not including specific target guidance in the ESRS, allowing flexibility for each sector to define targets that are relevant to their unique roles and impacts on biodiversity and ecosystems. If guidance should be provided, we suggest including guidance in setting biodiversity- and ecosystems-related targets in the non-mandatory implementation guidance (NMIG).			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	We think it is appropriate to delete the voluntary datapoint and to align with the EU Pay Transparency Directive. However, we are still missing total alignment with the EU PTD with regards to the salary/wage components. This might lead to different calculation approaches, especially when the EU PTD is translated differently in the member states.			

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Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	Sustainability reporting should not be used to achieve other objectives, such as protecting SMEs. These requirements will not promote better payment terms for SMEs or ensure that large companies pay faster. Standard payment terms vary greatly by country and region. It is impossible for companies to track whether payments align with these terms. We support removing the "average time to pay an invoice" data point. However, we question the relevance and practicality of the remaining "standard payment terms" data point. This metric lacks clarity. It does not provide useful information for assessing supplier relationships. The percentage of payments made under "standard terms" is difficult to interpret and does not allow one to draw conclusions about the actual impacts on suppliers. Similarly, the requirement to report the number of legal proceedings due to late payments is not decision-useful in isolation. Without qualitative context, such as reasons for delays or materiality thresholds, the raw number lacks relevance. Also, disclosures on standard payment terms are already partially covered by existing financial reporting requirements, in particular IAS 7.44. There is a risk of duplication between ESRS and IFRS requirements. To avoid inconsistencies and unnecessary reporting burdens, it is essential to align and clarify the scope and purpose of such disclosures. The standard payment terms generally do not make any differentiation between supplier types. Therefore, the categorization of suppliers (e.g., SMEs) remains problematic. In general, financial systems of companies do not track suppliers by size class. For multinational companies with thousands of suppliers globally, a categorization of suppliers into SMEs and non-SMEs is not possible. Since it is a significant effort for companies to calculate these KPIs, we suggest deleting G1-6. If G1-6 remains, the KPI, please clarify what is meant by "the number of legal proceedings currently outstanding for late payments".			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Overall, the overarching ESRS 1 standard raises new interpretation issues, such as the distinction between "governance/strategy/IRO management" and "policies/actions/targets/metrics.			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The revision of the ESRS 2 is not sufficient to reduce the reporting volume and the reporting burden significantly. Many proposed changes to ESRS 2 disclosure requirements are only cosmetical and do not change the substance of the reporting. We object the introduction of new reporting requirements in comparison to the current ESRS Set 1. ESRS 2 AR 22 for para 26(a)-(c) Please clarify that no reporting obligations or more extensive evidence requirements at site/location level (e.g., specific listing/specification of analysis factors or variables per site/location) result for IRO-1.			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The ESRS revisions are not satisfactory overall. Although some areas have been shortened and disclosure obligations have been eased, some data points have been added or tightened further. We do not see any general simplification of the disclosure requirements. There is currently no balance. The European Green Deal can be better pursued with fewer but more precise requirements. The proposed changes in reporting on financial resources related to the transition plan and actions increase the reporting burden. The proposed formulation seems to indicate that the complete financial and investment planning needs to be disclosed and the ranges of short-, medium and associated long-term CapEx/OpEx are an extension of reporting requirements, going against the aim of reducing the reporting requirements. Not only are future financial resources always anticipated, but the requirements go beyond anything that is required in financial reporting. Changes in reporting on climate scenario analysis (i.e. application requirements for climate-related physical and transition risks) indicate rather behavioural obligations instead of being reporting requirements More clarity on how to treat leasing in GHG emission reporting would be appreciated. As intensity values are frequently asked for by Ratings and Rankings, we would suggest keeping the KPI. Please delete the disclosure requirements on anticipated financial effects completely. Unclear methodology and enormous discretion: e.g. Disclosure of expected short-, medium- and long-term financial effects on the financial position, net assets and results of operations from risks related to climate aspects is still required, despite the lack of generally accepted methods (Amended ESRS E1-11)			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	In E2-5, the emphasis on manufacturers and importers over users is noticeable. This is the only place where a distinction has been made beyond the real economy and the financial economy. Supplementing REACH only in relation to "articles" could lead to additional hurdles for manufacturers.			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The KPI "Water intensity" was removed without specific reason. As the "intensity KPIs" are frequently asked in Ratings & Rankings, we would suggest keeping the KPI as there is no real reduction in reporting effort (water consumption and net revenue data is needed anyway).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	New metrics impose additional reporting burdens and the introduction of new terms such as "strategic" and "key" adds significant uncertainty due to their lack of clarity and disclosing this information is sensitive information. Please clarify.			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The exposure drafts reduce the volume of the S1, especially through deleted redundancies. Unfortunately, the associated efforts are not being reduced proportionally. The change in nomenclature alone is now leading to high implementation efforts. The new structure could lead to confusion with a view to the IRO mapping. The categorization into sub-topics is less consistent. They should be fully distinct and not mixed between previous sub-topics and sub-sub-topics. Also, S1-16 should be a data point that can be mapped and should not be material of its own. ESRS S1-11: The collection of data on persons with disabilities is only possible on a voluntary basis. Employees are not obliged to disclose this information. The approach proposed in AR23 using "may" is impractical, as it further distorts the indicator and reduces its already limited informative value. The KPI requires a huge amount of effort on the part of companies to collect the data (with legal risks) which ultimately has no informative value and therefore no added value. We suggest deleting S1-11 completely. ESRS S1-13 The same goes for work-related ill health cases. As companies do not receive any information about those, if not provided voluntarily by the employees, they cannot be reflected it in reporting. Please delete. Some of the revised disclosure requirements will result in more extensive reporting obligations, e.g. the reporting obligation on "human rights incidents" (previously "severe human rights incidents"). This also applies to the new threshold (question 27) that will result in significantly more reporting. We propose returning to the old wording of those two last requirements.			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The reductions in ESRS G1 are reasonable. However, the new structure could lead to confusion with view to the IRO mapping. The categorization into sub-sub-topics is less consistent, for example, regarding the sub-topic 'corruption and bribery' and the previously more clearly separated sub-sub-topics 'prevention' and 'incidents'. It would be helpful for an effective materiality assessment if the topics were subdivided more distinctly again. Disclosure Requirement G1-2 – Actions related to business conduct: It is important to avoid merging broader procurement topics with compliance/responsible business conduct content and the associated IROs, to maintain a clear and consistent structure. Disclosure of standard payment terms and the proportion of actual payments in accordance with these terms is still required (Amended ESRS G1.20), even though such terms and information do not usually exist and information is not collected centrally. Please delete G1-6.			
Survey	Deutsches Aktieninstitut	Business association (other than association of financial institution)	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Specific comments on individual data points from the feedback collected in the spring were not considered. A good example is the suggestion to improve the definition of "hazardous waste" by adding that it can be recorded in accordance with local laws to avoid double counting. There is need to further work on the conceptual revision of the ESRS. The purpose of sustainability reporting is not sufficiently clearly defined in the revised ESRS draft and covers an unlimited and open-to-interpretation group of addressees. Due to this lack of specificity regarding the purpose of the regulation and the addressees of the reporting, we believe that there is a particular lack of an operational interpretative framework. ESRS E Particularly in the Environmental standards, the standards now increasingly refer to other EU directives and laws. Unfortunately, definitions in the glossary differ greatly from existing definitions from other regulations. This complicates the collection and coordination efforts enormously, sometimes resulting in additional work and rendering existing definitions unusable. It would be desirable to standardize the definitions in the glossary with definitions in existing regulations and laws.			
Survey	SBTi	Standard setting initiative	United Kingdom	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	The SBTi agrees that financial institutions should not be exempted from disclosing absolute GHG emission value targets when only intensity targets have been set. While the recently published SBTi Financial Institutions Net-Zero Standard permits emission intensity reduction targets for certain sectors under its portfolio near-term target criteria, its portfolio long-term targets require net-zero-alignment targets. Under these targets, financial institutions are required to increase their share of climate-aligned financial activities, such as supporting climate solutions and portfolio companies that are in transition or have reached a net-zero state. This combination of targets aims to reduce overall emissions, which through the Standard's further requirement for financial institutions to calculate and report absolute GHG emissions as part of the overall inventory (criteria FINZ-C6*) and reporting progress (criteria FINZ-C17.1**) serve to provide a comprehensive and transparent assessment of financial institutions' overall climate impacts. *Specifically under criteria FINZ-C6: GHG emissions inventory requires financial institutions to calculate a GHG emissions inventory for their base year across their operations, value chain, and in-scope financial activities (i.e. any lending, investing, insurance underwriting and or capital markets activities if >5% of total annual annual revenue). This includes gross portfolio absolute GHG emissions. **Further, criteria FINZ-C17.1: Reporting states that financial institutions shall commit to separately and publicly report annually on: emissions information for each in-scope financial activity annually, which includes gross GHG emissions inventory in FINZ-C6 for segments A, B and C climate-alignment and sector metric assessment (if relevant), as established in FINZ-C7, including a breakdown of climate-alignment methodologies used for the climate-alignment assessment.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fundación ONCE	NGO	Spain	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	Fundación ONCE	NGO	Spain	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Fundación ONCE	NGO	Spain	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I disagree	We express concern regarding the removal of ESRS S1 Appendix A.1, which previously supported the application of ESRS 2 cross-cutting disclosures with specific references to disability and diversity. While we acknowledge and appreciate the effort to streamline the structure and interaction between ESRS 2 and the topical standards, we are concerned that this simplification has gone too far in some areas, reducing clarity — particularly for preparers addressing diversity and disability-related issues. The deletion of Appendix A.1: Application Requirements for ESRS 2-related disclosures in ESRS S1 removes valuable practical guidance for conducting the double materiality assessment. The former appendix supported the application of the cross-cutting ESRS 2 SBM-2 and SBM-3 disclosures. It provided a non-exhaustive list of factors to be considered when assessing the materiality of social and human rights matters. The former appendix included a non-exhaustive table of factors, including: •Employment and inclusion of people with disabilities, with examples such as % employment and accessibility measures for employees with disabilities. •Diversity, with examples to include indicators such as % of persons with disabilities in the workforce, in addition to other categories like gender or age. These examples were particularly useful for preparers aiming to ensure their assessments aligned with key social indicators, especially in relation to marginalised groups. We strongly recommend reintroducing these references as part of the glossary,to ensure definitional clarity and consistent interpretation. Otherwise, an alternative would be their inclusion as examples in the non-mandatory guidance, in order to somewhat preserve a shared understanding of how such topics are to be treated across companies. Their complete removal risks underreporting of relevant data, particularly for vulnerable groups such as persons with disabilities.			
Survey	Fundación ONCE	NGO	Spain	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree				
Survey	Fundación ONCE	NGO	Spain	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	S1	We are concerned regarding the loss of clarity and practical direction from this process, particularly in the case of NMIG related to ESRS S1-1. In the 2023 version of DR S1-1, undertakings were encouraged to disclose whether their workforce-related policies addressed a series of specific anti-discrimination grounds and commitments, including: Whether the following grounds for discrimination are explicitly covered: racial and ethnic origin, colour, sex, sexual orientation, gender identity, disability, age, religion, political opinion, national extraction or social origin, and other forms of discrimination covered by EU regulation or national law. Whether the undertaking has specific policy commitments related to inclusion or positive action for people from groups at particular risk of vulnerability in its own workforce, and what those commitments are. These references have not been retained neither in the DR S1-1 nor in the NMIG. We would like to emphasise our call to re-state these explicit references in the DR S1-1, to give clarity and regulatory guidance as part of the future act. While NMIG 1 still provides general examples for disclosing anti-discrimination policies and mentions training and procedures, it no longer contains the level of specificity found in the former Disclosure Requirement 24(b) and 24(c). Only the mention on "elimination of discrimination and promoting equal opportunities" remains. This dilutes the interpretive guidance for undertakings, particularly when it comes to minority and vulnerable groups. We recommend restoring these two references in the Topical Standard, to ensure visibility and consistent understanding of which vulnerable groups (e.g. persons with disabilities) should be addressed through policy commitments. In addition to reintroducing the references in the DR S1-1, we recommend that (following the example of other references included in the NMIG) they be incorporated into this guidance material to preserve, at least in part, the practical orientation provided by the policy examples			
Survey	Fundación ONCE	NGO	Spain	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fundación ONCE	NGO	Spain	22.S1	Comments on deleted datapoints in ESRS S1	I partially agree and partially disagree	We understand and commend EFRAG's efforts to streamline and simplify the ESRS framework, particularly regarding voluntary datapoints. Simplification can enhance usability and reduce reporting burdens, especially for smaller undertakings. However, we caution that such streamlining must not come at the expense of the quality and completeness of sustainability reporting. In this context, we strongly advocate for the retention of all datapoints related to disability, inclusion, and diversity. These elements are not peripheral—they are central to understanding an undertaking's social impact and its commitment to human rights, equal opportunity, and inclusive growth. Inclusive reporting is strategically important. It enables stakeholders to assess how companies are addressing systemic inequalities, fostering diverse workforces, and ensuring accessibility for persons with disabilities. Removing these datapoints risks diminishing visibility for vulnerable groups and undermining the comparability and credibility of disclosures across sectors. Moreover, maintaining these datapoints aligns with EU policy priorities, including the European Pillar of Social Rights, the UN CRPD or even the UN Sustainable Development Goals at large. It also supports companies in identifying impacts, risks and opportunities linked to workforce inclusion, innovation, and long-term resilience. We therefore urge EFRAG to preserve all disability, inclusion, and diversity-related datapoints to ensure that simplification does not compromise substance.			
Survey	Fundación ONCE	NGO	Spain	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Overall, we welcome the effort to simplify and streamline the standards. However, we note with concern that the elimination examples and/or specific mentions to vulnerable groups -such as people with disabilities-, especially within the Application Requirements (ARs) and former Appendix - ARs for the Disclosure Requirements, has reduced practical clarity for preparers. ESRS S1. Partially agree and partially disagree. The retention of key disclosure requirements — such as S1-11 "Persons with disabilities" — along with the continued references to persons with disabilities in related sections like S1-10 and S1-16, helps ensure that this and other vulnerable groups remain visible within company reporting, and that their situations and treatment in the workplace continue to be addressed and made transparent. Nevertheless, we note in S1 a significant number of aforementioned AR deletions, where important guidance on how to interpret and implement disclosures related to anti-discrimination, diversity, and inclusion of persons with disabilities has been removed. Such deletions risk: 1.Reducing clarity for preparers, who now lack structured references to know what constitutes a complete or meaningful disclosure on social topics. 2.Decreasing comparability across undertakings, since the lack of suggested indicators or common benchmarks (e.g., on workforce diversity, accessibility measures, vulnerable groups) may lead to widely divergent interpretations and implementation.			
Survey	Fundación ONCE	NGO	Spain	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Fundación ONCE	NGO	Spain	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Fundación ONCE	NGO	Spain	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Similar concerns apply to ESRS S4, where a prior AR that provided an illustrative example has been dropped. This absence, however, more critically weakens one of the few references of reporting on inclusion and accessibility for consumers with disabilities in this topical Standard. Glossary. I partially agree and partially disagree. While the updated glossary reflects structural changes, we regret the absence of key definitions that were previously included in the former Appendix A.1 to S1. Notably: •The term "diversity" is not defined or delimited, even though it is central to reporting across ESRS S1 and G1. Its omission limits the scope of interpretation to gender only, as is often the case in DRs like SBM-2, SBM-3 and even GOV-1. •The concept of "employment and inclusion of people with disabilities" is not included, even though it was explicitly referenced in earlier versions of the standards and relevant application appendices. We believe the glossary should include at least basic definitions or clarifications to maintain a shared baseline of understanding, particularly when such terms are fundamental to social disclosures and to the EU's commitments under the UN Convention on the Rights of Persons with Disabilities. Simplification should not come at the cost of substance. Maintaining clarity through examples is key to fostering robust, inclusive, and comparable sustainability reporting.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fundación ONCE	NGO	Spain	35.S1-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We welcome the continued inclusion of Disclosure Requirement S1-1 in the revised draft, as it remains a key tool for guiding workforce-related reporting. However, while the core obligation is preserved, much of the detail that previously supported consistent and inclusive disclosures—particularly for persons with disabilities—has been removed. The earlier version of S1-1 encouraged companies to specify whether anti-discrimination policies covered protected grounds like disability, and whether they had commitments to inclusion or positive action for vulnerable groups. These references, vital for visibility and accountability, are now absent from both the revised DR and the Non-Mandatory Illustrative Guidance (NMIG). We are particularly concerned by the removal of Application Requirement 17, notably points (d) and (e), which provided practical examples such as workplace accessibility and bias assessments in job requirements. These helped translate inclusion policies into meaningful action. Additionally, the deletion of Appendix A.2 has weakened the framework's guidance on disability inclusion. Its previous reference to policies for accessible workplaces sent a clear signal that accessibility is a reportable and essential aspect of workforce strategy. This reduction in accessibility-related parameters risks sidelining a core principle of disability inclusion, as defined by the UN Convention on the Rights of Persons with Disabilities and the European Accessibility Act. With the EAA entering into force in June 2025, restoring concrete references to accessibility would better align ESRS with legal and social expectations. We urge the reintegration of these elements—either in the Application Requirements or NMIG—to ensure clarity, comparability, and continued visibility of disability inclusion in sustainability reporting.	S1	Disclosure Requirement S1-1 - Policies related to Own workforce	
Survey	Fundación ONCE	NGO	Spain	35.S1-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We appreciate the retention of Disclosure Requirement S1-2 in the revised ESRS. However, the removal of Application Requirement 25 significantly weakens the guidance on how such engagement should be conducted, especially for at-risk or marginalised groups such as persons with disabilities. Previously, AR.25 provided important clarifications and examples of how undertakings could ensure that their engagement processes were inclusive and accessible. It encouraged companies to disclose whether they had considered specific barriers faced by vulnerable individuals — including physical, communication, and social obstacles — and whether they took proactive measures to overcome them. It also invited disclosure on the use of accessible formats and culturally appropriate channels for sharing information with workers, both of which are key to enabling persons with disabilities to fully participate in workplace processes. The removal of this guidance risks weakening the quality and comparability of workforce engagement reporting and may result in less inclusive practices being overlooked in sustainability disclosures. Although we recognize this point was voluntary ("may"), it could be reinstated as illustrative examples within the new DR or its ARs, aligning with the simplification logic of limiting mandatory DRs. As stated in S1-1, The removal of these illustrative examples also reflects a concerning reduction in accessibility guidance. The original AR.25 specifically encouraged undertakings to disclose whether they provided information in formats that were understandable and accessible, an important enabler of meaningful workforce engagement — especially for persons with disabilities.	S1	Disclosure Requirement S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	
Survey	Fundación ONCE	NGO	Spain	35.S1-3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	In the 2023 ESRS set, Appendix A.3 to ESRS S1-4 provided concrete examples of actions that undertakings could disclose when addressing material social and human rights impacts. Among these, the employment and inclusion of people with disabilities was explicitly listed, with "increasing accessibility measures" cited as a relevant example. This type of illustrative content played an important role in guiding preparers towards meaningful and concrete disclosures. The removal of Appendix A.3 in the revised ESRS S1-3 thus represents a clear loss of accessibility-related references, reducing the visibility of disability inclusion and potentially diminishing comparability and depth in company reporting. Given the increasing relevance of the European Accessibility Act and the obligations stemming from the UN Convention on the Rights of Persons with Disabilities (see S1-1), we encourage EFRAG to consider reintegrating such illustrative content as an example in the DR S1-3; as a respective AR. Otherwise, their inclusion within the Non-Mandatory Illustrative Guidance could serve as a minimum basis that helps companies better understand where to include their accessibility measures mentions in their reports.	S1	Disclosure Requirement S1-3 - Actions and Resources related to Own workforce	
Survey	Fundación ONCE	NGO	Spain	35.S1-4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	For the new ESRS S1-4 (formerly S1-5), the omission of Appendix A.4: Application Requirements for ESRS S1–5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities results in the loss of key illustrative examples that supported companies in setting meaningful, concrete targets related to disability inclusion. In particular, this appendix listed examples under Social and human rights matters, such as "increasing the % of persons with disabilities in own workforce" and "increasing the % of underrepresented groups in own workforce and top management." These examples provided useful guidance for preparers on how to align their target-setting with the principles of inclusion and non-discrimination. Although this appendix did not impose mandatory requirements, its removal reduces clarity and risks weakening companies' accountability on disability-related targets. Reintroducing such examples in the updated corresponding AR would be fully compatible with the simplification approach while preserving visibility for disability issues in the ESRS framework. Alternatively, introducing these mentions as examples in the respective NMIG would ensure a minimum level of visibility of persons with disabilities in the targets related to companies IROs.	S1	Disclosure Requirement S1-4 - Targets related to Own Workforce	
Survey	Fundación ONCE	NGO	Spain	35.S1-10.	Do you agree with the amendments of this chapter?	I agree		S1	Disclosure Requirement S1-10 - Social protection	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fundación ONCE	NGO	Spain	35.S1-11.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We agree with the revised ESRS S1-11 and welcome the decision to maintain a specific disclosure on persons with disabilities, in line with the CSRD and previous ESRS drafts. This is a crucial step toward ensuring visibility and accountability for disability inclusion in the workforce. However, we regret the removal of the optional reference to gender disaggregation within this disclosure. While we understand that the original formulation used "may," and was therefore non-binding, its presence offered valuable guidance for undertakings wishing to report more granular and intersectional data. Gender-disaggregated information—where permitted by national legislation—can provide deeper insights into the experiences of women and men with disabilities, helping to identify specific barriers and promote targeted inclusion strategies. Eliminating this reference may discourage richer disclosures and reduce the potential for meaningful analysis. We therefore recommend that EFRAG consider reintroducing gender breakdowns as an illustrative example, not as a requirement. This would preserve flexibility while encouraging more comprehensive and inclusive reporting practices.	S1	Disclosure Requirement S1-11 - Persons with disabilities	
Survey	Fundación ONCE	NGO	Spain	35.S1-16.	Do you agree with the amendments of this chapter?	I agree		S1	Disclosure Requirement S1-16 - Incidents of discrimination and other human rights incidents	
Survey	Fundación ONCE	NGO	Spain	35.S2-2.	Do you agree with the amendments of this chapter?	I agree		S2	Disclosure Requirement S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	
Survey	Fundación ONCE	NGO	Spain	35.S3-2.	Do you agree with the amendments of this chapter?	I agree		S3	Disclosure Requirement S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	
Survey	Fundación ONCE	NGO	Spain	35.S4-2.	Do you agree with the amendments of this chapter?	I agree		S4	Disclosure Requirement S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	
Survey	Fundación ONCE	NGO	Spain	35.S4-4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	For the former ESRS S4-5 (now S4-4), we acknowledge and positively value that the example previously found in AR 44 (referencing progressive digital accessibility targets for persons with disabilities) has been retained in "NMIG 16 for para. 17". Its inclusion helps preserve some visibility of disability within the standard and offers preparers practical insight into how to set phased targets related to accessibility. Nonetheless, we would like to suggest the consideration of adding a broader, generalised example directly in the writing of the Disclosure Requirement itself. For instance, including a reference to setting targets for vulnerable or marginalised consumer groups (e.g. persons with disabilities, children, older people) would enhance inclusiveness and provide a clearer indication that such groups should be considered when designing and disclosing consumer-related sustainability targets (and further link it to the material found in the NMIG). This would reinforce the coherence of the ESRS new structure.	S4	Disclosure Requirement S4-4 - Targets related to consumers and end-users	
Survey	Community of European Railway and Infrastructure Companies (CER)	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	In general, we welcome these simplifications, particularly the streamlined terminology – now using only the term "topic". However, the structure involving sub-topics is still pending clarification. The changes insist on the importance of the double materiality analysis, a cornerstone of the CSRD, and simplify both its implementation and the description of the adopted process. Overall, the requirement has indeed become simpler, both in terms of wording and in terms of the interpretation of dual materiality. In our opinion, it will be easier for companies to identify material information. While avoiding excessive detail is an understandable and important goal, excessive flexibility may lead to issues with transparency, comparability, reliability, and inconsistency.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Community of European Railway and Infrastructure Companies (CER)	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	We welcome the effort to clarify what gross analysis vs. net analysis means, however the instructions described in "Appendix C : Assessing actual and potential negative impacts for materiality" might introduce more complexity. The main filter for "materiality of information" to be read in accordance with the introduction of the new "fair presentation" and in general the subjectivity of the DMA could lead to interpretations/grey area and to a lack of comparability between companies (that operate in the same business). Cross cutting standards or minimum DR related to business could help. The "gross vs net" issue is not clear and it risks and unnecessary complications. This is not aligned with the simplification concept. Furthermore not described for the financial materiality. The 8 possible scenarios could be simplified to help undertakings assess both their actual and potential negative impacts, keeping the overall objective of DMA in mind. While the intent to clarify is appreciated, the new guidance would benefit from further simplification, clearer definitions, and alignment between sustainability and financial materiality to enhance usability, comparability, and reduce reporting burdens.			
Survey	Community of European Railway and Infrastructure Companies (CER)	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Community of European Railway and Infrastructure Companies (CER)	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We welcome these changes, particularly the removal of GOV, SBM, and IRO from the topical standards, as their inclusion previously made the structure complex and repetitive. We also appreciate the significant reduction in mandatory 'shall' datapoints. These changes will probably enhance the readability of the sustainability reports and help focus on major issues. However, an in-depth analysis of the changes made to each ESRS, and particularly of the deleted datapoints, will be necessary. In our opinion, the transparency of the standard's requirements has significantly improved by the removal of GOV, SBM, and IRO.			
Survey	Community of European Railway and Infrastructure Companies (CER)	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We welcome in particular the elimination of the "may disclose" datapoints. These changes would help the auditing process as they clarify the status of the "may" datapoints and the "AR". The removal of the "May disclose" datapoints significantly simplifies the preparation of the report and enhances its transparency.			
Survey	Community of European Railway and Infrastructure Companies (CER)	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	These changes provide useful relief but weakens the comparability of data between undertakings (cf. ESRS 1 paragraph 90/91). For Chapter 5.3, we suggest to add the "guidance" reported in the non-mandatory illustrative guidance and the point 150 of "basis for conclusion" to clarify the reporting burden (lessor vs lessee). For Chapter 5.4, it is important to clarify what kind of information has to be reported for major acquisitions (disposals) not included in the materiality assessment and in sustainability statement.			
Survey	Community of European Railway and Infrastructure Companies (CER)	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We are generally supportive of these reliefs, especially those aimed at reducing reporting burdens; however, they may complicate comparability in the coming years, as metrics could be based on varying scopes and methodologies. In our view, one of the fundamental objectives of the CSRD is to establish a transparent and consistent sustainability reporting framework. Such an objective is not compatible with reporting practices that rely solely on partial data disclosures. Furthermore, we are concerned that the current regulatory framework—especially the application of reliefs—may convey the message that minimal compliance efforts are sufficient to meet the standard's requirements. As a result, there is a tangible risk that some companies may focus on fulfilling formal obligations without making genuine efforts to provide comprehensive and well-founded disclosures on sustainability-related matters.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Community of European Railway and Infrastructure Companies (CER)	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We understand the purpose of these amendments but we think that this relief in particular, the scope broader than IFRS S1 as it includes "impacts" and "all metrics" could lead to a new obligation (towards auditor) related to formalization of the assessment, and its confirmation/updated over time. As a first step, it would be important to clearly define what is expected in terms of disclosures. Making this voluntary, as proposed in Option 2, contradicts the promise of simplification and clarity in the omnibus package and ultimately shifts the burden back onto companies.			
Survey	Community of European Railway and Infrastructure Companies (CER)	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Community of European Railway and Infrastructure Companies (CER)	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Community of European Railway and Infrastructure Companies (CER)	Business association (other than association of financial institution)	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	It strikes acceptable balance however, regarding the PATs datapoints, it is regrettable not to encourage companies to project themselves onto a horizon to adopt a Policy, an Action Plan, or Targets on a material issue (cf. lack of consistency with CDP reporting practices on policies for example).			
Survey	Community of European Railway and Infrastructure Companies (CER)	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Community of European Railway and Infrastructure Companies (CER)	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Community of European Railway and Infrastructure Companies (CER)	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	Risk of interpretations/grey area regarding what is a "fair presentation"; in general, we suggest to clear that applying the ESRS and follow the DMA enable the achievement of a fair presentation. Alternative is to delete the concept of "fair presentation".			
Survey	Community of European Railway and Infrastructure Companies (CER)	Business association (other than association of financial institution)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	When it comes to employee turnover (S1-5-23c), we would prefer an option to use total headcount (end of year) as denominator instead of average headcount. We argue that since most of other disclosure requirements don't require to use of average, but the company can choose to use total et the end of the year or FTE instead, this requirement should have the same option. This new information on "ten largest countries" should be removed because it adds a specific granularity that may not be relevant.			
Survey	Community of European Railway and Infrastructure Companies (CER)	Business association (other than association of financial institution)	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	E1-6-44 (d) Table for reporting emissions: this has been clarified, but what should go in the "year" column for the rows, if the emissions column already includes the emissions in tons for that row, and the reference year is mentioned in the column header? Although the reference year can now be defined independently (target comparison year/previous year, etc.), I assume it still needs to be consistent across the table. E1-6-45 (d) AR was one of our most challenging requirements and, although it has been clarified, it still requires reporting on the "share and type of contractual instruments." It remains unclear what "types" refer to, leaving the reporter to guess what needs to be reported (renewable/non-renewable, REC/GoO, bundled/unbundled, etc.). If we understand correctly, the requirement to report total emissions (E1-6-44 (d)) has been proposed for removal, with the justification that report users can calculate the sum of Scope 1, 2, and 3 emissions themselves. We believe that total emissions (and their changes compared to the baseline year) are crucial information for assessing a company's progress on climate issues. We think that this data should still be reported and should be required.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Community of European Railway and Infrastructure Companies (CER)	Business association (other than association of financial institution)	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	G1-4 we suggest to consider this datapoint "voluntary" (as in the previous ESRS) because the disclosure of incidents of corruption or bribery could be critical; in particular, the definition of "confirmed incident of corruption or bribery" is not clear and could lead to interpretations/grey area and not comparable data across companies that used different determinations.			
Survey	Community of European Railway and Infrastructure Companies (CER)	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Companies most often conduct such granular analyses because it was required by auditors. To avoid not obtaining attestation, which would result in financial penalties, entities were often forced to perform in-depth, costly, and labour-intensive tasks. The situation could be resolved by more precise and binding guidelines for auditors that would not allow for their discretionary assessment.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The double materiality assessment is fundamental in preparing ESRS sustainability statements. However, due to the inherent complexity of the concept and also due to the lack of clarity, this has been perceived as a significant source of burden in practice. We welcome the proposed simplifications. Nonetheless, the standard should make it clearer that it is possible to apply a combination of a top-down and a bottom-up approach to DMA. It should be made clearer that AR 21 of ESRS 1 applies to each sub-topic within a standard, i.e. when a material IRO relates to two sub-topics in a standard, the undertaking needs only to report the material information that relates to those two sub-topics. Also, we do not support the exemptions from this principle in ESRS S1 paragraph 3. Paragraph 22 of ESRS 1 explains the interaction between topics and IROs. The purpose is to encourage more focused and less granular reports. Our understanding is that the paragraph address the presentation of topics/IROs in the sustainability statement. However, the paragraph may be interpreted as covering the DMA process. We recommend that this is clarified. Regarding to presentation, according to our understanding, it should be possible for an entity to provide disclosure on a topic without going into the detailed level of the corresponding IROs. We are concerned that the current wording may give rise to uncertainty regarding when an entity is required to disclose an IRO. We would therefore appreciate if this could be further clarified as to avoid misunderstandings or misinterpretations.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	How to consider remediation, mitigation and prevention actions in assessing materiality of impacts have given rise to many inquiries. Guidelines are therefore welcome. However, the proposed Appendix C is theoretical and may be difficult to understand for many reporting entities. The Board therefore understands why some SRB members find the proposal overly complex. The proposed model makes sense but to categorise impacts according to when they occur (in the reporting period, before the reporting period or after the reporting period) may in some cases be challenging. The Board recommend EFRAG to withdraw the proposed Appendix C as part of the revised ESRS. Instead, EFRAG should develop practical examples to illustrate how the model should be applied and to make it easier for reporting entities to understand how they should assess remediation, mitigation and prevention actions when they perform their DMA. Generally, potential impacts should normally be assessed after mitigation and prevention actions that are standard practice such as the use of safety equipment and educational efforts to prevent injuries in the workplace. Information about such actions is only relevant if an entity fails to take them or is hindered from doing so.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The Board supports efforts that aim to promote more concise reporting. We therefore welcome amendments that will make the presentation and format of the report more flexible. We also support the proposed clarifications regarding connectivity. We do not see the need for the proposal to explicitly allow entities to provide executive summaries, appendices and sub-parts as this is – according to our view – is already possible under the current standards. However, we do not oppose that this clarification is added.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We agree that the proposed amendments strike an appropriate balance and will help entities to avoid that duplications of information in the reports. But as we pointed out under Question 11, it should be made more clear when the provisions that address the interaction between ESRS 2 and Topical Standards refer to process, presentation or both. We welcome the amendments that explain that the disclosure requirements in ESRS 2 should be subject to materiality, but we recommend that this is expressed more explicitly in the standard to avoid divergence in the interpretation of the standards. As also mentioned under Question 11, we recommend that AR 21 of ESRS 1 is revised so that it is clear that the principle applies to each sub-topic within a topical standard, i.e. when a material IRO relates to two sub-topics in a topical standard, the undertaking needs only to report the material information that relates to those sub-topics. There should be no exceptions to this principle. We therefore do not support the proposed exemptions in ESRS S1 paragraph 3.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	The proposed amendments make the standards easier to understand and more accessible for readers with less prior knowledge of the reporting framework.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We welcome the introduction of this illustrative content as a separate document so that only mandatory disclosure and application requirements are included in the main body of the standards. We also support EFRAG's recommendation to not include this content in the Delegated Act. More time is required to develop this implementation guidance to ascertain that it does not conflict with the requirements in the new ESRS or risk adding any disclosure requirements. We support NMIGs remaining as something that is published by the EFRAG in accordance with its due process even if this would mean that they are not translated in all EU languages. This will support in identifying the level of authority of this guidance, which shall not be same as for legal text published by the European Commission. It will also make it easier to update this guidance, when needed without the lengthy processes connected with changes to the regulations. The mapping of sub-topics to disclosures in the topical standards is currently included in the NMIGs. Equally to the changed wording of the earlier ESRS 1.AR 16, we welcome including this mapping in the NMIGs instead of the body of the standards. This will allow EFRAG to continue ascertaining the accurateness of this mapping and streamlining it where needed. We note that currently the language used in the NMIGs is not always consistent within the document and with the expected authority of this guidance. We recommend EFRAG developing standard wording to be used in this guidance that will be aligned with its level of authority, such as "could consider" instead of "considers" to ascertain that the NMIGs are not considered as an extension of the requirements included in the standards. EFRAG needs to establish a process and allocate resources to review the already published implementation guidance and FAQs.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We welcome the additional reliefs now provided to tackle the practical challenges companies have been facing in developing their ESRS reporting. The proportionality mechanism in the ISSB standards, "undue cost or effort" provides a good mechanism for this purpose. EFRAG needs elaborate on the concept so that it is clearly understood and consistently applied. When this principle is well-defined, it will make the removal of the preference for direct data and permission to report "partial scope" instead of using estimations (for example) possible to work with. We anticipate this to be challenging initially and would welcome more language to support these considerations. When the "undue cost or effort" mechanism is well-defined, the list provided here could be examples of its practical application. When applied in a consistent way, we would not expect this principle to significantly diminish transparency in reporting. To ascertain this, we support adding a process of reevaluating the impact of this principle a couple of years after the start of the application. We note that change number 7 introduces an inconsistency between ESRS reporting and IFRS financial reporting and other parts of the annual report. It also goes beyond the reliefs provided in the ISSB standards. Introducing this relief, which we see to be justified due to the practical challenges that late changes in the group structure create, will prevent the reporting companies to incorporate information by reference from other parts of the annual report as the scope of activities reported there will not be the same as in the sustainability statements, if acquisitions and disposals are not included/excluded from the date on which control is transferred. More guidance would be helpful to define the expected reporting scope used for comparative information for year after the acquisition/disposal.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	In principle, we support consistent application of the financial control approach. We welcome the introduction of "reasonable and supportable information available without undue cost or effort" relief as a helpful mechanism to introduce proportionality. As sustainability information is always going to include estimations and proxy data, key to the successful introduction of this mechanism are the disclosures that are required to accompany decisions to exclude some disclosures or data. What comes to ESRS 1 paragraph 92, we support the requirement to consider operational control.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	We support Option 1, but with introduction of an additional phase-in optionality to allow companies with flexibility on this challenging area. We find the requirements in ESRS E1 paragraph 40 and 41 to still be challenging to understand and to create a possibility of inconsistent interpretations. These paragraphs would need to be clarified, perhaps through addition of Application Requirements or will be clarified through observing how practice evolves. Considering these challenges we do not consider that requiring mandatory quantitative disclosures would serve the needs of information users. These information needs can be served through other means without requiring complicated calculations and estimations from the companies. As a compromise solution we would recommend introducing disclosure requirements related to investment plans and to reevaluate the need to introduce mandatory quantitative disclosures in a couple of years' time. We support writing the standards with a longer time perspective in mind and expect reporting capabilities to evolve and grow quickly and would therefore expect Option 1 to provide a long-lasting principle that would support this development and that could be maintained unchanged over the years. We therefore recommend introducing this reporting requirement, but with a phasing-in so that it is made mandatory only in a couple of years time. This approach would provide much needed stability and consistency to the reporting requirements while still allowing for the time needed for reporting capabilities and practices to evolve.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	We find it important that the ESRS standards consider the specific requirements of the EU regulatory environment and the disclosure requirements of Sustainable Finance Initiatives. We find this approach to support the objectives of the Green Deal and therefore it is acceptable to maintain these disclosure requirements that are needed by the users while still meeting the objective of simplification at the more overall level.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	We welcome the amendments made to enhance interoperability, including on fair presentation and referencing the IFRS industry guidance in the absence of EU sector-specific standards. In our view a sufficient level of interoperability is currently achieved. We do recognize, that there are still several differences in the language used in the ESRS when compared with the ISSB standards or GHG Protocol, which is due to the alignment with other EU specific regulations. We would recommend EFRAG to work to restrict these differences to a minimum, while still considering the alignment needs within the EU. As an example, the language on fair presentation is not exactly the same as in ISSB standards and could be harmonized without jeopardizing the alignment with other EU regulations.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	We welcome the reduction in the number of "shall disclose" data points. We believe that the standards now strike a good balance between the number of data points and disclosures that are relevant, given materiality. We see that the amended ESRS still supports the objectives and ambitions of the EU Green Deal.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	22.E1.	Comments on deleted datapoints in ESRS E1	I agree	n/a, see abvoe			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	22.E2.	Comments on deleted datapoints in ESRS E2	I agree	n/a, see above			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	22.E3.	Comments on deleted datapoints in ESRS E3	I agree	n/a, see above			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	22.E4.	Comments on deleted datapoints in ESRS E4	I agree	N/A, see above			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	22.E5.	Comments on deleted datapoints in ESRS E5	I agree	N/A, see above			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	22.S1	Comments on deleted datapoints in ESRS S1	I agree	n/a, see above			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	22.S2	Comments on deleted datapoints in ESRS S2	I agree	n/a, see above			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	22.S3	Comments on deleted datapoints in ESRS S3	I agree	n/a, see above			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	22.S4	Comments on deleted datapoints in ESRS S4	I agree	n/a, see above			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	22.G1	Comments on deleted datapoints in ESRS G1	I agree	n/a, see above			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Given that these disclosure requirements are based on materiality, one can assume that they are relevant for a company that has identified these areas as material and reporting on them should not pose a large burden.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	They appear to be justified.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	We favor that it is stated that the ESRS is a fair presentation framework. To meet the concerns that it may be challenging to demonstrate fair presentation in relation to relevant stakeholders, we believe that it should be clear that, whilst informed by stakeholder dialogue, it is the management of the reporting entity that is responsible for the report and thus for the assessment of fair presentation. BP-1 of ESRS 2 should clarify that the identification and grouping of stakeholders is made from management's point of view. We find this to be a welcomed clarification and additional alignment with the ISSB standards. We do note, however, that the language used for "fair presentation" is not exactly the same as that used in ISSB standards. Partially this is to accommodate for the specificities related to ESRSs (for example reference to material IROs), but EFRAG has also not included a reference to the entity-specific information that is specifically mentioned in the ISSB definition of fair presentation. As this is a new concept introduced to the ESRS, it would be helpful to align as closely as possible with the global wording			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Financial institutions should be allowed to disclose intensity-based GHG emission targets without being required to convert them into absolute values. Translating intensity targets into absolute emissions values would require extensive and speculative assumptions, including static portfolio composition, future client production volumes and sales mix. Intensity-based targets may be more appropriate for financial institutions given the nature of their business. Sector-specific intensity metrics or absolute targets per sector (e.g., CO_2e per tonne of cement produced) are already used to track progress and are aligned with methodologies such as those of the Science Based Targets initiative (SBTi). However, absolute targets would introduce complexity to reporting.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	We agree that the suggested changes would in most cases lower the reporting burden.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	As we understand the SFDR is under revision, and it is important that the suggested changes in ESRS are in line with the changes made in SFDR.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	This should be a no answer. We have no view on this question, i.e. no comment our view from our side.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	We agree that voluntary datapoints should be removed to help with clarity within the ESRSs.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	We agree with the amendments suggested and believe that the changes are sufficient and do not reduce the objectives in respect to SMEs compared to the former phrasing.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Based on the same arguments as in question 22 above.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Based on the same arguments as in question 22 above.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Based on the same arguments as in question 22 above.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Based on the same arguments as in question 22 above.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Based on the same arguments as in question 22 above.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Based on the same arguments as in question 22 above.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Based on the same arguments as in question 22 above.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Based on the same arguments as in question 22 above.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Based on the same arguments as in question 22 above.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Based on the same arguments as in question 22 above.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Based on the same arguments as in question 22 above.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Based on the same arguments as in question 22 above.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Based on the same arguments as in question 22 above.			
Survey	Swedish Corporate Reporting Board	(National) standard setter	Sweden	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		No other comments.			
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	Further alignment with the basis - the UNGPs/OECDG - required.			
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	In appendix C in the draft ESRS1 there is a considerable risk that companies can argue not to report on inherent material potential impacts, when they assess that their prevention or mitigation efforts were effective – i.e., choose to report on residual risks only: "Report the potential impact after mitigation or prevention actions if it remains material. If it is reduced below the materiality threshold, in principle no need to report the impact, as it is not material." As an example: The company runs a restaurant chain. The most material potential impacts will be on the right to health of its customers. The investors would have great interest in reading what the company does to prevent or mitigate these impacts on the right to health, when investing in the company. However, the company that has done a lot to effectively manage this risk do not even need to report the risk. Please note that Sustainability Due Diligence per definition (confer the UNGPs) is DISTINCT from legal compliance.			
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I disagree	ESRS 2, reflecting art. 19 a, 2. in the directive shall be maintained as mandatory - Policy Commitment / Sustainability Due Diligence (both in own operations and in external value chains - not to be conflated) / Access to Remedy through effective grievance mechanisms - shall be mandatory reporting. The draft ESRS still fail to recognise that companies need to conduct Sustainability Due Diligence in alignment with the UNGPs/OECDG in order to create the foundation for reporting. In wave 1 we noticed far to many companies that failed to report about Sustainability Due Diligence processes in alignment with the UNGPs/OECDG.			
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Misleading. It is very arbitrary, what has triggered the proposal of data points.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	ESRS G1 proposal is unacceptable - why do the draft ESRS keep highlighting downstream business relationships (suppliers) only. Reporting companies should have the same responsibilities vis a vis all business relationships. It is not aligned with the UNGPs/OECDG. It is fine that anti-corruption is included in the ESRS - however the indicators are of very little value, as an investor would like to see the due diligence efforts on anti-corruption / extortion / fraud / anti-competition / tax evasion disclosed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to ii)) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	ESRS 1, ESRS 2, and the topical standards fail to align with the well-defined terms from the UNGPs (as copied into the OECDG) in relation to how companies can be connected to impacts: Causing, contributing to, or being linked to. Not applying the definitions make some of the text in the proposed ESRS in direct opposition to the definitions from the Standard (UNGPs/OECDG), that forms the basis of the regulation. As an example it appears that Disclosure Requirement S2-2 dramatically overstate, what can and should be expected from companies in relation to engaging with and providing for access to remedy to workers in the value chain. ESRS S1 mistakenly differentiate between the upstream and the downstream value chain e.g., "12. (18 amended) The undertaking shall also state whether it has a supplier code of conduct." – all companies that implemented the management system in alignment with the UNGPs/OECDG would know that a code of conduct for companies in the value chain shall encompass all business relationships and not merely suppliers (upstream value chain). Hence, EFRAG is promoting bad practice.			
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The user cannot understand why EFRAG has decided to divide the topical standards ESRS S1 – S4 in groups of stakeholders. The artificial division into predefined stakeholder groups is bound to leave out stakeholders that can also be materially impacted on their human rights by companies. The division further leads to the challenge that EFRAG in their definitions of sub-topics in relation to own workers (S1) and workers in the value chain (S2) appears to prioritise a few human rights from the bare minimum of human rights that businesses can have impacts on, and according to the UNGPs shall consider impacts on, confer UNGPs Foundational Principle 12: "The responsibility of business enterprises to respect human rights refers to internationally recognized human rights – understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work". There is a mayor risk that EU companies refrain from assessing risks against all distinct 48 human rights from the International Bill of Human Rights, that also include the core labour rights, and instead focus on the few human rights (app. 14 human rights) mentioned explicitly by S1 and S2. If the EU Commission accepts such proposal by EFRAG, i.e., prioritising a few human rights over others, it acts in direct contradiction to Vienna Declaration where all EU states declared to treat all human rights with equal importance and of equal value. The obvious lacuna further expose workers in the EU to lack of attention to their rights to freedom of information, freedom of expression, right to material gains from inventions, moral rights of authors, right to fair trial freedom from hate speech, right to participate in public affairs, etc.			
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	GLOBAL CSR	Consultant (including software vendor)	Denmark	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Global Network Initiative (GNI)	NGO	United States	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The simplification of the Double Materiality Assessment (DMA) process and emphasis on the materiality filter are welcome steps toward improving clarity and reducing unnecessary reporting burden. However, we remain concerned about the potential underrepresentation of important sustainability issues, particularly in the absence of sector-specific standards. With sector-specific standards no longer part of the ESRS framework, entity-specific disclosures (as referenced in ESRS 1, Paragraph 10) will play a crucial role in capturing material issues. To avoid a narrow or "checklist" approach to reporting, we urge EFRAG to reinforce the importance of these disclosures. In this context, we encourage EFRAG to explicitly guide companies toward credible, multistakeholder, sector-specific organizations that can help identify relevant risks, opportunities, and impacts. For example, organizations such as the Global Network Initiative (GNI) offer valuable guidance on sector-relevant topics like digital rights, privacy, and freedom of expression. Such external expertise can support more accurate and comprehensive sustainability reporting where sector-specific standards are absent.			
Survey	Global Network Initiative (GNI)	NGO	United States	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Global Network Initiative (GNI)	NGO	United States	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree				
Survey	Global Network Initiative (GNI)	NGO	United States	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Global Network Initiative (GNI)	NGO	United States	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				

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Survey	Global Network Initiative (GNI)	NGO	United States	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		GNI is the preeminent multistakeholder organization focused on advancing freedom of expression and privacy in the tech sector. Drawing on our 17+ years of experience with stakeholder engagement and human rights due diligence (HRDD), we highlight the following priorities for consideration in the consultation. Changes that we support and urge EFRAG to safeguard, as they are central to effective reporting and should not be weakened: 1. Preserving the foundational four-pillar structure of the social standards. (Question #14) 2. Preserving the flexibility that allows companies to present a clear, connected narrative on their most significant sustainability issues. (Question #13) Additionally, we would like to shed light on the following points from the amended ESRS: 1. References to international human rights law: While we acknowledge that ESRS 2 appropriately references key instruments like the UNGPs and ICCPR, there is inconsistency across the standards. Notably, ESRS S4, which addresses users and consumers, fails to include references to international human rights instruments, unlike ESRS S1, S2, and S3. This omission weakens alignment with Recital 49 of the CSRD. For consistency and to ensure companies appropriately consider the full range of relevant human rights, ESRS S4 should reference the International Bill of Human Rights (UDHR, ICCPR, ICESCR) and other core UN human rights conventions. 2. Removal of "for example" in S3 and S4 (Para 4): The proposed removal of the term "for example" from the list of economic, social, cultural, civil, and political rights of potential relevance to ESRS S3 and S4 contradicts one of the core principles of human rights-based approaches by suggesting that only a narrower list of sub-topics be considered by companies, not a complete set of potentially relevant human rights. This is relevant for ESRS 1 Appendix A (List of Topics), ESRS S3 paragraph 4, and ESRS S4 paragraph 4.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We welcome the improvements to the ESRS and recognize them as a move towards clarity. Nonetheless, the level of simplification of the DMA process or the amendments to the materiality filter are, in our view, still not sufficient. We recommend considering a more flexible approach regarding the double materiality assessment by clarifying that companies should only carry out a full DMA periodically or whenever any significant changes in their strategy or business model appear as opposed to the current yearly basis requirement. Companies could instead review internally their DMA on a yearly basis to determine whether such a reassessment is compulsory. The DMA should therefore only be audited when updated periodically. A yearly re-validation would constitute a disproportionate burden and distract from truly material issues. It would also be of added value to clearly define what constitutes a reassessment to avoid divergent interpretations of this concept by both preparers and auditors. There should be clear rules on the correct manner of disclosing immaterial information, by way of categorization, so to avoid obscuring material information. We support the use of reasonable and supportable information available without undue cost or effort per ESRS 2 paragraph 47 & chapter 7.3, as well as ESRS 1 para 48 on materiality based on the business model and AR 17 on the top-down approach alike. It is important to grant undertakings discretion to define the appropriate level of disaggregation whether by topic, business or another relevant area. However, it would be worthwhile to concretely define the term "undue costs", given it leaves space for interpretation. In addition, we advocate deleting references to sub-sub-topics such as in Appendix A E4 ("Drivers of biodiversity and ecosystem change (terrestrial and marine habitat change, invasive species)"). We would like to avoid unnecessary burden and audit pressure.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We endorse adopting a net approach to assessing potential negative impacts within the Double Materiality Assessment (DMA). This reflects real business practices, where impacts are evaluated after accounting for credible, systematic, and effective prevention and mitigation measures. Industrial companies already invest heavily in regulatory compliance, site-level controls, advanced monitoring systems, and global frameworks (e.g., ISO, OGMP 2.0). These measures are audited, budgeted and continuously improved to reduce risk exposure. A gross-only assessment would inflate disclosures with the hypothetical risks that are already effectively managed, creating excessive burden and misrepresenting actual exposure. A net approach ensures disclosures remain decision-useful, rewarding companies for proactive and data-backed mitigation efforts. However, at the same time, we caution against the rigidity introduced by the gross vs. net approach in Appendix C. Framing materiality around gross impacts poses a risk of turning the exercise into a theoretical checklist, disconnected from sustainability reporting's purpose of accountability, comparability, and faithful representation. Safety topics, for instance, would be reported regardless, as they are business priorities even without annual incidents. Overall, by treating all impacts as material, the gross approach risks over-reporting and obscuring meaningful disclosures. As per our comments above, we underscore that there should be a flexible approach to the matter of the frequency of reviewing DMA and IRO. For companies with a stable business profile, where there are no big expansions or large new projects, the DMA should be valid for at least 3 years, while retaining the possibility of more frequent review should a yearly internal adjudication point towards its necessity. Absent any real material reasons for doing so, a full IRO review carried out yearly would only expending extra resources with no uptick in the quality of reporting.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We believe that the proposed changes provide companies with greater flexibility in preparing their sustainability reports and enable them to concentrate on the most relevant information. It is helpful that very detailed data, including information related to the EU Taxonomy, may be presented in separate sections or appendices, as outlined in [DRAFT] ESRS 1, section 8.2. At the same time, we recommend deleting or relocating the amended ESRS 1, AR 36. This provision allows companies to present detailed GHG emission calculations in a separate appendix or section. Since it is not mandatory and applies only to ESRS E1, retaining it within ESRS 1 risks creating confusion. For clarity, it would be preferable either to remove this requirement entirely or to place it under ESRS E1 (Climate Change).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We concede that proposed changes provide more clarity on how the disclosure requirements related to Policies, Actions and Targets are reported. However, the changes are not far-reaching enough, as they still do not address excessive burdens leading to the duplication of information and distract from truly material issues. We showcase on the basis of three examples, the issues which still hold: ESRS 2, paragraph 38 (a–c) – resources allocated to key actions The obligation to disclose detailed data on resources allocated to ESG-related actions does not reflect the way reporting processes are typically organized within large industrial enterprises. Some of our member companies indicate that such information is monitored primarily at the level of individual projects, rather than through the Impact–Risk–Opportunity (IRO) framework. Adapting these data to that structure and aligning them with financial reporting would require disproportionate effort compared to their informational value. A concise narrative description should be sufficient instead of extensive numerical reporting. ESRS 2 GDR-M, paragraph 41(b) – environmental conditions and characteristics of areas. This provision overlaps with paragraph 41(d) which already requires contextual environmental information. As a consequence, companies would be compelled to present the same data twice, generating additional administrative burdens without enhancing usefulness of reporting. These requirements should therefore be consolidated and streamlined. ESRS 1, paragraph 40 – application of the materiality principle. The standard should explicitly clarify that disclosure of metrics under topical standards is subject both to the principle of double materiality and to the materiality of information itself. For companies with a wide scope of operations, certain metrics may not be practically relevant. Providing this clarification would ensure that disclosures remain focused and proportionate. We would also like to encourage EFRAG to explore possibility of merging disclosure requirements on PATs in the topical standards as these are often implemented together			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We fully support the changes introduced pertaining to the distinction between mandatory and voluntary datapoints, as it was flagged as one of the main sources of confusion during the preparation of the sustainability statement. The same challenges apply to the auditors as a result. Furthermore, additional simplification and precision are needed to improve usability and to avoid confusion, particularly with auditors. - Unclear and contradictory terminology should be eliminated, for instance, terms such as "shall consider" create significant ambiguity: "shall" implies mandatory action, while "consider" suggests discretion. This phrasing leaves room for interpretation and could result in inconsistent application or auditor disputes. -Application requirements (ARs) that use "may" should be removed, as "may" implies voluntary action, which contradicts the stated objective of eliminating voluntary disclosures. Clear, mandatory language is essential to ensure consistency and enforceability across undertakings.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We strongly recommend excluding the NMIG from the Delegated Act to ensure its clear interpretation as non-mandatory to prevent an unintended increase in reporting burden. NMIG should remain a helpful reference tool for preparers, not a regulatory requirement. As a consequence, there is a need to move all voluntary and non-mandatory data points into a separate document to improve the clarity of the standards.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We strongly advocate the disclosure about resilience be limited to risks only as well as limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). Moreover, we endorse other relief measures introduced by EFRAG: •included in [DRAFT] ESRS 1 section 5.4 as regards acquisitions and disposal •included in [DRAFT] ESRS 1 paragraph 92 allowing reporting undertakings to exclude joint operations over which they do not have operational control for the calculation of certain environmental metrics. Yet, we believe additional alignment with financial reporting (i.e. IFRS 11-Joint arrangements) could be achieved. Following the financial consolidation method would improve the consistency of the information reported by companies. We also notice risk in the disclosure of detailed environmental information, especially as pertaining to ESRS E5 (as regards mass balance, material flows, resource consumption, waste and recycling), as well as ESRS E2 and ESRS E3, which may force companies to disclose sensitive information of the selected strategy in the specified scope, which in turn may lead to lower competitiveness due to reactive decisions of third-parties (including competitors), and exposure of the companies vulnerabilities. We would likewise highlight the need to consider the confusion and unclarities which appear when reporting confidential information, in particular justifying its omission to auditors.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We fully back the relief measures as regards the use of reasonable and supportable information that is available without undue cost or effort as it will significantly reduce the administrative burden on reporting undertakings. We believe this provision should be permanent and not subject to a time limit as proposed by some EFRAG SRB members as mentioned in paragraph 76 of the [DRAFT] Basis for Conclusions. In the case of large Capital Groups, some information may not be available for a long time, not just a year or two, due to the fact it requires a complete remodeling of the current method of data collection. We support ESRS 1, paragraph 92, which acknowledges the practical limitations of data availability in joint operations where the undertaking lacks operational control. Allowing the exclusion of such operations from environmental metrics is a pragmatic solution that enhances reporting feasibility and avoids duplicative or misleading disclosures. Similarly, we endorse ESRS 1, paragraph 91, which permits the use of metrics based on a partial scope of calculation. This flexibility is vital in the early years of reporting, when data systems are still evolving. Importantly, the requirement for companies to disclose the scope limitations and outline plans to improve data coverage ensures transparency and demonstrates continuous progress.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	We would like to support the wording included in OPTION 2, since it addresses our concerns on the sensitivity of the information disclosed and the excessive burden on calculating quantitative disclosures. The issue of anticipated financial impacts is extremely difficult. Advisors themselves do not yet know how to approach the topic and preparing the input for the disclosure of such data can take years for large capital groups. In addition, such flexibility is required given the significant legal risks which are particularly acute where disclosures include financial data not reported in official financial statements and not reliably estimable. Such disclosures should fall under the remit of financial boards to ensure consistency with financial reporting requirements. If disclosure requirements are maintained, they should focus on qualitative information only, providing general indications of the time horizon and type of effects (e.g., financial position, performance, cash flows). Anticipated effects must be consistent with those considered for the current financial effects. Crucially, inherent effects should not be required, as these are theoretical, not grounded in reasonable and supportable information, and risk misleading external users.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	It is of key importance not to require disclosure 'before considering adaptation/mitigation actions', as this does not reflect how the business strategy is defined and on top of that adds little value for users. Mitigation measures are typically embedded within corporate strategy, structural in nature, and linked to multiple risks. Attempting to calculate hypothetical monetary amounts before mitigation is both overly complex and unreliable, producing figures that are neither estimable nor dependable. For less technical readers, such disclosures could be misleading, since they are not recognized in the financial statements. We therefore strongly recommend limiting anticipated financial effect disclosures to qualitative information only. As a suggestion, the IFRS S1 reliefs in § 38 and § 39 should be integrated in the ESRS: 38. An entity need not provide quantitative information about the current or anticipated financial effects of a sustainability-related risk or opportunity if the entity determines that: (a) those effects are not separately identifiable; or (b) the level of measurement uncertainty involved in estimating those effects is so high that the resulting quantitative information would not be useful per paragraphs 77–82. 39. In addition, an entity need not provide quantitative information about the anticipated financial effects of a sustainability-related risk or opportunity if the entity does not have the skills, capabilities or resources to provide that quantitative information.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	We fully support the amendment about the datapoint reduction resulting in the elimination of 7 "shall" datapoints described in Basis for Conclusions (BfC) per Chapter 4, Lever 6. In addition, we approve the changes introduced to enhance interoperability with the ISSB standards, especially the harmonization of the reporting boundary for GHG emissions.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	We endorse the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	22.E1.	Comments on deleted datapoints in ESRS E1	I agree	We endorse the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	22.E2.	Comments on deleted datapoints in ESRS E2	I agree	We endorse the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	22.E3.	Comments on deleted datapoints in ESRS E3	I agree	We endorse the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	22.E4.	Comments on deleted datapoints in ESRS E4	I agree	We endorse the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	22.E5.	Comments on deleted datapoints in ESRS E5	I agree	We endorse the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	22.S1	Comments on deleted datapoints in ESRS S1	I agree	We endorse the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	22.S2	Comments on deleted datapoints in ESRS S2	I agree	We endorse the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	22.S3	Comments on deleted datapoints in ESRS S3	I agree	We endorse the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	22.S4	Comments on deleted datapoints in ESRS S4	I agree	We endorse the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	22.G1	Comments on deleted datapoints in ESRS G1	I agree	We endorse the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	We do not favour adding new datapoints, especially when these datapoints were assessed and concluded voluntary after a thorough drafting process of the ESRS and should remain as such since their content, and therefore their relevance, have not changed.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	The introduction of new mandatory datapoints contradicts with the stated objective of the standards' simplification. Businesses in Europe are already facing significant challenges in collecting and reporting the extensive information required under ESRS. Adding further datapoints - such as pertaining to microplastics, critical raw materials, or waste - will not only increase the complexity of the process and burden companies, many of which are still in the early stages of building robust reporting systems. This challenge is particularly acute in the downstream value chain, where companies have very limited visibility and control over how products are used after leaving the gate of their facilities. Obtaining reliable data from customers, distributors, or end-users is in practice extremely complex, and in many cases simply not feasible. Instead of introducing these requirements as mandatory at this stage, we strongly recommend that such topics are first developed and tested within non-mandatory guidance (NMIG). This would allow companies to experiment and progressively prepare their reporting systems. Imposing new obligations undermines the principle of burden relief and seriously threatens the feasibility of the entire reporting framework, especially for sectors with complex and fragmented value chains.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	We cannot endorse the proposed disclosure obligation concerning secondary microplastics. While EFRAG describes it as a mere clarification of existing rules, in practice it significantly broadens the reporting perimeter to include the downstream value chain. This would markedly increase the reporting workload and run counter to the declared aim of simplification. At present, calculating secondary microplastic emissions is not realistically achievable. There is no established methodology, and companies have very limited influence over the later stages of the product life cycle. Reporting requirements should therefore be limited to aspects that can actually be monitored and managed — specifically, emissions directly released from a company's own operations. Furthermore, the current definition of microplastics under REACH is overly expansive and does not suit this reporting context. For greater clarity and consistency, the term "synthetic polymer microparticles" would be more appropriate. On this basis, we propose removing the disclosure requirement on secondary microplastics from ESRS E2, along with the corresponding definition in Annex II.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	We are alarmed that the revised workforce disclosures introduce a level of detail that is not necessarily relevant or decision-useful, particularly for multinational companies. The requirement to disclose employee numbers per country with more than 50 employees may add little extra value, as in practice these employees may be concentrated in a single region (e.g., Europe) without enhancing the reader's understanding of global workforce distribution. A more representative and meaningful approach would be to return to the previous version of the disclosure, which required companies to report on countries where there are more than 50 employees representing at least 10% of the total workforce. This ensures focus on material geographies while avoiding unnecessary granularity. We also recommend removing the requirement to disaggregate employees by contract type (permanent, temporary, non-guaranteed). While well-intentioned, this requirement offers limited value to users and creates disproportionate complexity for preparers. Contract categories are defined differently across jurisdictions, leading to inconsistencies and undermining comparability. Moreover, workforce composition often fluctuates throughout the year, particularly in industries with seasonal demand or project-based work, which reduces the reliability of such disclosures.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree				
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	We recognize the importance of aligning EU legislation, in particular ensuring coherence between the CSRD and the SFDR, and we appreciate the simplifications proposed in the ESRS. At the same time, much of the requested information is not yet systematically gathered by companies. To ensure that the positive impact of the ESRS adjustments is not diminished, it is essential that other EU regulatory frameworks are also streamlined accordingly.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We strongly agree with the objective of simplification in DR E4-4. When it comes to biodiversity and other nature-related issues, the central difficulty lies in the lack of standardized, well-defined, and comparable indicators. Unlike climate reporting, which benefits from the broadly recognized metric of CO_2 equivalents, this area remains fragmented, creating a high risk of inconsistency across disclosures. Moreover, the LEAP assessment process identified in the ESRS as the foundation for biodiversity transition planning is extremely demanding. For large companies, such an exercise may require 6–9 months to complete, involve considerable financial and human resources, and still produce results of limited comparability and questionable usefulness for decision-making.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	Current indicator does not make distinction between positions held by employees, neither taking into account purchasing power between markets, or other important socio-economic and macroeconomic factors that strongly feed into ultimate discrepancy in income between genders, not to mention matters associated with outcome differences that are based on personal choices and personality traits. Studies, including Harvard University "Why Do Women earn Less Than Men? Evidence from Bus and Train Operators" by Valentin Bolotnyy and Natalia Emanuel (2018), show that while there is inherent bias with regards to sexes, it is of no explicative utility in any statistically significant manner. Variable of highest explanatory power for differences in pay between males and females is different choices with regards to overtime and propensity to ask for raises – both levels of which vary greatly between males and females. Given the complexity of adjudicating what gender pay gap actually means, process of collecting said data is not meaningful, and certainly should not have any a priori bearing on the classification of whether a company rates highly in an ESG context, or for the needs of CSRD reporting. We propose that the indicator is removed or modified in a way that would make it meaningful from a disclosures perspective, for ex. by weighing the gender pay gap by overtime differences between sexes, so that it is properly contextualized. We recommend that [DRAFT] DR S1-15 paragraph 44(a) be based on comparable employee profiles and reformulated as "gender pay gap by employee category." Regarding [DRAFT] DR S1-15 paragraph 44(b), standard should either permit disclosure limited to an adjusted ratio, or adopt the earlier EFRAG approach of "countries with a significant number of employees." Another workable option would be to require disclosure for five largest countries in which a company operates, following model used in current S1-8.			
Survey	Business & Science Poland (BSP)	Business association (other than association of financial institution)	Poland	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		On value chain reporting, we respectfully would like to request that EFRAG considers limiting the scope of the impact materiality assessment to entities with which an undertaking has a direct contractual relationship. For large multinational organisations, value chains are highly complex and global in scope. Tracking and assessing impacts beyond direct contractual partners presents substantial practical, operational, and methodological challenges, particularly given the absence of consistent data availability and supplier transparency. In many cases, undertakings lack the leverage to influence or collect reliable information from actors further down the chain, resulting in disclosures that are burdensome to produce yet incomplete or inaccurate in practice.			
Survey	Bundesverband Nachhaltige Wirtschaft e.V.	Business association (other than association of financial institution)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	EFRAG is reducing the number of mandatory disclosures by over 56% and eliminating all voluntary disclosures. This significantly reduces the amount of information contained in the binding framework. These reductions affect all qualitative content relating to environmental, social, and governance issues. Although much of the content has been moved to the Non-Mandatory Illustrative Guidance (NMIG), it is no longer legally binding there. This carries the risk that key information for comparability and verifiability will be lost. This counteracts the goal of transparency through sustainability reporting. The BNW therefore calls for essential data points, especially those relating to climate impact, to remain mandatory. In addition, information that is crucial for regulatory connectivity—for example, in relation to the SFDR or the EU taxonomy—must remain mandatory in the mandatory standard section. Clear labeling of content moved from the NMIG The transfer of numerous content-relevant requirements from the binding ESRS standards to the Non-Mandatory Illustrative Guidance (NMIG) has led to increased confusion. For companies, auditors, and other stakeholders, it is not clear which content is still relevant and which serves only as supplementary guidance. We therefore call for all content transferred to the NMIG to be clearly and transparently labeled – both in the standard text and in the NMIG itself. This applies in particular to content from ESRS E4 (biodiversity), ESRS S1 (social) and ESRS G1 (governance). This labeling must clearly indicate which requirements were originally part of the binding standards and which are now considered illustrative guidance. Only through such transparency can the traceability of reporting and consistency in the application of the ESRS be ensured.			
Survey	Bundesverband Nachhaltige Wirtschaft e.V.	Business association (other than association of financial institution)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	Securing the SFDR indicators on significant adverse impacts (PAI) From the outset, one of the ESRS's key objectives was to establish close links with the Regulation on sustainability-related disclosures in the financial services sector (SFDR) in order to avoid duplication of effort. We expressly welcome this avoidance of duplicate reporting requirements. However, the deletion or postponement of individual indicators on significant adverse impacts (PAI) weakens the link to other disclosure requirements. For financial market participants, this means that they must collect the necessary data themselves or rely on external sources. This leads to additional work and carries the risk of inconsistencies. The BNW therefore calls for the publication of a complete overview of all SFDR PAI indicators, clearly indicating whether they remain mandatory, have been postponed, or have been deleted. In addition, it must be ensured that ESRS reports remain the central source for SFDR data in the future.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Bundesverband Nachhaltige Wirtschaft e.V.	Business association (other than association of financial institution)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I disagree	Gradual implementation of the so-called reliefs The newly introduced reliefs in ESRS 1 §92 and §93 allow companies to permanently omit certain disclosures if their collection is considered disproportionate. In general, it is questionable how this disproportionate nature is determined and whether determining it is not ultimately more costly than the original scope of the ESRS. This also applies to key performance indicators relating to the environment (ESRS E1–E4), biodiversity (ESRS E4-1), and social issues (ESRS S1-9, S1-14). The BNW calls for a phased implementation approach: the reliefs provided for should only be granted for a limited period, and companies should present a clear timetable and action plan for closing the data gaps. This time limit will allow companies to prepare for the full future scope of the reports and build up expertise and resources. In addition, EFRAG should require annual progress reports to ensure traceability. Furthermore, reliefs must not exceed the level of international standards such as IFRS S1/S2 in order not to jeopardize interoperability.			
Survey	Bundesverband Nachhaltige Wirtschaft e.V.	Business association (other than association of financial institution)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I disagree	Ensuring financial materiality The amendments to ESRS 2 SBM-3 and ESRS E1-9 offer a choice between two options: Option 1 allows qualitative disclosures with justification, while Option 2 allows quantitative disclosures to be omitted entirely. Quantitative disclosures on expected financial impacts are essential for embedding sustainability issues in corporate governance. The option to omit such disclosures entirely would undermine this function. The BNW therefore calls on EFRAG to develop a uniform methodology and comprehensive guidelines to enable companies to justify missing disclosures and, where necessary, fill data gaps. This will allow companies to continuously expand their capacity to collect such information.			
Survey	Bundesverband Nachhaltige Wirtschaft e.V.	Business association (other than association of financial institution)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	EFRAG is reducing the number of mandatory disclosures by over 56% and eliminating all voluntary disclosures. This significantly reduces the amount of information contained in the binding framework. These reductions affect all qualitative content relating to environmental, social, and governance issues. Although much of the content has been moved to the Non-Mandatory Illustrative Guidance (NMIG), it is no longer legally binding there. This carries the risk that key information for comparability and verifiability will be lost. This counteracts the goal of transparency through sustainability reporting. The BNW therefore calls for essential data points, especially those relating to climate impact, to remain mandatory. In addition, information that is crucial for regulatory connectivity—for example, in relation to the SFDR or the EU taxonomy—must remain mandatory in the mandatory standard section. Clear labeling of content moved from the NMIG The transfer of numerous content-relevant requirements from the binding ESRS standards to the Non-Mandatory Illustrative Guidance (NMIG) has led to increased confusion. For companies, auditors, and other stakeholders, it is not clear which content is still relevant and which serves only as supplementary guidance. We therefore call for all content transferred to the NMIG to be clearly and transparently labeled – both in the standard text and in the NMIG itself. This applies in particular to content from ESRS E4 (biodiversity), ESRS S1 (social) and ESRS G1 (governance). This labeling must clearly indicate which requirements were originally part of the binding standards and which are now considered illustrative guidance. Only through such transparency can the traceability of reporting and consistency in the application of the ESRS be ensured.			
Survey	Bundesverband Nachhaltige Wirtschaft e.V.	Business association (other than association of financial institution)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	Gradual implementation of the so-called reliefs The newly introduced reliefs in ESRS 1 §92 and §93 allow companies to permanently omit certain disclosures if their collection is considered disproportionate. In general, it is questionable how this disproportionate nature is determined and whether determining it is not ultimately more costly than the original scope of the ESRS. This also applies to key performance indicators relating to the environment (ESRS E1–E4), biodiversity (ESRS E4-1), and social issues (ESRS S1-9, S1-14). The BNW calls for a phased implementation approach: the reliefs provided for should only be granted for a limited period, and companies should present a clear timetable and action plan for closing the data gaps. This time limit will allow companies to prepare for the full future scope of the reports and build up expertise and resources. In addition, EFRAG should require annual progress reports to ensure traceability. Furthermore, reliefs must not exceed the level of international standards such as IFRS S1/S2 in order not to jeopardize interoperability.			
Survey	Bundesverband Nachhaltige Wirtschaft e.V.	Business association (other than association of financial institution)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	Ensuring financial materiality The amendments to ESRS 2 SBM-3 and ESRS E1-9 offer a choice between two options: Option 1 allows qualitative disclosures with justification, while Option 2 allows quantitative disclosures to be omitted entirely. Quantitative disclosures on expected financial impacts are essential for embedding sustainability issues in corporate governance. The option to omit such disclosures entirely would undermine this function. The BNW therefore calls on EFRAG to develop a uniform methodology and comprehensive guidelines to enable companies to justify missing disclosures and, where necessary, fill data gaps. This will allow companies to continuously expand their capacity to collect such information.			

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Survey	Bundesverband Nachhaltige Wirtschaft e.V.	Business association (other than association of financial institution)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	Ensuring financial materiality The amendments to ESRS 2 SBM-3 and ESRS E1-9 offer a choice between two options: Option 1 allows qualitative disclosures with justification, while Option 2 allows quantitative disclosures to be omitted entirely. Quantitative disclosures on expected financial impacts are essential for embedding sustainability issues in corporate governance. The option to omit such disclosures entirely would undermine this function. The BNW therefore calls on EFRAG to develop a uniform methodology and comprehensive guidelines to enable companies to justify missing disclosures and, where necessary, fill data gaps. This will allow companies to continuously expand their capacity to collect such information.			
Survey	Bundesverband Nachhaltige Wirtschaft e.V.	Business association (other than association of financial institution)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				
Survey	Bundesverband Nachhaltige Wirtschaft e.V.	Business association (other than association of financial institution)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	Bundesverband Nachhaltige Wirtschaft e.V.	Business association (other than association of financial institution)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	EFRAG is reducing the number of mandatory disclosures by over 56% and eliminating all voluntary disclosures. This significantly reduces the amount of information contained in the binding framework. These reductions affect all qualitative content relating to environmental, social, and governance issues. Although much of the content has been moved to the Non-Mandatory Illustrative Guidance (NMIG), it is no longer legally binding there. This carries the risk that key information for comparability and verifiability will be lost. This counteracts the goal of transparency through sustainability reporting. The BNW therefore calls for essential data points, especially those relating to climate impact, to remain mandatory. In addition, information that is crucial for regulatory connectivity—for example, in relation to the SFDR or the EU taxonomy—must remain mandatory in the mandatory standard section. Clear labeling of content moved from the NMIG The transfer of numerous content-relevant requirements from the binding ESRS standards to the Non-Mandatory Illustrative Guidance (NMIG) has led to increased confusion. For companies, auditors, and other stakeholders, it is not clear which content is still relevant and which serves only as supplementary guidance. We therefore call for all content transferred to the NMIG to be clearly and transparently labeled – both in the standard text and in the NMIG itself. This applies in particular to content from ESRS E4 (biodiversity), ESRS S1 (social) and ESRS G1 (governance). This labeling must clearly indicate which requirements were originally part of the binding standards and which are now considered illustrative guidance. Only through such transparency can the traceability of reporting and consistency in the application of the ESRS be ensured.			
Survey	Bundesverband Nachhaltige Wirtschaft e.V.	Business association (other than association of financial institution)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	EFRAG is reducing the number of mandatory disclosures by over 56% and eliminating all voluntary disclosures. This significantly reduces the amount of information contained in the binding framework. These reductions affect all qualitative content relating to environmental, social, and governance issues. Although much of the content has been moved to the Non-Mandatory Illustrative Guidance (NMIG), it is no longer legally binding there. This carries the risk that key information for comparability and verifiability will be lost. This counteracts the goal of transparency through sustainability reporting. The BNW therefore calls for essential data points, especially those relating to climate impact, to remain mandatory. In addition, information that is crucial for regulatory connectivity—for example, in relation to the SFDR or the EU taxonomy—must remain mandatory in the mandatory standard section. Clear labeling of content moved from the NMIG The transfer of numerous content-relevant requirements from the binding ESRS standards to the Non-Mandatory Illustrative Guidance (NMIG) has led to increased confusion. For companies, auditors, and other stakeholders, it is not clear which content is still relevant and which serves only as supplementary guidance. We therefore call for all content transferred to the NMIG to be clearly and transparently labeled – both in the standard text and in the NMIG itself. This applies in particular to content from ESRS E4 (biodiversity), ESRS S1 (social) and ESRS G1 (governance). This labeling must clearly indicate which requirements were originally part of the binding standards and which are now considered illustrative guidance. Only through such transparency can the traceability of reporting and consistency in the application of the ESRS be ensured.			

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Survey	Bundesverband Nachhaltige Wirtschaft e.V.	Business association (other than association of financial institution)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	EFRAG is reducing the number of mandatory disclosures by over 56% and eliminating all voluntary disclosures. This significantly reduces the amount of information contained in the binding framework. These reductions affect all qualitative content relating to environmental, social, and governance issues. Although much of the content has been moved to the Non-Mandatory Illustrative Guidance (NMIG), it is no longer legally binding there. This carries the risk that key information for comparability and verifiability will be lost. This counteracts the goal of transparency through sustainability reporting. The BNW therefore calls for essential data points, especially those relating to climate impact, to remain mandatory. In addition, information that is crucial for regulatory connectivity—for example, in relation to the SFDR or the EU taxonomy—must remain mandatory in the mandatory standard section. Clear labeling of content moved from the NMIG The transfer of numerous content-relevant requirements from the binding ESRS standards to the Non-Mandatory Illustrative Guidance (NMIG) has led to increased confusion. For companies, auditors, and other stakeholders, it is not clear which content is still relevant and which serves only as supplementary guidance. We therefore call for all content transferred to the NMIG to be clearly and transparently labeled – both in the standard text and in the NMIG itself. This applies in particular to content from ESRS E4 (biodiversity), ESRS S1 (social) and ESRS G1 (governance). This labeling must clearly indicate which requirements were originally part of the binding standards and which are now considered illustrative guidance. Only through such transparency can the traceability of reporting and consistency in the application of the ESRS be ensured.			
Survey	Bundesverband Nachhaltige Wirtschaft e.V.	Business association (other than association of financial institution)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	Strengthening environmental standards The changes to environmental standards improve readability in some respects, but weaken the content. The reduction in emissions reporting is particularly critical, as companies will only have to use one control method in future. In ESRS E4, for example, key content has been removed, including site screenings, marine resources, and specific metric examples (formerly ESRS E4 ARs). This may lead to underreporting. The BNW calls for both operational and financial control to remain mandatory for emissions reporting, or for a requirement to justify any deviations to be introduced. In addition, deleted content must be reinstated or backed up by references to recognized international frameworks such as TNFD and SBTN. On the positive side, however, the new disclosures on water withdrawals, microplastics, and critical raw materials create greater transparency.			
Survey	Bundesverband Nachhaltige Wirtschaft e.V.	Business association (other than association of financial institution)	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Concluding remarks The proposed ESRS amendments will significantly weaken European sustainability reporting. The drastic reduction of mandatory disclosure requirements by more than half and the transfer of key content to the non-mandatory NMIG counteract the original goal of uniform, transparent, and comparable reporting. The BNW therefore calls for key content to be reintegrated into the mandatory standards and clearly marked. Reliefs must be limited in time and linked to progress monitoring. Quantitative reporting on financial impacts must remain mandatory, and climate reporting must be comprehensive and comparable. Without these improvements, there is a risk of a system that meets neither the demands of stakeholders nor the challenges of climate change. Furthermore, Europe's future as a business location can only be secured if companies monitor their long-term profitability and adapt accordingly to their risks. The EU itself would also jeopardize its pioneering role in sustainability reporting and undermine the credibility and attractiveness of European companies among international investors and insurance companies.			
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Family businesses describe that even in the new version of the ESRS standard, there are formulations that are not yet completely clear and could possibly lead to different implementations of the standard or its requirements. For them, a definition of the scale of likelihood would be helpful. In addition, family businesses explain that there still seems to be room for interpretation which will result in discussions with auditors. Therefore, they would hope for a clearer definition of when an information is "necessary". Finally, family businesses describe it as unclear how to examine the new S-Subtopics with the former sub-sub-topics in brackets.			
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Family businesses explain that most of the changes make the materiality analysis easier. However, an initial review of the adjustments revealed that some could still lead to misunderstandings and additional work during implementation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	For some family businesses concerns remain regarding the practicality of certain detailed requirements, the clarity of the wording, and the avoidance of unnecessary complexity and redundancy.			
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Family businesses explain that the proposed amendments largely aim to improve the clarity, comprehensibility, and accessibility of the ESRS by reducing complexity, eliminating redundancies, and increasing flexibility. This is also perceived and supported in many respects. However, there are specific areas where further clarifications are considered necessary by family businesses to fully achieve the "desired level of clarity and accessibility." Furthermore, some texts still appear quite long.			
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Some family businesses give the following feedback: ESRS 1: In general, a step in the right direction has been taken. However, there are still unclear topics that need to be reviewed and adjusted before the standard is finalized. See the compatibility of the requirements of the various standards.			
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I would like to skip this question and provide my feedback in Part 3				
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Some family businesses express that the level of interoperability should be further enhanced by incorporating certain other elements.			
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree				
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	E5-4: the critical raw materials should be treated separately, only if material			
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	Some family businesses explain that the principle of "fair presentation" should be further elaborated to prevent from room for interpretation.			
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Some family businesses are concernced that if the standard begins with individual exceptions, other industries will also come up with justifications.			
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	Family businesses express different views here.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	Some family businesses propose a renewed review of whether the changes actually bring relief and clarity.			
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	Family businesses express different views.			
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	Family businesses express different views			
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Family businesses generally welcome the urgently needed changes and the resulting simplifications of the ESRS standards. However, there are changes that do not lead to any practical simplification in the view of some family businesses. Therefore, some family businesses propose a general review of the amendments. A focus should be placed on the new methodologies and qualitative disclosures.			
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Feedback by family businesses: •Standard-specific disclosures regarding concepts/measures/targets were not completely removed. •E5-1, new no. 11 for measures, remains as an additional standard-specific disclosure requirement and includes the new term "eco-design principles". •There is no relief from the disclosure requirement for resource inflows (weight and percentage of materials used still have to be reported) or additional disclosure requirements (percentage of critical and strategic raw materials, new no. 15 c). •An additional disclosure requirement has been added for waste whose final destination is unknown (new no. 18 e). •New AR 2 (related to new no. 15 a) requires a higher level of granularity in the breakdown of materials used than before.			
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Feedback by family businesses: •New No. 12 on the reporting of a transition plan is now a mandatory data point; previously, it was voluntary. •The section "The purpose of this disclosure requirement is to..." was not removed. In other standards, this disclosure requirement was partially deleted because it is not a data point. •Standard-specific disclosures regarding concepts, measures, and targets were not completely eliminated. •There is no relief from the new No. 14 b) for reporting on own sites that are located in or near a biologically sensitive area. •New appendix disclosures now have partially more complex requirements than before (new AR 8, 9, 10). For example, the new AR 8, which was recently added, describes how to determine if a site is located near a biologically sensitive area—this is now more complex than before.			
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Foundation for Family Businesses and Politics	Business association (other than association of financial institution)	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I would like to skip this question and provide my feedback in Part 3				
Survey	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				
Survey	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	Materiality serves as a general filter, including ESRS 2 General Disclosures, ensuring reported information is consistent and interoperable with the financial materiality lens in ISSB standards. This promotes framework compatibility, cross-referencing, and comparable disclosures across reporting regimes. We support the flexibility under AR 17–19 allowing top-down or bottom-up materiality assessments. A top-down approach, starting from topics or sub-topics to identify related impacts, risks, and opportunities, can reduce complexity and documentation burdens while achieving the same outcome as bottom-up assessments. This flexibility allows undertakings to align assessments with internal risk management, focus on diverse material topics, and avoid duplicative reporting. This creates context-appropriate, proportionate, decision-useful reporting without undue cost or effort. Regarding the distinction between own operations and the value chain, materiality assessments should focus on areas with the greatest potential impact on the business model, geographies, or risks. Undertakings need not assess every possible impact, risk, or opportunity. Aggregating material impacts by "risk density" highlights areas of higher exposure, enhancing decision-usefulness while maintaining proportionality. We support double materiality assessments that aggregate or disaggregate information by sector, country, or location, including key upstream and downstream value chain information without requiring exhaustive reporting.			
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The new guidance in ESRS 1 is a welcome step toward addressing a common implementation challenge: how to factor remediation, mitigation, and prevention measures into the materiality assessment of negative impacts. By distinguishing between actual and potential impacts and clarifying how past versus ongoing actions should be treated, the standard improves consistency compared to previously divergent practices. The illustrative guidance in Appendix C also provides practical direction for preparers. However, the guidance introduces complexity and, in some cases, counter-intuitive outcomes. Assessing potential impacts on a "gross" basis—where ongoing actions are required to contain severity or likelihood—may inadvertently penalize companies with proactive, continuous risk management systems while allowing those with weaker, one-off measures to report fewer material issues. This can reduce comparability across companies and sectors and may misinform investors by distorting the underlying risk profile. Paradoxically, companies investing in robust safety or environmental management may appear riskier than those relying on outdated or passive measures. The guidance also imposes a high interpretive burden, particularly for reporters with complex operations or overlapping risk controls, risking inconsistent application and undermining the goal of simplification. Overall, the guidance clarifies the treatment of actions and provides a structured approach, including the distinction between actual, potential, and residual impacts, and allows omission of potential impacts where remediation actions contain or nullify risks. Encouraging qualitative disclosure on remediation, mitigation, and prevention further enhances transparency and comparability and provides practical examples to support improvements in strategy, governance, and risk management, while maintaining relevance and decision-usefulness in sustainability reporting.			
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We support the strengthened connectivity between financial and sustainability statements, as well as the option for preparers to include an executive summary of the sustainability statement, with detailed information presented in the appendices. This approach enhances the overall presentation format and improves usability by enabling users to quickly identify key messages. To safeguard against misuse, this option should be supplemented with clear guidance to ensure that executive summaries are not used to convey incomplete or misleading information.			
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We believe that the proposed amendments risk reduced granularity if PAT is overly high-level. One concern is that by making PAT more "principles-based" and centralised in ESRS 2, some topical detail may be lost. If companies only provide generic PAT disclosures (without linking them to specific PAIs, like emissions or social violations), it could make SFDR alignment weaker (E & S DRs in particular). Retaining PAT disclosure for material IROs while removing the requirement to disclose plans/timelines may risk obfuscating sustainability risk management for material topics over a short-, medium-, and long-term horizon. The amendments improve PAT–IRO connectivity and allow disclosure at a higher aggregation level, aiding usability.			
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ESG Book GmbH	User (analyst, data provider, rating agency, etc.)	United Kingdom	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E1	The NMIG ESRS E1 is helpful as it provides essential clarifications for reporting GHG emissions and assessing climate-related risks, supporting consistency and interoperability with global standards. It clarifies the operational control boundary for emissions from operated assets, balancing financial control and operational realities while reducing the risk of double-counted emissions. The guidance also clarifies the treatment of contractual instruments in gross emissions reporting. Unbundled energy attribute claims are distinguished from GHG attribute contractual instruments, ensuring that energy purchases and sales are properly accounted for separately from emissions reporting. NMIG ESRS E1 reinforces materiality assessments by linking internal carbon pricing to exposure to carbon pricing risks, allowing narrative disclosure where complexity may otherwise obscure relevance. It provides clear examples of transition risk assessment, such as coverage under the EU Emissions Trading System (EU ETS), and contextual elements for disclosing potential liabilities from material transition risks under paragraph 41. The guidance promotes interoperability with ISSB standards by encouraging detailed disclosures of business activities at transition risk, including the associated percentage of net revenue, risk factors, and anticipated financial effects, such as margin erosion over short, medium, and long terms. Where relevant, business activities may also be disaggregated by operating segments if margin contributions are disclosed in financial segment reporting.			
Survey	ESG Book GmbH	User (analyst, data provider, rating agency, etc.)	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Yes, we broadly agree that the proposed Amendments provide sufficient relief while maintaining transparency and interoperability with the ISSB's IFRS S1 and S2, though this balance depends on ensuring reliefs are proportionate, time-bound, and exceptional. The removal of the strict preference for direct value chain data is a pragmatic adjustment, provided entities disclose where estimates are used, the basis for those estimates, and the safeguards for reliability. Reliefs for partial-scope metrics (§92) also improve practicability for first-time preparers, but should remain temporary to preserve incentives for better data collection and comparability. Linking such reliefs to the phased timeline for limited and reasonable assurance requirements would help avoid undermining reporting integrity. We also support the principle of undue cost and effort, but caution that reliefs for poor data quality must be narrowly applied. The CSRD's purpose is to create a reliable chain of sustainability data that supports the EU Green Deal and the sustainable finance framework. Permanent or unconditional reliefs could dilute this goal, reduce interoperability with IFRS, and risk counterproductively increasing the reporting burden. Other clarifications and scope limitations are also welcome, as they reduce complexity and strike a balance between disclosure, transparency, and practicality. For example: undertakings may exclude non-significant IRO drivers and joint operations without operational control, resilience disclosures are limited to qualitative risks, financial effect disclosures are narrowed to announced investments and plans, and a new relief for acquisitions/disposals ensures proportionality in group reporting (ESRS 1 Ch.5.4). The resolution of implementation issues through EFRAG's Q&A Appendix further strengthens clarity and consistency. On technical alignment, we welcome deletion of redundant topical specifications (Appendix C, with exceptions like resilience in ESRS E1), streamlining metrics, and moving unnecessary datapoints to NMIG. Converting some mandatory datapoints into voluntary should also encourage uptake without compromising relevance.			
Survey	ESG Book GmbH	User (analyst, data provider, rating agency, etc.)	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	While we support the principle of undue cost of effort, which ensures proportionality of burden and complements the fair representation framework, reliefs for poor data quality should be limited in time and, more generally, be exceptional. We recognize that first-time preparers of CSRD reports may face challenges related to data quality and availability. However, the objective of the CSRD is to establish a reliable chain of information across the sustainability reporting ecosystem, ensuring that entities collect, measure, and monitor relevant metrics to support the EU Green Deal and strengthen the sustainable finance framework—metrics that may not have been collected previously. Permanent or unconditional reliefs could have unintended consequences: they would remove the incentive to improve data availability and collection over time and risk undermining the goal of comparable disclosures. Such reliefs would also exceed the scope of IFRS reliefs, reducing interoperability and potentially increasing the overall reporting burden, producing a counterproductive outcome.			
Survey	ESG Book GmbH	User (analyst, data provider, rating agency, etc.)	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We support Option 1, which requires both qualitative and quantitative disclosures of anticipated financial effects, with reliefs available under certain conditions (e.g., when no reasonable or supportable quantitative information exists, or high uncertainty). This approach ensures that quantitative information remains central, enabling investors to properly assess and manage the financial impact of ESG risks. Option 1 maintains interoperability with IFRS, aligns with the CSRD objective of equal footing between financial and sustainability reporting, and supports connectivity between these frameworks. The relief mechanisms already included provide sufficient flexibility to address feasibility, data limitations, or commercial sensitivity, without weakening the principle of transparency. By contrast, limiting reporting to qualitative disclosures only (Option 2) would reduce comparability, increase dual-reporting costs (not interoperable with IFRS), and diminish decision-usefulness for investors. We therefore consider Option 1 essential to preserve robust financial materiality and ensure that sustainability disclosures remain actionable and relevant.			
Survey	ESG Book GmbH	User (analyst, data provider, rating agency, etc.)	United Kingdom	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	We agree that the amended paragraphs have been sufficiently simplified and strike an appropriate balance between reporting effort and users' needs. The datapoints retained—particularly those concerning anticipated transition and physical risks—remain critical for investors, lenders, and other users to assess an undertaking's exposure and resilience. We also support these changes because they do not go beyond the scope of IFRS standards, thereby maintaining and even strengthening interoperability with IFRS S2. By aligning with IFRS, the amended requirements reduce the risk of double reporting, and avoid creating unnecessary divergence that could increase complexity and costs. This consistency is particularly important for financial institutions, who rely on these disclosures not only to evaluate risks but also to meet supervisory expectations and sector-specific disclosure obligations.			

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Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Overall, we welcome the furthering of interoperability as this strikes the right balance between improving alignment and meeting the simplification objectives. Where possible, regulators and standard-setters should continue collaboration, with the fair presentation framework as the basis and the general filter for materiality ensuring that methodology remains in line with the IFRS S1 financial materiality lens. We also welcome the removal of one of the main interoperability differences, with the ESRS E1 GHG emission boundary now aligned to the financial consolidation approach (ESRS E1 AR19) and consistent with the financial control approach in the GHG Protocol. A separate disclosure based on operational control is only required for entities with more complex ownership structures (ESRS E1 AR20), which is proportionate and aligns with the GHG Protocol. We note positively that the IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of those still pending outcome of Level 1 discussions (commercial sensitivity of opportunities, Scope 3 impracticability, omission of financial effects where skills are lacking). However, we caution that implementing additional reliefs beyond IFRS S1 and S2 risks creating new interoperability differences. We strongly support the permanent reference to SASB Standards and IFRS industry-based guidance for entity-specific sector disclosures until ESRS sector standards are issued. This ensures continuity, comparability, and usability for preparers and users. Advancement of interoperability in the Basis for Conclusions is also supported. On aligned datapoints, we agree with the deletion of overlapping requirements where equivalent disclosures remain elsewhere in ESRS, thereby reducing redundancy. However, the deletion of certain IFRS-aligned datapoints (e.g., gross GHG intensity, governance integration, remuneration linkages) risks undermining comparability. We recommend retaining such datapoints in NMIG or ARs as voluntary disclosures to avoid unnecessary divergence.			
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	We support the streamlining where datapoints are redundant across topical standards, the transfer of disclosure requirements (DR) to application requirements (AR), and the enhancements on disclosure metrics and guidance based on feedback from preparers and stakeholders.			
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	22.E1.	Comments on deleted datapoints in ESRS E1	I agree	We broadly agree: the redundancy of GHG intensity metrics, energy intensity associated with activities in high climate impact sectors, absolute total emissions (Scope 1, 2 & 3) is left to users, but this may conflict with the objective of improving usability, as it requires users to derive this information themselves. We broadly agree on the deletion of the constraint as this metric could potentially be materially relevant to traditionally lower impact sectors – Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors). However, this must be supplemented and balanced with sector-specific guidance for high-climate impact sectors that may use the deletion of this explicit reference to omit of obfuscate material information.			
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	22.E2.	Comments on deleted datapoints in ESRS E2	I agree	We support the targeted scope (E2-5): substances of concern only for chemical manufacturers/importers; substances of very high concern apply to chemical manufacturers/importers & users; adding of the REACH threshold.			
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	22.E3.	Comments on deleted datapoints in ESRS E3	I agree	We support the simplification of water-related impact metrics (own operations – discharge and withdrawal) and consolidation into 4 DRs as this significantly reduces reporting burden without compromising data availability for material nature-related risks and opportunities.			
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	22.E4.	Comments on deleted datapoints in ESRS E4	I agree	We support the deletion of prescriptive biodiversity and ecosystem resilience requirements where these disclosures are integrated, referenced in the NMIG, or absorbed into the ARs if duplicative. This ensures simplification without loss of critical information. We emphasize that the general filter of materiality must remain the guiding principle, ensuring companies focus on the most relevant E4 topics while retaining flexibility to choose appropriate metrics. Guidance should also ensure comparability and prevent under-reporting of material biodiversity impacts.			
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	22.S1	Comments on deleted datapoints in ESRS S1	I agree	Deleting the voluntary adjusted gender pay gap datapoint removes nuance. The unadjusted global pay gap aligns with EU Pay Transparency Directive, but adjusted ratios by employee category or geography provide critical insight into structural inequities. Even as a "may disclose," keeping it would improve decision-usefulness without materially increasing burden.			
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	22.S2	Comments on deleted datapoints in ESRS S2	I agree	We support this simplification, as respondents have already provided input on the appropriate granularity of social information in SFDR PAIs, so consolidation may be a necessary step. These disclosures could potentially be phased out or refined as the SFDR framework is finalized, particularly for metrics related to human rights and the company's own workforce, which are difficult to consolidate across the value chain and in complex operations. Narrative disclosures should supplement these metrics where the information is material. The amendments significantly simplify the standards through a principle-based approach, reducing ESRS S1 by one DR and ESRS S2–S4 to four DRs each. Human rights policy disclosures are now centralized in ESRS 2 GDR-P, rather than being repeated in the social standards (S1–S4 DR1). In addition, previous DRs 2 and 3, which related to stakeholder engagement, channels to raise concerns/grievance mechanisms, and approach to remedy, have been merged into a single disclosure. This simplification improves usability, reduces duplication, and allows preparers to focus on material social topics while maintaining transparency.			
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				

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Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	We support the introduction of a principles-based approach, which provides preparers with a transparent and decision-useful framework for reporting sustainability information. This approach ensures proportionality of burden, allowing disclosing entities to report on material impacts, risks, and opportunities (IROs) in line with their capacity and available resources.			
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We disagree with the exemption for financial institutions to report absolute emissions only when setting intensity targets. Absolute disclosures are equally critical for financial institutions, as they enable stakeholders to track the overall evolution of financed emissions over time—the central question in any transition plan. This transparency is essential to understanding banks' exposure to transition risks in the context of EU objectives under the Paris Agreement. While we acknowledge that all GHG targets involve complex assumptions, this challenge applies across sectors and does not justify an exemption. Moreover, intensity targets may distort a reality of rising emissions. Absolute targets are essential for comparability, the exception would create unlevel playing field.			
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	While shifting to the "top 10 largest countries by headcount" improves comparability across undertakings, it may increase reporting burden for companies with geographically dispersed but relatively small operations. A hybrid approach (e.g., limiting the requirement to top 5 countries unless they exceed a materiality threshold of total workforce) could strike a better balance. For large multinational groups with operations in many countries, disaggregating to 10 countries may mean pulling more granular data than is actually decision-useful for users. It also risks shifting focus away from countries where social risks are higher (e.g., low union coverage, weak labour protections), since it is purely based on headcount size.			
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	The methodology aligns with ILO principles but risks under-reporting where statutory wages are below adequate levels. To ensure comparability, undertakings should be required to disclose (i) which prong of the hierarchy was applied, and (ii) a justification if living wage benchmarks were not used. Without this transparency, users cannot reliably assess adequacy.			
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	The streamlining improves overall usability and avoids duplication. Deleting the datapoints (e.g., marine resources) relating to anticipated financial effects in ESRS E3 (marine resources) is justified since the granularity goes beyond the scope of the IFRS, which only requires information on transition and physical risks, thereby achieving the Omnibus objective of reducing reporting burden. Additionally, we support the consolidation and streamlining of SFDR PAIs relating to human rights policies, procedures and cases aligned with UNGP and OECD Guidelines for MNEs, as well as the clarification of scope of healthy & safety metrics in ESRS S1-4. To preserve alignment with SFDR, EFRAG could provide a mapping note clarifying which PAIs remain fully covered, which are partially covered, and which are excluded.			
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Keeping AR 26 is helpful, as biodiversity and ecosystems-related targets can effectively showcase mitigation and restoration with reference to the area of protected landed or natural resources that may be impacted by business activities. We agree with the suggestion to require disclosure of whether targets are aligned with recognized external frameworks (e.g., SBTN, TNFD) to improve credibility and comparability.			
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	Deleting the voluntary adjusted gender pay gap datapoint removes nuance. The unadjusted global pay gap aligns with EU Pay Transparency Directive, but adjusted ratios by employee category or geography provide critical insight into structural inequities. Even as a "may disclose," keeping it would improve decision-usefulness without materially increasing burden.			
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	We agree – At minimum, a mandatory narrative disclosure on how undertakings manage timely payments to SME suppliers is maintained by the PAT provisions.			
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We support the simplification of ESRS 1, including the consolidation of ARs, relabeling of MDRs as GDRs, and deletion of duplicative "may disclose" datapoints. The principle-based approach, clearer distinction between own operations and value chain reporting, and use of appendices for granular information improve usability. Materiality is appropriately emphasized, and the "fair presentation" principle enhances decision-usefulness while limiting undue burden. Guidance on "gross vs net" and the undue cost or effort principle is helpful. Overall, ESRS 1 now provides a pragmatic framework that supports meaningful sustainability reporting while maintaining CSRD ambition.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ESG Book GmbH	User (analyst, data provider, rating agency, etc.)	United Kingdom	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Centralizing human rights policy disclosures in GDR-P and merging DRs on stakeholder engagement, grievance mechanisms, and remedies reduces complexity and improves clarity. The IRO structure (IRO-1 describing DMA process, IRO-2 covering DMA outcomes) enhances focus on material impacts. Where duplicative datapoints are removed, remaining disclosures adequately cover governance, monitoring, and decision-making responsibilities. Alignment with IFRS S1 datapoints is largely maintained, though voluntary guidance should be preserved to support comparability.			
Survey	ESG Book GmbH	User (analyst, data provider, rating agency, etc.)	United Kingdom	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We welcome alignment with the GHG Protocol and the financial consolidation boundary for emissions, with operational control disclosures only for complex ownership structures. Optional splits for financial institutions and simplified anticipated financial effects disclosures reduce burden. IFRS reliefs for undue cost, ranges, and quantitative effects improve usability. Additional reliefs beyond IFRS may create minor interoperability differences, which require continued coordination with the ISSB.			
Survey	ESG Book GmbH	User (analyst, data provider, rating agency, etc.)	United Kingdom	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Simplifications in E2, including general pollutant reporting and targeted scope for substances of concern, reduce reporting burden while maintaining material coverage. Microplastics are now clearly categorized. Overall, the principle-based approach focuses preparers on material pollution-related risks and impacts.			
Survey	ESG Book GmbH	User (analyst, data provider, rating agency, etc.)	United Kingdom	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Mandatory disclosure of water withdrawals and discharges and removal of revenue-based intensity metrics simplify reporting while maintaining materiality. Focus on water related impacts, risks, and dependencies, with marine water still in scope, ensures relevance. Anticipated financial effects are addressed through ESRS 2 SBM-3 and qualitative disclosures.			
Survey	ESG Book GmbH	User (analyst, data provider, rating agency, etc.)	United Kingdom	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We support the consolidation into one generic requirement for all material E4 topics, with flexibility for companies to choose relevant metrics. Where deletions are absorbed into NMIG or ARs, this reduces redundancy. The general filter of materiality must be emphasized, and narrative guidance should ensure comparability and prevent under-reporting of material impacts.			
Survey	ESG Book GmbH	User (analyst, data provider, rating agency, etc.)	United Kingdom	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Simplifications and principle-based metrics focus on material topics, with new data points on key raw materials and waste destination improving decision-usefulness. Scope clarifications support clarity without increasing burden.			
Survey	ESG Book GmbH	User (analyst, data provider, rating agency, etc.)	United Kingdom	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We support reduced granularity in S1-5 and S1-7, with disaggregation now limited to the top 10 largest countries with >50 employees. Tabular or narrative reporting options enhance flexibility. Centralization of human rights policy disclosures in ESRS 2 GDR-P and merger of DRs on stakeholder engagement and grievance mechanisms improve usability. Adjustments to S1-6, S1-9, S1-12–S1-16 reduce burden while maintaining material coverage.			
Survey	ESG Book GmbH	User (analyst, data provider, rating agency, etc.)	United Kingdom	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Simplification and principle-based disclosures reduce complexity while maintaining focus on material workforce topics. Merging overlapping DRs and centralizing human rights policies improve clarity. Narrative disclosures supplement metrics where consolidation across value chains or complex operations is challenging.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	same as comments for ESRS S2			
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	same as comments for ESRS S2			
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	ESG Book GmBH	User (analyst, data provider, rating agency, etc.)	United Kingdom	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We support the principles-based, fair presentation framework introduced in ESRS 1, which provides preparers with a transparent and decision-useful approach to report material impacts, risks, and opportunities (IROs) while ensuring proportionality of burden. The reduction in data points streamlines reporting, focusing on material sustainability matters and balancing EU Green Deal objectives with competitiveness. The flexibility in materiality assessments (AR 17–19) to adopt top-down or bottom-up approaches is welcome, allowing preparers to align reporting with internal risk management, avoid excessive documentation, and apply the "undue cost or effort" principle. Emphasis on material IROs across own operations and value chains, with aggregation where appropriate, ensures decision-useful reporting without unnecessary burden. Relief mechanisms for partial-scope metrics, estimates, and data quality improve practicability but should be time-bound and exceptional to maintain incentives for comparability and reliable reporting. Clarification on the distinction between DRs and ARs would support consistent application. We also support comparative and qualitative disclosures highlighting judgments, uncertainties, and assumptions, and progress on improving data coverage. For financial institutions, guidance on value chain definitions and reporting absolute emissions alongside intensity metrics is essential for transition risk assessment. In ESRS 2, simplification of governance and SBM disclosures, aggregation of IROs, and BP-1 referencing ESRS 1 via "comply or explain" enhances clarity and proportionality. Option 1 for anticipated financial effects maintains interoperability with IFRS S1/S2, preserving quantitative transparency while providing relief where necessary. Regarding environmental standards, we support alignment with IFRS metrics in ESRS E1, including scenario-based assessment of climate risks and anticipated financial effects, and the use of operational control boundaries for GHG reporting. In ESRS E4, AR 26 on biodiversity targets should remain, with stronger alignment to SBTN and TNFD frameworks, including LEAP methodology. Explicit linkages between biodiversity and social impacts strengthen holistic reporting and comparability across sectors.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	x	User (analyst, data provider, rating agency, etc.)	Italy	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree				
Survey	x	User (analyst, data provider, rating agency, etc.)	Italy	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree				
Survey	x	User (analyst, data provider, rating agency, etc.)	Italy	35.ESRS1_10.3.	Do you agree with the amendments of this chapter?	I agree		ESRS1	10.3 Transitional provision: List of Disclosure Requirements that are phased in	
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We welcome the simplified language in DR IRO-1 and DR SBM-3 which reduces the granularity of the information disclosed. We support the view that the DMA should remain a principles-led process, enabling contextual judgment and supporting a meaningful connection between an undertaking's strategy and its sustainability reporting. The recent simplifications in the ESRS are a positive step forward. However, greater emphasis is needed on the role of auditors, who should focus on assessing the soundness of the DMA methodology, rather than challenging its outcomes. Companies should not be required to disclose detailed methodological descriptions in their CSRD reports, nor should they be asked to provide unnecessary scoring details for topics that are clearly either material or immaterial. Expanding the DMA into sector- or industry-specific instructions risks undermining its core purpose: empowering undertakings to apply professional judgment within their unique context. The ESRS framework rightly positions materiality as the primary filter for disclosures, promoting a top-down, strategy-driven approach rather than a compliance-oriented checklist. It is crucial that any guidance materials remain clearly non-authoritative and distinct from the core standards, to preserve the flexibility and application of judgement central to the DMA process. We welcome the clarification as regards the definition of "short-term" in the context of time horizons. Companies could also benefit from additional clarification on the interlinks between sustainable due diligence (SDD) and the DMA process and how the financial materiality and enterprise risk management (ERM) are expected to interact. EFRAG should consider a more flexible approach as regards the double materiality assessment by clarifying that companies should only carry out a full DMA periodically or when there are significant changes in their strategy or business model, and not necessarily on a yearly basis. Companies could instead review internally their DMA every year to assess any expected changes.			
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	We welcome the clarifications in [DRAFT] ESRS 1 paragraph 35, as it gives undertakings the option of taking into account preventive and mitigative measures that are in place to reduce the likelihood of an IRO scenario evolving to tis ultimate scale/scope or irremediability. However, EFRAG should consider the following wording in paragraph 35 of the amended ESRS for additional clarity and to support sustained prioritisation of the most significant matters: "Mitigation and prevention measures can be considered in the materiality assessment when there is reasonable and supportable information to demonstrate that they reduce the severity and/or likelihood of a potential impact". As regards the net-gross aproach, while we believe that the proposal is balanced, we would like to point out that a net approach to assessing potential negative impacts within the DMA evaluates impacts after accounting for credible, systematic, and effective mitigation and prevention measures—aligning sustainability reporting with actual business practices and risk management frameworks. Companies across sectors, particularly in high-impact industries, invest heavily in regulatory compliance, site-level controls, advanced monitoring systems, and global frameworks (e.g. ISO, OGMP 2.0.). These measures are not theoretical; they are audited, budgeted, and continuously improved to reduce risk exposure. Requiring a gross assessment—where impacts are evaluated without considering these controls—risks inflating disclosures with hypothetical risks that are already effectively managed. This not only creates administrative burden but also misrepresents exposure to stakeholders and regulators. Moreover, gross reporting dilutes the clarity and relevance of sustainability statements by obscuring truly material issues. A net approach ensures that disclosures reflect the real-world risk landscape, rewarding companies for proactive and data-backed prevention and mitigation efforts. Similarly, considering a net assessment for actual impacts already managed by efficient mitigation plans will have the advantage of not cluttering the DMA with closed, non-material impacts.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We believe the changes proposed will provide reporting undertakings more flexibility in the preparation of their sustainability statements and will allow them to focus and highlight the more relevant information. It is relevant the option to disclose the most granular information or EU Taxonomy-related information in dedicated sections or appendices, as specified in [DRAFT] ESRS 1 section 8.2, and the option of including an executive summary. However, we recommend removing or relocating (amended) ESRS 1, AR 36. This Application Requirement suggests that undertakings may present detailed GHG emission calculations in a separate appendix or section. As this is not a mandatory requirement and is specifically related to ESRS E1, its inclusion in ESRS 1 may cause confusion. We recommend either removing it or relocating it to ESRS E1 (Climate Change), in which context it would be more appropriate			
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We support the changes proposed since they provide more clarity on how to report the disclosure requirements related to Policies, Actions and Targets (PATs), which was one of the main comments raised by Cefic members. We specially support the removal of GOV, SBM, and IRO-1 disclosure requirements from the topical standards. This is a significant improvement that contributes to the overall simplification of the ESRS framework. However, we reiterate that EFRAG should explore the possibility of merging disclosure requirements on PATs in the topical standards as these are often implemented together. The following datapoints could also be streamlined to reduce the reporting burden: •ESRS 2 paragraph 38 (a-c) on resources allocated to key actions: This requirement demands detailed data that is typically tracked on a project basis rather than through the Impact-Risk-Opportunity (IRO) lens. Additionally, the reconciliation with financial statements adds significant preparation effort. This DR could instead be fulfilled with a short narrative description. •ESRS 2 GDR-M paragraph 41(b): This datapoint requires disclosure of specific environmental conditions and characteristics of impacted areas. However, this is already addressed under GDR-M paragraph 41(d), which covers contextual information. Both datapoints could be merged and streamlined. •ESRS 1 paragraph 40: It should be explicitly stated that the disclosure of metrics required by topical ESRS is subject to materiality (double materiality assessment and materiality of information).			
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We fully support the changes introduced as regards the distinction between mandatory from voluntary datapoints, as it was flagged by members as one of the main sources of confusion during the preparation of the sustainability statements, also presenting challenges with auditors. To further simplify the ESRS, EFRAG could consider relocating definitions to the Annex II glossary and illustrative examples to the NMIG and embed presentation guidance directly within datapoints and removing optional ARs. Also, the term "significant" is ambiguous. The ESRS should clarify that undertakings determine significance based on their specific context, ensuring disclosures remain relevant and material.			
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	As stated in the previous section, we support moving all voluntary and non-mandatory data points into a separate document to improve the clarity of the standards. However, it is It is crucial that EFRAG clarifies to assurance providers that NMIG content is not to be treated as de facto mandatory, in order to prevent an unintended increase in reporting burden. We therefore support EFRAG's recommendation that the NMIG not be included in the Delegated Act.			
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We support the relief measures introduced by EFRAG. In particular, as regards acquisitions and disposal and the relief measure allowing reporting undertakings to exclude joint operations over which they don't have operational control for the calculation of certain environmental metrics. However, on the latter, additional alignment with financial reporting (i.e. IFRS 11-Joint arrangements) could be achieved (i.e. financial consolidation method). The burden relief in ESRS 1 paragraph 91 should also be available for scope 3 GHG emissions. However, we do not agree with the decision of not including any relief measure for commercially sensitive information for the reasons stated in paragraph 70 of the [DRAFT] BfC. The ongoing legislative process should not pre-empt EFRAG of directly addressing this issue in the standards, especially after acknowledging that it is a "concern frequently expressed by preparers" (paragraph 82 of the Basis for Conclusions). We note how section 7.7 in the current ESRS 1 is directly quoting Art. 2 from the Trade Secret Directive in paragraph 106 conditions (a)-(c), which aligns more clearly with existing EU law than the previous draft from EFRAG. However, the text is still qualifying this to be limited to information "corresponding to intellectual property, know-how or the results of innovation", which is narrowing down the scope and excludes other commercially sensitive information protected by the Trade Secret Directive. The quoted wording should therefore be deleted to ensure consistency and alignment with the EU Trade Secret Directive. Additionally, the ESRS could provide for more flexibility in this regard, following the approach in the GRI Standards. GRI 1 includes "confidentiality constraints" as a permitted reason for omission, and the reporting undertaking is required to explain the reasons for such omission. Members also highlight confusion and unclarity when reporting confidential information, especially justifying its omission to auditors.			
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We fully support the relief measures as regards the use of reasonable and supportable information that is available without undue cost or effort as it will significantly reduce the administrative burden on reporting undertakings. We believe this provision should be permanent and not subject to a time limit as proposed by some EFRAG SRB members (as mentioned in paragraph 76 of the [DRAFT] Basis for Conclusions. We strongly support the provisions outlined in ESRS 1 paragraph 92, which recognize the practical limitations of data availability in joint operations where the undertaking lacks operational control. Allowing the exclusion of such operations from the scope of environmental metric calculations is a pragmatic and necessary relief that enhances the feasibility and integrity of sustainability reporting and avoids duplicative reporting. In addition, we endorse the flexibility provided under ESRS 1 paragraph 91, which permits the use of metrics based on a partial scope of calculation. This approach acknowledges the evolving nature of data systems and reporting capabilities. Crucially, it encourages transparency by requiring undertakings to disclose the limitations of their current data coverage and to outline concrete actions aimed at improving completeness in future reporting periods.			

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Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	We would like to recommend the wording included in OPTION 2, since it better addresses our concerns on the sensitivity of the information disclosed and on the excessive burden in calculating quantitative disclosures. We understand that qualitative disclosures would be more decision-useful for users since forward-looking information usually relies on uncertain assumptions and is not easily comparable given the lack of standardised and mature methodologies. In any case, if relevant financial risks in this context are assessed, they will be reflected in the financial report. We note that applying anticipated financial effect disclosures to private subsidiaries, especially those of foreign multinational corporations imposes significant compliance burdens without delivering appropriate benefits to stakeholders or the broader market. Private subsidiaries (in particular those of foreign multinationals) typically do not raise capital independently in public markets and have no direct engagement with external investors. The typical rationale for sustainability disclosure—addressing information asymmetries between a company and its investors—does not apply in this context. All relevant sustainability risks and opportunities are already captured and reported at the consolidated group level. As such, requiring reporting at the subsidiary level provides no new insight to capital markets. Private subsidiaries typically roll up into the consolidated sustainability disclosures of their listed parent companies, which may already adhere to equivalent reporting frameworks (ISSB, TCFD, SEC) or can address the information needs of direct investors by other means than a public statutory financial disclosure. We recommend EFRAG to exempt private subsidiaries from anticipated financial effect disclosures.			
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	While we welcome the significant simplification efforts achieved in this disclosure requirement, we still question the relevance of quantitative data. Companies especially point out the difficulty of providing cash-flow forecasts, especially since it can raise confidentiality, strategic, and liability issues; and it is users, particularly investors, which are best placed to build their own forecasts based on information disclosed by preparers regarding their business model, risks, historical information, and targets. As a suggestion, the IFRS S1 reliefs in § 38 and § 39 should be integrated in the ESRS: 38. An entity need not provide quantitative information about the current or anticipated financial effects of a sustainability-related risk or opportunity if the entity determines that: (a) those effects are not separately identifiable; or (b) the level of measurement uncertainty involved in estimating those effects is so high that the resulting quantitative information would not be useful (see paragraphs 77–82).39. In addition, an entity need not provide quantitative information about the anticipated financial effects of a sustainability-related risk or opportunity if the entity does not have the skills, capabilities or resources to provide that quantitative information. Paragraphs 40, 41, and 42 address the quantified financial impacts of material climate-related risks and opportunities. Consistent with our response to Question 19, we support Option 2 and recommend that companies be required to disclose quantitative information only on a voluntary basis. In any case, datapoint in paragraph 41(f) should be suppressed.			
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We note how the ESRS are still more prescriptive while the ISSB standards follows the GHG Protocol and allows for more flexibility. The proposed revision in ESRS E1 (see AR18) does not fully align with IFRS S2, particularly paragraphs 29(ii), 29(iii), and application guidance B27. While IFRS allows entities to choose among the GHG Protocol approaches—equity share, financial control, or operational control—AR18 of ESRS E1 mandates financial control as the primary method, permitting operational control only in exceptional cases (see AR19). Additional clarity is required to avoid confusion in the interpretation of scope 1 and scope 2 emissions. Based on a comparative analysis of the input provided by industry players in their respective audited annual integrated reports tackling CSRD requirements, we notice that the concept of "Operational Control" within the relevant ESRS has been interpreted differently by companies and auditing firms. While certain actors report accounting for just one of the operational control criteria, others consider these cumulatively. This has de facto inevitably led to non-comparable data and uncertainties for all the relevant stakeholders. The reference to the financial consolidation approach (a widely well recognized perimeter applied in International Financial Reporting Standards (IFRS)) instead of the operational control approach, or at least the introduction of appropriate clarifications about how the latter should be interpreted by companies and auditing firms, would provide legal certainty, benefit the level playing field and avoid inconsistencies.			
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	General comment: We support the deletion of mandatory datapoints as proposed by EFRAG as it will enhance the effectiveness of sustainability reporting under the ESRS. However, we note that the reporting burden risks staying the same since most of the datapoints removed where less relevant, many of the underlying metrics remain, and multiple datapoints are now merged under the same disclosure requirement.			
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	These datapoints were assessed as voluntary after a thorough drafting process of the ESRS and should remain as such since their content, and therefore their relevance, have not changed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	Overall, the introduction of new mandatory datapoints, like microplastics, critical raw materials, or waste entails a significant increase in reporting burden, adds complexity and conflicts with the European Commission's simplification mandate, Particularly for the new disclosure requirement on secondary microplastics. Although EFRAG presents this new datapoint as a clarification of the existing disclosure requirement, it significantly extends its scope to downstream value chain Disclosure requirements should focus on what companies can control and measure. Secondary microplastic generation depends on downstream use and end-of-life handling, where companies have limited visibility/control. Estimating downstream emissions of secondary microplastics is unfeasible at present due to the absence of validated, standardized methods for quantifying and attributing such particles across complex, context-specific degradation pathways in the value chain. The new datapoint poses material challenges to auditability; credible materiality assessments require traceability, reliable measurability, and risk characterization. No existing risk-based framework allows undertakings to evaluate how their activities, or actors in a company's value chain, may contribute to potential downstream impacts from secondary microplastics. The amended definition for microplastics draws from the restriction under Annex-XVII REACH (entry78). However, this definition covers synthetic polymer microparticles (SPM), which includes materials beyond microplastics. Importing this definition into ESRS creates legal ambiguity and undermines fit-for-purpose reporting. Primary microplastics (ESRS|E2-4 paragraph16(b)(i)) reporting is required in the EU under the REACH restriction addressing the use of intentional SPMs (Annex-XVII, Entry78), and the future regulation on pellet loss prevention. This subjects EU companies to multiple reporting mandates. The disclosure requirements in E2-4 should focus on microplastics leaving the undertaking's facilities as emissions rather than products. We recommend the proposed disclosure requirement on secondary microplastics in paragraph16(d) of the amended ESRS|E2 be removed from the final technical advice to the Commission, alongside removal of definitions related to synthetic polymer microparticles and secondary microplastics in Annex-II.			
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	The introduction of the concept of "fair presentation" raises significant concerns. We understand that the notion of "fair presentation" would increase alignment with ISSB standards and help reporting undertakings to further clarify the expectations related to analysing entity-specific material IROs. However, we agree with some EFRAG SRB members that it can lead to additional obligations for companies, as they would not only need to comply with the standards but also be required to demonstrate that the information reported is a fair representation with respect to all relevant stakeholders. At the same time, this could also potentially increase Boards members' responsibilities and auditor costs. The ESRS introduce impact materiality, encompassing environmental and social dimensions beyond financial relevance. Applying a fair presentation standard in this context risks disproportionate legal, assurance, and reputational exposure for preparers. Sustainability data is often forward-looking, qualitative, and judgement-based, lacking the evidentiary rigor of financial data. The absence of established practices and experience for impact materiality makes it difficult to define what constitutes a "complete and faithful" representation, increasing uncertainty and inconsistency. We therefore recommend EFRAG to thoroughly assess the implications of implementing the concept of "fair presentation" in sustainability reporting.			
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	This new threshold may require companies to include disclosures on countries that are immaterial, resulting in information that is not decision-useful for users and adding unnecessary complexity for preparers. We recommend reverting to the original threshold to maintain focus on materiality and reduce reporting inefficiencies. This will also entail a larger audit scope. As currently formulated, S1-5 lacks a clear connection to a specific material sub-topic and does not provide decision-useful information, except in the limited context of secure employment. The requirement is triggered whenever the own workforce is deemed a material topic, yet the stated objective—to offer insight into employment practices—is not effectively achieved through headcount and employee breakdowns alone. If S1-5 is retained, it should be made clear that it only should be disclosed if related to a material topic and relevant to the reader. We strongly propose the removal of the requirement to disaggregate employees by contract type (permanent, temporary, non-guaranteed). This level of granularity introduces significant complexity for preparers while offering limited value to users. Definitions of contract types vary widely across jurisdictions, resulting in inconsistent and non-comparable data. Moreover, these categories tend to fluctuate throughout the year, particularly in sectors with seasonal or project-based employment, further undermining the reliability and relevance of the data. Without harmonized definitions, the risk of misinterpretation increases substantially. For multinational companies, the reporting burden outweighs the potential benefits. Should the split be maintained, it is imperative that clear and standardized definitions be provided to ensure consistency and comparability across companies and sectors.			
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	We flagged this disclosure requirement as potentially burdensome as the benchmarks necessary to carry out the assessment are not available to all companies and/or countries. While the amended ESRS S1 methodology prioritizes the use of nationally recognized living wage benchmarks, this approach introduces a significant risk of inconsistency across geographies. The definition and calculation of living wage benchmarks can vary widely from country to country, depending on local institutions, data availability, and socio-economic conditions. Without a standardized framework or clear disclosure requirements on which tier of the hierarchy is used, companies may face challenges in ensuring comparability, transparency, and internal alignment. This could lead to fragmented reporting, misinterpretation of wage adequacy, and reputational risks if stakeholders perceive wage disclosures as insufficient or misleading. The changes proposed seem to partially address these concerns as they give more clarity and flexibility to reporting undertakings.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	We understand the need for consistency between EU legislation, especially between the CSRD and the SFDR and we welcome the simplification changes proposed by EFRAG in this regard. However, these metrics are often not collected or used (at least in the way the datapoint is worded) by reporting undertakings. Legislators and standard-setters should simplify and streamline disclosure requirements in other EU legislation so ESRS simplification is not compromised. In general, these datapoints are not necessary information to understand the group's impacts on sustainability matters, and information necessary to understand how sustainability matters affect the group's development, performance and position (which is the wording in Article 19a and 29a).			
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	While we welcome the simplification proposals for DR E4-4, for biodiversity and other nature related topics (e.g. freshwater) the current challenge is that the impact is not measurable in a single metric that is comparatively easy to measure (e.g. GHG equivalents) but often in a multitude of potential metrics. The potential metrics are often not clearly defined and without clear boundaries, while they should be standardized and must be comparable between different companies and ideally also sectors. Therefore, comparable to the climate agreements and actions, as a first step we need international scientific consensus on meaningful environmental metrics as a basis for setting ambitious and consistent global reporting requirements. If retained, AR 26 should be reviewed accordingly. However, we note that EFRAG has removed other similar prescriptive and potentially behavioural application requirements from the ESRS.			
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	While we agree with the deletion of that voluntary datapoint, in [DRAFT] DR S1-15 it is impossible to apply hourly pay since some work contracts rely specifically on there being no working hours (annual working days). Creating a methodology to approach hourly pay would defeat the purpose of this kind of contract and couldn't represent accurately the hourly pay of such workers. In addition, disclosing only one gender pay gap disadvantages disproportionately groups that have companies in emerging countries, as the pay in such countries will be compared to those of developed countries. As regards [DRAFT] DR S1-15 44(b), the indicators are too global and not relevant, difficult to prepare and again, will disproportionately discriminate global groups. In addition, a consequent amount of the top management's remuneration relies on variable income, which in turn relies on the financial results and statements; this indicator cannot therefore be calculated accurately before the certification of the financial statement. The preparation of these disclosures is significantly challenging for large multinational groups with numerous subsidiaries. This would require having data on the annual salary of each employee of the group, which would have to be collected outside the HR and payroll system. Obtaining such data would be also difficult in the context of the EU data protection law, as it is only available to the employer at subsidiary level. We reiterate that [DRAFT] DR S1-15 paragraph 44(a) should be calculated on the basis of comparable profiles (e.g. "Gender pay gap by employee category"). [DRAFT] DR S1-15 44(b) should give the possibility to present only an adjusted ratio or to use the concept defined previously by the EFRAG of "countries with a significant number of employees" and disclose the ratio of such countries, or the 5 biggest countries of the company (e.g. current S1-8).			
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	It is challenging for a company to distinguish between SME and non-SME suppliers. The distinction is not made in ERP systems. It is also unclear if ESRS G1-6 requires to distinguish the SME category or to include SMEs in the breakdown by sector. Instead, EFRAG could ask: -If the company has a procedure to avoid late payments, it can disclose it (as is currently the case); and if it exists, the specific procedure for SME suppliers. -The average payment period indicator, but without distinguishing between SMEs and non-SMEs (information not available).			
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		It is important that the ESRS are properly translated into other languages by ESG experts in order to minimise errors and interpretational confusion.			
Survey	Cefic - The European Chemical Industry Council	Business association (other than association of financial institution)	Belgium	35.ESRS1_7.1.	Do you agree with the amendments of this chapter?	I disagree		ESRS1	7.1 Presenting comparative information	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	PensionsEurope	Association of financial institutions	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We appreciate the clarifications on IROs and related topics (ESRS 1, paras. 2 and 22), which enhance understanding. However, the simplified DMA approach, especially for complex value chains, may narrow the scope of disclosures. Additional guidance is required to ensure assessments remain robust. We support more detailed reporting on companies' assessment processes. The determination of negative impacts guided by scale, scope, and irremediability, aligns well with the UNGPs and OECD Guidelines. Yet, annual reports often lack sufficient detail on how these indicators and impacts inform their DMA (methodologies) and materiality thresholds. We welcome the flexibility to choose between top-down and bottom-up DMA approaches. Making Appendix A illustrative rather than prescriptive appropriately reduces rigidity. While the top-down method can be pragmatic, companies should clearly document their process and address potential blind spots. A quick scan of initially non-material topics may help mitigate these blind spots. Reporting at the IRO level may reduce comparability across companies. Clear guidance and examples illustrating differences between topical and IRO-level disclosures would support preparers in making informed choices. We also encourage undertakings to disclose what triggered changes in materiality assessments over time. Value Chain Integration We recommend stronger alignment between due diligence and value chain reporting. When negative material impacts are identified through due diligence, stakeholder engagement could be required. Companies should explain (i) chosen value chain boundaries, (ii) coverage per material topic, and (iii) data quality for key metrics. Where policies or targets do not cover the value chain for material IROs, constraints and intended leverage mechanisms should be clarified, including time-bound plans for extension.			
Survey	PensionsEurope	Association of financial institutions	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We are not able to definitively favor the net impact approach (reflects actual impacts after mitigation measures) over gross impact reporting (based on pre-control scenarios; which may become overly theoretical at the expense of practicality and be overly burdensome for companies). We find one uniform approach for both actual and potential impacts (either net or gross) with sufficient safeguards most important.			
Survey	PensionsEurope	Association of financial institutions	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We support reducing duplication, particularly through clearer guidance on connected information. We support the proposed amendments. When conducting sustainability disclosure analysis, we find that repeating content across sections of the annual report (most notably regarding policies, actions, and targets) only enhances complexity at the expense of transparency. We also welcome the use of appendices for detailed metrics. This structure enhances readability and provides a clearer overview for users, while maintaining access to relevant data.			
Survey	PensionsEurope	Association of financial institutions	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We do not support the removal of the requirement to disclose whether a Policy, Action, or Target (PAT) or timelines have been removed for material topics. Transparency is essential, particularly for material negative impacts and risks. Therefore, choosing to remove PATs should require an explanation. Without an explanation, companies may simply state "no PAT" without clarifying existing gaps or intended actions, weakening accountability and comparability for investors. We also have concerns about the reformulation of certain mandatory datapoints into Application Requirements (ARs). The legal status of ARs may be unclear to preparers, potentially leading to inconsistent interpretation and reduced enforceability. Clear communication that ARs represent mandatory methodological guidance is essential to maintain consistency and reliability in reporting. Finally, we support the restructuring of the reporting architecture, which promotes conciseness and reduces duplication. It is important that companies focus on reporting what is most material to their operations, while maintaining clarity and completeness for users of sustainability information.			
Survey	PensionsEurope	Association of financial institutions	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We welcome the proposed amendments, which significantly enhance clarity and accessibility. The removal of "may disclose", relocation of mandatory application guidance under each Disclosure Requirement (DR), and reformulations align well with Lever 4's objective of improving understandability, clarity and accessibility. The restructuring of ESRS 1, clearly separating Disclosure Requirements (DRs) and Application Requirements (ARs), is a positive step towards useability. Furthermore, removing sub-subtopics and being more consistent with the use of topics and sub-topics improves navigation and interpretation. The clearer articulation of double materiality, especially the distinction between impact and financial materiality, supports more consistent application across sectors. To build on these improvements, we recommend to: 1. Begin the ESRS 1 with a clear statement that ARs linked to DRs are mandatory and specify whether they are subject to assurance. 2. Introduce stable identifiers for each mandatory datapoint and AR (e.g., E1-6.M1 for a datapoint, E1-6.AR1 for its application requirement). This would improve navigation, reduce tagging errors, and support high-quality digital reporting and tool integration. These enhancements would make the distinction between mandatory and non-mandatory content immediately clear, consistently applied, and easier to implement across systems. We therefore support the amendments, subject to these refinements, which are fully aligned with the intent of Lever 4.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	PensionsEurope	Association of financial institutions	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We acknowledge that the Non-Mandatory Illustrative Guidance (NMIG) can offer valuable support to companies by clarifying reporting expectations and providing practical examples. This can enhance consistency and improve the decision-usefulness of sustainability information for investors. However, the current legal status of NMIG remains unclear, which may lead to interpretive uncertainty. We support EFRAG's recommendation that NMIG content should not be included in the Delegated Act. Incorporating illustrative material into legally binding regulation could blur the distinction between mandatory and non-mandatory content, potentially increasing compliance burdens and undermining the simplification objectives. Should the European Commission decide to include NMIG content in the Delegated Act, we recommend it be presented as a separate annex. The annex introduction should clearly state that the content is for guidance purposes only and does not carry compliance obligations. It should also explicitly confirm that undertakings are not required to justify deviations from these illustrative elements, thereby maintaining a clear distinction from mandatory disclosure requirements.			
Survey	PensionsEurope	Association of financial institutions	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We support the introduction of horizontal undue cost or effort relief. However, safeguards are essential to prevent overuse (particularly in value-chain metrics) which could undermine data consistency and comparability. Companies invoking this relief should disclose the rationale, scope excluded, and any material gaps to preserve decision-usefulness for investors. On the use of estimates, we acknowledge the benefit of flexibility for preparers. At the same time, investors require estimates that are assurable, transparent, and comparable. We recommend clear criteria for estimation methodologies, including disclosure of bandwith of uncertainty, data coverage ratios, and plans to improve data quality over time. This will help maintain the integrity of reported information. Regarding financial effects, we support Option 1, which aligns with IFRS relief and is familiar to large undertakings that fall within the scope of the CSRD. Quantitative disclosures are critical for valuation, performance analysis, and ste ESRS E1 must cover impact & risk (target alignment and transition investments). Competitive advantages are derived from linking sustainability impacts to financial statements, not merely harmonizing language.			
Survey	PensionsEurope	Association of financial institutions	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We support allowing investee companies to balance thorough reporting with avoiding undue cost or effort. This flexibility may be most relevant during early implementation phases. However, we stress the importance of continuous improvement of reporting efforts by companies over time. To maintain reliability and comparability, especially across peers and reporting periods, any room for using reliefs should be accompanied by clear safeguards. These include: a transparent rationale for invoking the relief, criteria used in the decision, disclosure of excluded scope, and time-bound plans to improve data coverage and quality. As noted in the Basis for Conclusions, aligning these reliefs with IFRS S1 enhances interoperability.			
Survey	PensionsEurope	Association of financial institutions	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	We acknowledge and support the changes to anticipated financial effects but believe that Option 1 raises significant short-term concerns, including estimation uncertainty, increased litigation risk, and the lack of standardised methodologies and comparable data to ensure consistent disclosures. Such forward-looking and sensitive information is particularly difficult to report at present and may give a false impression of certainty. We therefore recommend adopting Option 2, as it offers a more balanced and realistic approach. It recognises the practical challenges, legal risks, and audit impracticability of forward-looking disclosures and allows time for the development of reliable data and methodologies. Ideally, this topic would have been introduced as a phase-in provision under the revised ESRS; its absence significantly increases effort for companies at this stage. We also note that Option 2 allows for the voluntary disclosure of quantitative information, so that ISSB interoperability is still easily achievable. However, we recognise that to achieve full interoperability with ISSB standards, a phased-in transition towards Option 1 for environmental topics in the longer term could be considered. Should Option 1 be implemented in the future, it should be fully aligned with ISSB standards to avoid unnecessary additional burden. This means removing the specification that relief applies only when no reasonable and supportable information from business plans is available, as even minor wording differences create extra work, and including an explicit provision allowing undertakings to omit quantitative information where they lack the skills, capabilities, or resources to provide it.			
Survey	PensionsEurope	Association of financial institutions	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	We welcome the amendments aligning disclosure criteria with data requested by banks. As noted in the log of amendments, this alignment with IFRS S2 supports interoperability and consistency. We recognise the practical challenges companies may face due to evolving methodologies and limited data availability. To ensure disclosures remain both feasible and decision-useful, we strongly support the consistent application of the comply or explain principle. Under this approach, companies should disclose the required quantitative information by default. Where this is not possible, a clear and substantive explanation should be provided. Such disclosures offer valuable insights into a company's data infrastructure and risk management practices. Applying comply or explain provides short-term flexibility while promoting transparency and long-term improvement. It supports the ambition of full quantitative reporting as methodologies mature, ensuring the framework remains practical for preparers and useful for investors.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	PensionsEurope	Association of financial institutions	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	We welcome the increased interoperability between ESRS and IFRS S1/S2 (both in wording and the reliefs) We support maximum interoperability, provided it does not compromise the ESRS's double materiality principle. Most asset owners (pension funds) require both the financial dimension offered by IFRS S1/S2 and the broader impact dimension of ESRS. Key considerations: ESRS E1 must remain broader than IFRS S2, covering both impact and risk dimensions, including target alignment, transition CAPEX, and forward-looking metrics. The true value for investors lies in linking sustainability impacts to financial statements, not merely harmonizing terminology.			
Survey	PensionsEurope	Association of financial institutions	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We consider the proposed datapoints highly relevant for investors, as they clarify key elements essential to assessing a company's sustainability performance and risk exposure. Their inclusion can enhance transparency, comparability, and the overall decision-usefulness of reported information.			
Survey	PensionsEurope	Association of financial institutions	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	- We welcome the emphasis on ESRS as a fair-presentation framework, aligned with IFRS S1, and with materiality as a general filter. This could help reduce 'checklist-reporting' and improve decision-useful information for investors. - There is the concern that 'fair presentation' could be interpreted by auditors as 'true and fair view' of the annual accounts, but this is only applicable with reasonable assurance, not with limited assurance (as prescribed by the CSRD). This mean that, in line with paragraph 51 of the BfC, it should be made sufficiently clear that it is the reporting company's role to assess materiality, while the assurance providers executes only a review of the process. - Since EFRAG indicates that it is not their role to specify the auditor's role and mandate, we ask EFRAG to address this issue with the European legislator. - However, some question whether fair presentation should solely on management judgement. To safeguard comparability and reliability, members support some sort of safeguards. For example, for the accountant to monitor the fair presentation.			
Survey	PensionsEurope	Association of financial institutions	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	We welcome the inclusion of key elements such as collective bargaining and periodic revision of minimum wages, which are relevant for assessing wage adequacy. However, we share concerns raised by EFRAG SRB members regarding clarity and comparability. To support investor analysis, it is essential that companies disclose which prong of the wage adequacy methodology is used. Without this, it is difficult to assess the robustness of reported figures or compare across peers and through time. We recommend referencing the ILO's internationally recognised definition of a living wage to strengthen consistency. As currently phrased, adequacy may be interpreted as meeting national minimum wage levels, which in many non-EU countries fall short of covering basic needs. We are convinced that the current phrasing risks misrepresenting wage conditions and undermines comparability. The current hierarchy of wage indicators could also lead to misleading conclusions. A company reporting 100% of employees earning at least the minimum wage may appear to outperform a company that reports 80% earning a living wage, despite the latter reflecting a higher standard. We suggest reversing the order: prioritise living wage estimates, and only refer to minimum wage data where living wage benchmarks are unavailable. Finally, we welcome EFRAG's field testing initiative, which will help refine the methodology and improve practical implementation.			
Survey	PensionsEurope	Association of financial institutions	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	We support the consolidation of datapoints and removal of overlaps, as this can improve readability and reduce duplication for preparers. However, it is essential that investor use-cases under SFDR remain fully supported. For asset owners and -managers relying on ESRS data to meet SFDR Annex I PAI reporting, changes must ensure complete and computable coverage of all relevant indicators (even after deletion and mergers). All SFDR Table 1 datapoints should remain mandatory within ESRS topics. These indicators are critical to the functioning of the Sustainable Finance Disclosure Regulation and must remain accessible to financial institutions. We specifically object to the proposed removal of Indicator 3, table 1 (Gross GHG emissions intensity). The rationale that users can calculate this themselves overlooks practical challenges: It creates inefficiencies and increases the burden on financial institutions. It risks inconsistent methodologies across undertakings and may promote cherry picking. It undermines the SFDR's goal of providing standardised, comparable data. We would also prefer the obligation to report total emissions distinctly (even though it can be derived from combining Scope 1, 2, and 3 figures). Yet, the intensity ratio is a distinct and decision-useful metric that is of far greater importance to us. Its removal could lead to misleading comparisons and reduced data quality.			
Survey	PensionsEurope	Association of financial institutions	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	The ESRS GDR-T still require companies to publish information on the methodology, baseline value, scope of target etc.			
Survey	PensionsEurope	Association of financial institutions	Belgium	31.	ESRS S1 DR1S: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	We believe the adjusted gender pay gap is a more meaningful indicator for investors than the unadjusted metric, as it better reflects wage equity and supports robust peer and trend comparisons. While we understand the unadjusted metric was introduced to align with SFDR requirements, it is worth noting that the ESAs have previously acknowledged its limitations and proposed replacing it with the adjusted metric in the revised RTS. This was not pursued due to alignment constraints with the ESRS at the time. We see this as an opportune moment to signal that both ESRS and SFDR should adopt the adjusted gender pay gap as the primary datapoint. This would improve decision-usefulness and better reflect investor needs. The additional reporting burden for companies is expected to be limited, as the adjusted metric is already widely used in response to investor demand.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	PensionsEurope	Association of financial institutions	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	We recommend greater transparency for the procurement practices of large undertakings, as these can significantly influence value chain impacts. For example, strict contractual terms (such as tight delivery deadlines) may unintentionally contribute to adverse labour conditions, including excessive overtime. Improved transparency in how suppliers are managed would help investors better assess social risks and the effectiveness of a company's due diligence processes.			
Survey	PensionsEurope	Association of financial institutions	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We recognize that the ESRS are overly burdensome, and a significant number of data points is irrelevant for investors and stakeholders. At the same time, it needs to be avoided that important data points for pension investors will be removed that are relevant for the responsible investment policies of pension funds or their own reporting requirements under the SFDR . The following points are most relevant for our pension fund investors: ESRS 2 •Governance (2)GOV-1; GOV-2; GOV-3; GOV-4; GOV-5 •Strategy (3)SBM-3 •Metrics and Targets (5)MDR-M; MDR-T ESRS E •Climate and Energy (E1)E1-1; E1-3; E1-4; E1-5; E1-6; E1-7; E1-8; E-9 •Pollution (E2)E2-4; E2-5; E2-6 •Water and Marine Resources (E3)E3-1; E3-4; E3-5 •Biodiversity and Ecosystems (E4)E4:1; E4-2; E4-4; E4-5; E4-6 •Resource Use and Circular EconomyE5-4; E5-5 ESRS S •Own Workforce (S1)S1-1; S1-2; S1-6; S1-7; S1-8; S1-9; S1-13; S1-14; S1-16; S1-17 •Workers in the Value Chain (S2)S2-1 •Affected Communities (S3)S3-1 •Consumers and End-Users (S4)S4-1 The majority of these data points have been maintained in the exposure draft. We support this decision.			
Survey	PensionsEurope	Association of financial institutions	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	-			
Survey	PensionsEurope	Association of financial institutions	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		- The questionnaire states that some requirements were not changed in the amended ESRS as they are subject to level 1 changes. This a.o. relates to the meaning of 'compatibility with 1.5 degrees" for the Transition Plans disclosures. In that respect we do note that clarification is needed, for example re. the base year (reference point) for measuring the reduction of greenhouse gas emissions and setting climate targets. (Explanation: Companies that started early with Climate Transition Plans (KTP), for example, may use 2019 as their base year. However, as CO_2 data and other information improve over time, it may be useful to use a more recent year as the base year. This raises practical considerations, such as how to handle reporting—especially in terms of comparability with previous annual figures. Guidance on this could be helpful, particularly regarding comparability between companies. It could also support establishing an accepted way of working for the external auditor.) - By way of guidance, we propose EFRAG to develop a standard model report that includes the minimum reporting requirements per ESRS, such as a structure, table of contents with tables and/or graphs, and explanatory notes. (Explanation: For financial accountability reports like annual accounts, the use of standard model reports has been common practice for years. Applying a similar approach to sustainability reporting based on ESRS would provide clarity for both preparers and auditors regarding what and how information should be reported.)			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	see our opinion paper, section 2, ESRS 1, paragraph 1 (page 3)			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	see our opinion paper, section 2, ESRS 1, paragraph 2 (page 4)			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	see our opinion paper, section 2, ESRS 2, para. 4 (page 5)			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS2; E1; E2; E3; E4; E5	Feedback on NMIG for ESRS 2 and E1 to E5 is provided in Part 3 of our response (comment table)			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	see our opinion paper, section 2, ESRS 1, para. 3-4 (page 4)			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	The relief should only apply to value chain metrics but not for own operations. See our opinion paper, section 2, para. 4 (page 4)			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We recommend that EFRAG chooses Option 1, which would require reporting of quantitative information and, if not possible, qualitative information. Only this option is in line with EFRAG's mandate to improve interoperability with the IFRS standards. see our opinion paper section 2, ESRS 2, para. 3 (page 5)			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We note that certain proposed amendments could impede interoperability between the ESRS and IFRS S1 and S2. However, given that the IFRS standards have not been tested in practice and have simplification potential on their own, we recommend that EFRAG prioritizes simplifications and improvements derived from reporting experience over IFRS interoperability.			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	Despite significant reductions in "shall" datapoints, EFRAG achieved to preserve the key requirements that keep the core of the ESRS intact. However, for the environmental reporting standards, we note that a further reduction would likely impair their overall usefulness.			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	22.E1.	Comments on deleted datapoints in ESRS E1	I agree	Despite significant reductions in "shall" datapoints, EFRAG achieved to preserve the key requirements that keep the core of the ESRS intact. However, for the environmental reporting standards, we note that a further reduction would likely impair their overall usefulness.			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	22.E2.	Comments on deleted datapoints in ESRS E2	I agree	Despite significant reductions in "shall" datapoints, EFRAG achieved to preserve the key requirements that keep the core of the ESRS intact. However, for the environmental reporting standards, we note that a further reduction would likely impair their overall usefulness.			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	22.E3.	Comments on deleted datapoints in ESRS E3	I agree	Despite significant reductions in "shall" datapoints, EFRAG achieved to preserve the key requirements that keep the core of the ESRS intact. However, for the environmental reporting standards, we note that a further reduction would likely impair their overall usefulness.			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	22.E4.	Comments on deleted datapoints in ESRS E4	I agree	Despite significant reductions in "shall" datapoints, EFRAG achieved to preserve the key requirements that keep the core of the ESRS intact. However, for the environmental reporting standards, we note that a further reduction would likely impair their overall usefulness.			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	22.E5.	Comments on deleted datapoints in ESRS E5	I agree	Despite significant reductions in "shall" datapoints, EFRAG achieved to preserve the key requirements that keep the core of the ESRS intact. However, for the environmental reporting standards, we note that a further reduction would likely impair their overall usefulness.			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We support the decision to include mandatory metrics on water withdrawal and discharge as well as on biodiversity transition plans. Reporting information on water withdrawals and discharges should come with additional effort because both figures are inputs to the already existing metric on water consumption. For biodiversity transition plans, EFRAG introduced conditions on when they would need to be disclosed. Also see our opinion paper on ESRS E3 and E4			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The datapoint on secondary microplastics is already included in the ESRS delegated act, but respective requirement is unclear. In this regard, we consider the proposal an improvement. However, specific calculation guidance is still missing and should be developed in the NMIG.			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	see our opinion paper, section 2, ESRS 1, para. 1 (page 3)			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Please see our detailed feedback on ESRS 1 and 2, ESRS E1, E2, E3, E4 and E5 in the excel sheet submitted in part 3 of this survey and in our feedback paper.			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Please see our detailed feedback on ESRS 1 and 2, ESRS E1, E2, E3, E4 and E5 in the excel sheet submitted in part 3 of this survey and in our feedback paper.			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Please see our detailed feedback on ESRS 1 and 2, ESRS E1, E2, E3, E4 and E5 in the excel sheet submitted in part 3 of this survey and in our feedback paper.			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Please see our detailed feedback on ESRS 1 and 2, ESRS E1, E2, E3, E4 and E5 in the excel sheet submitted in part 3 of this survey and in our feedback paper.			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Please see our detailed feedback on ESRS 1 and 2, ESRS E1, E2, E3, E4 and E5 in the excel sheet submitted in part 3 of this survey and in our feedback paper.			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Please see our detailed feedback on ESRS 1 and 2, ESRS E1, E2, E3, E4 and E5 in the excel sheet submitted in part 3 of this survey and in our feedback paper.			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Please see our detailed feedback on ESRS 1 and 2, ESRS E1, E2, E3, E4 and E5 in the excel sheet submitted in part 3 of this survey and in our feedback paper.			
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Please see our detailed feedback on ESRS 1 and 2, ESRS E1, E2, E3, E4 and E5 in the excel sheet submitted in part 3 of this survey and in our feedback paper.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Please see our detailed feedback on ESRS 1 and 2, ESRS E1, E2, E3, E4 and E5 in the excel sheet submitted in part 3 of this survey and in our feedback paper.			
Survey	Baker Hughes	Preparer (non-financial preparing a sustainability report)	United States	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	While the wording may be simplified, the revised definition of materiality fails to simplify the DMA or clarify materiality determinations. The definition of materiality in Paragraph 21 should derive from the undertaking's determination of what is "material" to the users of its financial and sustainability statements. It should enable undertakings to define materiality based on its unique situation. An acceptable standard for financial materiality would be the standard set out in the relevant financial reporting regulation or as determined by undertaking's corporate enterprise risk programs, which serve to identify and manage significant or material risks to companies. the value chain boundaries should be clarified and limited to the undertaking's direct business relationships. Appendix B "Qualitative Characteristics of Information" contains subjective guidance therefore should be classified as interpretive, not authoritative or legally binding. It reads like a "writers' guide" for sustainability reports and often states the obvious, like the report should provide a "faithful representation" and be "understandable." There is a lack of clarity around what constitutes a "fair" view from the users' perspective. Such terms are very subjective and depend on the perspective of the reader, thereby presenting potential challenges in terms of exercising judgement on what is needed to fulfil the requirement. Especially given that sustainability reporting (and the concept of impact materiality) is less mature than financial reporting, where the concept of "fair presentation" is better-established. The proposed amendments are likely to increase legal risks and audit costs. from an assurance perspective, the amendments will allow third-party auditors to expand their control and authority. This contradicts the Commission's February 2025 Omnibus proposal stating that a goal of the simplification exercise is "to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process."			
Survey	Baker Hughes	Preparer (non-financial preparing a sustainability report)	United States	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The process for characterizing potential risks in Appendix C provides clarity that was lacking in the original ESRS. However, the new guidance remains difficult to apply and may give rise to interpretative challenges creating a risk of inconsistencies in assurance and a lack of comparable reporting. We disagree that Appendix C provides simplification. For actual impacts, assessing materiality based on the situation "before" the impact can be challenging, especially if timing and effectiveness are unclear. This is likely to result in diverging interpretations between companies and assurance providers. For potential impacts, the principle that materiality should be assessed without considering the effect of significant "ongoing" actions introduces similar judgment challenges, as the distinction between when an action reduces risk structurally versus when it merely controls the risk for now is often a matter of judgment. This will be interpreted differently by preparers and auditors, especially in sectors with mature risk management systems, such as aviation, pharmaceuticals, nuclear energy and oil and gas sectors. As proposed, the numerous variations on potential impacts that have mitigation actions are overly complex. The definition of "potential" should be limited to "No prevention or mitigation action has been taken or mitigated." The other definitions of "potential" include scenarios where mitigation actions are already in place. Currently, the proposal would require disclosure of all potential unmitigated and associated risk mitigation measures. Many sectors with high risk activities such as construction, energy, automotive, and aerospace have well established and mature risk management programs to mitigate and eliminate risk. Evaluation of these activities at the gross risk level would result in disclosures that are not relevant to stakeholders. If this proposed approach is maintained, further illustrative guidance is needed to clarify how mitigation affects materiality judgments to support consistency, auditability, and alignment with investor expectations.			
Survey	Baker Hughes	Preparer (non-financial preparing a sustainability report)	United States	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We caution against the rigidity introduced by the gross vs. net approach in Appendix C. Framing materiality around gross impacts risks turning the exercise into a theoretical checklist, disconnected from sustainability reporting's purpose of accountability, comparability, and faithful representation. Safety topics, for instance, would be reported regardless, as they are business priorities even without annual incidents. By treating all impacts as material, the gross approach risks over-reporting and obscuring meaningful disclosures. Finally, risk evaluation remains insufficiently defined. Without clarification, auditors may impose approaches inconsistent with established residual risk methods, creating confusion and undermining connectivity with annual financial reporting. We therefore recommend removing Appendix C to preserve a more flexible, principles-based approach.			
Survey	Baker Hughes	Preparer (non-financial preparing a sustainability report)	United States	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2				
Survey	Baker Hughes	Preparer (non-financial preparing a sustainability report)	United States	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Our proposal to adapt the definition of "dependencies" by including the word "directly": Dependencies: The situation of an undertaking being directly dependent on natural, human and/or social resources for its business processes.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Baker Hughes	Preparer (non-financial preparing a sustainability report)	United States	35.E1-9.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The revised standard does allow for the disclosure of an undertaking's emissions removals calculations methodology but does not include avoided emissions. Recommendation is to include avoided emissions reference in paragraph 35 (58 amended). "If it has implemented AVOIDED GHG EMISSIONS, GHG removal OR storage projects, the undertaking shall disclose information about AVOIDED GHG EMISSIONS OR GHG removal projects it has developed in its own operations or contributed to in its upstream and downstream value chain..."	E1	Disclosure Requirement E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The new ESRS1 does not cover the following issue. What if a (positive or negative) material impact is identified but no metric is available? For example, regarding biodiversity preservation and imapcts on species (biocontrol), there are few metrics that can be collected without high cost effort and time. How do you deal with that?			
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I disagree	* It does not make sense to ahve a policy for each significant topic. For example, biodiversity ... --> there should not be policies required for all significant topics but only when it makes sense from an organisational point of view * As stated above there are topics which might be significant but for which it is very complicate (or even impossible) to have metrics and hence targets. This point is not adressed. * Another example, the number of empoyee complaints is a mandatory KPI's. Let's say that it is a sigificant topic as well (employee well bieng). How can you set target on the numbers of employees complaints? What I mean is that there are metrics and actions which are out of the control of a company. * An emphasis for making targets should be put on negative impacts and not on positive impact. For example, if ou a solar company, why would you set up targets regarding the positive impact that you have by using renewable energy? And which target would you put?			
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I disagree	The previsou framework was clear. I would not ahve chnaged that.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	see comments above			
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	See above comments			
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	This kind of "predictions' are so unaccurate that it is not worth spending time in making it.			
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree				
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	* E4: having a transaitional plan make only sense when you have a negative impact. So this DP should be mandatory only in the case of engative imapct			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree				
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree				
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree				
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	I am not sure tif the proposed improvements will prevent issues identified in previous comments regarding E4. In particular: 1. When setting targets a distinction should be made between negative and postiive impact. For positive imapct, it should not be mandatory to set targets; 2. How do you set targets, when you are not able to make metrics with reasonable efforts			
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree				
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree				
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Floridienne	Preparer (non-financial preparing a sustainability report)	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Eurogroup for Animals	NGO	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	Eurogroup for Animals welcomes the clarifications and simplifications to the Double Materiality Assessment (DMA) process. We stress the importance of ensuring that simplification does not dilute the scope or quality of reporting on material sustainability topics, including animal welfare: - The materiality principle continues to capture indirect and upstream impacts of business activities on animal welfare, especially along supply chains. - Companies should be required to assess and disclose impacts on animal welfare where relevant, even when the topic might be considered "non-material" at first glance, to avoid underreporting. - Guidance should be provided on how to apply the DMA in relation to animal welfare, to ensure consistent reporting across sectors.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Eurogroup for Animals	NGO	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Eurogroup for Animals welcomes the effort to clarify the "gross versus net" approach in the Double Materiality Assessment (DMA), as it can contribute to more consistent reporting. We stress that the guidance must ensure that significant impacts on sustainability topics, including animal welfare, are not excluded from reporting solely because mitigation or prevention actions exist. We recommend that EFRAG requires companies to: - Report on the effectiveness of those measures and any residual impact, rather than assuming full remediation removes the need for disclosure. - Ensure that ongoing mitigation actions for potential impacts are clearly documented, including quantitative information where possible.			
Survey	Eurogroup for Animals	NGO	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Eurogroup for Animals	NGO	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Eurogroup for Animals	NGO	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Eurogroup for Animals	NGO	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Eurogroup for Animals	NGO	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Eurogroup for Animals	NGO	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Eurogroup for Animals	NGO	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Eurogroup for Animals	NGO	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Eurogroup for Animals	NGO	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Eurogroup for Animals	NGO	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Eurogroup for Animals	NGO	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Eurogroup for Animals	NGO	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Eurogroup for Animals	NGO	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Eurogroup for Animals	NGO	Belgium	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DUFAS	Association of financial institutions	Netherlands	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Clarification on IRO and topics is considered helpful (ESRS 1, paragraphs 2 and 22) The simplified DMA approach, particularly for complex value chains, risks reducing the scope of reported information. We welcome (1) additional guidance to safeguard the robustness of assessments and (2) more substantial reporting on an assessment process, including more detailed information on the assessment related to UNGPs and OECD Guidelines, which we find highly useful, and materiality thresholds that they have implemented. The choice between a top-down or bottom-up DMA approach provides valuable flexibility for different undertakings' circumstances. We recommend making the topic list in Appendix A illustrative rather than mandatory. The top-down approach too requires thorough documenting, also on how companies aim to avoid blind spots, covered by the text "unless an assessment at the individual level of IROs is needed to conclude on their materiality". We recommend that companies conduct a quick-scan of the initially non-material topics to ensure they do not miss blind spots. The option to disclose on the IRO level (compared to topical level) might result in a lower level of inter-company comparability. We recommend there be more guidance on the practical differences between these approaches, with examples to help preparers make appropriate choices. We encourage that undertakings shall disclose what triggered changes in the results of the materiality assessment from previous periods. The amendments on value chain integration would benefit from stronger integration of due diligence with value chain reporting. When negative material impacts are recognised during due diligence, engagement actions should be required. Undertaking should disclose the rationale for value-chain boundaries, coverage of value-chain information per material topic, and brief data-quality grading for key metrics. Where PAT do not extend into the value chain for material IROs, undertakings explain constraints and leverage mechanisms with time-bound extension plans.			
Survey	DUFAS	Association of financial institutions	Netherlands	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	DUFAS does not agree with EFRAG's proposal on the new guidelines for a hybrid approach and urges EFRAG to adopt one consistent approach to reporting actual and potential impacts. The majority of DUFAS members prefers a gross approach enabling transparency around inherent risks to -promote assessment and reporting before remediation, providing insight into the effectiveness of remediation and the actual reduction of adverse impacts. This transparency is essential in avoiding bias in final outcome, which a net approach may cause by understating risk exposure. -improve comparability among firms, helping distinguish between those with no impacts and those that actively mitigated them. -enhance year-on-year comparability of reporting in ESG performance, underscoring the need to differentiate between firms with no impacts and those that have mitigated them after facing challenges. On the other hand, members preferring a net approach indicate that it better reflects the actual situation. Also, the auditor's conclusion on the sustainability statement implicitly covers a net approach. And a more extensive sustainability statement based on gross might be at odds with the simplification objective. However, a net approach would still need transparency on the outcomes of mitigation or prevention measures implemented before the impact occurred, especially when due to mitigating measures a topic is assessed as immaterial for reporting purposes. Additionally, the term "supportable evidence" in ESRS 1 (paragraph 35) could create ambiguity due to its vague definition and its reliance on accountants' interpretation during DMA and annual reports. Clarifying whether reported impacts stem from previous periods – even if remediated – would greatly benefit investors. For instance, if a company reports 12 health and safety impacts, it's unclear whether these are new or unresolved from earlier reports. We recommend removing Appendix C and clearly defining the "gross" approach to ensure consistency and comparability across undertakings.			
Survey	DUFAS	Association of financial institutions	Netherlands	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	DUFAS is in favour of the reduction of duplications (clarifications on connected information). DUFAS agrees with the proposed amendments. As users of sustainability information, we recognize that it is unnecessary for companies to duplicate content various times in the annual report. Especially, as the basis for conclusions mentions, in the area of policies-actions and targets. The use of appendices for detailed metrics also provides more overview for users. Lastly, we note that the optional inclusion of an executive summary at the beginning of the statement may serve the interest of some users. We ask EFRAG to clearly specify the safeguards (following from the ESRS principles for quality of information and/or from the Accounting Directive) that govern the quality of an executive summary whether as part of the sustainability statement or of the management report.			
Survey	DUFAS	Association of financial institutions	Netherlands	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	DUFAS does not support elimination of the requirement to disclose whether the undertaking plans to implement a PAT for material topics, and neither that the timeline has been eliminated. Transparency requires explanation when PAT are absent, particularly for material negative impacts and risks. Elimination might lead to weaker accountability and comparability for investors. It could allow companies to simply state 'no PAT' at topic level without explaining where gaps remain and how they intend to close the gaps. We argue that an "explain if not" approach would better serve stakeholders: undertakings should disclose why PAT have not been developed for material risks and negative impacts, distinguishing these from opportunities where PAT may be less critical. This maintains accountability without excessive prescription, ensuring that the absence of PAT represents a deliberate strategic choice rather than oversight. Transparency about risk management decisions is essential for stakeholder confidence and comparability between undertakings DUFAS expresses concern relating to the reformulation of certain mandatory datapoints into Application Requirements (ARs). The legal status/requirements of application requirements might send mixed signals to companies, as companies might not understand that it relates to mandatory methodological guidance. This could weaken enforceability and comparability. Lastly, it is important that companies report information that is most material to them. We believe that the restructuring of the architecture establishes more concise reports and prevents unnecessary duplication of information.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DUFAS	Association of financial institutions	Netherlands	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	DUFAS agrees that the Amendments materially improve clarity and accessibility. Eliminating "may disclose," relocating mandatory application guidance directly under each Disclosure Requirement (DR), and streamlining language deliver on Lever 4's aim of improved understandability, clarity, and accessibility. We broadly agree that the proposed amendments to ESRS 1 improve clarity and accessibility. The restructuring of disclosure requirements (DRs) and application requirements (ARs) into clearly delineated sections enhances usability. The removal of "sub-subtopics" and the consistent use of "topics" and "sub-topics" simplifies navigation and interpretation. The clearer articulation of double materiality—particularly the distinction between impact and financial materiality—supports more consistent application across sectors. To make these improvements unmistakable in practice—and auditable—we recommend two targeted enhancements: 1. Stamp the assurance scope on AR. Open ESRS 1 with a single explicit sentence that Application Requirements attached to a DR are mandatory and within assurance scope. In the standards text, prefix every AR block with "Mandatory application requirements" (not just "AR"). This removes residual ambiguity created by moving content out of appendices and ensures preparers, assurers, and users interpret AR consistently. 2. Introduce stable IDs for every mandatory datapoint and AR. Assign durable identifiers (e.g., E1-6.M1 for a datapoint and E1-6.AR1 for its application requirement) and require their use in cross-references and digital tagging. Stable IDs will make the standards easier to navigate, reduce mis-tagging risk, and facilitate high-quality digital reporting and tool support. With these adjustments, the separation between mandatory and non-mandatory content will be clear at a glance, consistently interpreted across entities and assurers, and straightforward to implement in systems and tags. We therefore agree with the proposal, subject to the enhancements above, which are fully aligned with the intent of Lever 4 to remove "may" provisions, streamline drafting, and clarify the structure between mandatory and non-mandatory content.			
Survey	DUFAS	Association of financial institutions	Netherlands	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We acknowledge that the non-mandatory illustrative Guidance could provide useful support for companies by clarifying how to report and providing practical examples. This can enhance consistency and ultimately improve the decison-usefulness of information investors depend on. However, the current legal status of NMIGs seems to remain uncertain, and this creates ambiguity. We want to emphasize the importance of legal certainty. We agree with EFRAG's recommendation that the European Commission should not include NMIG content within the Delegated Act. Including this material in legally binding regulation would risk creating ambiguity about its status and potentially trigger additional compliance efforts, undermining the simplification objectives. However, if the European Commission decides to include NMIG content in the Delegated Act, it should be structured as an annex with clear introductory language stating that the content provides guidance and examples only. The annex introduction should explicitly clarify that undertakings are not required to justify non-compliance with these illustrative elements, distinguishing them clearly from mandatory disclosure requirements. We request clarification on the intended final use of this guidance, its legal status, and a clear statement that these are non-mandatory standards. Additionally, we highly recommend combining all guidance. Throughout 2024, various forms of guidance (e.g., Q&As, Implementation Guidance) have been issued to support firms in preparing their sustainability reports. Our preference is to combine all forms of guidance ('combined guidance') to make it easier for reporting companies to seek support in their implementation, referring them to a single document rather than multiple documents.			
Survey	DUFAS	Association of financial institutions	Netherlands	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	DUFAS acknowledges that the introduction of a horizontal undue cost or effort relief seems pragmatic, but there is a risk companies will invoke this widely, especially in value-chain metrics. From an investor standpoint, broad or repeated use could fragment datasets and erode cross-issuer comparability. Any relief should be bounded by clear safeguards. For instance, disclosure why the relief applies; disclosure of scope left out and material gaps. Without such safeguards, decision-usefulness and portfolio-level aggregation might suffer. DUFAS notes that flexibility to use estimates could be helpful for preparers, but investors need estimates that are assurable, transparent and comparable. We would like to emphasize the importance of stringent criteria regarding estimation methodology and transparent reporting on the estimation methodology, uncertainty ranges/sensitivities, data coverage percentages, plans to improve data availability /quality over time. This will help preserve decision-usefulness and comparability for investors. Regarding the balance between burden relief, preserving transparency and interoperability with the ISSB's IFRS S1 and S2: We support maximum interoperability between ESRS and IFRS S1/S2 without diluting double materiality. Our clients need both the financial lens (IFRS S1/S2) and the ESRS impact lens. Key points: * ESRS E1 must remain broader than IFRS S2 (impact + risk, including target alignment, transition capex, etc) * Alignment should not dilute ESRS ambition * The real value for investors is linking sustainability impacts to the financial statements, not just aligning ESRS and S2 wording			
Survey	DUFAS	Association of financial institutions	Netherlands	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	DUFAS supports that investee companies strike a balance between identifying and uncovering available information without undue cost or effort to conduct their assessments and report on their metrics. We emphasize the importance that companies use this as a learning curve, having to continuously improve over time. Our concern is that repeated use of narrow scopes could weaken trend and peer comparability and complicate assurance. To preserve reliability, any reliance on reliefs should be accompanied by clear guardrails, e.g. explicit rationale for invoking the relief and the decision criteria applied, scope transparency, time-bound improvement plans, method transparency. As the Basis for Conclusion mentions, the objective is to align with the IFRS S1 reliefs, which enhances interoperability.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DUFAS	Association of financial institutions	Netherlands	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	DUFAS strongly prefers option 1, as it is most aligned with the IFRS relief, and large undertakings in scope of the CSRD are familiar with this type of reporting. As EFRAG notes, the likelihood that the undertakings do not have skills, capabilities or resources is highly limited. For institutional investors, information on anticipated financial effects is highly useful as we aim to realise long term value creation. As it presents a "comply or explain" mechanism, it challenges undertakings to be transparent about their progress and priorities. It pushes the field forward by encouraging the development of more mature reporting practices, rather than allowing a default to less informative qualitative disclosures. For sustainability reporting to be truly meaningful, it must connect impacts and risks to financial figures. However, we stress the importance of the applicable conditions and safeguards (on the use of the relief) to be further specified. We believe that the availability of climate risk metrics is important. For that reason, the effects of both options should be assessed as preparers often raise undue costs and burden as a reason for not providing this information. It would be valuable to assess and specify the conditions under which it can be invoked by a preparer and whether it could negatively impact on the wide availability of climate risk metrics. In terms of conditions and safeguards, we suggest: 1. Phase-in requirement for companies to comply with qualitative information in the first three years of reporting, with quantitative information to be reported afterwards. 2. Companies should provide a clear rationale for invoking any relief, specify the methodology and uncertainty assumptions applied, and outline concrete improvement plans — comparable to the 'best-effort' obligation under SFDR.			
Survey	DUFAS	Association of financial institutions	Netherlands	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	DUFAS welcomes the amendments that keep the criteria aligned with the primary data requested by banks, as this is also useful information for other financial institutions. As the log of amendments notes, the changes are also aligned with IFRS S2. We recognize the practical challenges undertakings may face due to evolving methodologies and data availability. To ensure these disclosures are both feasible and effective, we strongly advocate for the consistent application of the "comply or explain" principle. This approach would require undertakings to disclose the required quantitative information by default. If they are unable to do so, they must provide a clear and substantive explanation for the omission. This explanation is, in itself, a valuable piece of information, offering insight into a company's risk management maturity and data infrastructure. Applying the "comply or explain" principle will increase adoption rates by providing necessary flexibility in the short term, while simultaneously fostering greater transparency. It maintains the ambition of achieving full quantitative disclosure as methodologies mature, ensuring that the reporting framework remains both practical for preparers and decision-useful for stakeholders.			
Survey	DUFAS	Association of financial institutions	Netherlands	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	DUFAS welcomes the amendments, including the IFRS reliefs as well as the language that is more common between the two standards, that aim to increase interoperability with other international standards. We support retaining maximum interoperability between ESRS and IFRS S1/S2 without diluting double materiality. Clients need both the financial lens (IFRS S1/S2) and the ESRS impact lens. Our key points: 1. ESRS E1 must remain broader than IFRS S2 (impact + risk, including target alignment, transition capex, etc) 2. Alignment should not dilute ESRS ambition 3. The real value for investors is linking sustainability impacts to the financial statements, not just aligning ESRS and S2 wording Accordingly, it is important that any reliefs introduced in the exposure drafts should not negatively impact interoperability, particularly those reliefs that go beyond the ones described in the ISSB standards. This could be the case for the reliefs on climate-related disclosures in E1, as they may result in placing the ESRS standards below the global baseline. We suggest ensuring further alignment between the ESRS E1 climate standard and IFRS S2, to avoid unnecessary reporting burden on undertakings that have to disclose under CSRD and ISSB.			
Survey	DUFAS	Association of financial institutions	Netherlands	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	DUFAS	Association of financial institutions	Netherlands	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	DUFAS acknowledges that the proposal ensures ESRSs are structured better and redundancy is reduced. This is a good outcome as it ensures the core of the ESRSs is maintained. The 57% reduction in "shall disclose" datapoints can support greater proportionality and usability for preparers, particularly during first-time application. However, whilst the number of datapoints has significantly decreased, this doesn't necessarily translate to equal/equivalent reduction in burden. We also refer to our response to Q29 regarding insufficient coverage of SFDR datapoints in the proposals.			
Survey	DUFAS	Association of financial institutions	Netherlands	22.S1	Comments on deleted datapoints in ESRS S1	I agree	See our response to Q31 on the gender pay gap.			
Survey	DUFAS	Association of financial institutions	Netherlands	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	DUFAS in general supports the proposal to exceptionally move these disclosures from "may" to "shall", provided they remain subject to the double materiality assessment. For E4 we do note that transition plans are already inherent to the general PAT disclosures under E4, if considered material. It feels redundant to have another disclosure on this, which aims to include information on targets, key actions, financial planning, governance of the plan. At the same time, the second part of the newly proposed disclosure on transition plans which requires a clear explanation of how the undertaking's strategy and business model will evolve to become compatible with relevant global goals, such as halting and reversing global biodiversity loss in line with the GBF, is relevant.			
Survey	DUFAS	Association of financial institutions	Netherlands	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	DUFAS welcomes the introduction of the new mandatory datapoints, as they are relevant to investors because they make explicit the elements that are critical for assessing a company's sustainability performance and risk exposure. From an investor standpoint, these datapoints will improve comparability, transparency and decision-usefulness without introducing undue burden, given particularly their direct link to existing disclosure objectives.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DUFAS	Association of financial institutions	Netherlands	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	DUFAS welcomes the emphasis on ESRS as a fair-presentation framework, aligned with IFRS S1, and with materiality as a general filter. This could help reduce 'checklist-reporting' and improve decision-useful information for investors. We suggest that further clarification is necessary on the framework to avoid divergent interpretations. We question whether fair presentation should solely on management judgement. To safeguard comparability and reliability, our members support some sort of safeguards. For example, for the accountant to monitor the fair presentation. Additionally, guidance is needed on how the fair presentation principle will be applied by assurance providers, as we have concerns that 'fair presentation' could be interpreted by auditors as 'true and fair view' of the annual accounts, which is a concept most commonly applied within the context of reasonable assurance engagement. Therefore, in line with paragraph 51 of the BfC, it should be made sufficiently clear that it is the reporting company's role to assess materiality, while the assurance providers executes only a review of the process. Since EFRAG indicates that it is not their role to specify the auditor's role and mandate, we urge EFRAG to coordinate this issue with the European legislators. Lastly, we have been consistently expressing support for the notion for reporting companies to submit their sustainability to a (binding or non-binding) vote at the AGM, to put sustainability reporting on a more equal footing with financial reporting and to increase the board's accountability regarding the sustainability performance of the company.			
Survey	DUFAS	Association of financial institutions	Netherlands	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	DUFAS agrees with the proposal. We note that, if financial institutions have chosen an approach based on intensity targets, they should not be required to also have absolute targets (though they should report absolute emissions). In this context, we do stress that CSRD reporting for asset managers should not relate to the client assets/investments.			
Survey	DUFAS	Association of financial institutions	Netherlands	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	DUFAS does not agree with the removal of the threshold. While indeed the information is usually easily accessible and the additional burden is limited, removing the threshold of 10% causes situations in which detailed information for small offices in different countries still needs to be reported. The added value of the information is immaterial compared to the disclosures that already need to be made about the undertaking's employees, collective bargaining coverage, and social dialogue. Maintaining the 10% threshold helps report only about countries in which the undertaking has considerable employment relative to total employees.			
Survey	DUFAS	Association of financial institutions	Netherlands	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	DUFAS does not agree with the proposed change to the methodology. For investors to determine whether companies pay their employees an adequate wage, it is important to provide information on the methodology that is used. Without this, investors cannot judge the robustness of figures or compare across peers and time. It is positive that key elements such as collective bargaining and the periodic revision of minimum wages in a country are explicitly included. However, we share the concerns flagged by the EFRAG SRB members. Our main concerns are: It is insufficiently clear when a wage can be considered "adequate." Now that there is an internationally recognized definition of a living wage by the ILO, it would be more logical to refer to this. As currently phrased, it would be sufficient if employees' wages meet the national minimum wage. The issue is that in many countries outside the EU, the minimum wage is far from adequate to meet basic needs, resulting in a significant gap between the minimum wage and a living wage. The hierarchy of the listed elements is also problematic. A living wage estimate should be ranked higher than the publication of a minimum wage. It would therefore be more logical to reverse the order: if a living wage estimate is not available, then a minimum wage can be published. As currently formulated, a company that can report 100% of employees earning at least the minimum wage and labels this as adequate could be perceived as performing better than a company that can report a living wage for 80% of its employees. Since a living wage is higher than a minimum wage, this presents a misleading picture and sends the wrong incentives to companies.			
Survey	DUFAS	Association of financial institutions	Netherlands	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	DUFAS notes that alignment with SFDR remains of crucial importance. In light of the upcoming SFDR revision, the revision of Annex I PAIs is also under consideration; it is crucial that sustainability-related disclosures under the SFDR rely on available reported data by undertakings under the CSRD. In the meantime, EFRAG should ensure that it retains within the ESRS all datapoints corresponding to the 14 mandatory PAIs. All SFDR Table 1 datapoints must remain mandatory within the ESRS topics, if material. These indicators are essential for the functioning of the SFDR and must remain fully available to financial institutions. A key concern remains that not all mandatory SFDR PAI indicators are yet fully covered by ESRS datapoints. In particular, PAI 3 (GHG intensity of investee companies) and PAI 6 (Energy consumption intensity) are not directly addressed. For financial institutions this creates significant challenges: if they are required to calculate these indicators themselves, it will be resource-intensive, risk inconsistent methodologies across the market, and ultimately run counter to the policy objective of reducing reporting burdens. These challenges are underestimated in EFRAG's reasoning for deletion. For the Social Standards (S1–S4), SFDR-related datapoints corresponding to PAI 10 (Severe human rights violations) and PAI 11 (UN Global Compact/ OECD Guidelines alignment) have been spread across the four standards. While this strengthens alignment with international due diligence frameworks (UNGP and OECD MNE Guidelines) and the ESRS double materiality approach, it complicates SFDR reporting. Investors must consolidate disclosures across multiple standards to report a single PAI indicator, increasing complexity and the risk of inconsistency. Greater centralisation or clearer cross-references would improve usability without undermining ESRS principles.			
Survey	DUFAS	Association of financial institutions	Netherlands	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	We agree. The ESRS GDR-T still require companies to publish information on the methodology, baseline value, scope of target etc.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DUFAS	Association of financial institutions	Netherlands	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	DUFAS notes that the simplification of the ESRS is grounded in the "decision-usefulness" principle, enabling users, including asset managers, to assess and make informed decisions based on the availability of sustainability information. We emphasize that the adjusted gender pay gap is a significantly more relevant indicator for investors than the unadjusted gender pay gap. We do understand that the mandatory unadjusted pay gap metric has been introduced to align with the SFDR PAI requirements, and indeed alignment with the SFDR is crucial. Furthermore, with the implementation of the EU Pay Transparency Directive, the unadjusted pay gap information will become much more broadly available through company-level gender pay reporting. However, the Directive also requires a joint pay assessment (Article 10) when gaps exceed 5%, using objective, gender-neutral criteria to explain and address disparities. This requirement in fact produces the adjusted pay gap information, but the outcomes do not have to be reported by the companies. We therefore ask EFRAG to align the ESRS with this directive and include under the ESRS the key mandatory KPIs of the Pay Transparency Directive, including (in case of significant pay gaps above the defined threshold) a requirement to also disclose the adjusted pay gap in a way that is methodologically aligned with the joint pay assessment requirement. The ESRS requirement is of course subject to the topic having been identified as material for a company. Such alignment will significantly increase decision-usefulness for investors. We further note that EFRAG should also reiterate to the European Commission the importance of the EU Pay Transparency Directive being incorporated into national legislation by 7 June 2026, as this is essential to ensure consistent availability of this information across Member States.			
Survey	DUFAS	Association of financial institutions	Netherlands	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	DUFAS is not supportive of the proposed changes, given that the procurement practices of large undertakings and the management of suppliers could be more transparent, as stringent practices may lead to a higher likelihood of negative impacts. This is for example the case when orders with strict deadlines can result in workers having to work overtime.			
Survey	DUFAS	Association of financial institutions	Netherlands	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	DUFAS reiterates its position that client assets should be explicitly excluded from the scope for purposes of CSRD reporting. In particular, some requirements have not been amended in the proposed revised ESRS, as they are indicated to be subject to Level 1 changes, including the value chain for FIs. Therefore, we do not interpret any changes that might indicate reference to the value chain for FI as such, including ESRS 1 paragraph 38 and ESRS 2 paragraph 68. We do welcome further clarity on the definition of FIs own operations in L1, in line with the presentation in paragraph 59 (p.42) of Log of Amendments ESRS 1 General Requirements stating that own operations relate to "assets, liabilities, income and expenses". EFRAG also notes that some requirements were not changed in the amended ESRS as they are subject to level 1 changes, for example regarding 'compatibility with 1.5 degrees" for the Transition Plans disclosures. However, clarification is needed, for example regarding the base year (reference point) for measuring the reduction of greenhouse gas emissions and setting climate targets. Guidance on the comparability between disclosures, where the implementation year among different companies differs, as the CO2 data improves over time, would be helpful and would establish an accepted way of working for external auditors to ensure reliable information. By way of guidance, we propose EFRAG to develop a standard model report that includes the minimum reporting requirements per ESRS, such as a structure, table of contents with tables and/or graphs, and explanatory notes. For financial accountability reports, including annual accounts, the use of standard model reports has been common practice for years. Applying a similar approach to sustainability reporting based on ESRS would provide clarity for both preparers and auditors regarding what and how information should be reported.			
Survey	DUFAS	Association of financial institutions	Netherlands	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Regarding the inclusion of non-material information by user request, further clarification needed on whether this is only possible at a user's request (ESRS 1 paragraph 108) and the location of these extra disclosures (59 sub b of the BfC).			
Survey	CDP	Standard setting initiative	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Dilution of ambition & loss of comparability The proposed simplifications (e.g. reducing granularity, fewer topics, more "reasonable" evidence) can lead to under-reporting of certain impacts, especially for smaller or more complex organizations. Outcomes of materiality assessments may diverge more than under more prescriptive rules and thus, the comparability across companies might suffer. Request that EFRAG provide illustrative examples or sector-specific materiality indicators to guide consistent judgments, even under a flexible framework. Vagueness and lack of clear thresholds Evidence on materiality is proposed to be "reasonable and proportionate". However, this is highly subjective and likely results in inconsistent materiality determinations. Such a subjective approach makes it also more likely that materiality assessments become a box-ticking exercise and/or facilitates minimum compliance rather than meaningful disclosure. Request clarification through non-mandatory implementation guidance, (potentially imtegrated into the ARs) of what constitutes acceptable evidence, including case studies for common use cases (e.g. groups with limited value chain data). Risk of backsliding in impact materiality Because "impact materiality" (i.e., how the company affects environment, society) tends to require more external / value chain data, the burden has always been high. With more reliefs and flexibility, there may be a temptation to understate or omit impacts rather than push for better data. Environmental impacts that are not yet financially material might become so in the future through accelerated environmental degradation and transition-related risks. This can translate into risks to financial stability. While providing some additional flexibility, EFRAG must mitigate negative consequences of potential short-sighted materiality assessments. Request that EFRAG reintroduce a mandatory 'minimum topic list' that must be considered (not disclosed) by all undertakings, or flag certain high-risk topics as "presumed material unless rebutted."			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CDP	Standard setting initiative	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	CDP supports gross assessment and disclosure of risks in line with current ESRS requirements. This supports greater ambition. Residual reporting could be allowed for full transparency.			
Survey	CDP	Standard setting initiative	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	CDP welcomes the suggested amendments on encouraging connected information as this will address duplicative reporting and enhance easy access of key disclosures. Eliminating duplicative reporting of PAT related disclosure will also enable disclosers to effectively showcase integrated approach to management of interconnected topics e.g. integrated nature and climate reporting. Providing the option of developing an executive summary also provides disclosers flexibility to provide performance highlights enhancing accessibility of key data points to stakeholders. However, with this increased flexibility there is a risk of companies' cherry-picking positive performance indicators in prominent sections of the report and obscuring key risks and negative impacts in appendices. The reduction of overall prescriptiveness of required disclosures could also lead to lower comparability between corporate disclosures thereby compromising the ability of data users to effectively analyse data at a sector/geographical level. Request that EFRAG prescribes minimum required information to be included in the executive summary and a clear format for cross-referencing topic-level information across appendices.			
Survey	CDP	Standard setting initiative	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	CDP welcomes amendments that remove duplication and encourage an integrated approach to PATs. These changes reduce overlap with MDR and topical standards, ease reporting burdens, and simplify application of the ESRS digital taxonomy. While the principle-based approach to PAT disclosures provides flexibility to companies, the granular requirements provided valuable guidance. Linking the standard to the relevant NMIGs - or embedding them in topical standards, would help ensure the necessary level of detail and topic specificity for meaningful reporting. CDP flags the following areas as potential risks to ambition and/or obscure material information: The requirement to disclose whether an undertaking plans to implement a PAT for material topics, and the associated timeline, should be retained. This data is critical to assess whether companies are moving from commitments to implementation. These will allow companies to disclose their progress to come, not just past actions. Retaining this disclosure requirement will be key to encourage transparency, accountability and drive meaningful action through disclosure requirements. Elimination of detailed information required if the organization determines that climate change is not material (ESRS2, 28b)- though the extent and nature of climate impacts vary by sector, it would be important for companies to explain the rationale behind omitting climate related disclosures including how this was assessed as part of their materiality assessment and potential of climate change being a material topic in the future.			
Survey	CDP	Standard setting initiative	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	CDP welcomes and supports the reorganization and amendments to the overall structure of the standards, particularly the streamlining of Application Requirements and the inclusion of clear cross-references to the corresponding Disclosure Requirements. These changes are a positive step forward, as they will enhance navigability and improve users' understanding of the mandatory disclosure expectations. The inclusion of voluntary data points within the standards has provided an important opportunity for companies with advanced reporting practices to demonstrate leadership and set higher benchmarks. In the interest of encouraging continual improvement in both sustainability performance and related disclosures, it would be beneficial to retain these voluntary data points within the Application Requirements. This structure would nudge companies to go beyond minimum compliance and adopt more comprehensive reporting practices. To further support this approach, we suggest that the Non-Mandatory Implementation Guidance (NMIG) be embedded within the main body of the standard—immediately following each Application Requirement. Doing so would not only improve the overall flow and readability of the standards, but also actively promote advanced, forward-looking reporting practices among companies aiming to lead in sustainability disclosure.			
Survey	CDP	Standard setting initiative	United Kingdom	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Illustrative guidance is crucial in environmental disclosure as companies often lack topical expertise. Moving this guidance entirely into NMIG could lead to them being disregarded, leading to weaker and less comparable reporting. CDP recommends that the NMIG content instead embedded within the main body of the standard—immediately following relevant Application Requirements (ARs). This would avoid a strict obligation but set the guidance as an example to be considered. This could further be strengthened with an obligation for organisations to make a best-effort to align with the guidance, maximising ambition while preserving flexibility.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CDP	Standard setting initiative	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	CDP believes that some of the reliefs proposed will weaken the capacity of the ESRS to contribute to the goals of the EU Green Deal and will undermine the comparability of data. Financial institutions representing a quarter of all institutional assets use CDP data to help inform investment and lending decisions, and comparability of data is key for them. CDP believes that enabling comparability of data in the ESRS is one of the key prerequisites for directing capital to sustainable activities and creating fair competition. The relief around "undue cost and effort" is vague and overly permissive, particularly when applied to the calculation of metrics. The purpose of the standards is increase the quantity and quality of disclosure data across the economy. If companies can omit core datapoints the standards are weakened. CDP recommends narrowing the use of this relief to clearly defined cases such as forward-looking data or complex value chains. Key impact metrics such as a complete, comparable, accurate and transparent GHG inventory should not qualify. Metrics from within direct operations should not qualify. Best efforts to obtain data before invoking the relief should be disclosed.			
Survey	CDP	Standard setting initiative	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	Undertakings reporting even partial data is welcomed, but without an expiry on this relief it could become a permanent loophole without sufficient incentive to improve reporting. To counter this: The relief should expire after a fixed time period. at the very least there should be a requirement to demonstrate year on year progress. CDP believes this would preserve flexibility while ensuring the intended outcome. CDP data shows that across companies of all sizes, sectors, and geographies disclosing complex environmental data is feasible and advantageous, and that improvement in data coverage and quality are achievable: Scope 3 disclosure (high-impact categories 1 & 11, and FS category 15) rose from 27% in 2019 to 45% in 2023. Use of internal carbon pricing in a stable sample of over 5,300 companies increased from 12% in 2019 to 20% in 2022. Quantification of physical climate-related risk impacts grew from 31% of companies in 2019 to 40% in 2023. On water, around half of 223 consistent disclosers reduced withdrawals between 2015–2023, with 70,134 million m^3 saved by 120 companies (≈10× Loch Ness). On targets, the share of companies with absolute and/or intensity targets increased from 62% in 2020 to 73% in 2023.			
Survey	CDP	Standard setting initiative	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	CDP supports option 1 but urges that it should be subject to a requirement for clear best efforts to be made before any relief is invoked. Quantitative disclosure must be maintained as a baseline. The disclosure required has been significantly weakened compared to the original ESRS, it's a lot less detailed, and what remains is much more flexible. CDP has repeatedly demonstrated the feasibility and value of disclosure of anticipated financial effects. Insights: Over 4,000 companies already disclose quantitative data on environmental risks through CDP. The data tell a strong story: mitigating these risks costs 13× less than the financial impact of ignoring them. Such quantitative disclosures are not only about transparency but also about smart business practice, enabling better investor decisions and strengthening corporate reputation. This inclusion in standards would level the playing field across the European economy strengthening competitiveness and achievement of sustainability goals. CDP believes reliefs should only be used as a last resort, if too much data is omitted disclosure loses its value to investors, companies, and the general public. Undertakings should be required to make a best-effort attempt to quantify their anticipated financial effects and only invoke relief in extreme cases. Without this safeguard the requirement risks becoming meaningless.			
Survey	CDP	Standard setting initiative	United Kingdom	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	CDP welcomes the simplification of the above disclosure requirements on anticipated financial effects and believes that this enhances alignment with IFRS S2 29 while upholding primary data requests by banks and maintaining interlinkages with EBA Pillar 3 requirements. CDP agrees with the move to encourage granular reporting on potential to pursue climate related opportunities by retaining these provisions as guidance in NMIG. In keeping with this practice, we recommend retaining the requirements on reconciliation with line times in financial statements by moving them to NMIG as this would encourage the good practice of building connectivity between financial and non-financial reporting.			
Survey	CDP	Standard setting initiative	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	CDP supports EFRAG's efforts to enhance interoperability with the IFRS Sustainability Standards. We welcome the resolution of boundary reporting inconsistencies, alignment of language with IFRS S1, and the proposed convergence towards SASB/IFRS and GRI sectoral standards. However, to preserve both ambition and interoperability CDP proses that several datapoints(~7 of them) in ESRS E1 be retained. Their removal hinders interoperability with IFRS S2. (e.g. requirement for disaggregation of GHG emissions by consolidated accounting group and other investees excluded from consolidated accounting group has been removed from ESRS E1.) In addition, the introduction of certain reliefs in ESRS that go beyond those provided in IFRS S2—such as allowing companies to report on a partial scope indefinitely due to lack of data as well as broader application of "undue cost or effort" principle—could be counterproductive from an ambition and accountability perspective. While flexibility can address reporting burden in the short term, prolonged exemptions risk undermining comparability, data quality, and the broader goal of driving improved sustainability performance. CDP encourages EFRAG to consider preserving critical data points aligned with IFRS S2 and to apply any transitional reliefs with clear time limits and expectations for progress to maintain the robustness and ambition of ESRS.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CDP	Standard setting initiative	United Kingdom	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	CDP supports the transition of the aforementioned data points from voluntary to mandatory reporting, particularly those that capture key details enabling stakeholders to understand water balance and the transition plans for biodiversity and ecosystems. However, limiting the disclosure of nature transition plans to cases where they are already publicly available undermines the principle of double materiality and the ESRS's broader focus on material impacts, risks, and dependencies. We support elevating the requirement to a "shall" but recommend that it apply to companies or sectors with significant nature-related risks and dependencies, rather than being contingent on prior public disclosure. Broadening the requirement for nature transition plans to all companies for whom it is material could avoid addition of significant extra burden due to the fact that nature transition plans are currently not as detailed as climate transition plans but also could be integrated into climate transition plans. Movement towards integrated transition planning is already happening in voluntary reporting.			
Survey	CDP	Standard setting initiative	United Kingdom	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	E2-4 - Microplastics: CDP agrees with the inclusion of the new datapoint on secondary microplastics. While both primary and secondary microplastics pose environmental and human health risks, primary microplastics are already restricted under REACH. The leakage of secondary microplastics is a distinct consequence of plastic overproduction and overconsumption and should be explicitly addressed in the ESRS framework. E5-4 - Alignment with ESPR and CRM Act: CDP supports the addition of the datapoint on critical and strategic material disclosure, which strengthens alignment with the Eco-design for Sustainable Product Regulation and the Critical Raw Materials Act. E5-5 - Waste Disposal Disclosure: CDP partially agrees with this datapoint. In our own disclosure framework, we allow companies to select "other, please specify" when reporting waste disposal methods. However, we emphasize that this option should be used only as a last resort. It must not become a workaround that allows undertakings to report under E5 without properly tracking disposal methods and waste streams.			
Survey	CDP	Standard setting initiative	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	CDP supports the principle of fair representation as a foundational element in the transition from a prescriptive to a more flexible, principles-based reporting approach. As this shift takes shape, it becomes increasingly important for companies to not only understand but effectively apply this principle. Fair representation requires that disclosures be accurate, complete, and free from bias, ensuring that they reflect the true substance of an organisation's activities and sustainability impacts. Failure to adhere to this principle, whether through omission, misstatement, or selective disclosure can result in legal, regulatory, and reputational consequences. It is critical that companies recognise the responsibilities attached to fair representation and the potential liabilities associated with misrepresentation. To support effective implementation, it is essential to build the capacity of companies and sustainability professionals to interpret and apply this principle consistently and with integrity.			
Survey	CDP	Standard setting initiative	United Kingdom	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	CDP disagrees with this exemption for financial institutions. While it may require complex reporting and estimation this type of disclosure is becoming more common all the time. Exempting a sector from absolute emissions targets can hide the true picture of emissions targets across the economy. Given the reduction of scope of reporting requirements due to the EU omnibus its more important than ever that all sectors remaining subject to the CSRD report crucial data like absolute GHG emissions targets.			
Survey	CDP	Standard setting initiative	United Kingdom	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Given the removal of most of the disclosure specifications and application requirements under E4-4 as part of the simplification process, it is essential that companies are provided with clearer methodological guidance on how to define and disclose biodiversity- and ecosystems-related targets. In this regard, companies could draw on well-established conceptual frameworks such as the Pressure-State-Response (PSR) model, originally developed by the FAO and widely adopted in biodiversity-related frameworks, including SBTN and TNFD. This approach enables companies to set targets that are grounded in a structured understanding of their impacts (pressures), the condition of ecosystems (state), and the actions taken in response. Importantly, because biodiversity is inherently location-specific, target-setting must be informed by local ecological context. Frameworks such as the Science Based Targets Network (SBTN) offer detailed guidance on how companies can assess site-level impacts and dependencies and establish science-based, measurable targets for nature. Aligning ESRS guidance—such as E4 AR 26—with these frameworks would not only improve coherence across standards but also help companies ensure that their targets are credible, actionable, and relevant to the most material areas of their operations. We therefore recommend that the revised ESRS E4 retain and expand AR 26 to better reflect recent developments in the methodological landscape and enhance alignment with science-based initiatives like SBTN. This would support preparers in setting robust biodiversity targets, even in the absence of prescriptive disclosure requirements, and ensure that simplification does not come at the expense of ecological integrity or reporting quality.			
Survey	CDP	Standard setting initiative	United Kingdom	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	It is vitally important for principle of double materiality to be maintained in order for the information reported to be meaningful for users. As mentioned in other responses the driving principles guiding these amendments should be the enhancement of ambition and comparability while reducing burden.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CDP	Standard setting initiative	United Kingdom	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	To strengthen the revised approach, see our feedback below: Pollutants disclosure: We strongly recommend retaining the reference to the European Pollutant Release and Transfer Register (E-PRTR). Its removal could allow undertakings to omit disclosure of material emissions to air, water, and soil at non-EU locations, which risks undermining the integrity and impact of environmental reporting. Consistent global disclosure is essential to ensure transparency and comparability across jurisdictions.			
Survey	CDP	Standard setting initiative	United Kingdom	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	To strengthen the revised approach, we recommend the following updates: Retain metric specifications within mandatory requirements: Given the current lack of standardisation and limited maturity in biodiversity-related corporate reporting, it is essential that key metric specifications remain within the mandatory disclosure requirements. Removing them risks undermining comparability and the quality of reported information. Revise AR7(b) to better reflect double materiality: The current allowance to report metrics only for locations with existing sustainability targets (as per AR7(b)) should either be removed or clearly presented as optional or supplementary. To uphold the principle of double materiality, companies should be expected to report biodiversity metrics for all locations deemed material to biodiversity and ecosystems, not only where targets have already been set. Clarify scope: ecosystem extent, condition, and species all necessary: It should be clearly stated that all three elements—ecosystem extent, condition, and species—are needed to comprehensively assess the state of nature at material locations. Selecting only one or two does not provide a complete picture. Furthermore, while reporting in this area is still developing, ecosystem service metrics are also important, as they help companies understand both their impacts on local communities and their dependencies on nature.			
Survey	CDP	Standard setting initiative	United Kingdom	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	To strengthen the revised approach, see our feedback below: Terminology for value chain coverage: We recommend updating the terminology for resource outflows to "materials, products, and services". This broader phrasing ensures all actors in the value chain are included, from primary material producers to manufacturers and service providers. Material identification using double materiality: We support the introduction of the term "key" in relation to materials used to manufacture, bring to market, and deliver products and services. This refinement enables undertakings to focus disclosures on select materials, balancing relevance and reporting burden. We encourage further guidance to help corporates apply a structured methodology for identifying these materials, based on a double materiality approach. Additional criteria to consider include recyclability, toxicity, and reusability, assessed across both direct operations and the broader value chain. Clarifying definitions: We welcome the inclusion of a "recycled materials" datapoint. To avoid confusion, it is essential to clearly distinguish between: Recyclable: Materials that can be recycled Recycled: Materials sourced from secondary or previously used inputs			
Survey	CDP	Standard setting initiative	United Kingdom	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We note that the absence of standardized nature-related metrics is a major barrier to comparability, usability, and efficiency in corporate reporting. Companies are currently confronted with divergent approaches across frameworks, which increases reporting burden and undermines decision-usefulness for stakeholders. EFRAG, through the ESRS, is uniquely positioned to act as a convergence anchor and facilitate global interoperability in nature disclosure. To achieve this, we encourage EFRAG to embed for example explicit references to the TNFD core disclosure metrics within the Application Requirements of the nature-related standards (E2–E5). Doing so would align ESRS with an emerging global baseline, provide clarity for preparers, and enhance consistency for users, while still allowing for flexibility through a "comply or explain" approach.			
Survey	Assogestioni	Association of financial institutions	Italy	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The responses provided in this consultation have been developed in coordination with EFAMA, the European Fund and Asset Management Association ,ensuring alignment with the positions agreed at EU level and representing the view of asset managers, playing both the role of users and preparers of ESG reports. EFAMA's consolidated stance,to which Assogestioni has contributed reflects a common understanding of how amended ESRS should balance simplification with robustness, enhance comparability, and safeguard decision-useful disclosures for investors. Assogestioni welcomes the clarifications to the DMA and acknowledges the shift toward a more pragmatic, top-down approach. We reiterate support for ESRS as a fair presentation framework, with materiality as the guiding principle. This reduces checklist-style reporting and improves decision-usefulness for investors. Excessive reliance on preparer-defined thresholds, however, risks omitting critical information, while the removal of the sub-sub-topics structure may weaken thematic coherence. The option to disclose on non-material topics is a positive addition but remains voluntary, with no safeguards against material data gaps.In order to strike the right balance between simplification and robustness, we recommend reinforcing the DMA framework with a mandatory "core data layer",that would include DPs of universal relevance and high investor demand, particularly those aligned with EU regulatory obligations. A hybrid model—principles-based DMA plus a core mandatory layer—would safeguard data continuity, comparability, and reliability. Moreover, this core data layer could serve as the basis for a voluntary mid-cap standard – should the Omnibus proposal lead to a reduction of the scope. Unlike the lighter VSME framework, a mid-cap standard anchored in ESRS would deliver consistent, comparable, and reliable ESG information also in continuity with current obligations. It would also help reduce the impact of the dramatic expected reduction in mandatory reporting,also reducing reliance on costly third-party data providers,and enhance financing opportunities for EU mid-sized companies in line with EU sustainability goals.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Assogestioni	Association of financial institutions	Italy	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	Assogestioni considers the adoption of a hybrid approach excessively complex and potentially ambiguous. A consistent approach is needed to ensure comparability and decision-usefulness across undertakings. As Assogestioni, we support the gross approach over the net approach. This approach also enhances comparability across undertakings by distinguishing between entities with no impacts; and entities that experienced impacts but effectively mitigated them. A net approach risks blurring these differences, potentially rewarding entities that disclose minimal information while downplaying actual exposure. This approach enhances year-on-year comparability of reporting in ESG performance, underscoring the need to differentiate between firms with no impacts and those that have mitigated them after facing challenges, which is only visible under a gross approach. We therefore recommend adopting a gross presentation as the single consistent approach within ESRS. This reduces complexity, ensures transparency, and provides investors with a reliable basis to assess risk exposure, remediation effectiveness, and long-term sustainability performance.			
Survey	Assogestioni	Association of financial institutions	Italy	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	Assogestioni supports the proposed amendments aimed at improving readability, conciseness, and connectivity of sustainability statements. As users of this information, we recognise that duplicating disclosures already available in companies' annual reports is both burdensome and of limited added value. We therefore welcome the reduction of duplicative indicators, the clarifications on "connected information," and the option to relocate detailed metrics into appendices, all of which should enhance the usability of reports. To safeguard traceability and comparability, however, it is essential that all mandatory datapoints remain clearly identifiable and tagged, regardless of their placement in the main body or appendices. EFRAG should ensure that appendices preserve the narrative and contextual meaning of disclosures and do not devolve into fragmented data repositories. This structuring is critical for both readability and auditability. Finally, we caution against the proposed inclusion of an executive summary without clear guidance. In practice, executive summaries risk introducing vague, generic information rather than enhancing clarity. We therefore recommend that EFRAG either provide detailed instructions on their content or avoid mandating them, to ensure that simplification efforts translate into genuinely more accessible and decision-useful reporting.			
Survey	Assogestioni	Association of financial institutions	Italy	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Assogestioni acknowledges EFRAG's intention to streamline the ESRS architecture. We view ESRS 2 (General Disclosure Requirements) as a safeguard against materiality-driven omissions, ensuring that cross-cutting governance, strategy, and impact-related information remains available even when topical standards are deemed non-material. The preservation of "shall disclose" General Disclosure Requirements is therefore a positive step. Nonetheless, we do not support the elimination of the requirement to disclose whether undertakings plan to implement Policies, Actions, and Targets (PAT) for material topics and associated timelines. Removing this obligation risks obscuring how companies intend to address identified sustainability risks and opportunities. Transparency requires explanation when PAT are absent—particularly for material negative impacts and risks—otherwise investors may face weaker comparability across undertakings. Without this, companies could simply declare "no PAT" at the topic level without clarifying where strategic gaps exist or how they will be addressed. From an asset management perspective, this information is critical. Eliminating mandatory transparency on PAT plans diminishes the ability to assess transition readiness, net-zero alignment, and progress monitoring, which are key inputs for stewardship and investment decision-making. We recommend retaining a minimum layer of PAT transparency across all material topics, irrespective of whether implementation has started. Alternatively, an "explain if not" requirement would ensure that the absence of PAT reflects a deliberate strategic choice rather than an omission, thereby safeguarding comparability, accountability, and investor confidence.			
Survey	Assogestioni	Association of financial institutions	Italy	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We agree that the proposed amendments improve understandability, clarity, and accessibility. The clearer distinction between impact and financial materiality supports consistent application across sectors, while the restructuring of Disclosure Requirements (DRs) and Application Requirements (ARs) into separate, clearly delineated sections enhances usability for preparers and users alike. However, we are concerned about the complete removal of "may disclose" datapoints. Eliminating these risks discouraging the voluntary reporting of qualitative and contextual information that is crucial for emerging or evolving sustainability themes. Such disclosures often provide valuable forward-looking insights—on corporate strategy, stakeholder engagement, or innovation—that investors rely on to assess long-term sustainability performance. Their absence could reduce disclosure richness and limit comparability across undertakings. We propose reclassifying these datapoints into a structured optional disclosure framework, for example under Non-Mandatory Illustrative Guidance or a voluntary annex, rather than removing them entirely. This approach would preserve the simplification and usability benefits of the amendments while maintaining the availability of forward-looking or contextual information.			
Survey	Assogestioni	Association of financial institutions	Italy	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We acknowledge that the Non-Mandatory Illustrative Guidance (NMIG) could support companies by clarifying reporting practices and providing practical examples. This can enhance consistency and ultimately improve the decision-usefulness of information that asset managers depend on. However, the current legal status of the NMIGs remains uncertain as to whether those will be included by the European Commission in the delegated act or not, according to the recommendation by EFRAG. We agree with the recommendation, as including this material in a legally binding regulation would risk creating ambiguity about the status and potentially trigger additional compliance efforts, undermining the simplification objectives. In case the European Commission decides to include the NMIGs in the Delegated Act, we suggest introducing them as an annex with clear introductory language stating that the content provides guidance and examples only. The annex introduction should explicitly clarify that undertakings are not required to justify non-compliance with these illustrative elements, distinguishing them clearly from mandatory disclosure requirements.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Assogestioni	Association of financial institutions	Italy	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We acknowledge that the introduction of a horizontal undue cost or effort relief appears pragmatic and could ease the reporting burden for preparers. However, from an investor perspective, there is a significant risk that this relief will be broadly invoked, particularly for value-chain metrics. Excessive or repeated use would fragment datasets and undermine comparability across issuers. Safeguards are essential. Any use of this relief should be accompanied by clear disclosures on the rationale for applying the relief, the scope of information excluded, and the identification of material gaps. On the use of estimates, we recognise their potential value for preparers. However, for investors, estimates must be transparent, insurable, and comparable. Allowing estimates and partial scopes is only acceptable if accompanied by robust disclosures of estimation methodologies, scope boundaries and data coverage percentages, and uncertainty ranges or sensitivities. This is particularly important given ongoing Level 1 negotiations, where reductions to CSRD scope or value-chain thresholds may render parts of the data permanently unavailable. Ensuring transparency and comparability of estimates is therefore critical to maintain decision-useful ESG information for investment purposes. Finally, with respect to financial effects and interoperability, we refer to our dedicated responses to Questions 19 and 20.			
Survey	Assogestioni	Association of financial institutions	Italy	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	In line with EFAMA response, Assogestioni shares the approach that investee companies should strike a balance between uncovering and reporting all available information while avoiding undue cost or effort. Relief for lack of data quality can play a role in easing the reporting burden, but it must be designed to promote continuous improvement rather than justify long-term gaps. Companies should treat this provision as a learning curve, progressively enhancing their data quality and scope over time. To preserve readability, any reliance on reliefs should be accompanied by clear guardrails, for example, explicit rationale for invoking the relief and the decision criteria applied, scope transparency, time-bound improvement plans, and method transparency.These measures would ensure that reliefs are applied proportionately and that missing data does not undermine readability or comparability of sustainability statements. We also underline the importance of aligning this provision with IFRS S1 reliefs, as highlighted in the Basis for Conclusions. Ensuring interoperability between ESRS and IFRS standards will reduce complexity for preparers reporting under both frameworks and improve the global consistency of sustainability data available to investors.			
Survey	Assogestioni	Association of financial institutions	Italy	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	As Assogestioni, we express preference for Option 1, which applies a "comply or explain" approach, that requires undertakings to be transparent about their progress and priorities. This option requires undertakings to disclose anticipated financial effects as a default, while allowing omission of quantitative data only under specific conditions. Such an approach fosters more mature reporting practices, avoids a default to purely qualitative disclosures, and ensures interoperability with international frameworks, particularly the IFRS Sustainability Disclosure Standards, already familiar to large undertakings within CSRD scope. It is important, however, that EFRAG further specifies the applicable conditions and safeguards on the use of the relief. The disclosure of anticipated financial effects is among the most critical elements of sustainability reporting. It is the only way investors can adequately assess the materiality of sustainability risks and opportunities by connecting them to financial disclosures. To safeguard proportional and sufficient disclosures, we propose re-introducing phase-in requirements matching those of the original ESRS, ensuring that companies could comply with qualitative information in the first three years of reporting, and afterwards would need to report on quantitative information. Safeguards are essential. EFRAG should specify clear conditions for invoking relief, including a clear rationale for omitting quantitative information, disclosure of the methodology and assumptions applied, with related uncertainties, the qualitative indicators used as proxies, and a concrete plan for improvement. This transparency will prevent critical data gaps, maintain comparability, and ensure that simplification does not result in stagnation of preparer practices.			
Survey	Assogestioni	Association of financial institutions	Italy	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	Consistent with the position jointly established with EFAMA, we welcome the amendments that maintain disclosure criteria aligned with the primary data requested by banks, as this information is equally useful for other financial institutions. We also note positively that the revised requirements align closely with IFRS S2, thereby strengthening interoperability with the ISSB standards. Nonetheless, we recognise the practical challenges undertakings may face due to evolving methodologies and uneven data availability. To ensure disclosures are both feasible and effective, we support a consistent application of the "comply or explain" principle. This means that undertakings should be required to disclose the necessary quantitative information by default. If unable to do so, they must provide a clear and substantive explanation of the omission, including the reasons, the limitations of available data, and any steps toward improvement. Such explanations would themselves be decision-useful, providing investors with valuable insight into a company's risk management maturity, data infrastructure, and transition preparedness. The application of the "comply or explain" principle strikes the right balance between flexibility and accountability, allowing companies, in the short term, to address methodological and data challenges. Over time, as reporting practices mature, it safeguards the ambition of achieving full quantitative disclosure, ensuring the ESRS framework remains deliverable for preparers while remaining decision-useful for users.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Assogestioni	Association of financial institutions	Italy	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Assogestioni welcomes the amendments introduced to strengthen interoperability with international standards. We support the inclusion of IFRS reliefs and the use of aligned language, as these measures help ensure consistency for preparers reporting under both ESRS and IFRS frameworks. Interoperability must be maximised without diluting the principle of double materiality, which remains a defining strength of ESRS. We particularly value EFRAG's proposal to reference IFRS industry-based guidance and SASB standards as sources for entity-specific sector disclosures. This is a practical and user-friendly step that will support preparers while enhancing decision-useful information for investors. At the same time, we are concerned that some reliefs introduced in the draft exposure go beyond the ISSB framework and risk undermining interoperability. In particular, the reliefs on climate-related disclosures in ESRS E1 may place ESRS below the global baseline. This would increase the reporting burden for undertakings that must comply with both CSRD and ISSB, while reducing the quality of information available to investors. We strongly urge EFRAG to ensure closer alignment between ESRS E1 and IFRS S2, particularly on climate disclosures, to safeguard interoperability and prevent fragmentation of global sustainability reporting practices.			
Survey	Assogestioni	Association of financial institutions	Italy	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Assogestioni	Association of financial institutions	Italy	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	We acknowledge and appreciate EFRAG's intention to reduce the reporting burden by streamlining mandatory datapoints and eliminating all voluntary ones. The 57% reduction in "shall disclose" datapoints can indeed support proportionality and usability for preparers, particularly during first-time application. However, from the perspective of financial market participants, the removal of certain datapoints risks compromising consistency, comparability, and decision-usefulness of sustainability information. It is important to note that datapoints do not carry equal weight: while the overall number has decreased significantly, this reduction does not necessarily correspond to an equivalent reduction in reporting burden. In particular, we are concerned that the systematic removal of detailed narrative datapoints within Policies, Actions, and Targets (PAT) sections may weak the forward-looking and strategic dimension of disclosures, which is essential for assessing issuers' transition plans, governance quality, and alignment with climate/nature-related financial risks and create gaps in datapoint availability. We recommend EFRAG to maintain a minimum core set of strategic and forward-looking PAT datapoints as mandatory—especially when they align with international frameworks and to reintroduce or relocate select datapoints into appendices or sector annexes to ensure long-term usability, even if not mandatory under all circumstances.			
Survey	Assogestioni	Association of financial institutions	Italy	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We support the elevation of the six specified datapoints from "may disclose" to "shall disclose" status, provided they remain subject to materiality. This adjustment aligns with the overarching goal of simplification without compromising the quality, completeness, and usability of sustainability disclosures. From the perspective of asset managers, each of these datapoints provides decision-useful insights into the issuer's sustainability-related risks, impacts, and governance performance.			
Survey	Assogestioni	Association of financial institutions	Italy	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We support the introduction of the four new mandatory datapoints as exceptions to the general principle of no increase in disclosure obligations. Their addition enhances the clarity, regulatory alignment, and utility of the ESRS disclosures without introducing undue burden, particularly given their low number and their direct link to existing disclosure objectives.			
Survey	Assogestioni	Association of financial institutions	Italy	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We reiterate our support for recognising ESRS as a fair presentation framework. This shift can reduce checklist-style reporting, enhance decision-usefulness of disclosures, and strengthen alignment with international sustainability reporting practices. However, further clarification is required to ensure consistent application and to avoid unintended consequences. We strongly recommend that European guidelines be established for auditors. Clear guidance would facilitate exchanges between preparers and assurance providers and improve audit controls, avoiding divergent interpretations across jurisdictions.			
Survey	Assogestioni	Association of financial institutions	Italy	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Also in line with EFAMA, Assogestioni proposes that financial institutions should be allowed to use intensity-based targets instead of absolute reduction targets,provided they continue to disclose absolute financed emissions together with contextual information, including the potential trend in absolute values. For investors, intensity targets are generally more meaningful than absolute targets when it comes to setting and monitoring objectives. Absolute targets are less relevant for financial analysis, as they can be distorted by portfolio growth or contraction rather than reflecting genuine improvements in financed emissions. Moreover, introducing a strict obligation on absolute targets only in Europe would risk undermining international comparability, particularly since European investors are already subject to key performance indicator disclosure requirements under other regulations such as the SFDR. Ensuring interoperability with global practices is crucial to maintaining a level playing field and avoiding unnecessary fragmentation.			
Survey	Assogestioni	Association of financial institutions	Italy	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Assogestioni	Association of financial institutions	Italy	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	For investors to assess whether companies pay their employees an adequate wage, transparency on the methodology used is essential. Without such information, it is impossible to evaluate the robustness of wage figures or to compare companies across peers and over time. We welcome the inclusion of elements such as collective bargaining and the periodic revision of minimum wages as part of the revised methodology. However, we share the concerns raised by several SRB members, particularly regarding the lack of clarity on what constitutes an "adequate" wage. As currently phrased, compliance could be achieved merely by paying the statutory minimum wage, which in many non-EU jurisdictions is insufficient to meet basic living standards. This would create a substantial gap between "minimum wage" and a living wage. We recommend that the definition of adequate wage explicitly reference the ILO's definition of a living wage, ensuring alignment with internationally recognised standards. We also suggest reversing the hierarchy of the listed elements: a living wage estimate should take priority, and only if unavailable should minimum wage data be reported. As currently structured, undertakings reporting 100% of employees earning at least the minimum wage could appear to perform better than companies disclosing that only 80% of employees earn a living wage. This would be misleading and create the wrong incentives, rewarding minimal compliance over genuine progress toward fair wages. A clearer, internationally aligned hierarchy would avoid such distortions, enhance comparability, and provide investors with decision-useful information on companies' wage practices, especially in high-risk regions.			
Survey	Assogestioni	Association of financial institutions	Italy	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	Assogestioni suggests that the consolidation of datapoints and the removal of overlaps can improve readability and reduce duplication for reporting entities, provided that investor use-cases under SFDR remain fully supported. In light of the upcoming SFDR revision, the revision of Annex I PAIs is also under consideration it is crucial that sustainability-related disclosures under the SFDR rely on available reported data by undertakings under the CSRD. In the meantime, EFRAG should ensure that it retains within the ESRS all datapoints corresponding to the 14 mandatory PAIs. These indicators are essential for the functioning of the SFDR and must remain fully available to users of sustainability disclosures.			
Survey	Assogestioni	Association of financial institutions	Italy	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	Also in line with EFAMA, Assogestioni considers that the proposed simplification is understandable, given that biodiversity remains a relatively immature topic at this stage. We are therefore aligned with the proposed modifications. However, to ensure improvement on the topic of biodiversity, we believe this issue should be revisited in the coming years, and we request the inclusion of a review clause. The purpose of this clause would be to confirm that the topic is currently insufficiently mature to provide the necessary data, while ensuring that these thematic indicators will be revisited in a few years (3 to 5 years) once progress has been made. This would also encourage companies to adopt a long-term perspective on the issue.			
Survey	Assogestioni	Association of financial institutions	Italy	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	Our approach to the simplification of the ESRS is performed on the "decision-usefulness" principle, which allows users, including asset managers, to assess companies and execute investment decisions based on the available sustainability information. We understand that the mandatory unadjusted metric has been introduced to align with the SFDR PAI requirements. The ESAs have previously acknowledged this very issue and suggested (for the revised Regulatory Technical Standards, RTS) to replace this metric with the "adjusted gender pay gap" indicator. Nonetheless, the "adjusted gender pay gap" is deemed more relevant by asset managers and investors than the "unadjusted". Therefore, we urge EFRAG to signal that both the ESRS and the SFDR PAIs should revert to the former indicator as the primary datapoint. The additional reporting burden for companies is limited, as driven by investor demand, the adjusted gender pay gap is commonly reported.			
Survey	Assogestioni	Association of financial institutions	Italy	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree				
Survey	Assogestioni	Association of financial institutions	Italy	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Consistent with the position jointly established within EFAMA, Assogestioni reiterates its position that Assets under Management (AuMs) should be explicitly excluded from the scope of CSRD. As clients' investments do not form part of an asset manager's balance sheet, it would be inappropriate to treat them as part of the value chain. In the absence of a clear exclusion, asset managers should be granted flexibility on whether and how to include AuM-related information in their CSRD reports. In particular, some requirements have not been amended in the proposed revised ESRS, as we understand, they are subject to Level 1 changes, including the value chain for FI. Therefore, EFAMA does not interpret any changes that might indicate reference to the value chain for FI as such, including ESRS 1 paragraph 38 and ESRS 2 paragraph 68. The proposed amendment also does not foresee clarifications on the "comparability with 1.5 degrees" for the Transition Plans disclosures. Therefore, we highly recommend additional clarifications, for example, regarding the base year (reference point) for measuring the greenhouse gas emissions reduction and setting climate targets. Guidance on the comparability between disclosures, where the implementation year among different companies differs, as the CO2 data improves over time, would be helpful and would establish an accepted way of working for external auditors to ensure reliable information. By way of guidance, we propose EFRAG to develop a standard model report that includes the minimum reporting requirements per ESRS, such as a structure, table of contents with tables and/or graphs, and explanatory notes. For financial accountability reports, including annual accounts, the use of standard model reports has been common practice for years. Applying a similar approach to sustainability reporting based on ESRS would provide clarity for both preparers and auditors regarding what and how information should be reported.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	In general, EFAA for SMEs supports the principle of simplification and reduction in the amount of data collection required throughout this consultation. EFAA represents over 400,000 accountants, auditors and tax advisors throughout Europe, and through them many thousands of SMEs. SMEs are often resource-constrained and thus particularly adversely impacted by requests for additional information from larger organisations within whose value or supply chains they sit. At first glance, these amendments in the DMA do not appear to directly affect SMEs. However, as large undertakings need to assess their double materiality clearly to report on material topics throughout their value chain, SMEs will also have to provide this information. The requirements for SMEs depend on DMA. EFAA for SMEs recognises and supports the importance of reporting for sustainability purposes but will continue to advocate for this to be done in a way which does not distract SMEs from the vital roles they play throughout Europe in wealth and job creation.			
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	EFAA for SMEs welcomes the provision of new guidance on how to consider remediation, mitigation, and prevention actions in the Double Materiality Assessment (DMA). This is indeed an area where clarification was needed, and the attempt to bring consistency is positive. However, we remain concerned that the approach may become disproportionately onerous for many companies, especially SMEs, and may lead to excessive reporting. The split views within the EFRAG SRB illustrate that further work is required. We would therefore advise: Pilot testing and feedback loops – Before finalising this guidance, structured pilot applications with a representative sample of companies (from several sizes) should be carried out. This would provide evidence of whether the "gross approach" is workable in practice and proportionate. Clearer practical examples – Appendix C is helpful, but further illustrative guidance with sector-specific examples would reduce subjectivity and increase comparability in practice. Phased introduction – A staged implementation over a few years could allow preparers, auditors, and regulators to build the necessary experience before full application. Post-implementation review – After at least three reporting cycles, the effectiveness and proportionality of this guidance should be reassessed, with adjustments made if it proves too complex or generates unnecessary reporting. In conclusion, while the guidance clarifies the principle, we believe it still requires refinement, simplification, and validation through practice to ensure that it results in relevant, comparable, and proportionate reporting.			
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	EFAA for SMEs approves of measures to enable simplicity and conciseness in reporting, which is particularly important for time-constrained companies (including SMEs)			
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	EFAA for SMEs agrees with the objective of improving clarity, accessibility, and understandability of the Standards and recognises the progress achieved through the reorganisation of content, elimination of "may disclose" datapoints, and the streamlining of mandatory disclosure requirements. These changes should make the Standards easier to navigate and apply. That said, we also wish to stress a point that we have consistently raised since the beginning: the real test of whether the Standards are clear, proportionate, and workable will come only after they have been applied for a sufficient period. In our view, at least three reporting cycles are necessary before drawing firm conclusions. Only then will preparers, auditors, and users have enough experience and background to assess whether the simplification measures are effective and whether further adjustments are needed. Regarding the use of language, while simplification is welcome, it is inevitably somewhat subjective. Technical standards in this field are by definition complex and must be developed and interpreted by experts. What matters most is that the language used remains consistent, precise, and as clear as possible for its expert audience. We trust that over time, as practice develops, clarity will improve further and common understanding will be consolidated. Something similar happens with changes in financial reporting regulations; sufficient time is necessary to improve their understanding and succeed in their consolidation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	EFAA for SMEs supports the principle of such a relief as data is often difficult to source in a cost-effective and timely way leading to significant opportunity costs for the undertakings (and particularly for SMEs). EFAA also supports the absence of any time limit for such a relief.			
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	At this stage, EFAA for SMEs marginally prefers Option 2 while noting that Option 1 does contain some practical advantages. Option 2 offers the advantage of simplicity which is important for SMEs, as well as being potentially materially less onerous in terms of retrieving information. However, Option 1, with appropriate safeguards such as clear reporting guidelines to safeguard sectoral comparability and practical implementation, may also be appropriate, but perhaps only for climate issues that are clearly material. As noted, Option 1 appears to align better with IFRS with the important provision of some relief in the provision of data, which is of particular value to all companies, including SMEs, , and Option 2 may have the potential to result in loss of information and fail to incentivize development of robust methodologies and reporting practices. However, there remains a significant risk even under Option 1 that a lot of companies, including SMEs will still fail to provide data to the required disclosure level due to resource capacity and difficulty in retrieving the relevant data.			
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	EFAA for SMEs welcomes the efforts made by EFRAG to enhance interoperability between ESRS and the ISSB's IFRS S1 and S2, while also pursuing simplification. We recognise the significant progress achieved through alignment on consolidation approaches, reliefs, and the consistent use of language. These steps contribute to reducing duplication, increasing comparability, and facilitating implementation for preparers and auditors. At the same time, EFAA wishes to stress that interoperability should be understood as a two-way process. While ESRS has gone a long way to align with IFRS S1 and S2, we would also expect that the ISSB continues to adapt and take into account the European framework. It should also be borne in mind that standards are the result of specific cultural and national characteristics, and Europe has its own features that are difficult to export (100%) to other frameworks. This mutual recognition is essential to ensure that interoperability works not only in one direction, but also benefits European preparers that report under ESRS and seek consistency in global reporting. Given EFAA's unique role at EU level, we consider it important to recall this principle of reciprocity and expect that the ongoing dialogue between EFRAG and ISSB will secure interoperability in both directions. This will ensure that the high level of ambition in Europe is not only maintained but also acknowledged and integrated at the global level, avoiding unnecessary burdens for companies operating internationally.			
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	EFAA for SMEs supports the proposed reduction in datapoints which will reduce the burden on companies of reporting.			
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	22.E1.	Comments on deleted datapoints in ESRS E1	I agree	EFAA for SMEs supports the proposed reduction in datapoints which will reduce the burden on companies of reporting.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	22.E2.	Comments on deleted datapoints in ESRS E2	I agree	EFAA for SMEs supports the proposed reduction in datapoints which will reduce the burden on companies of reporting.			
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	22.E3.	Comments on deleted datapoints in ESRS E3	I agree	EFAA for SMEs supports the proposed reduction in datapoints which will reduce the burden on companies of reporting.			
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	22.E4.	Comments on deleted datapoints in ESRS E4	I agree	EFAA for SMEs supports the proposed reduction in datapoints which will reduce the burden on companies of reporting.			
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	22.E5.	Comments on deleted datapoints in ESRS E5	I agree	EFAA for SMEs supports the proposed reduction in datapoints which will reduce the burden on companies of reporting.			
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	22.S1	Comments on deleted datapoints in ESRS S1	I agree	EFAA for SMEs supports the proposed reduction in datapoints which will reduce the burden on companies of reporting.			
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	22.S2	Comments on deleted datapoints in ESRS S2	I agree	EFAA for SMEs supports the proposed reduction in datapoints which will reduce the burden on companies of reporting.			
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	22.S3	Comments on deleted datapoints in ESRS S3	I agree	EFAA for SMEs supports the proposed reduction in datapoints which will reduce the burden on companies of reporting.			
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	22.S4	Comments on deleted datapoints in ESRS S4	I agree	EFAA for SMEs supports the proposed reduction in datapoints which will reduce the burden on companies of reporting.			
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	22.G1	Comments on deleted datapoints in ESRS G1	I agree	EFAA for SMEs supports the proposed reduction in datapoints which will reduce the burden on companies of reporting.			
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	While EFAA for SMEs supports the overall simplification and reduction in reporting requirements on behalf of SMEs/SMPs, we also fully support measures that improve the quality, relevance, and usability of sustainability reporting. The amendments on water withdrawals and discharges, biodiversity transition plans, and business conduct disclosures can indeed provide more meaningful and decision-useful information to stakeholders. In principle, we acknowledge their importance. However, proportionality must remain a guiding principle in the development and application of ESRS. Requirements that add complexity or a reporting burden, especially where data collection depends on suppliers or the wider value chain, must be carefully assessed. If such requirements risk undermining feasibility, comparability, or legal certainty for preparers—particularly SMEs within large value chains—we cannot fully support them. We therefore welcome these targeted changes but stress that they should not set precedents for expanding mandatory datapoints without ensuring proportionality and practicality. For example, biodiversity transition plans should only be required where they already exist and are publicly available, as foreseen in the amendments. Similarly, metrics on water and confirmed incidents must be implemented in a way that avoids excessive burden or unintended consequences in the value chain. In conclusion, EFAA partially agrees with these exceptions, provided that proportionality and value chain feasibility remain at the forefront of ESRS implementation. EFAA is looking forward to knowing more details about the delegated act based on the VSME, which would be the value chain cap.			
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	EFAA for SMEs notes the disagreement between SRB members on this issue and considers that explicitly requiring fair presentation has the potential to support a more effective functioning of the materiality filter, reducing checklist-driven compliance and encouraging more relevant reporting. However, the transition from a pure compliance approach to a genuine fair presentation framework is complex, particularly in relation to impact materiality, where reporting practices and audit methodologies are still developing. In the short term, we believe that requiring fair presentation explicitly could generate uncertainty, higher audit costs, and potential legal risks, especially for companies and less experienced preparers. Therefore, we suggest a phased approach: ESRS implementation should initially focus on compliance, ensuring consistency, comparability, and the build-up of experience for preparers, auditors, and regulators. The medium-term objective (within 3–5 years) should be a full adoption of fair presentation as the standard principle guiding ESRS reporting. This gradual evolution would allow the profession and companies to mature in their understanding and application of materiality, while regulators and auditors can develop robust practices to support consistent and reliable assurance. We therefore recommend that the Amendments acknowledge this transition period, setting fair presentation as the end goal but allowing preparers and auditors to gain the necessary experience before it becomes the explicit requirement. This approach balances the need for high-quality, decision-useful reporting with proportionality, legal certainty, and cost-effectiveness.			
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	EFAA for SMEs notes the additional work to be undertaken in the area and reserves judgment until results of this work are published.			
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	EFAA for SMEs stresses the importance of providing SMEs with examples and clear information			
Survey	European Federation of Accountants and Auditors for SMEs	Auditor	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Use of "non-employees" (ESRS 1 – Appendix A & ESRS S1) While we support and understand the inclusion of workers who are not in a direct employment relationship with the reporting entity, EFAA for SMEs is concerned that the current level of detail in the definition may introduce ambiguity and reduce comparability across reports and jurisdictions. There really is no definition of non-employees. Specifically: •The definition and examples, as written, may be open to different interpretations, particularly when applied across sectors and legal systems or jurisdictions. The definition of self-employed and agency workers has legal certainty and this should limit divergence. •There is a risk of legal uncertainty, especially where national legislation evolves or differs significantly from the assumptions underlying the definition. •It diverges from the practices of major international standards such as GRI and SASB, both of which avoid highly detailed or jurisdiction-specific definitions and favour more flexible, principles-based language. Suggested alternative To improve clarity and ensure alignment with international practice, we would recommend adopting a more streamlined and targeted formulation. For instance: "Workers who perform work for the organization but are not in an employment relationship with the organization. For example: self-employed workers without personnel who are working exclusively for the undertaking, or individuals provided by undertakings primarily engaged in 'employment activities'." This wording would: •Clearly capture key groups such as temporary agency workers and economically dependent self-employed persons. •Avoid unintended inclusions (e.g., service providers whose work is not under the organization's control). •Increase consistency and comparability between undertakings and across jurisdictions. •Reduce the likelihood of divergent interpretations or legal disputes.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We partially disagree with the proposed amendments, in particular the introduction of a new top-down approach to the financial assessment in the DMA process. The Double Materiality Assessment is not only a compliance exercise but a crucial tool for understanding the company's impacts, risks, and opportunities, and for ensuring an internal learning process that strengthens long-term management of sustainability issues. A purely top-down approach risks undermining this learning effect. The involvement of different functions in a bottom-up process ensures that knowledge is spread across the organization, that risks and opportunities are understood at multiple levels, and that the outcomes of the DMA can be embedded into decision-making processes. This is also essential for unlocking business value from the DMA, as it creates ownership and accountability throughout the company. We also find the introduction of "top-down" terminology confusing, as it is already used with a different meaning in sustainability reporting and risk management contexts. This risks creating ambiguity instead of clarity. While we acknowledge the need to simplify and avoid unnecessary reporting burdens, we believe simplification must not come at the expense of robustness or organizational understanding for risks and opportunities. The DMA should remain a process that engages both bottom-up and top-down perspectives, ensuring that materiality assessments are both efficient and meaningful.			
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We acknowledge the effort to provide guidance on how remediation, mitigation, and prevention actions should be treated in the Double Materiality Assessment. This is an important area of clarification, as there has been divergence in practice and uncertainty on whether impacts should be assessed on a gross or net basis. However, the current drafting is quite complex and may be challenging for preparers to interpret and apply consistently. We encourage EFRAG to further streamline the explanation, making it more user-friendly while still maintaining conceptual clarity. In addition, while the new guidance focuses on impact materiality, we note that similar clarifications have not been provided for the financial materiality side of the assessment. We believe such guidance would be equally important in order to ensure consistent treatment across the double materiality concept and to support comparability and decision-usefulness of the disclosures.			
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We welcome the added flexibility (executive summary, use of appendices) and the emphasis on connected information. To ensure usability over time, when data is unavailable the Standard should require disclosure of a clear time plan: scope of missing data, interim estimation method, responsible function, and a target date for achieving full coverage. This will maintain conciseness while giving users visibility on data gaps and progress.			
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We support a more principles-based PAT approach but recommend a mandatory sequencing: targets before actions. This will mirror how companies work with sustainability and enable a more natural flow in the report. This gives the following headings and structure: •Strategy and targets •Impact risk and opportunity management •Metrics Actions should explicitly reference the target(s) they serve, with a traceable link to KPIs, budgets, and timelines. Where no target exists for a material IRO, undertakings should explain why and provide a timeline to set one. This preserves simplification while strengthening relevance, accountability, and comparability.			
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Overall supportive, with the following refinements: 1.Lack-of-data relief (para 92): Pair the relief with a required time plan (milestones and end-date) to avoid open-ended partial scopes. Disclose interim estimation method and improvement actions. 2.Excluding non-material activities (para 90): Please clarify group consolidation effects. How should groups demonstrate that excluded activities are not significant drivers of material IROs at consolidated level, and prevent "cherry-picking" across subsidiaries? We suggest: (i) disclose the basis for exclusion at consolidated level, (ii) quantify the excluded share of activity/impact, and (iii) commit to periodic reassessment. 3.We believe that financial effects for other topics than climate can be included using the "option 2"-way presented for E1-11. This will lead us in the right direction for other environmental topics and driving the development in assessing the financial effects from these risks and opportunities as well.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We support Option 1 because it drives the development of methodologies for assessing and disclosing sustainability-related risks. Quantitative data is essential for comparing risks across entities and sectors, and for ensuring reporting is decision-useful for investors and stakeholders. Option 1 provides the right balance: it requires quantitative disclosures but allows omission under clear conditions when measurement is not feasible or information would lack reliability. This ensures progress toward more mature practices without imposing unrealistic expectations. Quantitative calculations are also necessary to prioritize risks and understand their financial effects. Limiting disclosure to qualitative information only, as in Option 2, would undermine comparability and reduce incentives to advance methodologies. For these reasons, Option 1 better supports alignment with international standards, enhances comparability, and ensures sustainability reporting provides meaningful insights into financial impacts.			
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	We welcome the restructuring and reduction of overlapping disclosure requirements, as this alleviates unnecessary reporting burden and increases clarity. It is positive that the remaining datapoints are intended to drive meaningful action, and this focus should be maintained. At the same time, we believe the standard must continue to evolve to reflect increasing maturity in sustainability reporting and the availability of widely accepted practice-based KPIs. This is particularly relevant for emerging areas such as biodiversity and value chain workers, where more robust indicators are likely to be developed in the coming years. In addition, we would like to emphasize the importance of sector-specific guidance. Although we recognize that EFRAG may not be the final decision-maker in this regard, it is essential that sectoral standards are made available, for instance in energy and financial services. If reference is made to other frameworks such as GRI, it will be critical to ensure compatibility and interoperability so that companies can apply them easily.			
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	We agree that the disclosure of a biodiversity transition plan should be a mandatory ("shall") requirement, given the importance of transition planning for long-term sustainability and investor decision-making. However, we believe that the current wording is too weak, as it only requires disclosure if a plan already exists and is publicly available. This approach risks limiting the incentive for companies to actually develop and adopt transition plans, which is essential for driving meaningful progress on biodiversity and ecosystem protection. To ensure that the requirement contributes to sustainable development and management of risks and opportunities, it should be clarified that undertakings are expected to explain either their transition plan or, if none exists, the reasons why and their timeline for developing one. In our view, such a formulation would provide greater transparency, support comparability, and create a stronger incentive for companies to align their strategies with biodiversity objectives.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	For financial institutions, intensity-based targets (e.g., emissions per unit of invested capital or revenues financed) provide a more meaningful and practical way of measuring progress than absolute targets. Their business models, portfolios, and exposures change rapidly, making absolute target-setting highly assumption-driven, administratively burdensome, and of limited additional value for steering real-world climate action. In these cases, climate benefits can be achieved equally well through intensity targets. However, this exemption should not reduce transparency. Financial institutions must continue to report their absolute financed emissions (scope 3) on a regular basis, even if their forward-looking targets are intensity-based. This ensures stakeholders can assess both efficiency improvements and the total scale of impact. We also underline that absolute targets should remain required for institutions' own scope 1 and 2 emissions. Finally, transparency on portfolio composition – such as the share of investments in fossil fuel-related sectors – is also highly relevant for understanding direction of travel and alignment with climate goals. While we recognize that this may fall under sector-specific reporting guidance, we encourage EFRAG to ensure such disclosures can be effectively integrated in the broader reporting framework.			
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	We suggest this information can be presented in an appendix to the report.			
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We would like to raise a concern regarding the Commission's proposal on the value chain cap. Limiting companies' ability to obtain information from their suppliers to VSMEs risks undermining effective management of risks and opportunities. Such a restriction could ultimately hamper companies' capacity to improve their sustainability performance and, in the long run, weaken competitiveness.			
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	35.E1-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We would like to highlight a concern regarding duplication. Under E1-1, paragraph 14, it is clearly stated that a transition plan must include GHG reduction targets. Requiring these targets to be reported again under E1-6, paragraphs 25 and 26, appears redundant. The same applies for actions, E1-5. This risks creating unnecessary repetition without adding real informational value. We recommend streamlining the requirements to avoid duplication and ensure reporting remains focused and efficient. We are concerned that the explicit linkage between the climate transition plan (E1-1) and the EU Taxonomy has been removed. Re-introducing a clear connection to Taxonomy KPIs (CapEx/OpEx alignment and CapEx plans) would materially improve comparability and capital-allocation usefulness. We recommend requiring undertakings to map transition-plan measures to Taxonomy-eligible/aligned activities and disclose how planned investments affect Taxonomy CapEx trajectories.	E1	Disclosure Requirement E1-1 - Transition plan for climate change mitigation	
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	35.E1-4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We suggest that further clarification is needed regarding the expected content of a policy in relation to a comprehensive climate transition plan. If an undertaking already has a full transition plan in place, it is not clear how a separate policy is meant to complement or add value to this. Clearer guidance would help ensure consistency and avoid unnecessary duplication in reporting.	E1	Disclosure Requirement E1-4 - Policies related to climate change	
Survey	2050 Consulting AB	Preparer (non-financial preparing a sustainability report)	Sweden	35.S1-10.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	For clarity, comparability and gender equality, we recommend using "family-related leave" as the default umbrella term rather than "maternity leave." "Family-related leave" better reflects diverse family constellations (birthing and non-birthing parents, adoptive parents, same-sex couples) and avoids reinforcing gendered assumptions about caregiving. It also aligns with modern labour frameworks that promote shared caregiving and equal participation in the workforce.	S1	Disclosure Requirement S1-10 - Social protection	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	VTT Technical Research Centre of Finland	Preparer (non-financial preparing a sustainability report)	Finland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	I agree that some of the simplifications contribute to more relevant and concise reporting, especially point 6 above. The critique refers to paragraph 47. referencing "undue costs", that are not defined. I fear this might lead to companies to not disclose relevant information, e.g. GHG-emissions claiming disclosing to cause undue costs for any sized entity. Another concern is paragraph 65. I believe the addition to water down the trustworthiness and quality of information in the materiality assessment, if companies do not have to gather input directly from stakeholders in the value chain.			
Survey	VTT Technical Research Centre of Finland	Preparer (non-financial preparing a sustainability report)	Finland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	I believe the addition to be excessive, I didn't feel like I was missing the guidelines to begin with.			
Survey	VTT Technical Research Centre of Finland	Preparer (non-financial preparing a sustainability report)	Finland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	VTT Technical Research Centre of Finland	Preparer (non-financial preparing a sustainability report)	Finland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I disagree	Point nr. 4 waters down the integrity of the report, it is very important for companies to disclose if they choose not to implement a policy or target or actions for an IRO. Moving disclosure requirements from SBM-3 to IRO-1 seems to complicate rather than simplify it. Some reductions in the new GDRs watered down the integrity of the report: E.g. Progress regarding targets.			
Survey	VTT Technical Research Centre of Finland	Preparer (non-financial preparing a sustainability report)	Finland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	VTT Technical Research Centre of Finland	Preparer (non-financial preparing a sustainability report)	Finland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The whole point of the ESRS is to make sustainability reporting mandatory and comparable, it is likely that all content moved to NMIG will not be reported by anyone.			

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Survey	VTT Technical Research Centre of Finland	Preparer (non-financial preparing a sustainability report)	Finland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	I disagree with the additions of point 1 and 2 above, as they are unclear and waters down the integrity of the report. It will also compromise the comparability of the reports. Also nr. 4 will have a trickle-down-effect to smaller companies. Nr. 5 might make it harder for investors to make decisions. I object all deletions of "negative statements" (e.g. not having a diversity policy in S1). Negative statements force companies to transparently disclose performance.			
Survey	VTT Technical Research Centre of Finland	Preparer (non-financial preparing a sustainability report)	Finland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	It would be helpful to define what metrics you can use estimations for (e.g. not to be used in own workforce data)			
Survey	VTT Technical Research Centre of Finland	Preparer (non-financial preparing a sustainability report)	Finland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	VTT Technical Research Centre of Finland	Preparer (non-financial preparing a sustainability report)	Finland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	It is helpful that transition and physical risks are clearly separated in the disclosure requirement.			
Survey	VTT Technical Research Centre of Finland	Preparer (non-financial preparing a sustainability report)	Finland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	VTT Technical Research Centre of Finland	Preparer (non-financial preparing a sustainability report)	Finland	22.ESRS2	Comments on deleted datapoints in ESRS 2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	GOV-2 §26c: This is an important and concrete disclosure on managements involvement in sustainability work and highlights a company's commitment. GOV-4: Deleting requirement to disclose main risks identified and their mitigation strategies waters down integrity of report. SBM-1: G- Elements of the undertaking strategy that relate to or impact sustainability matters deletion: I do not believe this information to be redundant. SBM-2: Too many datapoints have been deleted regarding stakeholder engagement (20 a & c) These disclosures are necessary for the reader to understand how seriously the company engages with stakeholders. SBM-3, IRO-2 and PAT commented earlier.			
Survey	VTT Technical Research Centre of Finland	Preparer (non-financial preparing a sustainability report)	Finland	22.E1.	Comments on deleted datapoints in ESRS E1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	E1-4 §25: Risk of companies publishing reports without having to disclose the relevant content of the policy. High climate impact sector datapoints deleted: This sector should definitely report, as they are key drivers of climate change and biodiversity loss. E1-8: Total GHG emissions deleted- This is the first thing people look at! Is the reader now responsible for calculating all scopes emissions? It is the most simple thing to calculate, will take a worker 30 seconds and save time for others.			
Survey	VTT Technical Research Centre of Finland	Preparer (non-financial preparing a sustainability report)	Finland	22.E4.	Comments on deleted datapoints in ESRS E4	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Transition plan doesn't have to link to strategy or business model anymore = There is no point of having a plan then. Also, removing 80 % of policy requirements will lead to papershells. DR32 Deleting ecological thresholds: There are not any other effective ways to report than through the thresholds, this will lead to silence.			

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Survey	VTT Technical Research Centre of Finland	Preparer (non-financial preparing a sustainability report)	Finland	22.ES.	Comments on deleted datapoints in ESRS E5	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	If this is a material topic, reporting should not be optional.			
Survey	VTT Technical Research Centre of Finland	Preparer (non-financial preparing a sustainability report)	Finland	22.S1	Comments on deleted datapoints in ESRS S1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	§24abcd: I disagree with deletions, it is important for companies to have DEI polities in place and that they disclose relevant information. §15b (former §27): Frequency of engagement is important. §29 and §34: Negative statements matter for the reader. §19 (former §38c) and §41: Actions to deliver positive impacts is relevant knowledge. S1-6: Total nr of fulltime equivalent: Why has only one gender breakdown been deleted? It makes no sense. §29 (former §65): Relevant			
Survey	VTT Technical Research Centre of Finland	Preparer (non-financial preparing a sustainability report)	Finland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	This is relevant information to report			
Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We acknowledge the proposed clarifications to the double materiality assessment and the broader concept of materiality within the ESRS framework. The improved articulation of these principles is a welcome step toward enhancing consistency and usability. However, the current formulation, particularly the phrase "necessary for users to understand" in paragraph 21(b) of ESRS 1, remains overly broad and insufficiently defined. It is unclear whether this language implies a binding disclosure obligation or merely reflects a subjective judgment by the preparer. This ambiguity introduces interpretive uncertainty and risks inconsistent application across companies. Such vagueness may inadvertently expand the scope of required disclosures to accommodate a wide range of speculative or undefined user needs. It also places a disproportionate burden on preparers to justify exclusions, especially in auditor discussions where the absence of clear thresholds may lead to divergent expectations. Moreover, the clause overlaps with the qualitative characteristics of sustainability information such as relevance, faithful representation, and understandability, without offering a more precise or operationally useful standard. Importantly, the current wording may undermine the principle of proportionality by encouraging over-disclosure of immaterial information. This could dilute the focus of sustainability statements and reduce their decision-usefulness for stakeholders. For example, paragraph 21(a), which refers to information that could "reasonably be expected to influence decisions," provides a clearer and more actionable benchmark for preparers. To address these concerns, we recommend replacing paragraph 21(b) with a reference to the qualitative characteristics of sustainability information as defined in ESRS 1. These characteristics provide a coherent and principles-based framework for assessing materiality. A suggested revision could read: "Information is material when it meets the qualitative characteristics of sustainability information as defined in this standard and could reasonably be expected to influence decisions made by primary users of general purpose financial and sustainability reports."			
Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We acknowledge the newly introduced guidance on how to consider remediation, mitigation, and prevention actions when assessing the materiality of negative impacts—commonly referred to as the "gross vs. net" issue. While the clarification that preparers may take into account existing measures to avoid or reduce negative impacts is a step in the right direction, the current formulation remains insufficiently precise. To ensure consistent and defensible application, the guidance must be crystal clear: it must explicitly define when and how mitigation actions can be factored into materiality assessments, and under what conditions such consideration is appropriate. Ambiguity in this area risks inconsistent interpretations, undermines comparability across undertakings, and may expose companies to legal and assurance-related challenges. Users of sustainability statements are primarily concerned with whether material impacts have occurred or are reasonably likely to occur—not with hypothetical or highly improbable scenarios. Requiring disclosure of gross impacts without acknowledging effective mitigation efforts distorts the actual risk profile and may lead to overstated perceptions of exposure, thereby reducing the relevance and decision-usefulness of reported information. This issue directly touches on the principle of faithful representation, as outlined in ESRS 1, which demands that information be complete, neutral, and free from material error. Allowing preparers to reflect the net effect of their actions is not merely a helpful option—it is a necessary condition for balanced and proportionate reporting. In its current form, the guidance represents progress, but it must be strengthened and clarified to avoid interpretive uncertainty and ensure that sustainability disclosures reflect actual performance and risk management practices—not theoretical worst-case scenarios.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We acknowledge the structural improvements introduced in the revised ESRS, particularly those aimed at enhancing readability and connectivity with broader corporate reporting. The clearer organisation of content and the introduction of executive summaries and appendices may support more effective communication with stakeholders, especially investors. However, these enhancements primarily address presentation rather than substance. The inclusion of executive summaries and appendices, while helpful, implicitly acknowledges that the standards remain voluminous and complex. These additions do not resolve the underlying issue of excessive granularity, which continues to pose challenges for preparers in terms of documentation, internal coordination, and assurance. The reliance on Non-Mandatory Illustrative Guidance (NMIG) further contributes to interpretive uncertainty. While NMIG is intended to support implementation, its non-binding nature and undefined legal status may lead to inconsistent application and diverging expectations among auditors and regulators. In practice, NMIG content is often treated as de facto mandatory, which undermines the principle of proportionality and increases the compliance burden. To ensure that the ESRS framework remains both decision-useful and operationally feasible, further simplification is needed. This includes reducing the volume of mandatory disclosures, clarifying the role of supplementary guidance, and streamlining the architecture of the standards to avoid fragmentation. We recommend that EFRAG continue to prioritize simplification efforts that go beyond formatting and presentation. A more fundamental reduction in complexity is necessary to support consistent implementation, enhance comparability, and maintain alignment with the principles of proportionality and relevance.			
Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We support the restructuring of ESRS 2 and its clarified interaction with topical standards. The removal of Appendix C and the consolidation of general disclosures into ESRS 2 have reduced duplication and improved the logical flow of the standards. This architectural shift enhances usability and supports a more coherent implementation framework. However, further simplification is both possible and necessary. We recommend eliminating the concept of "Application Requirements" (ARs) and replacing AR references with paragraph numbers. The current AR structure fragments the standards and introduces interpretive ambiguity. Replacing ARs with paragraph references would streamline navigation, improve auditability, and align ESRS more closely with other frameworks such as IFRS S1 and S2. Given the welcomed reduction in mandatory and voluntary data points—57% and 100% respectively—this adjustment would be a logical next step.			
Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I disagree	In a regulatory framework that demands comparability, auditability, and legal defensibility, terminological precision is not optional—it is essential. The inconsistent and interchangeable use of many terms in ESRS, e.g. "topic," "sub-topic," and "sustainability matter", introduces unnecessary ambiguity. Each term must be clearly defined and consistently applied to denote its respective level of granularity. For example, the term "topic" is sometimes used to refer to high-level sustainability themes (e.g., climate change, biodiversity), while in other instances it appears to overlap with "sustainability matter" or even "sub-topic," depending on the context. This creates confusion not only for preparers attempting to structure their disclosures, but also for assurance providers and users interpreting the materiality assessment and reporting boundaries. Such ambiguity risks inconsistent application across undertakings and jurisdictions, undermines the comparability of disclosures, and may lead to misinterpretation or misclassification of material issues. We therefore strongly recommend that EFRAG and the European Commission: •Establish and enforce clear definitions for each term used in the ESRS framework. •Avoid interchangeable use of terms that denote different levels of reporting granularity. •Ensure alignment across all ESRS standards and guidance documents, including implementation notes and FAQs. •Clarify the hierarchical structure of sustainability matters, topics, and sub-topics in the context of materiality assessments and disclosure boundaries.			
Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	EFRAG should prioritize the development of sustainability reporting standards that are self-contained, clearly structured, and legally coherent—minimizing reliance on supplementary guidance of uncertain legal status. The current approach, which disperses interpretive content across non-binding materials such as NMIG, introduces ambiguity and undermines consistency in application. The NMIG is explicitly described as non-binding, with its legal status pending confirmation by the European Commission. If excluded from the Delegated Act, its authority is diminished; if included, it risks becoming a quasi-mandatory checklist—contradicting its intended purpose. This ambiguity may lead to inconsistent application and increased compliance pressure, particularly from auditors and regulators. Although NMIG is not a checklist and does not require justification for non-use, it may be treated as de facto expectation in practice. This could result in over-reporting and misalignment with the principle of proportionality. The separation between mandatory ESRS content and illustrative NMIG guidance also fragments the reporting process, requiring preparers to consult multiple documents to interpret a single requirement. The reclassification of "may disclose" content into methodological guidance under Application Requirements (ARs), and the migration of other elements to NMIG 2, creates uncertainty about prioritization and compliance. We recommend that EFRAG clarify the role and status of NMIG to ensure consistent and proportionate implementation. As stated before, the focus should be on developing standards that can be understood and implemented without the need for additional guidance.			

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Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We acknowledge the proposed burden relief measures as a constructive step toward reducing the complexity of ESRS reporting. The "undue cost or effort" exemption provides a practical basis for justifying omissions, particularly in auditor discussions. However, it may increase the evidentiary burden on preparers if challenged. The removal of the preference for direct data in value chain metrics is also welcome. Allowing estimates based on practicability and reliability reflects current data maturity and may reduce future reporting effort. We also support the option to exclude activities that are not significant drivers of impacts, risks, or opportunities (IROs). However, the amendments regarding anticipated financial effects do not resolve persistent issues of data availability and reliability. Given the variability in assumptions, such disclosures are unlikely to be comparable or decision useful. We recommend removing these data points entirely. The proposed relief for acquisitions is appropriate, though the one-year integration timeframe may be unrealistic. Greater flexibility should be considered to allow disclosures once integration is substantively complete. Collectively, these relief measures introduce greater flexibility in fulfilling and documenting ESRS requirements. They represent progress toward a more proportionate and practicable implementation framework, though further refinements may be necessary to fully align with the principles of transparency and the objectives of the EU Green Deal.			
Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	The proposed relief represents a pragmatic and timely enhancement to the ESRS framework. It explicitly acknowledges the operational constraints that preparers face — especially in the context of value chain reporting, where data availability and quality are often limited. By prioritizing reliability over completeness, the relief fosters more robust and defensible disclosures, thereby mitigating legal and reputational risks associated with the use of uncertain or unverifiable data. This approach aligns with the ESRS's fair presentation principle and supports the overarching goal of meaningful sustainability reporting without imposing disproportionate burdens on reporting entities. Moreover, the relief serves as a transitional mechanism, bridging the gap until robust methodologies for certain indicators are fully developed and standardized. Nonetheless, its practical utility may be constrained for companies in the initial implementation wave, where data collection protocols have already been formalized in collaboration with assurance providers. For these entities, revisiting and renegotiating established audit procedures may entail greater effort and complexity than adhering to existing practices. To maximize the benefit of the relief, further guidance should be considered to support retrospective application or phased integration, particularly for early adopters.			
Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	We recommend the removal of the disclosure requirement for anticipated financial effects, as currently proposed in the amended ESRS drafts. The concept, while well-intentioned, lacks standardization, definitional precision and methodological guidance within the ESRS framework. The absence of clear instructions on calculation techniques, required granularity, or acceptable estimation practices renders the disclosures inherently unreliable and undermines their comparability across companies. From a preparer's perspective, the requirement imposes a disproportionate reporting burden without delivering commensurate informational value. The data underpinning these disclosures is frequently speculative, and the methodological complexity involved in isolating the financial impact of individual sustainability risks is substantial. This not only increases the risk of misinterpretation by users but also heightens legal exposure for companies. Neither Option 1 nor Option 2 sufficiently mitigates these concerns, as both rely on forward-looking estimates that require substantiation without a clear methodological basis. Moreover, the recognition and measurement of future risks are already governed under IFRS standards. Introducing parallel requirements within the ESRS risks regulatory overlap and inconsistency, especially for dual reporters. If the requirement is retained, we strongly recommend that it be aligned with the ISSB's IFRS S1/S2 framework and supported by detailed implementation guidance. Additionally, its application should be deferred until robust and widely accepted methodologies are available to ensure meaningful and reliable reporting.			
Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Should the decision be made to retain the disclosure requirement for anticipated financial effects, we strongly caution against the adoption of Option 1, which mandates quantitative disclosures. In practice, such figures are frequently unavailable and/or lack the necessary reliability to support meaningful external reporting. The absence of established methodologies for calculating and substantiating these estimates further compromises comparability across companies and sectors.			
Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We strongly support the objective of enhancing interoperability between the ESRS and ISSB standards. Greater alignment is critical to reducing duplicative reporting obligations and enabling companies—particularly those operating across multiple jurisdictions—to meet both frameworks through a streamlined and unified reporting process. Preparers have consistently highlighted the need for ESRS disclosures to be designed with ISSB compatibility in mind, especially where thematic and structural overlaps exist. To facilitate practical implementation and minimize administrative burden, we recommend that after the final revision the ESRS/ISSB Interoperability Guidance be expanded to include a comprehensive, data point-by-data point comparison. Such a mapping would allow preparers to demonstrate compliance with IFRS S1 and S2 alongside ESRS requirements without the need to develop and reconcile separate documentation for external assurance purposes. This would significantly reduce effort, promote consistency across disclosures, and support a more proportionate and scalable application of the standards. Furthermore, this approach would foster convergence between European and global sustainability reporting frameworks, reinforcing the credibility and usability of ESRS disclosures in international capital markets. It would also enable preparers to leverage existing internal reporting structures, thereby improving efficiency and reducing the risk of conflicting interpretations across assurance engagements.			

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Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	We acknowledge and welcome the improved structuring and consolidation of the ESRS disclosure requirements. The clearer grouping and separation of data points contribute to enhanced usability and navigability of the standards, particularly for preparers managing complex reporting processes across multiple entities and jurisdictions. However, upon closer examination, many of the proposed changes appear to be editorial in nature and do not materially alter the substantive scope of the disclosure obligations. While the presentation of the standards has been streamlined, the underlying reporting requirements remain largely intact. As such, we do not anticipate a meaningful reduction in reporting volume or complexity under the revised ESRS. In several instances, the removal of data points affects only the format or phrasing, without relieving preparers of the obligation to collect and disclose the same underlying information. In this context, we are particularly concerned about the introduction of new mandatory disclosure requirements within the revised drafts. These additions run counter to the stated objective of reducing complexity and administrative burden. Retaining them risks diluting the impact of the simplification effort and may inadvertently increase the workload for preparers, especially those already engaged in implementation planning. To preserve the integrity of the revision process and ensure proportionality, we recommend that these newly introduced mandatory disclosures be removed or reclassified as voluntary, pending further stakeholder consultation and methodological development.			
Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We support the overarching goal of simplification within the revised ESRS framework. However, simplification should not result in the introduction of new mandatory data points or the conversion of previously voluntary disclosures into mandatory ones. While we acknowledge that the number of reclassifications from "may" to "shall" is limited and that many of these disclosures align with existing reporting objectives, the principle of avoiding increased reporting obligations must be applied consistently and transparently. Even where the content of reclassified data points is not technically new or complex, their elevation to mandatory status introduces additional implementation effort. Preparers must interpret the revised requirements, coordinate across internal functions, and engage with assurance providers to ensure alignment—particularly during first-time application. These operational implications should not be underestimated. Furthermore, certain revisions appear to expand the scope of reporting without sufficient justification. For example, the shift from "severe human rights incidents" to "human rights incidents" significantly broadens the reporting obligation and may lead to inconsistent interpretations and over-reporting. We recommend that these addition be removed. To ensure that the simplification objectives are genuinely achieved, it is essential that revisions do not inadvertently increase the reporting burden. A consistent application of the principle of proportionality—grounded in materiality and relevance—will support a more effective, scalable, and practicable implementation of the ESRS across diverse sectors and entity sizes.			
Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We do not support the introduction of new data points, as they result in additional reporting burdens without a corresponding increase in decision-useful information. The cost-benefit ratio of expanding disclosure requirements must be carefully considered. In our view, the current framework already imposes substantial demands on preparers. The inclusion of a mandatory data point requiring entities to confirm that ESRS 1 was considered during preparation is unlikely to enhance the quality of sustainability statements. Instead, it may increase the audit burden without providing meaningful insight. We also recommend removing several newly introduced data points that do not align with the stated objective of simplification. For example: •ESRS E2-4 on secondary microplastics should not be included as a separate data point, as only narrative information is currently available. •ESRS E5-4 on critical and strategic raw materials should be deleted, as it extends beyond the scope of sustainability reporting and appears to serve broader policy objectives. •ESRS E5-5 on "final destination unknown" should also be removed. The stated objective of avoiding unreasonable estimations can be achieved without introducing new mandatory disclosures. To maintain the integrity of the simplification process, we recommend that no new data points be added and that voluntary disclosures not be reclassified as mandatory. This approach would better support a proportionate and practicable implementation of the ESRS.			

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Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We acknowledge the ambition to enhance transparency and accountability through the concept of fair presentation. However, we have significant concerns regarding its proposed strengthening within the ESRS framework. 1. Conceptual Ambiguity The term "fair presentation" is well-established in financial reporting, supported by jurisprudence and audit practice. In contrast, its application in sustainability reporting remains undefined. The ESRS does not clarify whether it refers to completeness, neutrality, stakeholder alignment, or auditability—leading to potential inconsistencies. 2. Immaturity of Sustainability Reporting Systems Sustainability reporting remains in development, particularly in areas such as Scope 3 emissions, supply chain data, and ESG risk integration. Imposing a fair presentation requirement at this stage may lead to form-over-substance compliance, where the appearance of fairness is prioritized over substantive improvements. 3. Disproportionate Legal and Assurance Burden Elevating fair presentation to a legally enforceable standard introduces significant compliance risks, including board liability, regulatory enforcement, and escalating assurance requirements. Given the evolving nature of the ESRS, this level of scrutiny appears premature. 4. Disconnect Between Narrative and Quantitative Disclosures Sustainability reporting often relies on narrative explanations. The fair presentation model implies a level of quantitative precision that is not yet feasible. Without clear guidance on reconciling narrative and data-driven elements, preparers may default to overly cautious or vague disclosures. We recommend that EFRAG clarify the scope and application of fair presentation within the ESRS to ensure it is proportionate, operationally feasible, and aligned with the maturity of sustainability reporting practices.			
Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	We do not support the proposed expansion of thresholds for country-level disaggregation of metrics. This change contradicts the Commission's stated objective to simplify and reduce reporting burdens. For companies operating across multiple jurisdictions, the proposal could result in a substantial increase in disclosure requirements. Moreover, EFRAG has not provided a compelling rationale for why this level of granularity—exceeding that required for most other metrics—would yield decision-useful information. Without clear justification, the additional burden appears disproportionate.			
Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadequwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	We acknowledge the alignment of ESRS S1-9 with ILO principles and Directive (EU) 2022/2041. Referencing the directive in section (a) is consistent with existing requirements. However, we do not support the additions under section (b), which raise practical concerns. Companies cannot ensure that statutory minimum wages are set in accordance with ILO principles, nor can they verify whether national authorities apply these principles. The ILO's guidance is directed at governments, not reporting entities. Furthermore, the proposal lacks clarity on who should perform wage estimations and whether reliable data sources exist. Outside the EU, wage-setting mechanisms vary widely, and in some cases, statutory minimum wages are absent or weakly enforced. In such contexts, continued use of external benchmarks should remain permissible.			
Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	Feasibility and coherence across legislative frameworks must remain a guiding principle. The removal of certain SFDR-related data points is appropriate and contributes to simplification. However, any changes to ESRS must be coordinated with the ongoing SFDR review to avoid inconsistencies and duplicative reporting obligations.			
Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Inconsistency in the definition of "IRO management" Amended ESRS 1.8 suggests that "impact, risk and opportunity management" is distinct from "policies, actions and targets" (PATs). However, in practice, PATs are widely understood as the operational components of IRO management. This interpretation is also reflected in Amended ESRS 1.AR 1 to paragraph 11. We recommend revising the wording in ESRS 1.8 to align with prevailing practice and clarify that PATs are integral to IRO management. Suggested revision: "Amended ESRS 2 General Disclosures establishes Disclosure Requirements (DRs) on the information that the undertaking shall provide for topics related to material impacts, risks and opportunities (IROs). These DRs cover the governance and strategy underpinning IRO management, as well as the related policies, actions, targets, and metrics." Entity-specific information, specifically Amended ESRS 1.AR 2 for para 11: The paragraph introduces redundancy by listing relevance, faithful representation, and contextualization separately, despite these being embedded in the ESRS's qualitative characteristics. This may lead to fragmented interpretation and inconsistent application. We recommend simplifying the guidance by referencing the established framework. Suggested revision: "When determining the usefulness of metrics for inclusion in entity-specific disclosures, the undertaking shall assess whether the metrics meet the qualitative characteristics of sustainability information as defined in this standard." "Shall consider" – Amended ESRS 1.15 The phrase "shall consider" introduces ambiguity regarding its normative force. It is unclear whether it implies a binding obligation, a recommendation, or a discretionary judgment. This lack of precision complicates implementation, assurance, and internal control design. We recommend replacing "shall consider" with clearer, actionable language aligned with the qualitative characteristics of sustainability information. This will support consistent interpretation and auditability.			

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Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Amended ESRS S1, paragraph 3: The following paragraph in the draft ESRS text raises a fundamental concern: "When only one of the sub-topics covered by this Standard is material, the undertaking shall report only on that sub-topic. This does not apply to DRs S1-5 and S1-16, which shall be applied whenever an undertaking concludes that own workforce is a material topic and DR S1-6 when non-employees in the undertaking's own workforce are assessed as material." This formulation is inconsistent with the principles established in ESRS 1. The ESRS framework is explicitly built on the premise that all disclosure requirements are subject to a materiality assessment. Introducing exceptions that require the application of specific DRs regardless of their individual materiality contradicts this foundational principle. The paragraph should be deleted, and the materiality approach observed throughout the ESRS. Amended ESRS S1, paragraphs 12/13: Both paragraphs prescribe disclosures that appear to be mandatory regardless of materiality, which is inconsistent with the core principles of ESRS 1. According to ESRS 1, all disclosures must be subject to a materiality assessment. This ensures that sustainability reporting remains focused, relevant, and proportionate to the undertaking's actual impacts and risks. By requiring companies to state whether certain policies exist—without conditioning this requirement on the materiality of the underlying topics—the current wording can be interpreted as disrespecting the materiality principle.			
Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Materiality of information – Amended ESRS 1.21(b) The current wording—"necessary for users to understand"—lacks normative clarity and overlaps with existing qualitative characteristics. It risks broadening the scope of materiality beyond what is operationally feasible and may lead to inconsistent application. We recommend replacing paragraph 21(b) with the following: "Information is material when it meets the qualitative characteristics of sustainability information as defined in this standard and could reasonably be expected to influence decisions made by primary users of general purpose financial and sustainability reports." This revision enhances clarity, supports auditability, and aligns with the ESRS's principles-based architecture. Amended ESRS E1, paragraph 14: The revised paragraph 14 (16 amended) introduces terminology and expectations that go beyond the scope of existing ESRS requirements. The term "financial and investment planning" significantly expands the scope compared to the existing requirement in ESRS E1, which refers to "investments and funding". This broader formulation risks being interpreted as requiring disclosure of strategic financial planning, resource allocation, and capital deployment decisions that go well beyond climate-related investments. The term "financial and investment planning" may also compel companies to disclose sensitive and confidential information about their strategic priorities, financial structuring, and resource allocation.			
Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	35.ESRS1_1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Inconsistency in the definition of "IRO management" Amended ESRS 1.8 suggests that "impact, risk and opportunity management" is distinct from "policies, actions and targets" (PATs). However, in practice, PATs are widely understood as the operational components of IRO management. This interpretation is also reflected in Amended ESRS 1.AR 1 to paragraph 11. We recommend revising the wording in ESRS 1.8 to align with prevailing practice and clarify that PATs are integral to IRO management. Suggested revision: "Amended ESRS 2 General Disclosures establishes Disclosure Requirements (DRs) on the information that the undertaking shall provide for topics related to material impacts, risks and opportunities (IROs). These DRs cover the governance and strategy underpinning IRO management, as well as the related policies, actions, targets, and metrics." Entity-specific information, specifically Amended ESRS 1.AR 2 for para 11: The paragraph introduces redundancy by listing relevance, faithful representation, and contextualization separately, despite these being embedded in the ESRS's qualitative characteristics. This may lead to fragmented interpretation and inconsistent application. We recommend simplifying the guidance by referencing the established framework. Suggested revision: "When determining the usefulness of metrics for inclusion in entity-specific disclosures, the undertaking shall assess whether the metrics meet the qualitative characteristics of sustainability information as defined in this standard." "Shall consider" – Amended ESRS 1.15 The phrase "shall consider" introduces ambiguity regarding its normative force. It is unclear whether it implies a binding obligation, a recommendation, or a discretionary judgment. This lack of precision complicates implementation, assurance, and internal control design. We recommend replacing "shall consider" with clearer, actionable language aligned with the qualitative characteristics of sustainability information. This will support consistent interpretation and auditability.	ESRS1	1. ESRS Standards, reporting areas and drafting conventions	
Survey	Siemens Energy AG	Preparer (non-financial preparing a sustainability report)	Germany	35.S1-1.	Do you agree with the amendments of this chapter?	I disagree	Both paragraphs prescribe disclosures that appear to be mandatory regardless of materiality, which is inconsistent with the core principles of ESRS 1. According to ESRS 1, all disclosures must be subject to a materiality assessment. This ensures that sustainability reporting remains focused, relevant, and proportionate to the undertaking's actual impacts and risks. By requiring companies to state whether certain policies exist—without conditioning this requirement on the materiality of the underlying topics—the current wording can be interpreted as disrespecting the materiality principle	S1	Disclosure Requirement S1-1 - Policies related to Own workforce	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ministry of Finance of Estonia	Public authority	Estonia	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree				
Survey	Ministry of Finance of Estonia	Public authority	Estonia	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	Some feedback was received that the way the wording is constructed, it can be understood that for actual impact 'net' is possible when the communication on the topic has been opposite.			
Survey	Ministry of Finance of Estonia	Public authority	Estonia	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Ministry of Finance of Estonia	Public authority	Estonia	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree				
Survey	Ministry of Finance of Estonia	Public authority	Estonia	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Ministry of Finance of Estonia	Public authority	Estonia	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	We agree that more clarity has been brought to the standards. We also acknowledge that the principle of undue cost and effort was there before and has been now highlighed. We do suggest some practical guidance how to apply it to result similar application. While the concept is used in financial reporting, its the process which has been developed for a long time. Companies haven't had time to create such for sustainability reporting, and the sustainability expert do not have experience with this principle. The guidance saying that use information that comes from business plan/strategy, might lead to very limited data to be disclosed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ministry of Finance of Estonia	Public authority	Estonia	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	Ministry of Finance of Estonia	Public authority	Estonia	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The feedback from companies was mixed on the matter even if they in general vote for alignment with international standards. As it is important metric for management, we suggest that for actual risks it would be quantitative (practical guidance needed) and with a possibility of more qualitative information for potential risks.			
Survey	Ministry of Finance of Estonia	Public authority	Estonia	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Ministry of Finance of Estonia	Public authority	Estonia	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Ministry of Finance of Estonia	Public authority	Estonia	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Ministry of Finance of Estonia	Public authority	Estonia	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Ministry of Finance of Estonia	Public authority	Estonia	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Ministry of Finance of Estonia	Public authority	Estonia	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	If the standard was not clear for certain users/prepares then it needs to be highlighted.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ministry of Finance of Estonia	Public authority	Estonia	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	The feedback on that quesition was very mixed. We lean towards agreeing with hopes that it leads to lesser data gathering from bank stakeholders. Respondents pro exemption brought out that absolute values do not tell the adequate story in growth phase.			
Survey	Ministry of Finance of Estonia	Public authority	Estonia	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	Some companies still see that amount of information for S1 and 2 standards is above necessary. More guidance is needed that the disclosed information is information filtered out with DMA and materiality of information.			
Survey	Ministry of Finance of Estonia	Public authority	Estonia	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	Feedback was very mixed. It was indicated that its rather complex, especially if the results do not generated actions/change.			
Survey	Ministry of Finance of Estonia	Public authority	Estonia	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Ministry of Finance of Estonia	Public authority	Estonia	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Ministry of Finance of Estonia	Public authority	Estonia	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Ministry of Finance of Estonia	Public authority	Estonia	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	There are various ways how large companies can negatively affect SME-s. Removing one indicator that might shed some light to market practises, can lead to no metrics at all and ungrounded statements.			
Survey	Ministry of Finance of Estonia	Public authority	Estonia	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Ministry of Finance of Estonia	Public authority	Estonia	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ministry of Finance of Estonia	Public authority	Estonia	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The expectation of the market is that we follow well established methodologies and standards. The GHG Protocol is such and we should avoid EU additions and exemptions. Guidance is needed on '1,5C compatibility' to avoid uneven understanding and application /targets.			
Survey	Ministry of Finance of Estonia	Public authority	Estonia	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Ministry of Finance of Estonia	Public authority	Estonia	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Ministry of Finance of Estonia	Public authority	Estonia	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	For Wave 1 companies, E4 did not in general capture the attention of companies. Additional guidance is needed on the impacts and dependences/risks that come from ecosystems/biodiversity.			
Survey	Ministry of Finance of Estonia	Public authority	Estonia	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	The companies might not have information on waste destination and the use in next phase. In certain situation it could be considered to allow to use country average (19 c, d) otherwise they all will be reported as 19e - destination unknown.			
Survey	Ministry of Finance of Estonia	Public authority	Estonia	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Ministry of Finance of Estonia	Public authority	Estonia	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Ministry of Finance of Estonia	Public authority	Estonia	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ministry of Finance of Estonia	Public authority	Estonia	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Ministry of Finance of Estonia	Public authority	Estonia	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Ministry of Finance of Estonia	Public authority	Estonia	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Clarifications regarding the conduct of the DMA are welcome, as greater standardization is needed. Specifying the sequence of steps—(1) impact analysis, (2) financial materiality analysis, and (3) determination of material information—together with the clarification that not all potential IROs must be assessed and that comprehensive counterparty data collection is not required, can help streamline the DMA. However, it is noted that the possibilities for substantive simplification are limited for financial institutions. Since financial institutions usually cover a wide range of economic sectors and financing activities in their portfolios and are therefore broadly diversified in terms of sustainability topics, blanket exclusions of topics are difficult. This, in turn, results in an increased need for coordination with auditors. Financial institutions generally base their time horizons on prudential risk methodologies, where the short-term horizon is typically 3 years rather than 1. This creates difficulties in reconciling the two perspectives. We believe financial institutions should have flexibility to align sustainability materiality analysis with existing processes, as a 1-year horizon is largely irrelevant for risk assessment. In practice, relevant horizons are at least 3 to 5 years, and clear guidance would be helpful. The optional use of the top-down process for DMA is generally to be welcomed. However, in the absence of illustrative guidance on when a topic may be preliminarily excluded as non-material, preparers and auditors are likely to face challenges. Clarification or examples in the NMIG would be helpful. It is also noted that the consolidation of subtopics is not always effective. Excessive aggregation may dilute relevant aspects. The requirements for the materiality assessment should be clearly defined in advance of the analysis. We recommend that all aspects to be covered by the analysis be fully specified in ESRS 1.			
Survey	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	In principle, the concept of the gross-net approach is to be welcomed. It would be important to clarify how actions should be treated in the context of actual positive impacts. For example, under ESRS S1 Own Workforce, when an organisation identifies positive impact on own workforce it can be that there are internal policies and actions in place to increase the positive impact. If the respective policies and actions are set up with the focus on increasing its positive impact rather than on reducing its negative impact, it becomes difficult in practice to exclude these policies and actions from consideration when scoring its impact. In the NMIG, examples that help distinguish between potential and actual impacts could be included. Examples could also be included in the AR or in the NMIG for financial institutions, illustrating how the gross-net approach should be applied in the materiality assessment.			
Survey	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	In our view, the revised ESRS do provide the intended flexibility, particularly with respect to avoiding unnecessary repetition. However, further clarification would be helpful regarding the treatment of mandatory metrics under the topical standards when internal steering relies primarily on entity-specific metrics. We refer in this context to our detailed question under ESRS 2, paragraph 40. The requirements for an executive summary should be further specified. It can be assumed that this will be the part of the report most widely read. If the presentation is not appropriately balanced, it could distort the objective picture of the sustainability performance.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Overall, the revised ESRS provide greater scope for the exercise of professional judgment. Nevertheless, the associated processes remain highly burdensome for organisations. The renaming of terms (e.g., from "MDR" to "GDR"), changes in the numbering of reporting requirements, as well as inconsistent headings in the table of contents—particularly with regard to metrics in the social chapter—result in a significant amount of subsequent correction work. This affects both internal processes and external documentation and occurs at a point in time when many companies have already made substantial progress in their implementation efforts. EFRAG urgently needs to ensure that a transfer from the "old" requirements to the new ones is possible. An overview table should be provided, also indicating which concepts and terms have been revised. It would also be advisable to incorporate the new list of phased-in Disclosure Requirements. While the recent publication provides relief for the next two years, it remains unclear how these phased-in provisions will apply once this period ends or when the new ESRS enter into force. For example, regarding anticipated financial effects, the original transitional provisions required "wave 1" organisations to omit disclosures in the first year (FY2024) and to provide only qualitative disclosures in the second and third years (FY2025 and FY2026), with full disclosure required as of FY2027. It is uncertain whether full compliance will indeed be required from FY2027 onward, or whether additional transitional arrangements will be introduced to allow for further phased-in periods.			
Survey	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Despite efforts to improve clarity, the wording of the ESRS remains partly difficult to access. Certain passages are highly condensed and require repeated reading. Some disclosure requirements have been shortened to such an extent that they are no longer understandable and require interpretation (e.g., ESRS 2 IRO-1 26g: "a description of the decision-making procedures"). Please consider the detailed questions and observations raised in section 3 of this questionnaire.			
Survey	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The conceptual basis of the NMIG appears reasonable. The illustrative and non-binding nature of the NMIG is very important. It should not become part of the Delegated Act. The scope of the ESRS is already broad enough. The existence of the NMIG must not lead to demands for audits of NMIG compliance, nor should it serve as a basis for auditors' interpretations. Therefore, to avoid any risk of misapplication, we recommend including a clear disclaimer at the beginning of the guidance document explicitly stating that the NMIG is illustrative only and not intended to create additional obligations. This clarification is particularly important, as in practice auditors tend to treat documents issued by authorities as quasi-binding, even when labelled as illustrative.			
Survey	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We emphasize that, for effective bank management, relief measures must not undermine the overarching goal of improving data quality.			
Survey	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	While the terminology appears to provide flexibility in identifying material IROs and calculating metrics, its practical value remains limited, as entities are nevertheless required to demonstrate year-on-year improvements. Furthermore, the absence of a defined time limit for the application of such reliefs may reduce the incentive to enhance data quality and broaden calculation bases. The principle also offers little added value for organisations genuinely striving to improve, as these are already investing significant resources into strengthening their practices. This relief could, if misapplied, lead to problems with the comparability of reports, particularly if companies within the same sector make use of it in different ways. Breaking down the data points across the elements of the value chain could complicate the presentation. In these cases a more appropriate approach would be to initially rely on estimates and subsequently enhance data quality in a stepwise manner. The concept of "undue cost or effort" raises significant concerns, primarily because it lacks a clear definition. Without such clarity, companies may be required to demonstrate differently what constitutes "undue cost or effort" depending on the context, which creates uncertainty and inconsistency. As highlighted earlier, this could undermine the comparability of reports if entities within the same sector apply the principle differently. While it is presented as a relief measure, its practical usefulness is questionable when compared to more clearly defined relief mechanisms. As a principle, it therefore poses several challenges, which may not have been fully anticipated by EFRAG. That said, if the concept were more precisely defined and accompanied by clear guidance, it could serve as a helpful and pragmatic tool.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Anticipated financial impact should not be subject to compulsory public disclosure. Data that is highly dependent on estimates and subject to significant uncertainty does not provide reliable insights for investors or other users, due to its potential variability. Premature disclosure of such information may not only mislead stakeholders but also expose companies to reputational and legal risks associated with misinterpretation. The above applies to real-economy companies. Financial institutions, however, are already required under ESG-risk regulations to calculate, assess and incorporate financial effects. Measuring financial impacts for sustainability reporting only makes sense if it builds on requirements already in place for financial institutions. Therefore, it would be desirable if existing processes and calculation systems could continue to be applied. No obligation should arise to develop additional methodologies or generate new data points beyond those already available within existing structures. In this context, exposures to ESG-affected sectors could provide meaningful information (as for Pillar 3 disclosure). While the long-term goal of more detailed quantitative data on anticipated financial effects is acknowledged, a phased approach is needed. Given the nascent stage of disclosing anticipated financial effects, Option 2 (qualitative information) provides a workable solution that supports transparency and comparability, without compromising the quality or credibility of disclosures at the moment. It also allows time for methodologies and data availability to mature, paving the way for more robust reporting in the future. Therefore, Option 2 (qualitative information) is preferable at the moment, while Option 1 (quantitative information) could be appropriate in the long run and only once both sustainability reporting and auditing practices have sufficiently matured.			
Survey	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	In principle, disclosure of the expected financial effects is useful. We think that the amended Paragraphs 40, 41 and 42 of ESRS 1 have been significantly simplified. However, the required information should be made available in a stakeholder-oriented manner (e.g., in line with the needs of value chain partners, in particular banks and insurance companies, and, for capital market-oriented companies, additionally the capital market).			
Survey	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	The reduction of mandatory data points is generally considered a step in the right direction. However, the communicated decrease in the number of data points gives the impression of substantial relief, which in practice is likely to be only moderate to minor. This is partly because the data points that were removed are primarily those already classified as non-material in the first report. Moreover, the expected simplification is offset by the transition efforts required as well as by largely unchanged requirements for audit processes and documentation. Therefore, we think that the revised ESRS are a more realistic set of Disclosure Requirements for organisations to report upon. However, more is needed to fulfill the objectives of the EU Green Deal.			
Survey	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We support the wording and the requirements for the publication of the biodiversity transition plan. Regarding G1 paragraph 10 c: For reasons of consistency, it would be appropriate to establish a separate metrics chapter on supplier management. Furthermore, more background information would be desirable to explain why the substantively new topic of training on supplier engagement is to be introduced.			
Survey	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	In BP 1 paragraph 5, it is unclear to what extent further explanations on the respective points are still required in case of application.			
Survey	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We consider the incorporation of a "fair presentation" useful to support our professional judgment when concluding upon our information materiality. However, implementing the "fair presentation" principle would need an additional process to be established. Under a pure compliance approach, auditors tend to expect a checklist-type review and sometimes reporting on information that is not decision-relevant. In pursuing the "fair presentation" concept within the ESRS, it should be clarified that its purpose is to streamline processes and reduce the reporting scope, rather than introducing an additional explanatory hurdle. The audit practice in this respect remains to be seen. The concept of "fair presentation" might be more appropriate to rename it "faithful presentation", which could provide more precise wording. We caution that the interaction of entity-specific disclosures, the stakeholder-focused double materiality concept, and the unclear delineation of "fair presentation" risks an uncontrolled expansion of the reporting scope. This would contradict the political objective of simplification and proportionality in the ESRS and may create additional friction with auditors.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Financial institutions should be exempted from disclosing absolute emission values if they only have intensity-based targets. They may report absolute values if available, but where such data does not exist, they should not be required to perform calculations that would be meaningless. Many banks currently have no objectives based on absolute emission values and do not intend to set such targets. Requiring disclosure of absolute values in these cases would therefore be impractical and not feasible, and intensity metrics and targets fit the profile of a bank better. Please see below the arguments explaining this position. Some provisions of ESRS are unsuitable for the banking sector. For instance, ESRS E1-4 requires institutions to report greenhouse gas (GHG) emission reduction targets in absolute values. Currently, banks have developed targets through the Net Zero Banking Alliance, focusing on intensity metrics for most sectors and absolute values for fossil fuel-related sectors. Setting absolute reduction targets requires complex projections of financing volumes and emissions intensities. This is challenging due to uncertainties in macroeconomic and climate conditions and clients' decarbonization trajectories. Many companies have yet to measure their GHG emissions or establish decarbonization paths. Consequently, defining absolute targets risks contradicting banks' role in financing the low-carbon transition. Presently, some banks can only set absolute targets for sectors they wish to divest from, while their mission involves increasing financing for transitioning sectors. The availability and quality of data necessary for establishing a reliable baseline are currently insufficient. Expected volatility in reported emissions from clients complicates this effort. As many SMEs lack published data, banks often resort to estimates, which do not meet the CSRD's quality standards. This undermines the integrity and comparability of reported information, making it challenging for banks to align with required transparency principles.			
Survey	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	Please find below our considerations as to why, in our view, this amendment does not provide the added value sought. Considering ESRS S1-5 Characteristics of the undertaking's employees, for these Disclosure Requirements, reconciliation with disclosures in the financial statements is of primary importance. Users of sustainability statements should be able to gain a comprehensive view of the undertaking's own workforce, make the clear connection with the financial statements and relevant business segments, and zoom in on the material IROs for the specific Disclosure Requirements (e.g., ESRS S1-7). Furthermore, the detailed Disclosures Requirements should allow for sufficient flexibility to report information that is most relevant. The prescriptive approach of "at least 50 employees and top 10 largest countries by headcount" risks deviating from the fair presentation principle and reporting upon material IROs requirement. Instead, disclosures should focus on employees identified from a material IRO perspective.			
Survey	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Reviewing AR 26 is advisable to ensure clearer guidance on the scope and level of detail required for biodiversity and ecosystem disclosures. Suggested adjustment: "Undertakings should provide information proportionate to the scale, location, and nature of their impacts, dependencies, and risks on biodiversity and ecosystems, focusing on material aspects and supported by verifiable data where available."			
Survey	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	On the one hand, the deletion is understandable, as all voluntary datapoints were removed for the sake of simplification. On the other hand, from a technical perspective, retaining the voluntary datapoint on the adjusted Gender Pay Gap (GPG) appears meaningful. The adjusted GPG enables a more differentiated interpretation of the mandatory unadjusted GPG, as it takes into account salary-explaining factors such as organizational unit, job function, and hierarchical level (e.g., level of responsibility, pay scale group, management level). This methodological adjustment largely eliminates structural distortions that may be embedded in the unadjusted GPG. The adjusted figure thus allows for a more accurate assessment of potential pay disparities and contributes to transparency and traceability of remuneration structures. Disclosure of the adjusted metric should be permitted. It should be possible to publish it as an entity-specific disclosure without justification. The calculation logic should be illustrated in the NMIG by way of example.			
Survey	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	Paragraph 33 (a) in G 1-6 should be reinserted, as this is explicitly required by the CSRD. This provision is particularly relevant for the protection of SMEs.			
Survey	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The review of each non-consolidated subsidiary at every reporting date does not result in simplification. For the sake of comparability, the disclosures on 'own operations' should not extend beyond the group of entities that are financially consolidated. A non-consolidated subsidiary can only be considered as part of the value chain. Proposal to delete the last half sentence of the paragraph ESRS 1 - 59: " unless there are specific facts and circumstances that expose the group to material impacts, risks and opportunities arising from such subsidiary." and proposal to delete "usually". According to paragraph ESRS 1-58, the consolidation perimeter shall be aligned with the consolidation scope of the financial statements. However, ESRS 1-59 stipulates that the consolidation perimeter for the sustainability statement must be reviewed on an annual basis, with paragraphs 60-73 providing guidance. Nevertheless, this guidance – in particular with regard to the treatment of joint ventures, associates and SPVs – leaves open questions as to how the sustainability consolidation perimeter should actually be determined.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	Extending obligations to the entire value chain contradicts the objective of simplification, as it significantly increases reporting complexity without proportionate benefits for decision-making. The amendments do not sufficiently simplify the DMA process or reinforce the materiality filter, and the balance between simplification and robustness remains unsatisfactory. Further simplification is needed, particularly in reducing mandatory narrative and methodological disclosures and providing more practical guidance on materiality. The changes do not yet achieve an acceptable balance for preparers or regulators seeking both meaningful information and manageable compliance obligations.			
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	We find that the proposed approach outlined in ESRS 1 paragraph 34 to 36 as well as in Appendix C remains practically complex and difficult to understand. Especially, how to determine when mitigation or preventions measures are considered 'in place' before, during or after the impact and what constitutes 'significant ongoing mitigation and/or prevention" raises practical concerns. Extending obligations to the entire value chain contradicts the objective of simplification, as it significantly increases reporting complexity without proportionate benefits for decision-making.			
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I disagree	POV: While the Amendments introduce some improvements, they do not yet provide an appropriate level of reporting as a whole. Further simplification and practical guidance are needed to achieve these objectives in a meaningful and effective manner. Extending obligations to the entire value chain contradicts the objective of simplification. The proposed Amendments and related changes in the Amended ESRS introduce some measures intended to increase flexibility, such as the removal of certain prescriptive datapoints, clearer articulation of the materiality filter, and encouragement to focus on material topics. These steps are designed to allow undertakings to tailor disclosures to their specific circumstances and, in principle, support more relevant reporting. However, the overall increase in flexibility is limited. Many new or expanded requirements—especially narrative and methodological disclosures—remain prescriptive and require significant judgement, documentation, and explanation. The elevation of previously optional guidance to mandatory requirements, and the introduction of new qualitative datapoints, often offset the benefits of removed quantitative KPIs. As a result, preparers still face a high reporting burden without any meaningful reduction in the complexity or volume of disclosures. In terms of conciseness, while some streamlining is achieved through the deletion of certain datapoints, the addition of new narrative and methodological requirements add lengthier and more complex sustainability statements. The risk of over-disclosure and duplication remains, particularly for undertakings with diverse or complex operations. Regarding connectivity with broader corporate reporting, the Amended ESRS does encourage some alignment with financial and strategic disclosures, and references to financial statement line items and business model integration are clearer. However, the persistence of detailed, stand-alone sustainability requirements may still hinder seamless integration with other corporate reporting frameworks.			
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The proposed ESRS 2 amendments do not strike an optimal balance between prescriptiveness and preparation effort versus the need for relevant and comparable information. While the Exposure Draft introduces some streamlining, such as consolidating disclosures, reducing certain datapoints, and allowing qualitative options for financial effects, the overall compliance burden remains high. The draft amendments fall short of achieving a balanced approach. Further simplification, especially in supply-chain, stakeholder, and target-setting disclosures, is needed to ensure that reporting obligations are proportionate to the value of the information provided.			
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The initiative to minimise such duplications and to place greater emphasis on mandatory ("shall") disclosure requirements is a positive step forward. However, we would like to point out that not all "may" disclosures have been eliminated, and some ARs still contain mandatory datapoints. We find it important to highlight these facts, and we ask for further revision. Furthermore, we welcome the elimination of "may" disclosure points, which contributes to greater clarity and consistency in reporting obligations. These changes are important to streamline preparers' efforts and enhance the usability of reported information for stakeholders.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We support EFRAG's view that the Non-Mandatory Illustrative Guidance (NMIG) should remain outside the scope of the Delegated Act and continue to serve as a supporting document. Maintaining this status helps avoid confusion regarding its legal enforceability and allows NMIG to serve its intended role as a practical aid for implementation.			
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	We welcome EFRAG's efforts to address the practical concerns of preparers. The introduction of burden relief measures is an important step that will support the effective and realistic implementation of the CSRD. In particular, these reliefs acknowledge the current challenges around data quality and availability—especially in relation to value chain information—which will require time to develop and mature. Just as it took many years for financial reporting to reach its current level of robustness and comparability, sustainability reporting should similarly be allowed to evolve along a learning curve. The introduction of these reliefs not only supports preparers during this transition period but also provides stakeholders with greater transparency regarding existing data limitations and the areas where further maturity is needed.			
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	The proposed relief for lack of data quality on metrics in the ESRS Exposure Draft offers some flexibility for preparers, but it does not fully strike an acceptable balance between flexibility and the risk of undue loss of information. The relief is constrained by the requirement to justify exclusions and to commit to ongoing improvement, which may still result in a significant compliance burden. The need for detailed documentation and explanation of data gaps, as well as the expectation of continuous progress, creates uncertainty and discourages preparers from making reasonable scoping decisions for fear of regulatory or assurance scrutiny. In practice, preparers may err on the side of over-disclosure or invest disproportionate resources in marginal data improvements to avoid perceived risk. While the relief helps avoid the loss of material information by requiring transparency and improvement plans, it does not provide clear thresholds or safe harbors that would enable preparers to confidently exclude immaterial data without risk. As a result, the balance is tilted toward maintaining information quantity rather than truly enabling flexibility and proportionality. In summary, the relief is a step in the right direction but does not go far enough to empower preparers to focus on decision-useful, material information. Further simplification, such as clearer criteria for exclusions and more robust safe harbors, would better support both flexibility and the integrity of reported metrics.			
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	While the primary focus of this question is on anticipated financial effects, it is important to recognize that the proposed Options 1 and 2 also introduce differing approaches to the treatment of current financial effects. The reported financial effects—both current and anticipated—can vary significantly depending on the underlying assumptions and estimation methodologies used. Therefore, a certain degree of flexibility should be allowed, whether the information is presented in quantitative or qualitative form. This flexibility ensures that preparers can effectively reflect the reliability and availability of data, as well as the specific circumstances surrounding the material risks and opportunities, without altering the underlying scope of what is considered material. Additionally, at this current stage, the concept of anticipated financial effects in the ESRS is not yet mature and therefore subject to a very high level of ambiguity. While we acknowledge the need of investors for this type of information, we also need to draw the attention that if the concept is left as it is, the usefulness of the information will be extremely limited due to the high degree of uncertainty. In addition, notwithstanding how the final concept will look like, alignment between ESRS 2 and ESRS E1 in this topic is needed.			
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	The amended paragraphs 40, 41, and 42 of ESRS E1 introduce some simplifications, such as the removal of the requirement to split physical risk assets into acute and chronic categories and the introduction of relief options for deferral or phase-in of certain disclosures. However, the core reporting requirements remain highly granular and resource intensive. Preparers are still required to disclose the monetary amount and percentage of assets and revenues at material physical and transition risk, the location of key assets at risk, the percentage of assets addressed by mitigation or adaptation actions, and a breakdown of real estate assets by energy efficiency class. The methodology for quantification, including time horizons, assumptions, and limitations, must also be disclosed. These requirements demand significant data collection, modelling, and judgement, particularly for undertakings with complex or international operations.From the perspective of primary users, such as investors and other financial stakeholders, the disclosures exceed the level of detail necessary for decision-making, especially given the inherent uncertainties and evolving methodologies in this area. While the amendments offer some relief and incremental simplification, they do not strike an optimal balance between simplification/reporting effort and primary users' needs. The reporting burden remains high, and the disclosures may still be overly detailed relative to their practical utility. Further streamlining, such as focusing on the most decision-useful metrics and allowing more proportionality in the level of detail, would better align preparer effort with user needs and the current maturity of climate risk assessment practices that don't involve subjective speculation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	No reduce, just compilation of datapoints Anither level of complenxity introduced, adituonal information is required Number might be reduce, complexity has not been reduced New datapoints have been introduce			
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	As for the new disclosure on confirmed incidents of corruption and bribery, we support its inclusion under G1, as it aligns with business conduct and governance. However, we caution against interpreting the number of incidents as a straightforward performance indicator. The figure may reflect an entity's internal detection and reporting capability rather than the actual prevalence of misconduct. We recommend that both data points be contextualised through accompanying narrative disclosures—such as training scope and frequency, reporting systems, and corrective actions taken—to support meaningful interpretation and avoid unintended disincentives for transparency and delate quantitative data point as a mandatory requirement.			
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree				
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	Requiring fair presentation as an explicit principle in preparing ESRS sustainability statements has the potential to support a more effective functioning of the materiality filter, but its practical impact on reducing excessive reported information may be limited without further clarifications and safeguards. Fair presentation, as defined in the ESRS Exposure Draft, requires that only material information—information that could reasonably influence users' decisions or is necessary to understand material impacts, risks, and opportunities—is disclosed, and that such information is faithfully represented. This principle, if rigorously applied, should encourage undertakings to focus their reporting on what is truly relevant, thereby supporting the intended purpose of the materiality filter: to prevent the inclusion of immaterial disclosures that obscure key messages. However, the effectiveness of this approach depends on how preparers, auditors, and regulators interpret and operationalize "fair presentation" in practice. Without clear thresholds, safe harbors, or practical examples, preparers may still feel compelled to over-disclose to mitigate perceived regulatory or assurance risk, especially in areas of uncertainty or stakeholder pressure. The ESRS framework's detailed and prescriptive requirements may also lead to a conservative application of the materiality filter, resulting in lengthy and complex reports. In summary, while the explicit requirement for fair presentation is a positive step and conceptually supports more relevant and focused reporting, it is not, on its own, sufficient to ensure a meaningful reduction in excessive information. To fully realize its benefits, the ESRS should be complemented by further guidance on applying materiality, clearer scoping reliefs, removal of all recommendations to substantiate/defend/describe topics that are immaterial and a regulatory environment that supports, decision-useful disclosures. To create more certainty with the fair presentation principle, a strict alignment of the objectives of the DRs and the content of the DRs is needed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The collection, use, and disclosure of wage benchmark data—especially in the context of global sustainability reporting—raises significant concerns regarding the rights of individuals and organizations, as well as potential violations of antitrust and data privacy laws. •Data Privacy Risks - Wage benchmarks may require undertakings to collect or process sensitive personal data, such as individual salary information, household composition, or cost-of-living details. In jurisdictions with strict data protection regimes (e.g., GDPR in the EU, CCPA in California), processing such data without explicit consent, adequate safeguards, or clear legal basis may violate privacy rights. Furthermore, if wage data is sourced from third parties or aggregated from employee records, there is a risk of inadvertent disclosure of personally identifiable information (PII), especially in small populations or niche labor markets. 1 •Antitrust/Competition Law Risks - The use of wage benchmarks, particularly those established through industry collaboration or shared among competitors, can inadvertently facilitate wage-fixing or anti-competitive practices. If undertakings coordinate on wage levels or use common benchmarks to set pay, this may reduce labor market competition and violate antitrust laws in the EU, US, and other jurisdictions. Regulatory authorities have scrutinized information exchanges that could lead to collusion, even if the intent is to promote fair wages. •Rights of Third Parties - Benchmarking may involve data from external sources (NGOs, unions, government agencies) whose rights to control, disseminate, or monetize their data must be respected. Unauthorized use or publication of proprietary wage data can infringe intellectual property rights or breach contractual obligations. Without robust safeguards that are globally recognized, transparency, and legal review, wage benchmarking for ESRS reporting can expose undertakings to privacy violations, antitrust investigations, and infringement of third-party rights, undermining both compliance and trust.			
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	CLEPA	Business association (other than association of financial institution)	Belgium	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Impact France	Business association (other than association of financial institution)	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	We welcome the clarifications introduced in Chapter 3 of ESRS 1, notably the emphasis on the materiality filter (§21) and the possibility of a top-down or bottom-up approach (§3.6). These changes reduce unnecessary documentation and limit a checklist approach. However, guidance remains too high-level. To ensure consistency, we recommend developing sector-specific materiality matrixes, while preserving flexibility for entity-specific issues. We also support maintaining safeguards such as the former ESRS 1 §32, requiring undertakings to justify if climate change is deemed non-material.			
Survey	Impact France	Business association (other than association of financial institution)	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	We welcome the clarification in ESRS 1 (§§34–36 and Appendix C) distinguishing actual and potential impacts. However, the approach remains complex and may lead to divergent interpretations. For comparability and transparency, material impacts should always be reported on a gross basis, with remediation and mitigation disclosed separately.			
Survey	Impact France	Business association (other than association of financial institution)	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We agree that the restructuring of ESRS 2 and its interaction with the topical standards achieves the right balance between clarity and preparation effort. Keeping a single set of "shall disclose" General Disclosure Requirements and moving many PAT details to Application Requirements reduces duplication while preserving comparability and the five-part environmental / four-part social architecture. We recommend two refinements: give optional guidance on where disclosures can be placed within the ESRS 1 §105 statement structure, and make site- and value-chain screening an explicit datapoint in ESRS 2 IRO-1 together with key entity-specific social metrics. These changes would strengthen consistency without re-introducing reporting burden.			
Survey	Impact France	Business association (other than association of financial institution)	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We welcome the clearer drafting and the removal of ambiguous "may disclose" wording, which strengthens the mandatory / non-mandatory distinction and improves overall readability.			
Survey	Impact France	Business association (other than association of financial institution)	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The package of horizontal reliefs helps reduce the reporting burden and generally keeps alignment with the objectives of the EU Green Deal and with IFRS S1/S2. The new rules on "undue cost or effort" and on using estimates when direct value-chain data are unavailable are useful for preparers. Yet the combined effect of these reliefs is not always clear and could lead to inconsistent practices. Use of the "undue cost or effort" and "lack of data quality" options should come with a requirement to disclose the steps and timeframe for improving data coverage, and the unconditional exclusion of joint operations (ESRS 1 §60, §92) should be limited to cases where environmental or social metrics are not material. These clarifications would safeguard transparency while preserving the intended burden relief.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Impact France	Business association (other than association of financial institution)	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Quantitative information on anticipated financial effects is essential for assessing financial materiality and for integrating sustainability into business strategy and risk management. Option 1 maintains the expectation to provide such data while giving a targeted relief when measurement is not feasible or when uncertainty makes figures meaningless. This compromise safeguards investors' need for decision-useful metrics and keeps the ESRS broadly aligned with IFRS S1/S2. It also preserves the incentive for companies to develop robust methodologies, which would be weakened if quantitative disclosure were left entirely voluntary under Option 2.			
Survey	Impact France	Business association (other than association of financial institution)	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Impact France	Business association (other than association of financial institution)	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Impact France	Business association (other than association of financial institution)	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Impact France	Business association (other than association of financial institution)	France	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	The significant cut in mandatory datapoints, while prioritising key quantitative indicators, meaningfully reduces reporting burden and keeps alignment with international standards. This meets the objective of easing implementation without undermining the EU Green Deal goals. However, this already represents the maximum reduction that can be achieved without risking the completeness required by the CSRD. Any further deletions could create gaps in comparability and weaken the credibility of ESRS disclosures.			
Survey	Impact France	Business association (other than association of financial institution)	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	The six datapoints moved from "may" to "shall" are justified and do not create new obligations, as they clarify information already needed to meet existing disclosure objectives. For water withdrawals and discharges, these figures are integral to any water balance and already calculated when reporting water use; making them explicit improves transparency without extra burden. Likewise, a biodiversity transition plan and quantitative information on confirmed corruption incidents are critical for assessing long-term environmental and governance risks. Elevating these datapoints to mandatory status, subject to materiality, enhances clarity and comparability while maintaining the overall simplification achieved in the revised ESRS.			
Survey	Impact France	Business association (other than association of financial institution)	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	These four datapoints simply clarify information already implied by existing disclosure objectives and therefore do not create a new reporting burden. The additions on secondary microplastics (E2-4) and on critical raw materials and waste destinations (E5-4 and E5-5) respond to key EU policy priorities and strengthen environmental transparency. Requiring companies to acknowledge application of ESRS 1 principles (ESRS 2 BP-1) likewise consolidates earlier scattered requirements into a single, clearer statement. Together these changes enhance clarity and alignment with EU regulations while maintaining the overall simplification of the ESRS framework.			
Survey	Impact France	Business association (other than association of financial institution)	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Absolute GHG-reduction targets are indispensable for assessing how financial institutions' portfolios align with the economy-wide path to net-zero. Intensity targets show efficiency gains but can conceal rising total emissions; only absolute values reveal the real-world climate impact of financed activities. Estimating these figures is challenging but not unique to the financial sector, and existing frameworks (e.g. SBTi financial sector standard, EU SFDR) already expect disclosure of absolute financed emissions. Granting an exemption would weaken comparability across sectors and undermine the credibility of the ESRS climate objectives.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Impact France	Business association (other than association of financial institution)	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Impact France	Business association (other than association of financial institution)	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The revised methodology in ESRS S1 AR 22 risks conflating legal minimum wages with the concept of an adequate or living wage. Minimum wages in many non-EU countries often fall well below a level that ensures a decent standard of living, so using them as the primary benchmark undermines the objective of the disclosure. It also creates comparability and fairness issues: companies would apply a lower standard outside the EU and face the complex task of judging whether local minimum wages meet ILO principles. Adequate wages should instead be measured everywhere against living-wage estimates aligned with ILO guidance, with any use of local minimum wages clearly justified and disclosed.			
Survey	Impact France	Business association (other than association of financial institution)	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	Updating AR 26 is useful to keep the guidance on biodiversity and ecosystem targets aligned with the fast-evolving science and global frameworks. However, the revised text should go further by explicitly encouraging companies to set measurable, science-based targets. To improve comparability and credibility, the guidance could reference recognised frameworks such as the one of SBTN and the one of TNFD, require disclosure of whether targets are science-based, and, when material, describe restoration or renaturation strategies and progress indicators. This would strengthen the quality of biodiversity-related disclosures while remaining consistent with the ESRS simplification goals.			
Survey	Impact France	Business association (other than association of financial institution)	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree				
Survey	Impact France	Business association (other than association of financial institution)	France	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree				
Survey	Impact France	Business association (other than association of financial institution)	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Impact France	Business association (other than association of financial institution)	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Impact France	Business association (other than association of financial institution)	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Impact France	Business association (other than association of financial institution)	France	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Impact France	Business association (other than association of financial institution)	France	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Impact France	Business association (other than association of financial institution)	France	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Impact France	Business association (other than association of financial institution)	France	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Impact France	Business association (other than association of financial institution)	France	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Impact France	Business association (other than association of financial institution)	France	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Impact France	Business association (other than association of financial institution)	France	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Impact France	Business association (other than association of financial institution)	France	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Impact France	Business association (other than association of financial institution)	France	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Impact France	Business association (other than association of financial institution)	France	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	While the proposals offer limited value for companies that implemented CSRD, we agree that in the future, the amendments provide an appropriate basis for reassessment of the annual DMA. We support work to simplify and align the process for completing Double Materiality Assessments. Validity of approaches taken from wave 1 companies disclosing double materiality assessments must be accepted to avoid excessive administrative costs for these companies. We remain concerned on the lack of comparability and relevance of materiality assessment findings from companies operating within the same sector. We therefore support development of 'sector specific materiality guidance' by appropriate industry groups , in consultation from the reporting companies in the sector, based on fair reporting framework assessment. This would contribute towards individual company reporting and be used to reduce the costs of completing these assessments and associated audit fees. Sector specific materiality guidance helps define an aligned view of 'baseline material issues' that ensure companies in each sector report to broadly similar scopes, and in doing so help the readability, comparability and usefulness of sustainability statements for stakeholders. It would enable industry to collectively establish a consensus on a de-facto minimum list of material topics specific to the aviation and airline sector. This would support strength in messaging on the sector's needs to achieve its transition. It should lean on public source evidence and industry-accepted figures to justify materiality in terms of impact and finances. Under no circumstances would this approach aim to increase the reporting burden for companies who have already invested and completed double materiality assessments to date. Sector specific materiality should work on the principle of being an 'entry-level' materiality per sector. This enables companies to report beyond this scope where they believe material topics exist. Anything beyond these should be defined as 'voluntary' disclosures for the sector.			
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We disagree with the requirement to assess impacts on a gross basis and we disagree with the requirement to exclude mitigations that have been enacted. Entities do not operate their businesses on a gross basis alone nor are assessments made by reversing out actions taken already to mitigate risks. Simply put, users of reporting want to understand the risk to the business after mitigation. Reporting on a gross basis directly contradicts the new amendments with regard to aggregation and disaggregation of obscuring material information as a result of disclosing immaterial information. Where a risk or opportunity is determined to be material on a net basis, we consider the ESRS should encourage companies to detail what the gross risk or opportunity is, what mitigating actions have and are being taken, and therefore what the net result is. If the risk or opportunity is immaterial on a net basis, then no disclosure should be required, even if the gross risk or opportunity is considered material. Clarity on the magnitude of the impact and its relationship to the direct operations of the company should also be provided. Materiality should focus only on the most material and highest-impact topics, rather than obligating companies to provide extensive reporting on issues of only moderate importance. When assessing materiality, it should be taken into consideration the significance of an impact across the entire value chain, not just within their own operations. The degree of materiality should be determined not only by the scale, the scope , and irremediability of the impact itself, but also by its relative importance compared to other impacts across the value chain.			
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We support these simplifications with the following comments. Companies should be offered flexibility towards the presentation of their sustainability information but retain sufficient structure to allow for readability and comparability of reports. Companies should be allowed discretion on whether to include an executive summary. Guidance should ensure this is useful for stakeholders, and provides for fair comparison of key summary metrics, specific to the interests of investors and relating to the sector in which the company operates. Industry guidelines could be developed to support this approach. As with other disclosure requirements of the sustainability statement, any information contained in an executive summary of the sustainability statement should have a clear reference to further information in the statement, to manage greenwashing or other regulatory reporting risk (I.e. any numbers referenced must be made available in the subsequent topical standards of the statement, preferably with clear page number or section references to aid readability). Regarding presentation of information, we support further work to be done by EFRAG to require the most material quantitative data presented in the report by a company in a specific tabular format (which may be either presented in the topical standard section of its report or as an appendix to it), to ease comparison with other companies. See our comments in question 33 for more details.			
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We support these proposals with the following comments. We encourage clarity between material topics identified by a company and the policies, actions and targets in place to address them. We agree that no timeline or forced disclosure of actions to put in place PAT should imposed. However, disclosure should ensure it is clearly evident if a company does not address a material topics with PAT over repeated reporting years, which would suggest company inaction. We recommend that guidance allows companies to explain to readers where the development of their PAT is in relation to a particular material topic, and focuses on the frequency of updating policies or targets, to ensure they remain relevant to the material topic and reflect the ongoing market developments affecting their implementation or delivery.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We support the removal of 'may' datapoints from the ESRS, and the positioning of 'shall' datapoints within the main body of the standard.			
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We do not see a requirement for a NMIG in its current form. We agree that this information should not be considered in the Delegated Act. Supplementary guidance documentation should be provided to support companies develop their corporate reporting, however developing non-mandatory guidance with the inclusion of potential additional datapoints that are no longer in scope of the regulated reporting requirement will only confuse reporting companies. Any additional datapoint suggestions in the NMIG document therefore must be removed to avoid duplication or confusion with mandatory requirements. Industry must lead any efforts to develop guidance at a sectoral level to ensure it is appropriate for the needs of its stakeholders. Developing a process which enables EFRAG to incorporate investor and stakeholder feedback would serve as a useful basis for future revisions to the ESRS. Such a process could help develop recommendations to the Commission to revise and replace unnecessary disclosure requirements with relevant datapoints based on feedback. We support efforts to replace disclosure requirements with requirements that better inform and serve the interests of our stakeholders (at a sector level).			
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We generally support these proposals with the following comments. We support the relief regarding undue cost or effort, however, recommend that companies must indicate (through a glossary, footnotes, or other means, so not to confuse key messages) the range of evidence types/sources used to compile the information in their sustainability statement, to ensure an understanding of the comparability of data is possible by readers. We support the revision to disclosure of financial information on investments and plans that has already been announced. We also recommend permitting companies to disclose financial data that is being made publicly available for the first time through the publication of the annual report to be included. We agree with the relief to include acquisitions and subsidiaries in the disclosure starting from the subsequent reporting period. Furthermore, we recommend that EFRAG goes further by fully aligning with all relief measures provided in the ISSB standards. This will help providing a level plain field across multiple geographic jurisdictions.			
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We support the relief proposed for the partial reporting in the event of a lack of quality of emissions data, however, this should also be applied to Scope 3 category emission metrics in E1-6. We recommend that the requirement to stipulate when estimation or a partial scope has been applied for a metric is clearly marked against that datapoint (for example as a table column, or footnote in free text). Companies should be encouraged but not mandated to increase either the coverage, or the quality of data, or both in subsequent reports where its appropriate to do so. Current wording states that the undertaking shall disclose the actions it has taken to increase the coverage and quality in future reporting periods, and the progress compared to the previous reporting period. This assumes both a need for continued ongoing increases in coverage and quality, which may not be necessary depending on the dataset used by the reporting company.			
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	We support "Option 2" which would make the disclosure of financial effects optional. The removal of some of the requirements is helpful, however many still remain in particular the monetary amount and percentage of assets at material physical/transition risk before considering climate change adaptation actions. It is important to note that while we support the importance of transparency on climate-related financial and more largely sustainability risks and opportunities, we caution that mandatory disclosures based on climate scenario analysis may unintentionally harm companies if not framed appropriately. Scenario planning is not a forecast of the future but rather a stress-testing tool designed to explore potential pathways under different assumptions. Treating these scenarios as predictions could mislead stakeholders, create confusion in financial markets and expose companies to reputational or legal risks. Guidance is required for any companies providing any voluntary quantitative data. There is a high risk that unregulated disclosure of financial metrics could mislead investors and fail to provide fair, comparable reporting. Financial reporting should focus on the alignment of investments with delivering transition plan requirements. Indicating the size of investment relative to the scale of emission reductions planned and delivered must be the key focus for financial sustainability reporting.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	We appreciate the further alignment with the IFRS sustainability standards S1/S2 and other internationally accepted standards, including the GHG protocol. The concept should even go further and consider "equivalence". Specifically, it is unclear as to why EFRAG considers the change to ESRS E1 GHG emissions boundary. ISSB does not require companies to align their emissions boundary using the financial control approach, it only requires the company to disclose "the approach it uses to determine its greenhouse gas emissions (for example, the equity share or control approach in the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004)". As such, companies should be allowed to disclose emissions based on equity share, operational control, or financial control. We'd also like to see the removal of GHGP standard year to allow for flexibility as the GHGP is subject to change. We encourage EFRAG to align with ISSB and allow flexibility in the choice of organizational boundary, rather than prescribing a strict financial control approach. For many industries, including those operating in joint ventures, consortia or under long-term service arrangements, an operational control approach provides the most accurate reflection of emissions that management can directly influence and reduce. We also support maintaining the three reliefs listed as exceptions (omitting commercially sensitive information on opportunities, omitting Scope 3 GHG emission categories when impracticable, and omitting quantitative financial effects). The new reporting burdens on companies are already sizeable and resource-intensive without needing to disclose information that is sensitive to the business or extremely difficult to procure and calculate based on business structure.			
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	While we welcome a reduction in the number of datapoints, we continue to consider the revised number of datapoints (347) is still an excessively high number of disclosure requirements for any company to comply with. Datapoints remaining do not necessarily reflect the interests of readers of the sustainability statement in specific sectors, nor do they reflect the real-world sustainability questions asked by investors of companies today. We call for a further reduction in datapoints to ensure that mandatory sustainability reporting requirements remain fair and deliverable for all companies. We also encourage regulations to support sustainability reporting that is led by stakeholder interests, reflecting and integrating sector specific datapoints where applicable, in place of unnecessary, irrelevant datapoints given under the current standard. We support an approach that would also help to reduce duplication with other regulatory reporting requirements, often within the same management report, to ensure clarity across different regulations and reporting requirements, reduce stakeholder need to understand disparate regulatory guidance and drive enhanced, succinct and relevant reporting on sustainability disclosures.			
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We disagree with the 'shall' requirement to include any of these disclosure points.			
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The ESRS 2 requirement regarding the statement that the general requirements of ESRS 1 have been applied for the preparation of the sustainability statement is acceptable. All other data point requirements are not acceptable.			
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	We support the approach towards preparing ESRS as a fair presentation reporting framework. The goal of these revisions should be to both simplify the burden for all disclosing companies, but also ensure relevance between the company's sustainability statement and the needs and interests of its stakeholders. Therefore we also support more work and guidance from EFRAG for each sector, to ensure that a fair presentation framework delivers on the specific needs as per sectoral interest. No increase in audit or legal compliance costs should be incurred in transitioning towards a fair presentation framework.			
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	We disagree with this change. This would increase the reporting obligation for companies with a diversified workforce by location. We propose to maintain the 10% threshold for the inclusion of this data, and where there are at least 50 employees.			
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	We agree with the removal of AR for biodiversity targets. Flexibility towards target setting framework for biodiversity impacts should be maintained until further agreement between a standard framework and all stakeholders is achieved. Endorsing the SBTN would be premature while all companies work to understand their impacts.			
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	Yes we support these revisions.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Is direct engagement with affected stakeholders explicitly required? Can scope 3 requirements in ESRS E1-6 GHG Emissions be included in the relief to allow for partial estimations?			
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Recommend deletion of 38(b) and 38(c) on financial resource allocations Specifically regarding E1-6 AR 48, we strongly support the separation of the retrospective emissions data from the milestones and target years in this table. Progress towards targets should be communicated within DR E1-4, either as a datapoint (visible on the transition plan of the company, or as a table or graphic indicating progress towards targets set). The current table's structure is not conducive to focused emissions reporting on the most material topics. Its not possible to include all data in this table together, in a way that allows for ease of readability. While we support the separation of reported emissions and targets, we continue to support alignment in the presentation of this information across company reports – therefore propose reinstating the summary table of emissions as a mandatory requirement, to ease readability.			
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

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Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
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Survey	Airlines 4 Europe	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We welcome efforts to clarify and simplify existing regulation. However, the amended text should be written in plain English, as the current draft is confusing and contradictory. Double materiality assessments (DMAs) could be reported in a tabular format to improve readability, following practices used for TCFD disclosures. The amendments in paragraph 29 lack clarity on the frequency and depth of DMA reassessments. Prescriptive language should be introduced, such as a three-to-five-year cycle unless major structural changes occur. Guidance should also specify that previous DMA results are leveraged, focusing new assessments on changes in business operations. We also note incompatible language between Article 34 and Appendix C. Paragraph 34 states that remediation actions taken during the reporting period shall not be considered when assessing materiality. Appendix C, however, requires reporting of potential impacts after prevention or mitigation if still material, and ongoing actions until residual impacts are managed. Under Article 34, mitigation cannot be netted from impacts; under Appendix C, it can. This contradiction creates confusion. Either further clarification is needed, or Appendix C should be removed, as it introduces unnecessary complexity and inconsistency into the DMA approach. Clarity is also needed where the draft states an entity "shall consider" external standards (e.g., SASB, GHGP). Does this imply companies must prove to auditors that such standards were considered? If so, clear guidance is required on how to demonstrate compliance. Finally, new datapoints such as E2-4, E2-5 and E5-4 are extremely burdensome for the aviation sector. We strongly recommend making these requirements qualitative, or at minimum allowing the use of estimates indefinitely.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Confederation of Danish Employers	Business association (other than association of financial institution)	Denmark	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	We support the simplifications and the removal of unnecessary disclosure requirements and repetitions, as well as the introduction of greater flexibility with the possibility of using ap-pendices and estimates. •At the same time, however, we still see ambiguities and inconsistencies and consider that there is a need for further clarification of definitions and boundaries, with clearer requirements and guidance. •We also call for a sharper prioritization of necessary and targeted information for the primary users—with a consistent focus on ensuring that the information is decision-relevant. •To achieve sufficient relief for companies, it is crucial that significant reductions are made in both overarching and cross-cutting requirements. The proposed reductions in the draft are mainly found in disclosures and data points that, based on the DMA, for most companies, will be less significant and less resource-demanding areas or voluntary. A large part of the disclosure requirements originating from the first edition of the ESRSs has been moved/transferred to a new guidance document (Non-Mandatory Implementation Guidance). While we acknowledge the introduction of further guidance, there is a risk that this guidance may be perceived as indirect requirements and expectations. It should there-fore be made clear that the guidance is a voluntary aid.			
Survey	Confederation of Danish Employers	Business association (other than association of financial institution)	Denmark	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	The requirement to disaggregate the metrics for characteristics of the undertaking's employee as now suggested to be for the top 10 largest countries with more than 50 employees should be adjusted at least 250 employees or in line with EU-legislation on SME to more reflect the company.			
Survey	Confederation of Danish Employers	Business association (other than association of financial institution)	Denmark	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	Adequate wages" is mainly a political concept. However, disclosure on wages and wage-setting processes always needs to be seen in a national framework and in context of the na-tional social dialogue. This is vital to ensure that local realities related to the cost of living and economic prospects are fully integrated, therefore the guidance and principles of ILO wage setting processes and principles on estimating a living wage are crucial.			
Survey	Confederation of Danish Employers	Business association (other than association of financial institution)	Denmark	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	Any disclosure from companies on remuneration metrics on possible pay disparities should be fully aligned with the EU Pay Transparency Directive for the part of the company operat-ing in EU. Therefore, companies should be able to use directly the information country by country they have supplied according to the directive as required in the national legislation implementing the directive. Furthermore, it is not feasible to try to spread an EU Directive globally and a disclosure of global unadjusted pay differences does not seem meaningful due to national differences across borders as wages and levels need to be seen in a national framework and in context of the national social dialogue.			
Survey	Confederation of Danish Employers	Business association (other than association of financial institution)	Denmark	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	Confederation of Danish Employers	Business association (other than association of financial institution)	Denmark	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	Confederation of Danish Employers	Business association (other than association of financial institution)	Denmark	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The amended DMA process is clearer and more user-friendly for preparers. The inclusion of practical considerations supports them in identifying material topics aligned with their business models, enabling them to focus on disclosing relevant issues rather than having to justify to assurance providers why certain topics were deemed not material. In addition to the clarification of the DMA process, which enables a top-down approach, the clarification of AR16 as a reference point—along with the delineation of the relationship between IRO and associated disclosures—reduces the interpretive burden for preparers. This facilitates more robust alignment with ISSB and SSBJ requirements, which enables a focused assessment of material sustainability-related risks and opportunities.			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We welcome the clarification regarding the consideration of remediation, mitigation, and prevention actions in the assessment of the materiality of negative impacts. However, we find that the approach remains practically complex, and it is difficult to understand how to apply the logics outlined in ESRS1 paragraph 34 to 36 as well as in Appendix C. While the assessment of actual and potential impacts reflects due diligence risk assessment methodologies defined by international standards, in practice, it often takes time to fully assess actual negative impacts, and remediation actions may commence prior to the complete identification of such impacts. Consequently, actual and potential negative impacts are frequently interrelated, and in practice the distinction between them is often difficult to draw. The current guidance appears to suggest that prevention and remediation undertaken during the reporting period should be excluded when assessing severity of impacts, while their consideration is allowed for potential negative impacts. This raises practical concerns, particularly regarding how to determine when mitigation or prevention measures are considered 'in place' before, during or after the impact and what constitutes 'significant ongoing mitigation / prevention" Such strict distinctions risk creating confusion and may increase the reporting burden, especially if Appendix C is interpreted as a de facto compliance checklist. We respectfully suggest that remediation actions should also be taken into account at any stage of the assessment of actual negative impacts to better reflect practical circumstances, and that the guidance should avoid imposing rigid distinctions between actual and potential impacts. Flexibility should be ensured so that companies can apply the principles in a way that reflects practical circumstances, without Appendix C becoming a de facto compliance checklist.			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Although the revision provides greater clarity for undertakings established in the EU, it does not address the case where non-EU parent companies of in-scope EU subsidiaries prepare a stand-alone, ESRS-aligned consolidated sustainability statement in order to apply Article 29a (8) of Directive 2013/34/EU (CSRD). In such cases, the consolidated sustainability statement may not necessarily be embedded within a consolidated management report of the non-EU parent company. The current wording of paragraph 104 of ESRS assumes that the reporting entity is an EU undertaking, which does not reflect the situation of non-EU parent groups applying Article 29a(8). We therefore propose the following revision to paragraph 104: Paragraph 104: Sustainability information shall be presented: (a) in a way that allows for clear identification of the information required by the ESRS and, where applicable, other information included in the management report, other accompanying reports, or a stand-alone consolidated sustainability report prepared in accordance with Article 29a(8) of Directive 2013/34/EU; and (b) under a structure that facilitates access to and understanding of the sustainability statement, in a format that is both human-readable and machine-readable, regardless of whether it is presented within a management report or as a stand-alone consolidated sustainability report under Article 29a(8) of Directive 2013/34/EU.			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	Removing duplicative requirements from topical standards streamlines reporting, enabling preparers to focus more effectively on material topics.			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We welcome EFRAG's efforts to address our previous concerns regarding the spread and duplication of Data Points (DPs) and Disclosure Requirements (DRs) across the ESRS framework. The initiative to minimise such duplications and to place greater emphasis on mandatory ("shall") disclosure requirements is a positive step forward. Furthermore, we welcome the elimination of "may" disclosure points, which contributes to greater clarity and consistency in reporting obligations. These changes are important to streamline preparers' efforts and enhance the usability of reported information for stakeholders.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We support EFRAG's view that the Non-Mandatory Illustrative Guidance (NMIG) should remain outside the scope of the Delegated Act and continue to serve as a supporting document. Maintaining this status helps avoid confusion regarding its legal enforceability and allows NMIG to serve its intended role as a practical aid for implementation.			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	We welcome EFRAG's efforts to address the practical concerns of preparers. The introduction of burden relief measures is an important step that will support the effective and realistic implementation of the CSRD. In particular, these reliefs acknowledge the current challenges around data quality and availability—especially in relation to value chain information—which will require time to develop and mature. Just as it took many years for financial reporting to reach its current level of robustness and comparability, sustainability reporting should similarly be allowed to evolve along a learning curve. The introduction of these reliefs not only supports preparers during this transition period but also provides stakeholders with greater transparency regarding existing data limitations and the areas where further maturity is needed.			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We welcome this approach, as previous requirements caused disruptions within the value chain. Allowing metrics to be calculated with a partial scope supports preparers in conducting reporting while simultaneously enabling realistic improvements in data collection from the value chain. This approach helps avoid the difficult position of being caught between compliance obligations—including audits—and legal risks arising from disclosures. Given that value chains often extend beyond the EU, it is important to recognise the limited sphere of influence preparers have over data collection throughout the value chain. Therefore, we support EFRAG's decision not to impose a time limit on the use of this relief, as it appropriately reflects the practical realities faced by undertakings.			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Although we understand that the primary focus of this question is on anticipated financial effects, the proposed amendment wording of Option 1 also appears to encompass current financial effects, which introduces some ambiguity. If the intent is solely to address anticipated financial effects, we would support Option 2, under which only qualitative information would be a mandatory requirement. We believe this approach is more appropriate, as the quantitative disclosure of both anticipated and current financial effects can vary significantly depending on the underlying assumptions and estimation methodologies applied. In particular, methodologies for quantifying current financial effects related to environmental and social matters remain highly dependent on assumptions and proxies. For example, while some environmental indicators (such as water or electricity consumption) can be measured in a straightforward quantitative manner, others (such as GHG emissions or carbon footprints) can vary significantly depending on the choice of activity data, calculation methods, or emission factors. This shows that whether information is quantitative or qualitative cannot always be unambiguously determined. Given the current lack of standardised methodologies, imposing a uniform requirement for quantitative disclosure across companies may not lead to the provision of decision-useful or comparable information for stakeholders, including investors, who are assumed to be key users of such disclosures. Therefore, we believe a degree of flexibility should be maintained for both current and anticipated financial effects. This would allow preparers to appropriately reflect available data, relevant proxies, and the specific circumstances surrounding material risks and opportunities. Such flexibility should remain in place until more robust and standardised methodologies are established.			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	The disclosure is required for the amount and percentage of assets, as well as the proportion of business activity sales, exposed to significant risks after addressing climate change mitigation and adaptation measures. However, since mitigation and adaptation measures are implemented continuously and are undertaken to reduce risk, we consider disclosure unnecessary. In addition, Energy efficiency classes are defined differently according to the guidelines of each country or region where the property is located, and since not all countries or regions have energy efficiency guidelines, disclosure of energy efficiency classes is challenging. We request that this datapoint will be excluded from E1 standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	n/a			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	n/a			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	22.E1.	Comments on deleted datapoints in ESRS E1	I agree	n/a			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	22.E2.	Comments on deleted datapoints in ESRS E2	I agree	n/a			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	22.E3.	Comments on deleted datapoints in ESRS E3	I agree	n/a			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	22.E4.	Comments on deleted datapoints in ESRS E4	I agree	n/a			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	22.E5.	Comments on deleted datapoints in ESRS E5	I agree	n/a			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	22.S1	Comments on deleted datapoints in ESRS S1	I agree	n/a			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	22.S2	Comments on deleted datapoints in ESRS S2	I agree	n/a			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	22.S3	Comments on deleted datapoints in ESRS S3	I agree	n/a			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	22.S4	Comments on deleted datapoints in ESRS S4	I agree	n/a			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	22.G1	Comments on deleted datapoints in ESRS G1	I agree	n/a			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Although we understand the intention, we are concerned that changing the wording from "may" to "shall" could cause to excessive demands from the assurance by third-party. The purpose of sustainability reporting should be to provide stakeholders, including investors and financial institutions, with reasonable assessments of sustainability performance—non-financial information not captured by financial data. The main objective is to evaluate future prospects and stability of the company. Therefore, as reporting may become subject to assurance, it should be clarified that "shall" does not necessarily require comprehensive coverage, but reasonable evaluation, assessment, and reporting Regarding the new disclosure on confirmed incidents of corruption and bribery, we caution against interpreting the number of incidents as a straightforward performance indicator. The figure may reflect internal detection and reporting capability rather than the actual prevalence of misconduct. Therefore, newly added quantitative metrics should not be requested as mandatory datapoints. It is recommended to replace qualitive metrics with narrative disclosure such as training scope, reporting systems, and corrective actions taken—to support meaningful interpretation and avoid disincentives for transparency. We agree that the disclosure of transition plan for biodiversity and ecosystems targets certain sectors. At the same time, the TNFD is developing guidance for Nature transition plans. After its formal publication, companies will require preparation time. We therefore request a grace period until disclosure of the plan, rather than immediate obligation in the first year.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	We acknowledge EFRAG's intention to enhance clarity by introducing new datapoints. However, regarding E2-4 on secondary microplastics, we would like to highlight practical challenges. The generation of secondary microplastics varies significantly depending on operational conditions, making it difficult for companies to provide consistent or comparable information. In addition, we note that microplastics and microparticles are already subject to regulatory obligations under other EU frameworks. For instance, under the REACH Regulation (Entry 78, Regulation (EU) 2023/2055), companies are required to notify and report on microplastics. Moreover, with the provisional agreement reached in the European Parliament and the Council, the proposed Plastic Loss Prevention Regulation will introduce further requirements such as certification, notification, or labeling for plastic pellets, which also cover microplastics. These overlapping requirements risk creating double or even triple reporting burdens for companies. Therefore, we would like to respectfully encourage EFRAG to carefully consider consistency with existing and upcoming EU regulations, and to explore ways to avoid unnecessary duplication of obligations.			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We believe the principle of fair presentation is important in sustainability reporting. However, there are concerns about its practical application, especially regarding impact information. Such information frequently depends on estimates or assumptions, which can vary significantly depending on the methodologies and data sources employed. This inherent variability can affect both comparability and neutrality—core elements of the fair presentation principle. Furthermore, sustainability statements frequently include future-oriented targets, which by their nature involve uncertainties and risks, making faithful representation inherently challenging. In addition, there is a concern that assurance providers may interpret the wording of the ESRS in a formalistic manner, potentially turning it into a compliance checklist focused on "form" and "quality." This would deviate from the original purpose of meaningful and relevant disclosure and could increase the reporting burden for companies. In addition, there is a concern that assurance providers may interpret the wording of the ESRS in a formalistic manner, potentially turning it into a compliance checklist focused on "form" and "quality." This would deviate from the original purpose of meaningful and relevant disclosure and could increase the reporting burden for companies. While we acknowledge and support the importance of fair presentation, its practical implementation faces several obstacles. Overcoming these will require robust frameworks, clearer methodologies for diverse data points, and stronger assurance practices. Without these, we share the concerns expressed by EFRAG SRB members that this could lead to increased auditing costs.			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	For companies conducting business through multiple legal entities within a single country, the collection of the relevant data imposes an additional administrative burden. We do not understand the added value of this change in relation to the extra work required.			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The current application requirements offer a structured methodology by comparing the undertaking's lowest wage with relevant benchmarks. However, we suggest several improvements to enhance clarity, comparability, and practical implementation. First, while the benchmark hierarchy is helpful, the current approach relies heavily on minimum wage levels, which may not always reflect the actual needs of workers and their families. We recommend that EFRAG explicitly emphasise living wage benchmarks—aligned with ILO principles—as the preferred standard where available. Without this, there is a risk of inconsistent data quality. Secondly, AR 22 para.32 outlines a methodology for determining the lowest wage outside the EU, prioritising the statutory minimum wage where applicable. However, in many jurisdictions, statutory minimum wages are significantly lower than living wages. As a result, we question whether this hierarchy provides an appropriate basis for assessing wage adequacy outside the EU. Reconsider the proposed hierarchy and provide greater flexibility for undertakings to assess wage adequacy based on locally relevant benchmarks, including ILO principles on estimating a living wage and living wage estimates where available.			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	In the absence of established industry standards or guidance for target setting, there is a possibility of discrepancies in disclosed information arising. Therefore, it is highly likely that disclosing it will not provide valuable information.			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	n/a			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	n/a			
Survey	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		General : To support practical implementation, it would be helpful if future Excel publications by EFRAG included a side-by-side comparison of data points before and after simplification. NESRS: For third countries, the direction and content of the NESRS will be of great importance. We respectfully request timely development that ensures interoperability with other standards (e.g., SSBJ) and aims for requirements that are proportionate and less burdensome.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	susform GmbH	Consultant (including software vendor)	Austria	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Allowing disclosures either at topic level or IRO level risks undermining comparability between companies and may lead to inconsistent reporting approaches. The broader application of the materiality filter creates a risk of reduced data availability, which could limit both comparability and the reliability of reports for users. By removing the detailed list of topics (formerly AR 16, now only illustrative in Appendix A), binding reference terms are lacking. This makes it more difficult to select consistent categories and further jeopardizes comparability.			
Survey	susform GmbH	Consultant (including software vendor)	Austria	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The included examples and theoretical guidance are very useful and improve the understanding of how to apply the requirements. Even if a company, for instance in the chemical industry, already has very high safety standards in place, the risk of severe accidents remains. Such topics should therefore continue to be considered material and reported. It would also be valuable to develop a guideline with concrete practical examples for common situations (e.g. dealing with environmental or occupational safety risks). This should not be legally binding, but serve as an orientation tool for companies.			
Survey	susform GmbH	Consultant (including software vendor)	Austria	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	susform GmbH	Consultant (including software vendor)	Austria	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	*There could be a risk of inconsitancy, unclarity if the IRO and topics reporting varies on different aggregation levels - even tough i support that there is reporting possible on sub-topic level.			
Survey	susform GmbH	Consultant (including software vendor)	Austria	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	susform GmbH	Consultant (including software vendor)	Austria	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	While i agree to the principle to include relief undue cost or effort, there might be the risk of lacking data quality of indicators, and especially the comparability of indicators it needs a lot of transparancy on what wos ommidded and why . *Risk of omidding data and not putting effort in gathering info/data due to no interest in gathering the data that could lead in a negative representation of the company (e.g. diversity data)			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	susform GmbH	Consultant (including software vendor)	Austria	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree				
Survey	susform GmbH	Consultant (including software vendor)	Austria	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	We welcome the opportunity to report ranges for the anticipated financial effects. This is the right approach, given the uncertainty surrounding climate change. The flexibility of reporting qualitative data, where the quality of quantitative information is questionable, provides users of the sustainability statement with better grounds on which to make decisions than meaningless numbers.			
Survey	susform GmbH	Consultant (including software vendor)	Austria	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	susform GmbH	Consultant (including software vendor)	Austria	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	ESRS E3 : yes, but The data should be available in reporting company anyway, so reporting only makes it more transparent to interested parties.E4 Why I don't fully agree: - Companies could avoid publishing a plan just to sidestep the disclosure obligation - The result could be uneven coverage across sectors: some firms disclose, others remain silent, which reduces comparability. - There's also a risk that companies provide very generic or copy-paste style information without substance, since the rules don't set a minimum level of detail. Why I agree: - A biodiversity transition plan is one of the few forward-looking documents that shows how a company will actually deliver on its nature commitments. Making disclosure mandatory when the plan is public gives investors and stakeholders more useful and comparable information. - The rule is balanced: it doesn't force every company to create a plan, it just says if you already have one and it's public, you must disclose it. That avoids adding unnecessary burden. - It also aligns biodiversity disclosures with climate reporting, where transition plans are already becoming standard.G1: I mostly agree, make it mandatory, but add clarifiers (who's in scope, basic content & coverage, and a narrow risk-based proportionality note) to ensure it drives real practice rather than box-ticking. Atm,ilt's unclear who counts as "procurement" (buying, sourcing, contract managers, decentralized units), which can weaken comparability. I mostly agree with making the number and nature of confirmed incidents mandatory. However, to avoid under-reporting as well as ensure comparability and integrity, I'd add standardised context: - a brief description of the confirmation process (who investigates/standard used) - scope boundary (own operations vs. value chain where employees are involved) - severity categories for "nature," - disclosure of any ongoing cases reopened/restated from prior periods.			
Survey	susform GmbH	Consultant (including software vendor)	Austria	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	E2-4 Combined mandatory quantitative datapoint was overwhelming for reporters. Ability to separately report will increase transparency and granularity of automated analysis; E5-4 Since the indicator is only mandatory for key materials, there should be no extra pressure/burden for companies with small amounts of CRMs/SRMs; E5-5 Agree with the line of argumentation. Giving the option to admit not knowing what happens to waste streams could incentivize transparency, although it's questionable that without pressure from auditing the impact will be high.			
Survey	susform GmbH	Consultant (including software vendor)	Austria	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	susform GmbH	Consultant (including software vendor)	Austria	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	We agree with the change because the new threshold improves the relevance and comparability of disclosures. The former 10% threshold often resulted in very limited country-level information, even in cases where the undertaking had significant workforces spread across several jurisdictions. By requiring disclosure for the top 10 countries (with more than 50 employees), the amended approach better reflects the actual distribution of employees, ensures more transparency on important aspects like collective bargaining coverage and social dialogue, and avoids information gaps. Since the necessary employee data is typically already available to companies, the additional burden of disaggregating it is expected to be manageable.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	susform GmbH	Consultant (including software vendor)	Austria	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	We do not agree with the proposed methodology for calculating non-EU adequate wages . The amended approach risks undermining the objective of the disclosure. By anchoring the hierarchy in wage-setting principles that can default to statutory minimum wages, the methodology may lead to reported figures that fall well below what can reasonably be considered an adequate or living wage. This creates a risk of systematically understating adequacy and therefore misrepresenting the situation of workers outside the EU. In addition, the hierarchy of data sources is problematic. By treating living wage datasets as a last resort, the approach de-prioritizes the most relevant and decision-useful benchmarks, especially in non-EU contexts where statutory or collectively bargained wages are weak proxies for adequacy. This reduces the reliability and relevance of the disclosure precisely where stakeholders most need meaningful information. A further concern is the lack of transparency and comparability. Since companies are not required to disclose which "prong" of the methodology they used, users of the information cannot assess methodological choices, compare disclosures across undertakings, or meaningfully assure the data. This risks creating a reporting framework that produces inconsistent and potentially misleading results. To address these issues, we would recommend three adjustments: (1) require companies to disclose explicitly which prong of the methodology they applied and the underlying sources used; (2) elevate credible living-wage benchmarks to the preferred option, rather than treating them as fallback; and (3) introduce a guardrail requiring companies to flag and reconcile any reported "adequate wage" that falls below widely recognized living-wage benchmarks. Without such changes, the methodology risks creating disclosures that are neither comparable nor fit for purpose, and that fail to meet stakeholder expectations regarding transparency and wage adequacy.			
Survey	susform GmbH	Consultant (including software vendor)	Austria	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Yes, why I'd agree: atm, AR 26 is quite narrow (focusing mostly on hectares restored, surfaces recreated, or ecological integrity of sites). Since biodiversity target-setting is evolving quickly (e.g. SBTN Science Based Targets for Nature, TNFD, GBF), the guidance risks being outdated or too limited if left as-is. Companies need practical but future-proof guidance that reflects latest science and global frameworks while still keeping disclosures proportional. Without this, companies may set inconsistent or incomparable targets – limiting the usefulness for investors and stakeholders.			
Survey	susform GmbH	Consultant (including software vendor)	Austria	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	We do not agree with the deletion of the voluntary datapoint on the adjusted gender pay gap. While the global unadjusted gender pay gap is important for to show structural inequalities, it provides only a partial picture. The unadjusted metric aggregates all employees irrespective of category, seniority, or function, and therefore reflects mostly differences in pay due to structural factors such as gender distribution across roles. Without complementary disclosure of adjusted gender pay gaps (e.g. by employee category or country), users of the information cannot distinguish between pay inequality arising from actual differences in remuneration practices versus those caused by workforce composition. The adjusted metric is already in line with the EU Pay Transparency Directive, which recognizes its value in identifying pay inequities within comparable roles. Removing this datapoint reduces the ability of stakeholders to understand and assess whether companies are addressing equal pay for equal work, which is a fundamental principle of EU law and a central aspect of social sustainability.			
Survey	susform GmbH	Consultant (including software vendor)	Austria	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	The replacement improves the alignment of the topical standard by consolidating datapoints and linking them to PAT, but it does not fully meet CSRD's explicit objective of protecting SMEs in the value chain. late payments are one of the most significant risks SMEs face in supplier relationships, often affecting their liquidity and survival. Narrative PAT disclosures can highlight policies and intentions, but they are insufficient to capture whether undertakings are actually paying SMEs on time. Re-introducing even a single SME-focused timeliness metric, e.g. the percentage of SME invoices paid within agreed terms; together with a short information on payment practices, would provide transparency and comparability for users, maintain pressure on undertakings to manage supplier relationships responsibly, and at the same time avoid the complexity of multiple overlapping datapoints.			
Survey	susform GmbH	Consultant (including software vendor)	Austria	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The clarifications on double materiality and the role of the materiality filter are useful, and the inclusion of illustrative examples improves practical understanding. However, allowing disclosures either at topic level or at IRO level risks undermining comparability between companies. Likewise, the broader application of the materiality filter could result in reduced data availability, limiting comparability and reliability of the reports. While the list of topics (Appendix A) has been streamlined, the removal of binding reference terms makes it more difficult to ensure consistent categorisation across companies. We welcome the recognition that even in highly regulated sectors (e.g. chemical industry), potential severe impacts must remain material, and we recommend developing non-binding guidance with concrete examples for frequent situations to further support companies in applying the requirements.			
Survey	susform GmbH	Consultant (including software vendor)	Austria	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The reduction of datapoints and the clarification that disclosures can be provided either at topical or IRO level helps to streamline reporting. Nevertheless, the balance between simplification and comparability needs careful monitoring, as inconsistent approaches may emerge. The clearer separation between mandatory and non-mandatory content is a positive step, as it will improve readability and help companies focus on what is truly required.			
Survey	susform GmbH	Consultant (including software vendor)	Austria	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	In general, I am critical of the changes suggested by the TEG. The standards were substantially shortened, but this should not be confused with real simplification. From my perspective, this approach does not sufficiently meet the needs of the market nor the original mandate of the Commission. The reduction in datapoints – often those with important contextual information – does not actually reduce the information companies need to collect, but rather the information they report. Most KPIs remain unchanged. As a result, sustainability reports risk losing essential context and references to global best practices. This could make it harder for frontrunner companies to show how they go beyond minimum compliance, while those merely fulfilling legal requirements will experience little to no real relief in their reporting efforts.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	susform GmbH	Consultant (including software vendor)	Austria	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The stronger focus on quantitative information and the clearer guidance on how to apply the requirements, including the granularity of impacts (e.g. primary vs. secondary microplastics), are positive steps and do not necessarily add reporting effort. However, removing the requirement to disclose changes over time does not ease the reporting process but rather reduces transparency, as readers now need to search for past information themselves. In addition, deleting financial risk disclosures could obscure the significant risks certain industries face due to their reliance on substances such as PFAs.			
Survey	susform GmbH	Consultant (including software vendor)	Austria	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The focus on quantititative information and increase of claritiy in methodology and granularity KPIs without adding more effort is positive. The deletion of changes in storage is not understandable. All elements of the water balance should could be reported without additional stress and transparancy would benefit Lack of mandatory formatting (table) makes comparability for humans harder than it should be			
Survey	susform GmbH	Consultant (including software vendor)	Austria	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Why I agree Moving most PAT requirements into ESRS 2 and consolidating objectives into a single entry point reduces overlap and improves readability. The revised location guidance (e.g. priority/"in or near" biodiversity-sensitive areas) and the consolidation of site/location datapoints under E4-5 para. 20 help to target disclosures where impacts actually occur. Elevating transition plans: Making disclosure of a biodiversity transition plan mandatory if a public plan exists signals stronger alignment with the Global Biodiversity Framework (GBF) and EU policy. Flexibility on metrics: Collapsing many optional metrics into one requirement to report material metrics (para. 21) is pragmatic, given the current lack of universally accepted biodiversity KPIs. Why I don't fully agree Deleting most metric specifications and shifting important elements into guidance risks that companies report only a handful of company-specific metrics. This undermines comparability and reduces insight into actual biodiversity outcomes (state of nature), not just drivers and activities. Content moved to NMIG may simply disappear from practice over time, contrary to the Green Deal's goals of restoration and halting biodiversity loss. Transition plan loophole: The "mandatory if public" trigger means companies without a public plan disclose nothing in E4, creating a visibility gap precisely where ambition is weakest. Removal of SBM-3/IRO sections at topical level: While aligned with the new ESRS 2 architecture, it removes biodiversity-specific prompts that previously encouraged robust assessments of impacts and dependencies.			
Survey	susform GmbH	Consultant (including software vendor)	Austria	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Setting focus on key materials and products poses a huge relief on reportees. Lack of mandatory formatting (table) makes comparability for humans harder than it should be			
Survey	susform GmbH	Consultant (including software vendor)	Austria	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	I welcome simplifications that reduce redundancy, such as clarifications on the materiality filter and the consolidation of datapoints. However, deleting datapoints that shed light on workforce structure and equality (e.g. gender breakdowns, age distribution, employee exits, adequate wages) removes information that is readily available, not burdensome, and highly relevant to understanding inequalities and demographic trends. Reducing gender-disaggregated disclosures and renaming parental leave to "maternal leave" are especially problematic, as they obscure gaps and reinforce outdated stereotypes. In addition, redefining "adequate wages" risks masking the real issue where living wage and adequate wage diverge. Overall, transparency on structural inequalities and demographic realities should be preserved.			
Survey	susform GmbH	Consultant (including software vendor)	Austria	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	I support several of the proposed changes, such as the cleaner PAT-centric architecture in ESRS 2, which reduces duplication and should improve usability and auditability. Requiring disclosure of confirmed corruption or bribery incidents enhances comparability and transparency, and the clearer separation between lobbying and political influence is also a positive step. At the same time, I see risks to transparency and comparability. Weakening payment practice disclosures by removing timeliness data (G1-6) reduces insight into late-payment risks, which are highly relevant for SME protection and supply chain resilience. Shifting corruption- and lobbying-related datapoints into non-mandatory guidance invites inconsistent practice and could create blind spots, such as missing information on contract terminations due to bribery. Similarly, dropping identifiers like register IDs for lobbying reduces cross-checkability and benchmarking. Finally, without clearer topical guidance, PAT disclosures risk becoming too generic, limiting their usefulness for stakeholders.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree				
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We agree with the proposed amendments, including describing the IRO in IRO-2 section, but it would be more logical to describe IRO before describing the relation between strategy & business model and IRO. Thus it would be more logical to position IRO-2 before SBM.			
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Status of NMIG to be clarified			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree				
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree				
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Methodology to prepare quantitative information would be welcome, even if this remains voluntary under option 2 (which we support).			
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Simplification is only effective in case option 2 is implemented.			
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree				
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	Reduction in the number of data points mainly concerns qualitative data points, and not quantitative ones. As some data points have been regrouped under the same paragraph, there are facially fewer data points, but the same content remains to be disclosed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree				
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	No further increase in mandatory datapoints is needed, as the current amount already ensures comprehensive and meaningful reporting without placing unnecessary burden on reporting entities.			
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	This relief is vague and needs to be clarified. Also, the status of this relief to be clarified compared to the other relief principles => _what is the hierarchy of this relief compared to the other ones. Connect Europe supports a more detailed guidance on what constitutes fair presentation is needed, as this would help companies exercise sound judgment in their reporting, reduce uncertainty, and promote consistency across disclosures. Clear guidance would also support preparers in distinguishing between material and immaterial information, ensuring that reports remain relevant and decision-useful for stakeholders while minimizing unnecessary documentation and audit risks.			
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	This new threshold does not bring significative improvement to the relevance of the aforementioned DR. It also brings a new level of complexity for the DR S1-7. This threshold would force international country to put on the same level countries with more than 50k employees and countries with 100 employees, increasing the burden of reporting and audit. This may lead to the impossibility to disclose datapoints. Orange proposes to revert back to the previous threshold of "at least 50 employees and representing 10+% of the total workforce" which ensures the relevance of the reporting.			
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree				
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	Connect Europe supports improving the relevance of pay gap disclosures by requiring disaggregation by country (mandatory for countries with ≥10% of the workforce and ≥50 employees). At the same time, we disagree with the deletion of the voluntary adjusted gender pay gap. While remaining voluntary, this datapoint is essential as it provides a clearer and more accurate view of inequalities by factoring in role, seniority, and contract type—offering stakeholders a more meaningful assessment than the unadjusted global figure.			
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS 1 par. 59 - last sentence: We should not be expected to reassess each non-consolidated subsidiary in terms of its (non-)materiality. The current wording could suggest that this would be necessary, but it would not lead to a reduction in the burden. The aim should be that non-consolidated subsidiaries only need to be taken into account if, for example, there are obvious circumstances that lead to a different materiality assessment.			
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	E1 14(c): The notion of "dependencies" is unclear – it is not defined, nor is it clear how it should be explained. E1 24(c): The new requirement to break down Capex/Opex into short-, medium- and long-term figures creates additional reporting, duplicating what is already required under the EU Taxonomy, without offering simplification. E1 26(c): The absence of an external assurance requirement on targets could allow "greenwashing" (e.g. companies claiming 1.5°C alignment without independent verification). E1 29: Additional disclosure on fossil fuel use increases transparency but also creates extra burden. In practice, operators lack easy access to detailed data from energy distributors, while they already publish scope 2 emissions (location- and market-based). E1 36: Carbon sequestration remains voluntary and unregulated, making precise quantitative reporting (e.g. future carbon credit cancellations) unrealistic, sensitive, and potentially market-distorting. Flexibility is needed, while ensuring transparent communication on progress, methodologies (e.g. SBTi), and commitments. E1 42: Definitions of turnover or assets "aligned with climate change" are missing. If adaptation plans are implemented, everything could technically be considered aligned, which calls for clearer guidance.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	On ESRS E5 •(data point 15) we ask for a gradual ramp-up, a phase-in, on this issue, starting with the products we know best, namely the products we design (internet boxes) and even those we sell under white label. We can also have a clear vision on smartphones for instance. •(data point 17 c and d) the difference between the two requirements is unclear.			
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	ESRS S1: New threshold for reporting metrics disaggregated at country level: We oppose the proposed changes to the current thresholds as we believe that it only leads to additional burden and reporting without creating value. We strongly urge EFRAG to keep the adjusted pay gap in place as it is more meaningful for stakeholder analysis than the unadjusted. existing system in place as it is practical. ESRS S1 DR15: Gender pay gap: We strongly urge EFRAG to keep the adjusted pay gap in place as it is more meaningful for stakeholder analysis than the unadjusted. E S1 – 17: Human rights violations in the form of non-compliance with the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines relating to own employees: The clarification of terms and definition in the Annex on what should be seen as a human rights violations within the meaning of the ESRS bear the risk of increasing the cost for collecting all relevant data as well as legal costs. In the light of the current simplification spirit, those new definition should only be applied to legally concluded proceedings.			
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	S2 – Workers in the Value Chain: We welcome the simplified draft which emphasises that companies should not engage in theoretical scientific exercises to derive the DMA ('practical considerations', 'with undue cost or effort') but should derive materiality based on a 'top-down approach' from existing assessments, e.g. the exercise of due diligence. In this context, explicit reference is made to the results of supply chain due diligence obligations under EU law.			
Survey	Connect Europe	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		In general, we welcome the work done by EFRAG to simplify ESRS and to ease the burden for companies, while keeping up a high level of sustainability reporting. Double Materiality Assessment: oIn general, we welcome the increased focus on the materiality of a disclosure, as this means that only the information necessary for users working with the sustainable statement should be reported. However, the current framework lacks clear criteria for assessing when specific information becomes necessary for the user. This could ultimately lead to the unintended consequence of expanding reporting obligations instead of limiting them due to a lack of clear boundaries. Enhanced interoperability with the ISSB's standards IFRS S1 and S2 oReplacing ESRS E1 GHG emission boundary by the financial consolidation approach (ESRS E1 AR19) is not welcomed, as it is unclear how those data is compared to targets, other consumption tables, etc. oAllowing only for financial control approach introduces numerous new considerations, particularly for partially consolidated entities, minority shareholdings, and unresolved issues around asset consolidation. Such a requirement would, in effect, compel companies that have adopted an operational control approach to re-evaluate their entire footprint Four new mandatory datapoints: We do not see the need to introduce the data point E5-4 on Percentage of total weight that are critical and strategic raw material and E5-5 on Percentage and/or total weight for which the final destination is unknown. Contrary to the objective of simplifying ESRS, those two datapoint would lead to additional administrative burden as they are difficult to quantify.			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	ANIA, Italian Insurance Association, fully support the simplification process, as mandated to EFRAG by the EC within Omnibus package. We believe that, to achieve real simplification and reporting burden reduction, the key area to simplify is the DMA process. DMA is at the core of sustainability reporting and is - firstly - a strategic process for each preparer to report only the really relevant information, avoiding over-reporting. MA framework, set out in ESRS 1, should allow the flexibility needed for preparers to adapt it to its own strategy, business model and specificities, avoiding that it may be considered as a prescriptive compliance system (also by the auditors). In this vein, ANIA welcomes the extension of the DMA to all DR/DP, thus recognizing the full flexibility of the framework (and its principle-based nature) that allows to report only sustainability topics, and possibly also sub-topics, in accordance with undertaking strategy, business model and specificities. We also welcome the simplification of sustainability topics, by deleting the sub-sub topics. However, some more modifications are needed to: - allow full flexibility to choose among top-down and bottom-up approaches, without introducing additional reconciliation burden between the two, potentially stemming from auditors requests (see Q34 for drafting suggestion of ESRS1–AR17); - grant flexibility to report on a net basis (after prevention, mitigation and remediation actions taken), increasing readability and comprehensibility for users, without overburdening preparers; - allow flexibility to use, for DMA, results of analysis stemming from sectorial prudential regimes (such as SolvencyII) (see Q34 for drafting suggestion of ESRS1–40); - give flexibility to adequately represent potential differences in IROs inside a group (see Q34 for drafting suggestion of ESRS1–AR24); - grant flexibility to revise the MA (and describe the process in detail) only in case of significant and relevant changes to strategy, business model or context.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	ANIA deems that the MA is at the core of sustainability reporting and is – first of all – a strategic process for each preparer in order to report only the really relevant information, avoiding over-reporting. It is therefore essential that the MA framework – set out in ESRS 1 – allows all the flexibility needed for each preparer to adapt it to its own strategy, business model and specificities, avoiding that it may be considered as a prescriptive system of compliance (also by the auditors) (see answer to Q11). In this vein, flexibility should be granted to report on a net basis (after prevention, mitigation and remediation actions taken), in order to increase readability and comprehensibility for users, without overburdening preparers. The new guidance in ESRS 1 and Appendix C is overly complex and does not go in the direction of the simplification mandated by the European Commission and should therefore be deleted. It may be considered to provide more practical (and less complex) step-by-step guidance on this issue in the NMIG, that distinguish clearly between prevention and remediation measures already implemented (included in the assessment) and those only possible or planned (therefore excluded).			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	ANIA believes extremely important to improve the readability and the usability of the sustainability reporting, also in light of the very long and complex reports that have been published. Over-reporting should be avoided at all costs, giving the flexibility to each preparer of reporting only the really significant information (see answer to Q11). The flexibility should be granted also for the presentation format. We welcome, therefore, the modification set forth in ESRS 1 Chapter 8, relating to: - the four-part structure (general information, environmental, social, governance) with the flexibility (but no obligation) to separate them in sub-parts, using also appendix and internal references; - the flexibility to report additional information stemming from other legislation or from "accepted sustainability reporting standards and frameworks". In this latter respect, it is essential for the Italian insurance sector that these may cover – among others - Task Force on Nature-related Financial Disclosures -TNFD (with the possibility to re-organise environmental information according to the TNFD framework and not according ESRS E2-3-4-5) and the Principle for Sustainable Insurance – PSI - disclosure. The B-Corp (and for Italy the benefit corporation) reporting should be allowed to be included.			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	ANIA believes that one key driver of simplification and reduction of reporting burdens is to delete all duplication of similar or redundant DP, especially from the cross-cutting standards (in particular ESRS 2) and the topical ones. In this respect, ANIA welcomes the EFRAG work on the interaction between ESRS 2 and topical standards, particularly with respect to PAT. The reduction in 'shall' datapoints for PATs, through their conversion to ARs, is welcomed, provided that AR are not considered in any way as additional DP. We also acknowledge the deletion of topical specifications from Appendix C of ESRS 2 and the relocation of key elements to topical standards where relevant, which improves structure and reduces duplication. In particular, maintaining the requirement to disclose PAT for material IROs while removing the obligation to report future PAT intentions enhances clarity preserving the disclosure's purpose. We appreciate the improved alignment between PAT disclosures and IROs, including flexibility to report at a higher aggregation level where appropriate. However, we deem necessary to amend point SBM1 AR10 a) 'whether it represents over 10% of the undertaking's revenue or and is a reportable sector under IFRS 8 / local GAAP'. By introducing in SBM1 AR10 the 'reportable sector' clause, an additional filter is effectively being added, one that was not foreseen in the original criterion based on the 10% revenue threshold, introducing new obligations that appear to go beyond EFRAG's mandate. Therefore, we recommend reverting to the previous formulation, which states that the threshold should be more than 10% of revenues. In cases where the company applies IFRS, this should be reconcilable with the IFRS financial statements. "(a) whether it accounts for more than 10% of the undertaking's revenue" deleting following text: "or is a reportable sector in accordance with IFRS 8/local generally accepted accounting principles".			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	ANIA welcomes EFRAG efforts to simplify the ESRS, that were very long, complex to read and not always clear in their language and concepts. We appreciate the efforts to make the language more consistent and easier to understand. However, we recommend caution when updating established terminology, as many organizations are already using the original ESRS wording. Some changes could lead to confusion or make reporting more difficult. i.e. ESRS 1 - AR 24. We recommend extreme caution also in the use of AR. It is essential that they contain only clarifications, not introducing any additional DR (or DP) even indirectly (or that may be perceived so by auditors). In this respect, our main concern regards the 46 DP (40 "shall" and 6 "may" DP) that EFRAG states to have moved from the ESRS to AR (as reported in Appendix 3 of the Basis for Conclusions). In order to achieve a real simplification and to avoid confusion (for preparers and auditors), these 46 DP should be deleted from the AR of the Exposure Draft and relocated in the NMIG.			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	ANIA deems important that the revised ESRS are clear, simple, concise and does not create confusion (both for preparers and for auditors). The same criteria have to be applied to any additional material, such as the introduced NMIG, that should be streamlined and avoid any possible confusion. In this respect, our main concern regards the 160 DP (67 "shall" and 93 "may" DP) that EFRAG states to have moved from the ESRS to NMIG (as reported in Appendix 3 of the Basis for Conclusions). It should be clearly stated that these are no longer DP, but they are included in the NMIG only to provide guidance. Moreover, the NMIG should not be considered a checklist for auditors. It is therefore essential to clearly define the legal status of the NMIG and their non-authoritative nature (both for preparers and auditors) and do not include them in the delegated act. Moreover, ANIA fully supports the deletion of sectorial standards proposed by the European Commission in the Omnibus package, as they are not needed. And we believe also that no sectorial guidance is needed either.			

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Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	ANIA fully supports the objective of burden reduction, mandated by the European Commission to EFRAG. In this respect, it is essential that the reduction of the reporting burden is foreseen as permanent and not temporary (while the use of term "relief" may imply a temporary measure). Therefore, we propose to delete the term "relief" (or to replace it) as they are permanent changes to the ESRS. Among EFRAG proposal, we welcome the introduction of the "undue cost or effort" principle, that should be applied in a generalized way. We regret that the relief for partial data coverage (§91) explicitly excludes ESRS E1-8 on GHG emissions (noted as E1-6 in the draft, which should be updated). For insurers and financial institutions, reliable Scope 3 data remain extremely difficult to obtain. Extending this relief to E1-8 would support realistic implementation while upholding the Green Deal's transparency objectives. Finally, ESRS1 §74 requires sustainability reporting to match financial periods. This is unfeasible for investments, since investee data are only available after publication, inevitably creating a time lag. Therefore, we propose to include the option, where no other alternative is feasible, to report the most recent available information, accompanied by appropriate context.			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	ANIA believes that a lever of simplification is the deletion of all DP for which there is no robust and shared methodology or data, starting from the anticipated financial effects. If our deletion proposal is not accepted, we would support Option 2, that limits the disclosure to qualitative information, leaving the possibility to report – on a voluntary basis – quantitative information.			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	If option 2 is adopted, we suggest modifying the datapoints related to financial effects in the topical standards in line with this option, in order to reflect the different nature of qualitative disclosures (mandatory) and quantitative disclosures (voluntary and non-mandatory).			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	ANIA deems important to ensure the maximum possible level of interoperability with the ISSB standards. However, the overall objective of simplification of ESRS and of reporting burden reduction should not be hindered by seeking interoperability at all costs. With this perspective, some differences may be acceptable, if they go in the simplification direction. As for the emissions reporting boundaries (E1-8), full flexibility should be given to prepare in adopting the most appropriate approach between financial control and operational control, also in order not to controvert decisions and approaches already adopted in the first year of reporting (validated by the auditors).			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	The objective mandated by the European Commission to EFRAG was to simplify the ESRS and to reduce the reporting burden for preparers through – among others – a significant reduction of DR/DP, with particular reference to mandatory ("shall") DP. ANIA fully supports the European Commission objective and, in this respect, welcomes the significant DP reduction performed by EFRAG. However, it is essential that the proposed reduction is real and effective. And in this respect, the burden reduction should be assessed by weighting the DP and not only by counting them. In this respect, our main concern regards the DP moved from the ESRS to AR or NMIG (as reported in Appendix 3 of the Basis for Conclusions), for a total of 206 DP of which: - 46 DP (40 "shall" and 6 "may" DP) moved from the ESRS to AR (see answer to Q 15); - 160 DP (67 "shall" and 93 "may" DP) moved from the ESRS to NMIG (see answer to Q 16). These movements of DP accounts for an overall reduction of around 20% of the total DP. It is therefore key that these 206 DP should be deleted from the AR and NMIG where they have been moved (in case they remain in the NMIG, it should be clearly stated – also for the auditors - that they are guidance and not DP). Otherwise, the reduction would not be real and effective, with the result of adding more confusion (instead of clarity) and improving the reporting burden (instead of reducing it). And this stands true both for preparers and auditors.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	See comment above			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	22.E2.	Comments on deleted datapoints in ESRS E2	I partially agree and partially disagree	See comment above			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	22.E3.	Comments on deleted datapoints in ESRS E3	I partially agree and partially disagree	See comment above			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	22.E4.	Comments on deleted datapoints in ESRS E4	I partially agree and partially disagree	See comment above			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	22.E5.	Comments on deleted datapoints in ESRS E5	I partially agree and partially disagree	See comment above			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	22.S1	Comments on deleted datapoints in ESRS S1	I partially agree and partially disagree	See comment above			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	22.S2	Comments on deleted datapoints in ESRS S2	I partially agree and partially disagree	See comment above			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	22.S3	Comments on deleted datapoints in ESRS S3	I partially agree and partially disagree	See comment above			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	22.S4	Comments on deleted datapoints in ESRS S4	I partially agree and partially disagree	See comment above			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	22.G1	Comments on deleted datapoints in ESRS G1	I partially agree and partially disagree	See comment above			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	The objective mandated by the European Commission to EFRAG was to simplify the ESRS and to reduce the reporting burden for preparers through – among others – a significant reduction of DR/DP, with particular reference to mandatory ("shall") DP. ANIA fully supports the European Commission objective and, therefore, does not support any reclassification of DP from "may" to "shall" (considering also that EFRAG states in the Basis for Conclusions the intention of deleting all voluntary DP).			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	The objective mandated by the European Commission to EFRAG was to simplify the ESRS and to reduce the reporting burden for preparers through – among others – a significant reduction of DR/DP, with particular reference to mandatory ("shall") DP. ANIA fully supports the European Commission objective and, therefore, does not support any introduction of new DP (that, even if in a limited number, will increase significantly the reporting burdens for preparers).			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	ANIA deems DMA is at the core of sustainability reporting, being a strategic process for preparers to report only the really relevant information avoiding over-reporting. It is therefore essential that the DMA framework allows all the flexibility needed for preparers to adapt it to their strategy, business model and specificities, and it is not considered as a prescriptive compliance system (also by auditors) (see Q11). Then, ANIA deems unnecessary and risky to introduce the new Chapter on Fair Presentation (FP), that risks to undermine not only the ability to apply a rigorous materiality filter by each preparer (introducing a potentially unbounded user base whose informational needs may vary widely, in contrast of what is foreseen in the IFRS framework that consider only primary users) but also could be read as the need of further/detailed information to meet their specific information needs (especially by auditors). If maintained, its meaning and objective should be clearly stated (as in BfC, but not in ESRS1-Chapter2), with the following integrations, possibly with the introduction of AR in ESRS1-Chapter2 to clarify the concept (for preparers and auditors): - it should be clearly stated in ESRS1 that FP implies a flexible and principle-based framework (not a compliance framework), that allows each undertaking to focus on the reporting of information according to its own strategy, business model and activities, and it should not be considered as a prescriptive compliance system, also by auditors (concept present in BfC but not in ESRS1); - it should be clearly defined the main objective of FP framework, which is to avoid over-reporting ("obscuring" the really significant information specific to undertakings) (concept present in BfC but not in ESRS1); - it should be clarified (especially for auditors) that a FP framework has no similarities with the IFRS financial reporting framework, especially for auditors.			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	ANIA agrees with the proposal of an exemption for financial undertakings from reporting their climate reduction targets in absolute value for all GHG Scopes (1, 2 and 3). Especially for financial institutions, it is challenging to translate intensity-based targets into absolute values, as required by E1-6 26a. We believe it is the responsibility of the undertaking to set and assess the robustness of the intensity targets it has established, without necessarily having to break them down in order to derive an absolute value.			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	We do not support the new threshold, that does not provide simplification (as mandated by the European Commission), but on the contrary add mandatory quantitative details on metrics. For example, for groups composed of one large legal entity in a single country alongside multiple subsidiaries, located in different countries, with relatively small headcounts (but still above the 50-employee threshold), the resulting data may provide limited informational value while creating additional reporting burden. Therefore, we propose to maintain the current version.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	ANIA believes that the simplification and the burden reduction should apply to all kinds of reporting on sustainability, avoiding duplication and overlapping. In this respect, it is key to ensure the coherence of the overall sustainable finance framework and to preserve it over time, including a dynamic link among ESRS and other pieces of EU legislation, using the approach already used for Taxonomy also for SFDR and other EU regulations (Benchmark, etc). Moreover, it is essential to extend the simplification to the SFDR framework for the part concerning entity-level disclosure. The SFDR should be reviewed in the following direction: - entity-level disclosure should be deleted from SFDR and should be provided only through the sustainability reporting under CSRD; - materiality assessment should be applied to SFDR disclosure, in line with the general ESRS principle; - the current SFDR KPIs should be reduced in number and simplified, starting from the KPIs of Table 2 and 3 of delegated regulation (EU) 2022/1288, considering that of the 46 total KPIs financial market participants are obliged to report just 2 among them (1 from Table 2 and 1 for Table3). Waiting for the SFDR revision (the EC proposal is planned for Q4 2025), this approach may be already applied in the ESRS, with the dynamic link only to Table 1 KPI (while preparers should be granted the flexibility to report at least 1 KPI from Table 2 and 1 for Table 3).			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	We propose to remove any quantitative metrics.			
Survey	ANIA (Associazione Nazionale fra le Imprese Assicuratrici)	Association of financial institutions	Italy	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		In addition to the general comments in Q11, hereafter some drafting proposals: - ESRS1–AR 17: the choice between a top-down and bottom-up approach to MA should not be subject to additional burden such as the requirement that "is expected to lead to the same outcome as the bottom-up approach". This requirement may prompt auditors to request validation of this assumption, potentially undermining the intended simplification and therefore it should be deleted. - ESRS1–40: risks management frameworks are already prescribed for insurers by prudential regulation (from EIOPA), that can be used for DMA. Therefore, we propose to add: "Entities subject to prudential supervisory regulation can rely on the existing methodologies to assess financial materiality". - ESRS1-AR24: the requirement to 'disaggregate and present information in a way that allows an adequate understanding of the impacts, risks, and opportunities' may necessitate the production of detailed information; therefore we suggest to realigned to previous version ESRS1-103, by deleting the new requirement and replace it with ""the undertaking shall provide an adequate description of the impacts, risks and opportunities".			
Survey	DFDS	Preparer (non-financial preparing a sustainability report)	Denmark	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	DFDS	Preparer (non-financial preparing a sustainability report)	Denmark	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The proposed changes adds complexity for preparers. Depending on how reporting will look in practice, it may also be more complex for users of the reports.			
Survey	DFDS	Preparer (non-financial preparing a sustainability report)	Denmark	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DFDS	Preparer (non-financial preparing a sustainability report)	Denmark	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	DFDS	Preparer (non-financial preparing a sustainability report)	Denmark	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	DFDS	Preparer (non-financial preparing a sustainability report)	Denmark	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	DFDS	Preparer (non-financial preparing a sustainability report)	Denmark	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	DFDS	Preparer (non-financial preparing a sustainability report)	Denmark	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	View is based on maturity in reporting. With sufficient time for preparers to phase in, I agree that option 1 is better for the users of the report.			
Survey	DFDS	Preparer (non-financial preparing a sustainability report)	Denmark	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	DFDS	Preparer (non-financial preparing a sustainability report)	Denmark	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	The success of this amendment relies heavily on guidance of preparers as well as auditors.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DFDS	Preparer (non-financial preparing a sustainability report)	Denmark	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	The unadjusted pay gap is not a very useful metric. If replacing it by the adjusted is not an option, having both is better.			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Overall, the AMF supports the simplification of the DMA. However, we have some reservations: -The AMF supports the aggregation of IROs principle but recalls the objective of the ESRS to give "information necessary to understand the undertaking's [IRO]" (based on CSRD's Art.19a). In particular, IRO-2, §28(a) shall clearly require from companies to indicate –at least once, when reporting on the DMA results, if material topics are related to either positive/negative impact, risk and/or opportunity; for instance, there could be 3 columns labelled impact, risk and opportunity, and a simple "check" in the corresponding column(s) would be sufficient. This is to avoid cases where companies only report at topic-level in their entire statement, thereby leaving the user without any information about the actual IROs. -The ESRS should specify that companies do not need to conduct DMA every year but that the DMA should be reviewed where a company's circumstances have changed (§29 ESRS 1) -IRO-1 datapoints could be streamlined to avoid redundancies. For instance, regrouping in one § methodological aspects: assumptions, inputs (including stakeholders' engagement), and explanations on thresholds. Guidance should better explain how companies can avoid boilerplate disclosures by disclosing data/tools used in relation to specific topics. -Information on thresholds is key but ESRS 1 §28 could be simplified by not requiring thresholds for each and every criterion (severity/likelihood), cf. part 3. -The AMF supports the overall reduction of list of topics in appendix A (previous AR 16) but does not agree with the idea of merging topics for S1 & S2 and regrouping multiple G1 subtopics under "corporate culture". This may reduce the length of the ESRS but does not improve useability and readability of the standards (especially when this results in additional footnotes that are difficult to read).			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	The AMF does not support the proposed approach and strongly recommends retaining the actual ESRS methodology given that: (1) the new rules are excessively complex and leave too much room for judgement on the criteria proposed, especially for potential impacts. This does not simplify the useability of the ESRS. (2) the proposed rules will create significant burden for companies as it significantly changes the DMA methodology compared to methodology used in 2024/2025 reports, which limits the possibility to leverage on previous DMA. (3) information on gross impact is key to understand the need for/context of mitigation measures. Direct feedbacks from companies show that many negative impacts would be omitted as a result of the new methodology, resulting in a significant loss of relevant information for stakeholders (or might demonstrate the risk of overly broad interpretation of these rules). (4) risks and potential impacts should be treated in a consistent manner (both on gross basis) However, based on the experience from the 1st application of the ESRS, we see merit in clarifying in the DR/AR that material IROs shall be assessed without considering mitigation actions (clearer guidance/terminology in the ESRS) to increase comparability, because this methodological principle has not been uniformly applied by all companies although it was required.			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The AMF supports the inclusion of an executive summary and use of appendices. We also support that the revised ESRS allow for more flexibility on the structure to limit redundancies (several ESRS 2 datapoints can be placed in topical sections). However, we have two reservations: -This flexibility should also be possible for IRO-1 (e.g. if the company describes input parameters specific to one topic) and BP-2 to reflect the current practices as many companies find it easier to describe their material impact, risks and opportunities and the associated methodology in the topical chapters associated with the IROs and not necessarily in the general section to avoid redundancies). -These proposed changes may increase the difficulty readers to compare/navigate through the reports. While we support this added flexibility, we also strongly advocate to add a requirement for companies to indicate the DR number the text in the sustainability statement is referring to, such as "IRO-1" or "E2-4" (and not only in content tables/index). This is a practice already adopted by many issuers. There could be several options to do this human tagging (in the title, subtitles, text of the paragraph, etc.). Based on our experience as supervisors this year, this is the most efficient and simple solution to find the right balance between flexible structure and comparability.			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We support EFRAG's proposals.			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We overall support the measures described in point (1) to (3). There might however be cases where the status of datapoints remains ambiguous. In particular AR 23, ESRS 1 is requiring undertakings to "consider disaggregating reported information by location–such as by site, water basin or local ecosystem–when material impacts, risks or opportunities are highly dependent on local context, in line with [Draft] Amended ESRS 1 paragraph 51" (= shall consider datapoint). This AR relates to §51 which is requiring to "aggregate or disaggregate the reported information to reflect the level at which significant variations of material impacts, risks or opportunities arise" (= shall datapoint). Does AR 23 leave undertakings the choice not to disclose by location when material IRO are highly dependent on local context?			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1; ESRS2; E1; E4	We support the publication of NMIG as a separate document (vs. delegated act) so that there is no confusion on its legal status. Overall, we support the content of NMIG, with few exceptions: -"ESRS 2, NMIG 12 for §28(a) for Social Topic" on the different types of social impacts is a useful definition (neither an example or a methodology). As such, it should be added to the glossary or in the AR. -Climate: NMIG 4 for §24 explains that "information on resource allocation can be disaggregated between […] the planned allocation of resources over specific time horizons covering future periods of implementing actions and where the figures can be reported as ranges". This does not replicate the distinction in E1 between "quantitative short- and medium-term CapEx, and/or OpEx figures" and "anticipated long-term CapEx and/or OpEx ranges". We are not sure to understand if ranges can also be reported for short-term and medium-term Capex and Opex. -Biodiversity: in view of the streamlining of E4, we would suggest to reinforce NMIG in order to help preparers: oEcho the new suggested AR: highlight the importance of the value chain when it comes to biodiversity DMA: according to different studies (for instance: Finance for Biodiversity Foundation, Report, October 2024), the majority of the total impact occurs in the companies' value chains, encompassing both upstream and downstream activities; stress the importance of disclosing land-use change based on a Life Cycle Assessment (voluntary basis), as provided in the currently in-force E4-5, §36. oAdd guidance on biodiversity targets: contribution to alignment with ecological thresholds and recognised frameworks including Kunming-Montreal Framework focus on key impacts, such as land use change and ecosystem conversion while considering the local ecological context The undertaking may refer to the following sources: TNFD and SBTN			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Overall, we support the different reliefs to reduce the reporting burden, but suggest to fine tune some of them: -The undue cost or effort relief is a strong simplification that we support. While it seems appropriate to apply this principle to all metrics (except scope 3) today because we lack perspective on which metrics are most challenging for companies and because companies' facts and circumstances differ, it may however be necessary to set a time-bound limit and plan to transform this general principle into a more targeted undue cost and effort relief for certain well-identified complex metrics in the future to take into account companies' learning curve. -§90 of ESRS 1, which refers to the possibility for companies to exclude from the calculation of metrics activities that are not a significant driver of IROs, raises questions as it is not clear how it should apply in practice given how vague some terms are ("activities"; "not expected to be", "driver of the IRO"…). In addition, the inclusion/exclusion of activities should be based on the materiality assessment to drive the identification of IROs. If an activity is not linked to a material IRO, it should not be included in the scope of the associated metric. -On resilience, consistency between the reporting on anticipated/current financial effects and the resilience analysis need to be ensured: if quantitative reporting turns out to be expected for financial effects, then the same should be expected from the resilience. A graph that would help make the connection between the materiality analysis, the business model resilience, anticipated financial effects reporting and E1 resilience analysis could be useful. -We support the relief for acquisitions/disposals but suggest to make this subject to the condition that the company cannot make the necessary adjustments without undue costs or efforts.			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	The AMF supports the §91 relief but suggests that EFRAG considers companies' learning curve for the application of the relief (the AMF does not comment on §92)			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We support Option 1 for the following reasons: -This disclosure is not new, at least for climate, as documented in the TCFD work, which already recommended to "describe the impact of climate-related risks and opportunities on the organization's businesses, strategy, and financial planning". -This is valuable information for investors and other stakeholders, who can use it to better understand the articulation of the quantitative figures with the financial statements and with other elements displayed within the sustainability report (DMA, information on strategy…). -For climate in particular, it seems crucial to us that stakeholders and investors understand how undertakings are putting a price on their transition. This is done through giving both quantitative and qualitative elements on anticipated effects on the financial position, the cash-flows and the financial performance of an undertaking. Although the disclosure is phased-in for the first year of reporting under the current ESRS standards, we have seen some encouraging good practices by a few undertakings who provided some data as of the first year. -As voiced by the ISSB in its communication, Option 2 would jeopardise the interoperability between the ESRS and the ISSB standards on a key reporting aspect. We note that the ISSB requires quantitative disclosure on anticipated financial effects in ISSB S1 and S2 (i.e. not only for Climate). -Finally, EFRAG is proposing relieves on metrics that accommodate concerns raised around reporting on challenging metrics such as quantitative anticipated financial effects. If needed, one way to further accommodate concerns raised by proponents of Option 2 would be to apply Option 1 for climate standard and to grant more flexibility for standards other than Climate, as quantitative assessment is probably less mature on these topics.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	As already voiced by the AMF in previous contributions, it is extremely important that the standard-setters continue to cooperate to ensure the interoperability of the corporate sustainability reporting framework as a whole. We therefore encourage ISSB and EFRAG to undertake work at technical level in the spirit of the efforts made towards the elaboration of ESRS Set 1. Overall, we support EFRAG's efforts to better align with ISSB as interoperability is key for many companies. We also believe that EFRAG should be able to depart from ISSB when other simplifications are needed due to the specific circumstances of the ESRS (in particular, the fact that the ESRS covers more topics and datapoints than ISSB). We still see room for interoperability improvements concerning a few elements: -As mentioned, Option 2 around anticipated financial effects would represent a significant departure from interoperability ambitions (cf Q19). -The envisaged GHG emission boundary provision would differ from both ISSB and the GHG Protocol, which does not seem justified, as the provision looks burdensome and complex. -Information on connectivity			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	22.ESRS2	Comments on deleted datapoints in ESRS 2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The AMF supports the reduction of datapoints but has strong reservations on some of the removals: We regret the voluntary application of existing requirements concerning connectivity between sustainability statements and financial statements (ESRS 1, §114 and 115). Such transparency will be valuable for investors and enhance ISSB interoperability.			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	22.E1.	Comments on deleted datapoints in ESRS E1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The AMF supports the reduction of datapoints but has strong reservations on some of the removals: 1)We do not support the deletion of the definition of "net-zero target" in E1, despite its wide use in sustainability statements. oFirst, the net-zero target is well framed thanks to the associated 90-95% reduction pathway. Thanks to this ESRS definition, we have seen significant improvements in sustainability statements this year as compared to previous years. For instance, some companies that used to disclose net-zero targets in their Non-financial Statements have stopped using the notion this year, thanks to the strict ESRS definition. As supervisors, we have been relying on the ESRS net-zero denomination to prevent greenwashing practices and have managed to obtain improvements in reporting. oSecond, SBTi target-setting validation, particularly its Net-Zero Methodology, will probably remain massively used amongst companies worldwide. This means that, irrespective of the ESRS framework, companies will keep on using this notion to promote their sustainability efforts, without the ESRS accompanying this state of play. oConsequently, the removal might lead to a heterogeneous use of the notion, with companies whose targets are approved by SBTi continuing to make use of the denomination, and companies deprived of a SBTi-validation being able to assert net-zero targets without supervisors being able to react. oWe are therefore recommending the reinsertion of the notion in E1. This would also make sense considering the "net-zero" concept lies at the heart of the 2050 EU's long-term strategy, as documented in the European Climate Law.			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	E4: The AMF supports this disclosure but suggests to clarify what constitutes a TP vs. any other biodiversity strategy (or other less strategic actions plans). If not, the transition plan "opt-in' will not work and raise too many questions. In addition, we suggest to clarify the notion of "making public", for instance, the plan should be published if it has been made public by the entity itself and not by third-parties. G1: The AMF supports the consolidation of datapoints in relation to training scattered around into one paragraph, including several disclosures. However, the AMF disagrees with the proposal to transform the datapoint on "confirmed incidents of corruption or bribery" from voluntary to mandatory. There is already a datapoint requested on the number of convictions and this should be deemed sufficient. We therefore suggest removing the datapoint on confirmed incident, as the definition of what constitutes a "confirmed incident" lacks legal basis and will vary greatly from one country to another, making it difficult to have homogenous data and further complexifying the reporting. In addition, we disagree with EFRAG's justification that this new metric replaces previous narrative information; we are not sure to understand which narrative information has been removed to justify the introduction of a new mandatory datapoint.			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree with these exceptions, subject to clarifications. It seems necessary to reinforce the guidance on the new metrics (clear definition of the metrics, clear methodology and guidance on input parameters) to ease their application, in particular for E2-4 on secondary plastics. In addition, the JRC guidance platform on raw materials should be added in the NMIG (https://rmis.jrc.ec.europa.eu/), in particular the section dedicated to critical materials (https://rmis.jrc.ec.europa.eu/eu-critical-raw-materials).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	We agree with EFRAG's proposal to introduce a "fair presentation" principle in the ESRS, subject to clarifications. The application of fair presentation in the sustainability reporting area seems to trigger various interpretations, especially considering that the CSRD and subsequent ESRS rely on the double materiality principle (in particular the impact materiality approach, leading to a multi-stakeholder approach). It is essential to clarify the definition of this concept, in particular the difference – if any – with IAS 1/ISSA 5000 framework on which the ISSB standards are based. In addition, we suggest that EFRAG better explain the articulation of this concept with (1) the requirement to consider entity-specific information, for instance, clarify whether companies can "override" an ESRS metric with an entity-specific one; and (2) the possibility to use the different reliefs and phase-ins. However, we see merit in introducing this notion that relates to the qualitative characteristics for the presentation of sustainability information, which were already defined in Set 1. Besides, fair presentation is used in ISSB standards, therefore its introduction in the ESRS framework would contribute to better interoperability. This is also an opportunity to remind of the urgency of adopting EU audit standards which will help framing the use of this principle from an auditor view point.			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We partially agree with exempting financial institutions from disclosing climate absolute GHG emission targets along with their intensity targets. On the one hand, we see merit for investors to benefit from more comparable data on GHG emissions. On the other hand, we recognise that data collection might be challenging as (1) financial institutions are relying on their counterparties' decarbonisation pathways to disclose their own targets; and (2) considering the width of their value chain (emissions being concentrated on Scope 3's Category 15: Investments), data quality is not expected to be optimal. The first edition of sustainability statements confirms that, despite the ESRS requirement, financial institutions disclose their targets through intensity values, except for specific sectors (oil and gas, sometimes coal). The key issue is not whether targets are in absolute value or not, it is primarily the comparability of GHG inventory and targets from one financial institution to another due to the various scope chosen by these actors. Requiring absolute targets might not completely address this issue, and this is why we do not disagree with this exemption. We believe that EFRAG should find a middle-way and focus on how to improve these shortcomings, for instance by harmonizing intensity target scope (increase coverage of material emissions and facilitate comparability) and definition (e.g. add reference to physical intensity ratio) and requiring contextual information (such as requiring simpler information on general trends in absolute value i.e. "up/down"). In addition, we believe that it is of utmost importance to adjust the ESRS for financial sectors on other aspects such as: (1) the definition of "net revenue", (2) financial resources allocated to decarbonation levers [allow to disclose sectoral breakdown of the portfolios instead of Capex/Opex], and (3) guidance on the definition of the value chain, for instance, treatment of the third-party assets under management.			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	We support the new threshold introduced as our analysis also shows that companies' reporting at country level tends to be limited given that the 10% threshold is rarely exceeded. However, if the "ten largest countries with at least 50 employees" threshold is retained, EFRAG should ensure that the wording is adjusted accordingly in every DR. For instance, DR S1-7, paragraph 27(b) states: "in the EEA, whether it has one or more collective bargaining agreements and, if so, the overall percentage of its employees covered by such agreement(s) for each country in which it has significant employment, defined as at least 50 employees by head count and that are the ten largest countries in terms of employee numbers". We assume that for consistency purposes with the other DR, the company needs to take into account the largest countries at global level and only report on those that are in the EEA, but the drafting is not clear and could also suggest that the company needs to report on the ten largest countries in the EEA.			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	The AMF welcomes the proposed changes to the calculation methodology of non-EU adequate wages. The more explicit references to "minimum wage" as well as to international standards – particularly ILO – and national legislative frameworks represent a clarification. However, we also note that by focusing more on the minimum wage as a reference, it highlights companies' difficulties to determine what constitutes an adequate wage in every country they operate. Given these difficulties, simplification measures could go further and we suggest that companies should focus on the countries where they have significant employment (as per the new definition proposed).			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	To implement non-financial strategies as well as to meet SFDR requirements, financial market participants need to have access to ESG data of the highest possible quality as easily as possible. In this regard, CSRD reporting has a key role to play and SFDR 2.0 should be consistent with the changes made to CSRD and the ESRS, i.e. future indicators to be disclosed by FMPs under SFDR 2.0 should be selected among datapoints set out in the updated ESRS.			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	We welcome the proposed changes to G1 where a clear PAT structure has been introduced, similar to the one observed in other topical standards. We consider that companies still need to report on payment practices, including for SMEs. However, with regard to DR G1-6, paragraph 20 (a), the requirement for companies to describe their "standard payment terms in number of days by main category of supplier, including SMEs" could be further specified, by explaining that SMEs should represent a separate category.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Why partial disagreement: We do not agree with some simplifications (ex: on the DMA, the gross/net new rule, support the undue cost or efforts but suggest to introduce a time-bound limit, reduce reporting on connectivity, etc.) and we identified need for important clarifications (ex: on fair presentation). There are also areas for further simplifications (eg. more flexibility on the presentation, on DMA §28). In particular, paragraph 28 of ESRS 1 seems to imply that materiality thresholds are to be set for each and every materiality criterion (scale, scope, likelihood, etc.) which seems disproportionate. While thresholds are key and should still be mentioned in ESRS 1 and ESRS 2, this paragraph could be simplified by deleting the first part of §28 ("When applying the criteria set under Chapters 3.3.1 and 3.3.2")			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Why partial disagreement: we identified need for important clarifications and guidance (ex: for current and financial anticipated effects, guidance on DMA reporting). Some DR could be streamlined (ex: merge some IRO-1 datapoints) or deleted (ex: GOV-3 on due diligence)			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The deletion of the net-zero definition (E1-7) is detrimental to the core objective of the European Green Deal.			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Why partial disagreement: some important datapoints related to expenditures on incidents/remediations costs deleted in previous E2-6 should be reintroduced (as an item of the Action section)			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Why partial disagreement: support the inclusion of the TP but important clarification are needed (minimum content, conditions for disclosures). In addition, need to highlight the importance of the value chain in the guidance.			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Unsold products appear to be a missing point in E5 even though they are key elements of circular economy and European Policy. As they are mentioned in the Regulation 2024/1781 ESPR (Ecodesign for Sustainable Products Regulation which entered into force on 18 July 2024) as being eligible for inclusion in sustainability reports, an AR related to unsold products would ensure consistency between regulation and a better coverage of circular economy topic.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Why partial disagreement: We consider that disclosures on policies, actions and targets could be further simplified by removing redundancies. We also suggest to further simplify the information required on the adequate wage and annual total remuneration ratio. Finally, Other general S1 comment: 1) The definitions of employees, non-employees and workers in the value chain (section "Objective" of S1) still lack enough details or examples to provide insights on how to classify some workers categories. For instance, should interns and franchisees be categorized as non-employees or workers in the value chain? This is important as some companies rely on franchisees as part of their business model. 2) Paragraph 3 of ESRS S1 states that DR S1-5 and S1-16 should be applied whenever a company concludes that S1 is material; we consider that this creates different materiality regimes that may impair the readability and understandability of the standards. If even all DRs within ESRS 2 are now subject to the materiality assessment, it seems surprising to treat the S1 standard differently. Therefore, we consider that the materiality principle should apply regardless of the topic covered.			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Why partial disagreement: We consider that disclosures on policies, actions and targets could be further simplified by removing redundancies.			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Why partial disagreement: We consider that disclosures on policies, actions and targets could be further simplified by removing redundancies.			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Why partial disagreement: We consider that disclosures on policies, actions and targets could be further simplified by removing redundancies.			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Why partial disagreement: We disagree with EFRAG's proposal to change the metric on confirmed incidents of corruption from voluntary to mandatory. We consider that this metric lacks legal basis to ensure a uniform application.			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	The AMF identifies two remaining comments: -Water balance definition (from E3) is missing in the glossary. Since this concept, which originates from hydrology and agriculture, is not commonly used by companies, it would be useful to clarify the term and reiterate the formula described in the AR 1 for §17. -Double materiality definition: typo identified; the draft does not include the term "financial" when mentioning financial materiality (need to align with the second part of the definition that is given).			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		In the context of this consultation, the AMF conducted an in-depth study of the reporting practices of a sample of listed companies that published their first sustainability statement in 2025. This AMF's study « Corporate Sustainability reporting: the way forward » available in English will be shared with EFRAG and will be published on the AMF's website.			
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	35.ESRS2_IRO-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Two comments: 1. reinforce guidance in AR 19 to avoid boilerplate disclosures. For instance, "data sources and tools used for specific sustainability topics" (reflect current reporting good practices). 2.Streamline IRO-1 datapoints to regroup methodological aspects in one §. Proposed wording: "26. The undertaking shall disclose the following: a) an overview of the methods, assumptions, inputs (including whether and how views of affected stakeholders are factored) and judgements used during the assessment, in particular regarding materiality (qualitative and/or quantitative) thresholds; b) whether and how the undertaking prioritises sustainability risks relative to other types of business risks, including its use of risk assessment tools; and c) a description of the decision-making procedures, including significant changes compared to prior reporting period."	ESRS2	IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	

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Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	3S.E1-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The current drafting does not help to understand that the scenario analysis is optional, contrary to what §247 of the BC (p.45) seems to indicate.	E1	Disclosure Requirement E1-2 - Climate-related risks and scenario analysis	
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	3S.E1-9.	Do you agree with the amendments of this chapter?	I disagree	1) cf. comments in part 2: in favor of "net zero" target definition 2) Clarify the definition of "removals", in particular in relation to transferred emissions. 3)Clarify to what extent carbon credits and removals can both be used to net residual emissions in the context of net-zero targets (Disagree: cf. our comment related to the reintroduction of the "net-zero targets" definition, PART 2).	E1	Disclosure Requirement E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	3S.E2-2.	Do you agree with the amendments of this chapter?	I disagree	It is important to keep as mandatory the metric related to the provisions for environmental protection and remediation costs, as it provides valuable information. The datapoints from "ex E2-6" should be moved under GDR-A §38 or E2-2 (Actions related to pollution) in relation to significant Capex/Opex dedicated to key action of remediation and protection, as this is more related to actions than anticipated financial effects.	E2	Disclosure Requirement E2-2 - Actions and resources related to pollution	
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	3S.E4-5.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	1)In AR, make explicit that metrics chosen can cover both the perimeter of own operations and/or the value chain. 2)Use a terminology closer to the drivers of biodiversity and ecosystem changes, by referring to "use-changes" (which is also the term used in the Glossary) and provide guidance on the hierarchy of drivers based on IPBES hierarchy. 3)Delete reference to "IBAT" in AR8 (useful tool but private initiative that is fee-based).	E4	Disclosure Requirement E4-5 - Metrics related to biodiversity and ecosystems change	
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	3S.S1-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Reduce PAT datapoints: S1-1, paragraph 11 already requires the undertaking to describe its policies for managing its material IRO. Yet, paragraphs 12 and 13 require again for the undertaking to disclose if its policies explicitly address human rights issues and health and safety. Those two datapoints should be covered by paragraph 11 and therefore paragraphs 12 and 13 could be removed.	S1	Disclosure Requirement S1-1 - Policies related to Own workforce	
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	3S.S1-3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Disclosures under ESRS 2, GDR-A seem sufficient to cover a company's actions and associated resources to manage IROs in relation to its own workforce. Therefore, paragraph 19 of S1-3 could be removed.	S1	Disclosure Requirement S1-3 - Actions and Resources related to Own workforce	
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	3S.S1-4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Paragraph 21 could be limited to the link with ESRS 2, GDR-T only. The disclosure on whether and how the undertaking engaged directly with its own workforce for the purpose of target setting and tracking performance seems overly narrative and already not necessarily published by companies.	S1	Disclosure Requirement S1-4 - Targets related to Own Workforce	
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	3S.S1-9.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Companies face difficulties in determining what constitutes an adequate wage in every country they operate. Given these difficulties, simplification measures could go further and we suggest that companies should focus on the countries where they have significant employment (as per the definition proposed).	S1	Disclosure Requirement S1-9 - Adequate wages	
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	3S.S1-15.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The annual total remuneration is difficult to calculate on a consolidated basis. We suggest to allow companies to publish a metric by country for countries with significant employment (as per the new definition proposed).	S1	Disclosure Requirement S1-15 - Remuneration metrics	
Survey	AMF - Autorité des marchers financiers	National supervisory authority & regulator	France	3S.S1-16.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Paragraph 3 of ESRS S1 states that DR S1-5 and S1-16 should be applied whenever a company concludes that S1 is material; we consider that this creates different materiality regimes that may impair the readability and understandability of the standards. If even all DRs within ESRS 2 are now subject to the materiality assessment, it seems surprising to treat the S1 standard differently. Therefore, we consider that the materiality principle should apply regardless of the topic covered.	S1	Disclosure Requirement S1-16 - Incidents of discrimination and other human rights incidents	
Survey	Institut der Wirtschaftsprüfer in Deutschland e.V. (IDW)	Auditor	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We welcome, in principle, the streamlined list of topics in AR 16 (now Appendix A) and the deletion of sub-sub-topics but still see the need for clarification of what the deletion of the sub-sub-topic level means in combination with ESRS 1.AR21. If an IRO related to adequate wages is assessed to be material, but there is no material IRO for work-life-balance, working time, secure employment and social protection, ESRS 1.AR21 could be misinterpreted to mean that all the information related to the whole sub-topic "working conditions" needs to be provided and not only those related to adequate wages. The streamlined list of topics, being less granular than before, could lead to problems with evaluating the materiality of sub-topics. This could also pose difficulties for the newly introduced "fair presentation of material impacts, risks and opportunities" (also see Q 25). Since the top-down approach could lead to overlooking certain less obvious IROs, we suggest requiring targeted bottom-up checks in high-risk areas. We also suggest providing clarification regarding the possibility of reporting IROs "at the level at which they are managed". As a definition of what it means for an undertaking to be "connected" with an impact is still missing from the binding legal text, questions will continue to arise when conducting the DMA (see also Q 16). With respect to the materiality assessment for the upstream and downstream value chain (ESRS 1.65), it should be clarified that the phrase "may be conducted without direct information from counterparts" does not mean that information already available can be disregarded.			

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Survey	Institut der Wirtschaftsprüfer in Deutschland e.V. (IDW)	Auditor	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We welcome the principle-based clarification, which is very useful given that many remedial or preventive actions are either required by law or have long been established (e.g. filters for air pollution, measures to mitigate explosions, H&S management). Regarding the detailed table in Appendix C, which mainly focusses on the timing of actions and the need to maintain significant ongoing actions, we suggest also considering market practice, facts and circumstances and other factors (e.g. the duration for which an impact may remain in effect). These could be further informed by the results of ongoing field tests. Appendix C also seems to focus on an undertaking's own operations. We would welcome clarification on how it should be applied in relation to material impacts in the upstream or downstream value chain. According to para. 56 of the BC, the clarifications focus on impacts, since for risks and opportunities undertakings generally have experience from financial reporting which they can draw on. However, there is diversity in practice on this point (e.g. in Germany, there is an accounting policy choice regarding reporting in the management report before or after remedial actions). An alternative approach to adding rules in the ESRS could be to leave the interpretation to the ISSB/TIG to avoid interoperability issues. Any further clarification for risks should consider existing regulations (e.g. prudential regulation in financial services) that must be complied with as well as possible future international sustainability reporting rules, which might otherwise become obstacles to interoperability. Finally, it would be desirable for the consideration of remedial or preventive actions to also apply to risks associated with material impacts. This would mean that a material risk linked to an impact that has been eliminated through a mitigation measure would likewise not need to be reported.			
Survey	Institut der Wirtschaftsprüfer in Deutschland e.V. (IDW)	Auditor	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We welcome the possibility of including an "Executive Summary" (ESRS 1.109) as well as the flexibility allowed in the localization of datapoints (ESRS 1.110). Regarding the "Executive Summary" it should be clarified whether "key messages about its material environmental, social and governance impacts, risks or opportunities" (with reference to the qualitative characteristics) requires an undertaking to give an overview of all material IROs. Furthermore, clarification is also needed on how the "Executive Summary" interacts with the requirement for fair presentation. There is some doubt about whether allowing a company to choose whether to reference its financial statements (ESRS 1.114) will actually enhance connectivity to the financial statements. Furthermore, it is questionable whether this aligns with the requirements of article 19a para. 3 subpara. 3/ 29a para. 3 sub-para. 3 of the Accounting Directive. If this optional approach is to remain, clarification will be needed with respect to the requirement in ESRS 1.111 b), which still requires an undertaking to provide information that enables users of its sustainability statement to understand the connection to the financial statements.			
Survey	Institut der Wirtschaftsprüfer in Deutschland e.V. (IDW)	Auditor	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The simplification and partial deletion of the Minimum Disclosure Requirements as well as the datapoints regarding policies, actions and targets will reduce redundancies significantly. However, some MDRs that have been deleted (like MDR-T 80 j) on progress against targets) should be reintroduced, as they contain vital information and are still mentioned in the objectives. From our practical experience, in some cases companies do not always distinguish clearly between policies for climate change, pollution prevention and efficient use of materials, but have combined sustainability policies to cover all these items (this is the case for social topics as well). The changed structure better reflects this. We also agree with deleting topical specifications to GOV, SBM and IROs since the requirements were often repetitive.			
Survey	Institut der Wirtschaftsprüfer in Deutschland e.V. (IDW)	Auditor	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We welcome the deletion of "may"-disclosures and the moving of "shall"-disclosures to the main body of the standard. However, we still see room for improvement. In particular, reporting on upstream or downstream value chain information relies on determining whether an undertaking is "connected" to an impact in its value chain. In the ESRS themselves, there are only two illustrations of an undertaking being "connected" with an impact (see ESRS 1.AR 12), but the concept itself is not further defined. EFRAG provides more detail in IG 1 (FAQ 2), but as the concept is not defined in the binding legal text it is subject to interpretation uncertainty. It also remains unclear whether a scenario analysis is required (the BC states that is not, but the mandatory text is still ambiguous).			
Survey	Institut der Wirtschaftsprüfer in Deutschland e.V. (IDW)	Auditor	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The NMIG can be helpful, especially for first time adopters, to understand the methodological considerations of the ESRS Set 1. If the NMIG are to be intended as a long-term aid for companies, a robust due process for their development and maintenance should be established.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Institut der Wirtschaftsprüfer in Deutschland e.V. (IDW)	Auditor	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We welcome the introduction of an "undue cost or effort" principle. We would suggest aligning more closely to the wording used in IFRS S1, as the proposed wording is not fully consistent. While we generally welcome the new reliefs introduced in the amended ESRS, the interplay and hierarchy of these reliefs remain unclear and should be clarified. We also see the need for further clarification of the functioning of the new reliefs. ESRS 1.62 allows undertakings to choose whether they collect information from the value chain or use estimates. However, it remains unclear what "practicability and reliability considerations" means in this context, especially given the presence of the "undue cost or effort" principle. Therefore, it remains unclear whether a hierarchy of information exists (in the sense of external information being favored over using estimates where it can be collected with reasonable cost and effort). We also see the need to clarify how ESRS 1.87 (use of reasonable and supportable information available) interacts with the new rule in ESRS 1.62. Regarding the new rules on disaggregation (ESRS 1.AR24), which allow information to be provided at a disaggregated level reflecting only the activities for which the impact, risk or opportunity is relevant, further clarification is needed on how this interacts with the new relief on metrics (also see Q 18). Regarding ESRS E1, it remains unclear whether GHGP-exemptions in case of unreliable input for estimates can be used.			
Survey	Institut der Wirtschaftsprüfer in Deutschland e.V. (IDW)	Auditor	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We assume this question is linked to ESRS 1.91 (instead of ESRS 1.92). Even though we understand the motive in granting this relief, we see the risk of partially reported metrics significantly reducing comparability between under-takings and interoperability with the international standards. As the "undue cost or effort" principle will be introduced in ESRS, we do not see the necessity of this relief. If this relief is retained, we see the need for clarification regarding the following points: •The question remains whether the aim of relying on market discipline will lead to improved reporting over time, or whether it may instead put undue pressure on less experienced companies, particularly as there are typically very limited means to enhance data quality in the upstream supply chain. Owing to this uncertainty, we suggest including a time limit to this relief to ensure data quality in the long term (as undue cost or effort will remain without a time limit). An alternative could also be requiring continued effort from preparers to improve data quality. •It should be clarified how to distinguish "reliable information" and how this concept interacts with the "undue cost or effort" principle. Also, it may also be questioned why this relief does not also extend to Scope 3 emissions.			
Survey	Institut der Wirtschaftsprüfer in Deutschland e.V. (IDW)	Auditor	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	As interoperability between ESRS and IFRS S1 and S2 is a high priority, the option closest to IFRS S2 should be selected. The wording should be aligned with IFRS S1 and S2 even further, as ESRS 2.23 c) seems to be stricter than the corresponding rules in IFRS S1 (from paragraph 34). The way undertakings will report under option 1 may depend on their circumstances, because for undertakings with regulated risk management reporting requirements, qualitative statements about material risks will likely trigger the need for quantification, whereas for other undertakings, qualitative information may be sufficient.			
Survey	Institut der Wirtschaftsprüfer in Deutschland e.V. (IDW)	Auditor	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We welcome the effort EFRAG made to further align ESRS with IFRS S1 and S2 wording to enhance interoperability, but the wording in some cases still differs from the international standards without a clear reason. Regarding the new reliefs granted by ESRS it should be critically assessed whether those may impair interoperability.			
Survey	Institut der Wirtschaftsprüfer in Deutschland e.V. (IDW)	Auditor	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Institut der Wirtschaftsprüfer in Deutschland e.V. (IDW)	Auditor	Germany	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	We have comments on two specific data points: Regarding E1.27 and the following paragraphs it does not appear to be feasible to provide ALL primary energy sources for electricity. Most companies use either specific contracts (e.g. renewable power tariffs and nuclear tariffs only) or non-specific power contracts (grey electricity). We suggest not making a distinction between specific and non-specific contracts for electricity consumption. It gives little additional information about climate risks beyond what Scope 2, market-based and location-based, already provides. Regarding the requirement to "ensure all quantitative combustion-related information is reported in megawatt-hour (MWh) in Lower Heating Value or net calorific value" (E1.AR 17), this appears to be an uncorrected error from ESRS set 1. As energy bills in most cases provide amounts of energy based on the upper calorific value, changing the requirement to the lower calorific value would mean that all energy figures would need to be changed.			
Survey	Institut der Wirtschaftsprüfer in Deutschland e.V. (IDW)	Auditor	Germany	23.	Six datapoints exceptionally moved from “may” to “shall” In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, “may disclose” datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	We agree with changing the status of the following two datapoints from voluntary to mandatory for the following reasons: Regarding datapoint E3, own operations total withdrawal (former ESRS 3.28 c), and E3 own operations total discharges (former ESRS 3.28 d), it was unclear why this was a voluntary datapoint. If the sub-topics of water withdrawal or water discharges is material, the total withdrawal or discharges seems to be an important information to provide an understanding of the undertaking's water consumption.			
Survey	Institut der Wirtschaftsprüfer in Deutschland e.V. (IDW)	Auditor	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	These additions add clarity to sustainability reporting and therefore are welcomed. Since microplastics is such a universal topic, more methodological guidance was needed. We welcome the improved clarity and simplified understanding. As it was unclear how "biological and technical materials" are defined, we welcome the addition of a definition.			
Survey	Institut der Wirtschaftsprüfer in Deutschland e.V. (IDW)	Auditor	Germany	25.	Emphasis on ESRS being a “fair presentation” reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	We welcome the focus on fair presentation and refer to our letter to the EC from 8 January 2025 (https://www.idw.de/IDW/Medien/IDW-Schreiben/2025/IDW-EUCom-FAQ-CSRD-ESRS-Schreiben-250108.pdf). However, the fair presentation framework needs to be well-designed; describing the ESRS as a fair presentation framework does not make it one. In line with IFRS, auditing and assurance standards define a fair presentation framework as requiring compliance with framework requirements (as for a compliance framework) but also acknowledge it may be necessary: •to provide disclosures beyond those specifically required by the framework or •(rarely) for management to depart from a requirement of the framework to achieve fair presentation. To achieve fair presentation, there must be an objective understanding of what needs to be included in the sustainability information. Since impact materiality is inherently subjective, fair presentation can only be achieved based on the materiality assessment (which fair presentation does not replace). Furthermore, it is important to recognize that fair presentation does not: •Reduce the burden compared to compliance in general: it involves an additional "stand-back" to determine whether additional disclosures are necessary. Neither framework requires disclosure immaterial matters. •Change the meaning of materiality: what is material under a compliance framework is material under a fair presentation framework. •Result from requiring entity-specific information: since undertakings need to develop and comply with their own criteria for reporting such information. •Result from applying the qualitative characteristics of information: such as faithful representation and completeness. Since impact materiality is part of the materiality assessment, we recommend that ESRS 1.3 clarify that management's obligation to fairly present the sustainability statement is based upon the materiality assessment. This would make achievement of fair presentation feasible. We also recommend revising the assurance opinion in Article 34 of the Accounting Directive accordingly.			
Survey	Institut der Wirtschaftsprüfer in Deutschland e.V. (IDW)	Auditor	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 (“when only setting intensity targets”), to disclose also the associated absolute values” (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking’s progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We welcome the acknowledgement from EFRAG that specific rules are needed for financial services undertakings. We would like to point out, however, that the need for specific rules goes far beyond ESRS E1.26(a) and also covers the definition of own operations. Other specific rules will also be necessary, as sector-specific ESRS are no longer planned. This is evident, for example, from the fact that the draft LSME Standard introduced separate rules for financial services undertakings (see EFRAG, [Draft] ESRS for listed SMEs Section 4, para. AR 21) and because EFRAG IDs for financial undertakings refer to the future sector specific standards for further guidance (see EFRAG, ID 41). Consideration should also be given to the fact that certain financial services undertakings are subject to sector-specific rules on financial reporting (e.g. Directive 86/635/EWG or Directive 91/674/EWG). We propose considering the introduction of targeted specific rules for financial services undertakings, building on corresponding sector-specific financial reporting rules. For example, we see the need for specific rules for financial services undertakings for reporting on "high climate impact sectors" (see ESRS E1.38 onwards) and for the delimitation of the upstream and downstream value chain.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Institut der Wirtschaftsprüfer in Deutschland e.V. (IDW)	Auditor	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	As the European Commission plans on reviewing and amending the SFDR it is necessary to take these future developments into account, so that the amended ESRS and amended SFDR are still coherent. In preparation for this, we believe the following actions need to be taken: •EFRAG should clarify with the Commission and the ESAs whether they intend to require the PAI statement (Article 4 SFDR) after the review and whether they will keep the PAIs for the DNSH test relating to sustainable investments. •Discussions should address whether detailed KPIs such as the "energy consumption from fossil sources disaggregated by sources" or "the amount of each pollutant listed in Annex II of the E-PRTR Regulation emitted to air, water and soil" can really be collected for "all investments". It should be kept in mind that financial market participants need to gather these KPIs for their entire investment universe, which will either result in significant reporting requirements for investee companies (under ESRS/VSME) or to high data costs. If the PAIs are maintained within the SFDR review, we propose focusing on KPIs that are obtainable by FMPs without significant cost (especially given the reduced scope of companies under CSRD). •Generally speaking, the reduction of data points within the ESRS review is expected to be followed by equivalent reductions in the SFDR review. In the amended ESRS some datapoints (e. g. ESRS S1-14 88c, d) remained unchanged because they are SFDR PAI. However, in the example of ESRS S1-14, the wording should be adjusted to reportable injuries, to decrease the effort when collecting data. Another example is ESRS S1-13 c: the number and rate of recordable work-related accidents should be clarified such that it refers to reportable rather than to recordable accidents, because this would further reduce reporting burdens.			
Survey	Institut der Wirtschaftsprüfer in Deutschland e.V. (IDW)	Auditor	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	We welcome the explicit mention of PATs in G1, which makes the consistent approach across the thematic standards more evident. The way SMEs are addressed appears to be adequate.			
Survey	Institut der Wirtschaftsprüfer in Deutschland e.V. (IDW)	Auditor	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Regarding ESRS E1, the interaction between ESRS E1 and lease exemption in ESRS 1 from own operations is not clear. If the lease exemption were to apply to GHG reporting, the approach would not be consistent with financial control for lessors or lessees of operating leases, nor with RoU (local GAAP). When clarifying rules on whether and how the lease exemption is applicable for reporting on GHG emissions, consideration should be given to ensure a level playing field for all reporting undertakings. This would require consideration of comparable business models. There is also still an urgent need for clarification of how ESRS E1 rules interact with the GHGP and PCAF requirements and options. As the term "shall consider" has been kept, there is still room for interpretation. As is mentioned in the rationale for ESRS E1.AR39 a) ("'Shall consider' was maintained as final wording, however varying views were received on whether it should be 'measured in accordance with', 'accounted for', and various other permutations."). Since EFRAG has acknowledged this uncertainty, a clear hierarchy of rules should be implemented in ESRS (e.g. for reporting boundaries, calculation methods and use of options provided in GHGP or PCAF). As the GHGP and PCAF are both internationally recognized standards, reporting GHG emissions under ESRS must remain comparable to reporting according to GHGP or PCAF. Consideration should be given to allowing undertakings to freely choose between the financial control and operational control approaches. Furthermore, clarifications in IFRS S2 regarding GHG emissions should also be taken into account.			
Survey	Institut der Wirtschaftsprüfer in Deutschland e.V. (IDW)	Auditor	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		•In ESRS 1.59, the qualifier "usually" will lead to significant uncertainties in determining an undertaking's own operations. As this was added in relation to the exceptions and other provisions in paragraphs 60 and 69, "usually" should be replaced by an explicit reference to those to paragraphs. Furthermore, the wording of ESRS 1.59 should be extended to not just refer to "groups", but to undertakings reporting as a standalone entity as well. •ESRS 1.121 and 1.127 should clearly state whether the transitional provisions depend on national transposition or not (the "rationale/comment" seems to contradict the ESRS text in this case). Furthermore, the wording should be adjusted to be consistent. •In ESRS 1.10, the rewording of "entity-specific disclosures" referring to a topic related to one or more material IROs rather than a material IRO, should be reversed, as it may lead to interpretation difficulties. •It should be clarified whether ESRS 1.82 also applies to metrics and how it interacts with ESRS 1.84. Furthermore, a definition of "impracticable" is needed, as ESRS 1.85 is marked for deletion. •With the requirement for a fair presentation of material IROs, the new emphasis on topics rather than on IROs (e.g. ESRS 1.22) appears inconsistent. •Furthermore, we recommend merging water consumption and withdrawal, clarifying resource inflows versus waste, and removing the whistleblower protection sub-topic, as it pertains to management practices rather than being a sustainability matter. •We also suggest that the method for calculating the total number of employees should be the same at that which is used for the disclosure requirement in Art. 28 para 1 lit. b) of the Accounting Directive.			
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	Great restructuring of sub-topics - it is easier to follow now, but without removing the content and details of the sub-subtopics.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	I agree!			
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	I understand the intention behind reducing the number of datapoints, but I don't see this as a reduction in workload or reporting requirements in practice. The rationale given—"Deleted for simplification purposes and reduction of datapoints. The provisions in ESRS 2 GDR-PAT apply to material topic and/or subtopic"—does not translate into less work for us. Since the topic remains material according to ESRS 2 and GDR-PAT, we are still required to report on it. However, it's unclear where this reporting should take place if not within G1. We use a software (Position Green) that follows the structure of the delegated acts, and for simplicity and clarity, it would be preferable if these datapoints remained as Application Requirements (AR) under G1. This would help maintain structure and ensure that necessary disclosures are not lost. While I can appreciate the effort to reduce mandatory datapoints, I don't see how deleting PAT provisions from the topical standards but still requiring them in GDR actually reduces the workload. In fact, it creates ambiguity. Therefore, I would prefer these provisions to be retained as ARs in G1, as they offer valuable insights into company practices and ensure consistent reporting.			
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	I see an improvement in language and structure that enhances readability.			
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	During our outreach event, it was highlighted that the reduction in data points does not equate to a 50% reduction in workload. Furthermore, a proposal was made suggesting that EFRAG should consider removing even more data points. I strongly disagree with this suggestion. Further reductions risk omitting material information that is essential for transparency and accountability. To support effective decision-making and drive meaningful progress on the sustainability agenda, we need more sustainability data—not less. This data is crucial to balance the well-established infrastructure of financial reporting. Legislation and ESRS are key drivers of comprehensive sustainability reporting. The market alone will not develop this further, as history has shown. Globally, the data required by ESRS represents the baseline for what will be reported—not an excess.			
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Option 1 is my choice because the quantiative side is very important to assess for a company, even though it, in a short-term perspective, may be hard to publish right now. But the description is very clear on what to do if not and I think that we will drive more value and have more use of Option 1. In our outreach event, there was discussions that simplification of legislation will create more value and I strongly disagree with that. I think that the legisation will be ground zero, and if we don't have an aim, it will halt the development.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	22.E1.	Comments on deleted datapoints in ESRS E1	I agree	In E1-7 and E1-8 (E13: I strongly disagree that the intensity-figures should be deleted. Intensity-figures to enable sectoral comparability and benchmarking, both financial and physical denominators (Former para 40). I believe that it is necessary that all companies operating in high climate impact sectors have to disclose energy intensity and climate intensity. I also think that the addition of physical intensity based figures (production volumes or sold products) should be disclosed. Even though it may not enable comparability between sectors, it can enable comparability within sectors and most importantly, be really useful for internal analysis and business strategy as well as meet the objective of ESRS of fair presentation. Great modification with reducing the granularity of renewable energy.			
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	22.E2.	Comments on deleted datapoints in ESRS E2	I agree	-			
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	22.E3.	Comments on deleted datapoints in ESRS E3	I agree	-			
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	22.E4.	Comments on deleted datapoints in ESRS E4	I agree	-			
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	22.E5.	Comments on deleted datapoints in ESRS E5	I agree	Good modification in terminology.			
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	22.S1	Comments on deleted datapoints in ESRS S1	I agree	For S1-13: Good modifications, without losing transparency and comparability.			
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	22.G1	Comments on deleted datapoints in ESRS G1	I agree	(Former G1-1 Disclosure Requirement related to ESRS 2 GOV-1 – The role of the administrative, management and supervisory bodies) - It is good that it is handled in ESRS 2 GOV1 instead of seperated reporting in each topical standard.			
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	I agree that these should be mandatory datapoints and I support the addition of this datapoints, since it is a fundamental part of transparency.			
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	It will be easier now to know what to include, based on the terminology.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	Should the rest of the employees be reported in "Other countries", or just left out?			
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	I see a risk in this phrasing that will make it easy to avoid reporting on adequate wages.			
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	Former para S1-16 98. Removal of voluntary dp on adjusted gender pay gap by employee category and country/Segment. I doubt that anyone will disclose it, if it is in the NMIG. I think that organisation should report on this for significant employee categories, especially with pay transparency act coming up.			
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Interest and handling of affected stakeholders are important for governance and environmental aspects as well, not just social. We would urge that it remain for E, S and G topics, since it is an essential part of risk management. Pollution, ecosystem and resource usage are as important for a local community and other stakeholders - as well as corruption, bribery and whistleblowers - in a global production chain and economy. (GDR-P 2-34 (d)).			
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Important content of the topical standard and I appreciate the low reduction in datapoints. I would like to emphasize the need for intensity-based figures, that are now deleted.			
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Great clarifications in terminology.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Age distribution within top management and among employees are a rather basic level of reporting, and fundamental part of an organisation. It is my firmest belief that S1-8 30b should be mandatory.			
Survey	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	I support the addition of the mandatory datapoints.			
Survey	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The simplifications of the DMA process mainly reduce the effort for wave 2 companies, but will not significantly reduce the effort for companies that are already reporting according to ESRS. Also, some of the wordings in chapter 3 are still not sufficiently clear and leave room for interpretation, for example: •3.2 (22): "The information shall be presented either at topical level or at impacts, risk and opportunity level" -> if the provided options refer only to the presentation of IROs we believe this will lead to a lack of comparability between reports of different companies. The presentation in tables/overviews ect. should be preferred on IRO level (and this should be clearly stated in chapter 3.2) For further reporting based on IROs (e.g. PATs), we agree that reporting on IRO or topic level should be feasible. •3.3.1 (34): "Actual impacts in the reporting period include both newly arisen impacts and those persisting from previous periods." -> a clear definition of how many previous periods need to be included in the identification of actual impacts is missing. Please specify this part in order to avoid leaving too much room for interpretation.			
Survey	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	3.3.1 (35) states that "if the undertaking needs to maintain significant mitigation and/or prevention actions, to contain the severity and/or likelihood of occurrence of the potential impact below a materiality level, the impact shall be assessed without considering the mitigation and/or prevention action". This part is not sufficiently clear: •In which cases is a mitigation or prevention action considered "significant" and in which cases would such action not be considered as significant? -> please provide a clearer definition and more concrete examples. •Also, if all mitigation measures that need to be maintained over time cannot be considered in the assessment of a potential negative impact, companies would have to report a high number of potential negative impacts even though the likelihood and severity of their occurrence would be very low (and non-material) in reality. We strongly recommend deleting this phrase, as it will lead to a misrepresentation of reality and additional reporting effort for companies without adding value to the report. 3.3.1 (36) states that "The results of the undertaking's mitigation or remediation actions on negative impacts caused by or contributed to by its compliance with law and regulation are not positive impacts. However, if its business activities, products and services mitigate or remediate negative impacts of another party, this is considered a positive impact of the undertaking." •This section contradicts itself: It states that, while an undertaking cannot state a positive impact, e.g. for implementing actions to prevent human rights violations along the value chain (because they are mitigation actions and also required by law), it could at the same time report a positive impact, because with these actions, the company helps to mitigate negative impacts of its upstream suppliers on these human rights topics. This doesn't make sense. Please specify more/delete this part.			
Survey	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We generally welcome the increased flexibility introduced through the proposed amendments to the ESRS Sustainability Statements. The possibility of including an executive summary and the emphasis on using appendices to separate detailed information from key messages can be helpful steps toward improving readability and structure. However, we understand these changes primarily as clarifications of existing options rather than substantial simplifications. From our perspective, they do not result in significant relief in terms of implementation effort or reporting complexity.			
Survey	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We consider the proposed amendments under Level 3 to be a significant improvement. The restructuring of the architecture and the clarified interaction between ESRS 2 and the topical standards enhance the overall readability and usability of the standards. The simplification of the General Disclosure Requirements (GDRs), the reduction of mandatory datapoints for policies, actions, and targets (PATs), and the removal of overlapping topical specifications contribute to a clearer and more accessible framework. These changes reduce complexity and duplication, making it easier for preparers to navigate the requirements and focus on material information. In particular, the shift toward a more principles-based approach and the ability to report PATs at a higher aggregation level, reflects a pragmatic and proportionate response to the challenges identified during the first-time application. This supports more effective and relevant sustainability reporting, while maintaining the necessary level of comparability and transparency. In our point of view theses changes clearly promote readability, however it is important to note that those simplifications do not result in significant relief in terms of implementation effort or reporting complexity.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We agree that the proposed amendments improve the clarity and accessibility of the ESRS. The removal of "may disclose" datapoints and the clearer separation between mandatory and non-mandatory content contribute to a more structured and comprehensible standard. The revised layout—particularly the relocation of mandatory Application Requirements directly under the relevant Disclosure Requirements—makes the legal text easier to follow and reduces the need to navigate back and forth within the document. However, while the structure and readability have improved, the overall reporting requirements remain largely unchanged. As such, the simplification primarily supports better orientation within the standards rather than reducing the reporting burden itself.			
Survey	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We consider the introduction of Non-Mandatory Illustrative Guidance (NMIG) a useful addition to the ESRS framework. The separation of mandatory and non-mandatory content improves the structure and readability of the standards. NMIG can serve as an orientation tool—especially for preparers in the early stages of implementation—by illustrating how disclosures might be structured or interpreted in practice. However, it is important that the non-binding nature of NMIG remains clearly communicated and consistently understood by both preparers and auditors. There should be no implicit expectation that the examples provided must be followed or justified if not applied. Otherwise, the intended simplification effect could be undermined by new uncertainties or perceived pressure to align with the illustrative content.			
Survey	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	We welcome the proposed burden reliefs and consider them a meaningful step toward reducing the complexity and effort associated with ESRS reporting. In particular, the introduction of the "undue cost or effort" relief provides a practical and much-needed basis for preparers to justify omissions or limitations—especially in discussions with auditors—when data collection would require disproportionate resources. We also appreciate the removal of the systematic preference for direct data in value chain metrics. Allowing the use of estimates based on practicability and reliability reflects the reality of current data availability and maturity across the value chain. This change is likely to reduce effort in future reporting cycles. While these reliefs do not fundamentally change the scope of reporting obligations, they offer greater flexibility in how requirements can be met and documented. This supports a more proportionate and pragmatic implementation of the ESRS, without compromising transparency or alignment with the objectives of the EU Green Deal.			
Survey	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	We strongly oppose both quantitative and qualitative disclosures of anticipated financial effects. The underlying data is often unclear, and the risks cannot be reliably isolated, making any form of disclosure—whether narrative or numeric—legally risky and prone to misinterpretation. Such information lacks comparability and does not offer decision-useful insights for stakeholders. Moreover, IFRS already define when future risks and related current and anticipated financial effects must be reflected in financial reporting, e.g. through recognition and measurement criteria. Sustainability reporting should not override or extend these principles through financial disclosure requirements in the sustainability statement. We therefore recommend that this disclosure requirement should be removed entirely or made explicitly optional.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	From our perspective, there is currently no feasible methodology to directly link specific climate-related risks or opportunities to financial metrics such as assets, liabilities, or revenue. We support connectivity between financial and sustainability reporting, particularly with regard to the assumptions and parameters used in both areas. However, a direct mapping of sustainability risks to specific financial metrics such as individual assets or revenue would entail disproportionate effort and complexity. In our view, such linkages should only be pursued where they are methodologically sound and practically feasible. Otherwise even qualitative disclosures carry significant legal uncertainty and risk of misinterpretation. Moreover, comparability across undertakings is severely limited due to the absence of clear guidance on the required level of detail for qualitative disclosures. Also, from our perspective capital market participants typically rely on standardized models and data sources, which are not meaningfully enhanced by inconsistent, company-specific disclosures. The actual use of such granular data remains questionable and does not justify the disproportionate immense effort required from companies. We therefore advocate for anticipated financial effects to be entirely voluntary. This approach ensures flexibility while avoiding misleading or unverifiable reporting. If the justification for anticipated financial effects is based on data needs from banks or other financial stakeholders, we believe such needs should be addressed through enhancements to financial reporting requirements. There is no compelling reason to mandate these financial disclosures within the ESRS framework. According to AR 16 of ESRS 1, the risk management system is already defined as a key source for sustainability reporting. In our view, anticipated financial effects should also be derived from this source to ensure consistency and to consolidate all relevant information within the financial reporting architecture			
Survey	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	General remark: We acknowledge and welcome the improved structuring and consolidation of the ESRS requirements. The clearer separation and grouping of datapoints—especially the removal of voluntary datapoints and the streamlining of narrative PAT disclosures—enhance the usability of the standards. However, we would like to emphasize that the reduction in the number of datapoints does not necessarily translate into a proportional reduction in the substantive reporting scope or effort. In our view, the overall scope and complexity of the disclosures remain largely unchanged. The deletion of datapoints primarily affects how requirements are presented, not what is required. We do not expect a significantly reduced reporting volume under the amended ESRS. Instead, the changes may help reduce effort in data collection, documentation, and coordination with auditors. For example, the introduced options for burden reliefs may simplify internal discussions and reduce the need to justify the omission of non-material items. Furthermore, we anticipate that the revised wording and structural adjustments introduced in Wave 1 will trigger renewed alignment efforts with our auditors. Each change—whether in phrasing, grouping, or presentation—requires careful interpretation and validation to ensure consistent application and auditability. These additional coordination loops may temporarily increase the internal workload, particularly during the initial implementation phase. It is important that this distinction is clearly communicated: while the number of datapoints has decreased, the underlying disclosure obligations remain intact. This will help manage expectations and avoid misinterpretations regarding the actual simplification impact of the amendments.			
Survey	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We acknowledge that the number of datapoints moved from "may" to "shall" is limited and that the selected disclosures are aligned with existing disclosure objectives. The affected datapoints do not appear to introduce fundamentally new reporting obligations, and the rationale for each change is understandable. Nevertheless, we believe that the principle of not increasing reporting requirements should be applied consistently. Even if the datapoints themselves are not technically new or complex, their change in status to mandatory will require additional interpretation, internal coordination, and alignment with auditors—especially during first-time implementation. This effort should not be underestimated. From our point of view the ESRS revision should refrain from posing any additional effort to preparers. While the data collection may not pose an insurmountable challenge, the clarification and documentation of these disclosures will still require resources. We therefore recommend sticking to the rule of no additional reporting obligations.			
Survey	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	In general, we do not support the introduction of new data points, as they typically result in significant additional effort for reporting entities without a corresponding increase in decision-useful information. The cost-benefit ratio of expanding disclosure requirements must be carefully considered, and in our view, the current framework already places substantial demands on preparers.			

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Survey	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We welcome the explicit inclusion of the fair presentation principle in the ESRS. This codification strengthens the shift away from checklist-driven compliance towards company-specific, decision-useful sustainability reporting. It also aligns the ESRS more clearly with established financial reporting principles. The objective of introducing fair presentation should be to improve the functioning of the materiality filter—focusing disclosures on what truly matters. In this context, fair presentation should not be understood merely as a formal requirement, but as a guiding concept that supports relevance, clarity, and proportionality in reporting. However, further clarification is needed regarding its practical application. It must be clearly communicated that fair presentation is fulfilled when all applicable ESRS requirements—including relevant company-specific disclosures—are properly implemented. This includes the exercise of professional judgment in identifying material information, as defined in ESRS 1 §21(a), and tailoring disclosures to the needs of the primary users of the report. Importantly, fair presentation goes beyond the materiality of individual datapoints. It also encompasses the relevance of disclosures in the specific context of the reporting entity. To avoid misinterpretations, it should be emphasized that fair presentation is not about making every detail understandable to any reader, but about enabling informed decision-making. A clearer conceptual framework—one that integrates materiality, user orientation, and company-specific relevance—would help preparers apply the principle consistently and meaningfully.			
Survey	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	We do not consider a review of AR 26 to be necessary. AR 26 describes optional examples of how targets can be set. However, such a specification is not necessary because companies are best placed to assess which targets are most appropriate for them. AR 26 is therefore not required.			
Survey	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	We support the removal of the datapoint on "average time to pay an invoice," as it did not offer meaningful insights and was difficult to interpret in a decision-useful way. However, we also question the relevance and practicality of the remaining datapoint on "standard payment terms" (former ESRS G1-6 §33b). In our view, this metric lacks clarity—especially in international contexts where no legal standard exists—and does not provide useful information for assessing supplier relationships. The percentage of payments made under "standard terms" is difficult to interpret and does not allow conclusions about actual impacts on suppliers. Also, disclosures on standard payment terms are already partially covered by existing financial reporting requirements, in particular IAS 7.44. As such, there is a risk of duplication between ESRS and IFRS requirements. To avoid inconsistencies and unnecessary reporting burden, alignment and clarification on the scope and purpose of such disclosures is essential. Furthermore, the categorization of suppliers (e.g., SMEs) remains problematic. Our financial systems do not track suppliers by size class, and ilmplementing such a classification would require disproportionate effort. Similarly, the requirement to report the number of legal proceedings due to late payments (former ESRS G1-6 §33c) is not decision-useful in isolation. Without qualitative context, such as reasons for delays or materiality thresholds, the raw number lacks relevance. Furthermore, we consider a material use case to be unlikely.			
Survey	Kompaniets Consulting GmbH WPG	Consultant (including software vendor)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	(+) Emphasis on fair presentation is highly important. The ESRS framework has always been a fair-presentation framework but has partly been treated as a compliance exercise (BfC para 50). (+) Double materiality should be maintained. It is a vital component of a truly meaningful sustainability reporting. A single materiality approach would not suffice. (+) Level of aggregation based on a single IRO, groups of IROs, or topics: reporting should occur at the level at which management is steering its material IROs. This allows more flexibility in reporting. It may also increase complexity though, as entities must ensure that their external communication and internal practices are aligned. Nevertheless, this stems from the general fair-presentation requirement, so the benefits outweigh the costs. (-) ESRS 1 para 108: inclusion of non-ESRS information in the sustainability statement when needed by specific users is problematic, as the risk of diluting material information is high, even with the provision in ESRS 1 para 108. If entities wish to disclose such information, it should be presented outside the sustainability statement. Inclusion will increase audit organisation complexity. Therefore, para 108 should be deleted. (-) ESRS 1 AR 17: it is unlikely that top-down and bottom-up approaches will lead to the same results. While we generally support this clarification, we propose amending the second subparagraph of AR 17 to state that the list of material IROs under IRO-2 must be complete. Please note (+) means the arguments support the solution EFRAG reached in the Amended ESRS. (-) means the arguments do not support EFRAG's solution; in such cases we provide a suggestion to resolve the issue.			
Survey	Kompaniets Consulting GmbH WPG	Consultant (including software vendor)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	(+) Overall emphasis on "gross assessment" is clear and appropriate. The selected approach makes sense. For example, actions undertaken during the reporting period (e.g., 2025) should not be considered for the impact assessment. Past, fully completed actions (e.g., completed in November 2024) are reflected in the current residual impact, i.e., gross impact as of 2024 minus the effect of actions completed in 2024 equals the residual impact as of 2025. This implements a consistent gross approach. (+) More comparable disclosures are expected due to the general guidance on gross vs. net assessment. (+) The treatment of positive impacts is clarified, which should also improve comparability. (-) ESRS 1 Para 35 first sentence: clarify what is menat by "actions taken": We assume this sentence refers to past actions (eg. in previous reporting periods, similar to our example here above) (-) Deviations in reporting could result from different interpretations of "actions taken" or "actions fully completed" (Appendix C) and from differing thresholds for supportable evidence (ESRS 1 para 35). (-) Appendix C of ESRS 1 is complex and difficult to read. However, it should be retained because, once understood, it provides solid guidance on how to deal with actions. For example, this could be included in a new AR paragraph stating that, an action may be deemed completed, if no more effort is required by the company. Otherwise it shall be classified as ongoing action.			

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Survey	Kompaniets Consulting GmbH WPG	Consultant (including software vendor)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	(+) In general, requirements for the structure of the sustainability statement are more flexible. The options are listed in the ED ESRS (e.g., ESRS 1 paras. 107, 109, 110) and are clearly defined. However, flexibility reduces comparability. Excessively varied structures make comparability more difficult. This though, is a typical consequence of a fair presentation framework and should be maintained. ESRS 1 para. 108 on possible inclusion of other, non-legal information requested by specific users: (-) This contradicts the concepts of material information and fair presentation. The risk of dilusion of material information is too high, as for example, there is no limit set in para 108, hence, a significant amount of non-material information might be included. (-) Including non-ESRS information in the sustainability statement complicates the audit. If it is not assured, the audit report would need a scope exclusion, which risks confusing users. If it is assured, audit costs will rise. (-) There is no analogous requirement in financial reporting. Suggestion: Delete this requirement. If it is retained, allow such information only in an appendix to the sustainability statement, not within the statement itself. ESRS 1 para. 109: an "executive summary" may be provided in the sustainability statement. --> Interpretation: multiple executive summaries appear possible (e.g., one at the beginning of each of the four sections). BC para. 59 states the "option to have an 'executive summary' at the beginning...". --> Recommendation: clarify that multiple summaries are permitted or amend the BC accordingly.			
Survey	Kompaniets Consulting GmbH WPG	Consultant (including software vendor)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	(+) Many data points were removed, simplifying the requirements. (+) Allocating most GDR/IRO/SBM requirements to ESRS 2 improves clarity and readability. (+) Greater flexibility via aggregation levels and PAT reporting aligned with internal management. (-) ESRS 2 para 29 first sentence does not include "metrics". It seems that it is missing. (-) AR 38: presentation currency of the general financial statement to be used: We do not think that this is needed in the ESRS as this is a general requirement. The current GDR provide sufficient guidance on reporting PATs and allow flexibility. However, the GDR DRs remain complex and may be more challenging now, as increased flexibility shifts more judgment to entities.			
Survey	Kompaniets Consulting GmbH WPG	Consultant (including software vendor)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	(+) In the amended ESRS, numerous wording clarifications and editorial changes provide a clearer picture of what is expected under the requirements. (+) It is evident that public feedback from the first reporting season has been incorporated into the amended ESRS. (+) Including the Application Requirements (AR) in the main body of the standard increases readability. More precise cross-references to the related paragraphs increases understandability further.			
Survey	Kompaniets Consulting GmbH WPG	Consultant (including software vendor)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	In general: (+) NMIG provide additional guidance as ESRS remain complex. If NMIG are not adopted by the European Comission, consider inssuing NMIG as some form of "Implementation Guidance" as done previously			
Survey	Kompaniets Consulting GmbH WPG	Consultant (including software vendor)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	(+) Relief to exclude metrics from non-material drivers (ESRS 1 para 90) can increase the usefulness of reporting. In practice, it may be difficult to prove that. In other words, entities will need to establish proof in order to exclude such activities. Clarify that such exclusions should be explained under MDR-M (ESRS 2 para 41(d)). (+) ESRS 1 paras 72–73: significant operational simplification, because they provide companies with sufficient time to prepare sustainability information. (+) ESRS 1 para 91: due to the importance of the metric, Scope 3 should not be eligible for any relief. (-) In general, a data quality hierarchy will likely to lead to better reporting quality. Less emphasis on direct data leads to simpler processes, as preparers will likely use more estimates, which should be stated under MDR-M (already covered by ESRS 2 para 41 a)). This comes at the cost of lower reliability of the reported infomration. See next question regarding relief for own metrics			
Survey	Kompaniets Consulting GmbH WPG	Consultant (including software vendor)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	As stated in question #17, the relief for own metrics should only be made available for a transition period of eg. one or two years. In that time, it is expected that methodology has improved and is able to provide the full scope metric. There is a a risk that entities will use this exceptions for a long time, hence, providing less relevant information in that period. Regarding ESRS 1 paras 87(d) and 91 (relief for own metrics): (-) Such relief should be available only temporarily, e.g., for the first one or two years. If relief remains unconditional, even with the disclosures required by para 91, companies are unlikely to improve data-gathering methodologies quickly. Consequently, the overall usefulness of sustainability statements will remain low. (-) Para 91 disclosures, when relief is used, may not provide sufficient incentive for preparers to improve methodologies in the short term (contrary to BfC para 76). Suggestion ESRS 1 para 91 relief for metrics: if relief is retained, make it conditional and subject to phase-in rules, e.g., for one or two years. In addition to the disclosures required by para 91, preparers should state which parts of the reporting boundary are excluded from the metric due to the use of relief.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Kompaniets Consulting GmbH WPG	Consultant (including software vendor)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Option 1 should be implemented in the amended ESRS (+) Option 1 provides more relevant and decision-useful information for all users, as it requires quantified disclosures. Purely qualitative information will be insufficient and not reliable over time. (+) If quantification is voluntary, only a few companies are likely to disclose it; methodologies will stagnate and comparability will suffer. (+) possibility of single amount or range estimation offers flexibility to preparers (+) closer alignment with IFRS (+) In connection with metric relief options entities do have a lever to explain why certain quantification was not possible, though, as suggested in quesion #18: only for a limited period until the proposed phase-in period has expired. (-) Quantification is complex and ressource-intensive, especially initially; establishing robust, auditable methodologies and data systems will take time. → Suggestion: Adopt Option 1. Include phase-in relief: allow qualitative-only disclosures for the first year (optionally the first two years) to address complexity concerns.			
Survey	Kompaniets Consulting GmbH WPG	Consultant (including software vendor)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	(+) DRs are now less granular and reduced; this simplifies them, although they remain complex by nature. (+) We support Option 1 for anticipated financial effects; accordingly, this DR should require quantification. The information is key for users of the sustainability statement and should therefore be retained in E1 as well. Option will result in significant data gaps as this information is highly valuable for user of sustainability statements. (–) E1.40(b) "location of key assets": Disclosing financial effects at the individual asset level may be too granular, especially for companies with many assets. Simplify by allowing disclosure for groups of key assets, aggregated by management approach, region, or type of physical risk. The company should explain the basis for aggregation. Phase-in: As in Question 19, introduce a one-year phase-in (optionally two) for the quantitative disclosures to address complexity.			
Survey	Kompaniets Consulting GmbH WPG	Consultant (including software vendor)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	In general, we believe interoperability with IFRS and, to some extent, GRI is critical to fostering worldwide acceptance of the ESRS. Future ESRS development should always consider this. The Amended ESRS strike a good balance between enhanced interoperability and preserving key aspects of the Delegated Act ESRS. To further enhance interoperability, we suggest: (-) Remove reliefs that go beyond IFRS S1/S2. Do not introduce ESRS reliefs for Scope 3 emissions or due to insufficient skills/capabilities. (+) Maintain the DMA in the ESRS, as it is essential for complete sustainability reporting.			
Survey	Kompaniets Consulting GmbH WPG	Consultant (including software vendor)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Kompaniets Consulting GmbH WPG	Consultant (including software vendor)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	The reduction of more than 50% is significant. While we acknowledge the rationale for this drastic reduction, we stress that any further reductions risk watering down sustainability reporting requirements. In order to maintain a meaningful framework, the ESRS developtment should focus on clarifying requirements without deleting the existing ones.			
Survey	Kompaniets Consulting GmbH WPG	Consultant (including software vendor)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Kompaniets Consulting GmbH WPG	Consultant (including software vendor)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Please note that ESRS 2 para. 16(b)(ii) includes requirements regarding the downstream value chain. Such information may be difficult to obtain. The option to provide qualitative information (AR 5 to para. 16(b)(ii)) should ease the burden.			
Survey	Kompaniets Consulting GmbH WPG	Consultant (including software vendor)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	We agree emphasis on fair presentation is important. We also agree that fair presentation is indeed required to provide a more meaningful, useful and relevant sustainability reportings. We believe, the following are the main reasons for that: (+) Sustainability fair presentation is aligned with the financial reporting. Additionally, the sustainability statement shall be part of the management report, hence, it is important to make sure that both the financial and non-financial part of the management report are based on fair presentation. Otherwise, Quality, completeness and relevance of information procude may vary between these parts. (+) Fair presentation in general, leads to a more relevant and reliable decision making basis due to its "non-checklist nature" It is worth noting though, that fair presentation may increase reporting complexity as entities need to extend their efforts beyond on what is actually written in a framework. Hence, it is important to provide some guidance on how an entity should approach such requirement. We believe that the DMA (including process, identification and assessment methodology and the reference to other sector standards) provides sufficient general guidance for that.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Kompaniets Consulting GmbH WPG	Consultant (including software vendor)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Although the financial sector has distinct features that differ from other sectors, this does not justify exempting any sector from general sustainability reporting requirements. Every sector has specificities; excluding one is not appropriate. A common argument for exemptions cites the financial industry's other sustainability-related obligations (e.g., EBA Guidelines EBA/GL/2025/01 on ESG risk management for banks). However, these guidelines require banks to collect absolute and intensity-related data on counterparties. Therefore, banks should have sufficient portfolio data to set absolute and intensity-based targets.			
Survey	Kompaniets Consulting GmbH WPG	Consultant (including software vendor)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	We believe some general guidance, even if provided as examples, should be included in the Amended ESRS. Accordingly, incorporating AR 26 of the Delegated Act seems appropriate. If included, consider adding a generic reference to SBTN or another nature-based metrics framework under AR 26(d). Alternatively, if AR 26 is not incorporated into the Amended ESRS, consider placing this paragraph in the NMIG, subject to the NMIG's legal status.			
Survey	Kompaniets Consulting GmbH WPG	Consultant (including software vendor)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	We suggest to retain the adjusted gender pay gap a "may requirement" as this information can be useful. Alternatively, consider including this in the NMIG, depending on the legal status of the document.			
Survey	Kompaniets Consulting GmbH WPG	Consultant (including software vendor)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	In general, we agree, given that a significant reduction was an explicit aim of the Amended ESRS. Further reductions or simplifications would increase the risk that the reporting requirements fail to capture the core elements of a meaningful and useful sustainability reporting framework.			
Survey	Kompaniets Consulting GmbH WPG	Consultant (including software vendor)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	same as for ESRS 1			
Survey	Kompaniets Consulting GmbH WPG	Consultant (including software vendor)	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Overall, based on our analysis of the new ESRS, the simplifications and alterations are well designed. We recommend no further decreases in the number, granularity, or scope of requirements, except for the suggestions above. Further reductions risk watering down European sustainability reporting. In summary, our main points are: (+) Maintain the double materiality assessment. It is key to meaningful sustainability reporting. (+) The current simplifications strike a good balance between reducing complexity and preserving a well-crafted framework, though some changes go slightly too far. Sustainability reporting is inherently complex. Further reductions in ESRS requirements would likely water down reporting. Do not reduce further; instead use feedback to clarify requirements that are not fully understood. (+) Make quantification of anticipated financial effects mandatory, with a phase-in period if needed. (+) Reliefs, especially for entity-defined metrics, are too far reaching and should be conditional, with a phase-in period.			
Survey	ACPR	National supervisory authority & regulator	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	We welcome the amendments proposed to Chapter 3 of ESRS 1, which clearly simplify the DMA. In particular, we support the introduction of the "reasonable and supportable information / undue cost of effort" principle, and the possibility of adopting either a top-down approach or a bottom-up approach for the DMA. Overall, the simplifications result in more clarity, improve readability and conciseness, and reduce unnecessary administrative burden, while maintaining the integrity of the DMA process.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ACPR	National supervisory authority & regulator	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	We do not believe that the proposed guidance on gross versus net impacts achieves the intended simplification. On the contrary, our view is that it introduces additional excessive complexity, with exceptions and case-specific distinctions that will inevitably lead to inconsistent interpretations by preparers and auditors. This goes against the simplification objective of the ESRS review. More fundamentally, we do not consider it appropriate to associate the concept of net impact with the DMA process. While the notion of net impact is not in itself problematic, in our view, net impact should not be used to determine materiality. Companies should always recognize the materiality of a topic or sub-topic independently of any remediation or prevention actions. Such actions may legitimately influence the severity of actual impacts reported, but they cannot change whether a topic is considered material. Thus, if retained, the notion of net impact should be used to inform IRO disclosures only, where companies can explain how actions have influenced the severity of impacts. The impact should however always be disclosed on a gross basis first, and then on a net basis. And, such an introduction at the IRO disclosure level seems contrary to the objective of a substantial reduction in the number of datapoints. Consequently, we strongly suggest removing this new concept of net and gross impacts. And we would like to insist on the fact that remediation actions can never justify concluding that a topic is non-material. On the contrary, the very existence of remediation may indicate that the topic is material, even if net impacts are subsequently reduced (to zero).			
Survey	ACPR	National supervisory authority & regulator	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We agree that, overall, the proposed amendments strike an appropriate balance between the prescriptiveness of the requirements and preparation effort on the one side, and the need for relevant and comparable information on the other. In that context, topical requirements on resilience analysis have been suppressed from ESRS E4 – Biodiversity and ecosystems, on the ground of avoiding redundancy with paragraph 24 of ESRS 2. However, ESRS 2 paragraph 24 is not sufficiently prescriptive in terms of what is meant by "how the analysis was conducted". We suggest providing more detailed guidance on what is expected, by drawing on the previous ESRS E4 – DP13 requirements: the scope of the analysis, key assumptions, and stakeholder engagement. It would also be helpful to clarify the publication expectations for each material risk to ensure consistency and comparability across undertakings. Further specifications on the expectations in terms of biodiversity transition plans would also be welcome (see our answer to question 33). We hence propose the following wording for ESRS 2 paragraph 24: "The undertaking shall disclose information about the resilience of its strategy and business model regarding its capacity to address its material risks (i.e. physical, transition and systemic risks), either individually or at a higher level (i.e. groups of risks or related topics). The undertaking shall disclose a qualitative analysis of its resilience to the material risks disclosed in accordance with paragraph 22, including how the analysis was conducted and the scope and time horizons considered, and the level of involvement of stakeholders. Topical ESRS may set specific requirements about resilience."			
Survey	ACPR	National supervisory authority & regulator	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We agree that the proposed amendments successfully improve the clarity, understandability, and accessibility of the Standards. However, it would be possible to further enhance the comparability of sustainability reports by introducing mandatory references to the DR/AR to which an information is related. This referencing has already been in place in many CSRD reports published this year and good represent a welcome element of comparability without creating a substantial additional reporting burden.			
Survey	ACPR	National supervisory authority & regulator	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We support the decision to keep the Non-Mandatory Illustrative Guidance (NMIG) in a separate document. To support the evaluation of transition plans, the NMIG should specify the requirements under ESRS E1, including proposed granularity and units of measurement for activity volumes and greenhouse gas emissions, in accordance with IFRS S2, Appendix B – "Industry-based disclosure requirements." The diversification of the company's activities and its value chain should also be highlighted as adaptation levers, alongside measures to adjust working conditions in response to climate risks. Additionally, the NMIG should mention the company's insurance coverage related to both transition and physical risks.			
Survey	ACPR	National supervisory authority & regulator	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We agree that the proposed amendments strike an appropriate balance between burden relief and transparency. We particularly support the introduction of the "undue cost or effort" principle, which aligns with the ISSB global baseline. We also welcome the greater flexibility to use estimates, which is especially relevant given that fewer companies will fall under scope after the expected increase of thresholds at Level 1. That being said, it is very important to establish a clear and binding framework for the use of estimates, making their use transparent for the reader. Priority should always be given to direct data, if available.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ACPR	National supervisory authority & regulator	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We consider Option 1 preferable, as it ensures stronger interoperability with IFRS S1/S2 and maintains a minimum level of quantitative information, which is essential for investor decision-making. The financial sector requires quantitative metrics, and many actors have already started developing them. Purely qualitative disclosures on anticipated financial effects would not provide sufficient decision-useful information and would weaken incentives to build robust methodologies. That being said and given the advance regarding quantitative measures related to climate issues, a phase-in for the other environmental topics (E2 to E5), for example, could represent a viable compromise between the two options.			
Survey	ACPR	National supervisory authority & regulator	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	We agree with the approach of strengthening alignment with IFRS S1/S2 while maintaining certain additional provisions. This balance is consistent with the building blocks approach, under which ISSB Standards provide a global baseline and regional frameworks, such as EU regulation and EFRAG's work, add a complementary layer adapted to local regulatory needs.			
Survey	ACPR	National supervisory authority & regulator	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree that the above-mentioned exceptions to the general rule are appropriate and justified. We particularly welcome the new requirement under ESRS E4-1 to disclose biodiversity Transition Plans when they exist and are already public. This is a significant and positive step, putting ecological transition on the same level of importance as climate transition, sending a strong signal to the market. However, the provision remains insufficiently prescriptive and should be supplemented (see our answer to question 33).			
Survey	ACPR	National supervisory authority & regulator	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree that adding four mandatory datapoints does not jeopardize the overall simplification objective set for the revision of ESRS. Indeed, the justification to these exceptions seems valid as they do not represent completely new datapoints but enable a better understanding of already existing datapoints.			
Survey	ACPR	National supervisory authority & regulator	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We agree with the introduction of the fair presentation principle. This is a welcome clarification, as it helps to counter the observed market trend towards overly procedural and granular reporting, perceived primarily as a compliance exercise. Like in IFRS S1, fair presentation should refocus ESRS on the relevance and faithful representation of information, thereby reducing reporting burden while strengthening international alignment. That being said, the effectiveness of this provision will strongly depend on assurance practices. To ensure consistent application, it is essential that an audit standard is developed at the European level to define the concept of fair presentation and clarify its boundaries. Without such guidance, there is a risk of diverging interpretations by auditors, increasing legal risks and audit costs. In this context, we also deem necessary to underline that using the different reliefs introduced in the amended ESRS does not represent an obstacle to the "fair presentation" principle. We also request clarification on the interpretation of paragraph 17: "Applying the ESRS is presumed to result in a sustainability statement that achieves a fair presentation." The term "is presumed to" suggests this is not absolute. Our understanding is that in very rare cases, faithful representation may require information beyond what is mandated by ESRS. This would align with paragraph 10, which already requires additional entity-specific disclosures when material topics are not sufficiently covered. If this interpretation is correct, paragraph 17 should explicitly state that such additional disclosures are expected only in exceptional cicumstances.			
Survey	ACPR	National supervisory authority & regulator	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We partially agree with the above-proposed exemption for the financial sector. We understand the financial sector's crucial role in financing the transition. This not only includes the financing of already aligned sectors, but also the financing of highly emitting sectors to accompany them in their transition efforts. In this context, we understand that emissions targets in absolute value may be subject to misinterpretation. However, we think it would be worth specifying that financial institutions should publish reduction targets at the sectoral level as overall reduction targets are less relevant than for corporates. Indeed, as of today, financial institutions already set absolute GHG emissions targets for sectors for which an exit strategy has been put in place. The exemption would thus need to address the sectors for which no exit strategy has been put in place so far and where preparers face methodological issues. We also believe this exemption could be made more robust by introducing safeguards to ensure the reliability and comparability of reported data. Specifically, we propose that intensity metrics are expressed as GHG intensity per physical output and by sector. Some financial institutions have already adopted such metrics (e.g., $kgCO_2e/m^2$ for the real estate sector), which offer a more stable and meaningful basis for tracking progress. This would also be in line with the Pillar 3 requirements set by the EBA, which should be maintained for large institutions. These enhancements would strengthen the credibility of intensity-based disclosures and align them more closely with the overarching goals of the European Green Deal. Moreover, such an exemption should be subject to potential future revision taking into account potential methodological developments.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ACPR	National supervisory authority & regulator	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	We support the incorporation of the information needed for the calculation of the SFDR PAI into the Amended ESRS. We also agree with the consolidation and clarifications of scope, as this improves relevance while also ensuring a significant reduction in datapoints. We also note that moving explicit disclosure requirements on company commitments to international social standards (UN, ILO, OECD) and on material negative impacts from the topical Social Standards to ESRS 2 could make these disclosures more generic and less specific by stakeholder group. However, these elements are referenced in SFDR and in the EBA guidelines at an aggregate level and we therefore support the proposal to maintain them in ESRS 2 to ensure consistency with (prudential) reporting requirements in the financial/banking sector.			
Survey	ACPR	National supervisory authority & regulator	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	We strongly agree that E4-4 would gain from a review of AR 26 in the amended ESRS E4, instead of its deletion, based on the work done by the SBTN and in close consultation with relevant stakeholders. We thus propose to maintain the AR and modify it as follows: "Biodiversity-related targets should: • rely on material impacts and dependencies, prioritising significant activities, high-risk watersheds, and high-impact commodities. • contribute to alignment with ecological thresholds, policy objectives, and recognised frameworks, including SBTN and the Kunming-Montreal Global Biodiversity Framework. • focus on key impacts, such as land use change and ecosystem conversion (e.g., expanding from zero-deforestation to zero-conversion policies for all natural ecosystems), while considering the local ecological context." We also propose to include in NMIG, in order to ensure it refers to the latest progress: "When appropriate, the undertaking may refer to the following sources: • TNFD, which provides examples of quantifiable targets related to direct biodiversity pressures and nature state; • SBTN, which provides guidance for establishing targets and/or collecting associated data on pressures, impacts, and dependencies, as well as more detailed guidance for targets related to terrestrial ecosystem use (e.g., non-conversion of natural ecosystems, reducing land footprint, and landscape-level commitments)."			
Survey	ACPR	National supervisory authority & regulator	France	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We welcome the new requirement under ESRS E4-1 to disclose biodiversity transition plans when they exist and are already public. This is a significant and positive step, putting ecological transition on the same level of importance as climate transition, sending a strong signal to the market. However, the provision remains insufficiently prescriptive. The list of stated required elements is incomplete and lacks adjustments to biodiversity, despite available methodological tools/concepts (e.g. TNFD). More details are needed to clarify these expectations for biodiversity matters (e. g. what are biodiversity stranded assets?). A specification of the different types of risk (physical, transition and systemic) would also be welcome. We are also concerned that the current approach relies entirely on cross-references to the climate transition plans requirements under ESRS E1. This wrongly implies that any company that engages in biodiversity planning knows very well and has already gone through the process of designing and adopting a climate transition plan. And it risks constraining biodiversity transition plans within the climate framework, overlooking its specificities. Since transition plans were not defined in ESRS 2, climate and biodiversity transition plans should have distinct forms and purposes. ESRS E4-1 should therefore specify dedicated expectations for biodiversity transition plans, and answer questions such as: How can compatibility with GBF objectives be expressed? What types of targets should be set when CO_2 emissions are not the metric to work with?			
Survey	ACPR	National supervisory authority & regulator	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		E1-6 We fear that we will lack standardization by allowing companies to disclose different target years. While flexibility may benefit individual reporting strategies, eliminating this standardization would significantly hinder comparability across entities. A shared temporal framework, such as a common target year (e.g. 2050), is essential for assessing progress consistently and meaningfully across sectors and jurisdictions. Without it, stakeholders, including banks and investors, could struggle to evaluate the relative ambition and effectiveness of corporate climate strategies. Therefore, we would suggest to keep former §34d. E1-9 We believe that the disclosure of GHG emissions intensity should be mandatory for companies that set intensity-based targets. Allowing such disclosures to remain optional undermines the transparency and credibility of intensity targets, as stakeholders cannot assess progress or compare performance without access to the underlying intensity metrics. Requiring the publication of emissions intensity for those companies ensures consistency between targets and reported data.			
Survey	amfori	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	We believe that the revised chapter simplifies and clarifies the DMA significantly, while retaining its core principles and keeping its robustness. We are especially glad to see clear and user-friendly explanations for the due diligence steps and the assessment of IROs, which preserve the logic of well-established international standards on due diligence (severity and likelihood) and provide enough flexibility for companies to conduct the DMA according to their level of maturity and specific circumstances (e.g. bottom-up or top-bottom approach). We greatly welcome the explicit consideration of value chain information (since most IROs materialise in deeper tiers of the value chain), in order to increase resilience and improve risk management, it is critical for companies to gain a better understanding of their value chain over time (while acknowledging that having a full granular picture might not be realistic from the start). In addition, we see the inclusion of 'gross impact' (assessing impacts with regard to actions undertaken that could reduce the severity and/or likelihood of the impact) as a step in the right direction to encourage proactiveness of the undertakings and reward/promote good corporate practice.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	amfori	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We view that companies willing to, should be able to report on their general efforts to address material risks, impacts and opportunities beyond what is required by the ESRS. Due diligence is not about perfection, but showing progress over time. For that reason, we find particularly positive the possibility for companies to provide more detailed information related to their entity-specific disclosure in a more readable manner.			
Survey	amfori	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	-IRO-1: we welcome emphasis given to consideration of VC information to properly inform the DMA (in the clarification of the scope), clarification on the interconnection between IROs, and preservation of the severity x likelihood logic. -GOV-3: we are glad to see the interconnection with the due diligence exercise remains a core disclosure under ESRS. However, a short description of how the reporting and due diligence exercise informs each other is missing. -SBM-3: we welcome the separation of IRO requirements from SBM-3 as this improves clarity and readability. We are glad to note that core elements of the DR - essential information for the company to understand the connection of its SBM with its IROs, and how to address them – have been preserved. We are particularly positive about the addition of AR 12, 13 and 14, which place a strong focus on the relationship between IROs and PTAs. -While the additional flexibility is welcome, it might be insufficient to encourage good due diligence practice and cause lack of comparability. A middle-ground could be to include a specific reference to avoiding generic, boiler-plate information and disclose plans to improve the 'granularity' of reporting over time. -IRO-2: we are positive to note the reference to actual and potential impacts as well as the connection with the business model, operations and VC. We are positive about the improved coherence to disclose IROs according to the same same level of aggregation (IRO or topic level) as they are managed, same location covered by the PTAs to manage them, and level of managerial priority reflected in the reporting structure. -GDR-P: the clarification to disclose the scope of the policy, including own operations and/or VC is welcome. We also welcome reference to third-party standards/initiatives, which supports industry best practice/joint efforts.			
Survey	amfori	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Whereas we recognise the need to improve the implementability of the standards, we fear that paragraph 3 might undermine the capacity of undertakings and users to track progress and define adequate PAT, and the robustness of the methodology used to calculate the metrics and set targets. As in the case for Chapter 5, 5.2. on the "inclusion of upstream and downstream value chain information", we welcome a relief for the collection, use and disclosure of primary data in the supply chain, provided that the DR provides an incentive for companies to continuously improve the quality of their data collection process (and reporting exercise in general).			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We generally agree with the proposed simplifications and clarifications of the DMA and we support the intention to make sustainability reporting more focused and less granular. In line with these objectives, we have the following three suggestions for further clarifications of ESRS 1: 1. It should be made clear that a combination of the top-down and bottom-up approach to the DMA is possible to apply. 2. Clarify that AR 21 of ESRS 1 applies to each sub-topic within a standard, i.e. if a material IRO relates to two or more sub-topics, the entity needs only to report on those sub-topics. There should be no exemptions to this principle (i.e. we do not agree with the exemptions in ESRS S1 paragraph 3). 3. The interaction between topics and IROs is addressed in paragraph 22 of ESRS 1. The paragraph explains the process of identification of topics in relation to IROs and the presentation of information at either topical or IRO level. As we understand the proposal, an entity should not always have to disclose the detailed connection between an IRO and a corresponding topic/subtopic. This is a positive improvement that will enhance more focused reporting. However, the principle should be more explicitly clarified to avoid lengthy discussions around interpretation with auditors etc.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	How to consider remediation, mitigation and prevention actions when assessing impact materiality has been a reoccurring issue among preparers. From that point of view, the proposed guidance in paragraphs 34 and 36 of ESRS 1 is welcome, and the principles make sense. However, we believe that the examples in appendix C of ESRS 1 are confusing and thus adds rather than reduces complexity. Appendix C should therefore be removed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We agree as we favor more flexibility for preparers in preparing their sustainability reports. According to our understanding, there is no limitations in the current framework that prevents an entity from adding an executive summary to the sustainability report. EFRAG should therefore consider the necessity of this addition and the risk that it will give rise to discussions regarding other possible options for the display of information in the sustainability report that are permitted but not explicitly addressed in ESRS 1.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We welcome the amendments that will help entities avoid duplications in their reports and to disclose unnecessary details for pure compliance purposes. We believe that EFRAGs proposal will help entities focus on relevant and decision useful information. As we pointed out in our response to EFRAGs public call for input in the spring of 2025, there is a need for streamlining ESRS 2 and making the standard subject to materiality assessment. According to our understanding, EFRAGs proposal will accomplish this.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We find that the amendments make the standards more concise and easier to understand.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We agree with EFRAGs recommendation that the NMIG should not be included in the Delegated Act. We also believe that EFRAG should refrain from publishing the NMIG as guidelines as we see a considerable risk that this material will add to the burden and trigger additional unnecessary analysis by reporting companies. Additional guidance by EFRAG, if any, should solely be motivated by the aim of providing necessary support that is of actual help to preparers. Such material thus needs to be subject to thorough consideration.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	We welcome all the proposed reliefs. We believe they will contribute substantially to the aim of simplification.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We agree with the proposed relief. We do not think a time limit is necessary to incentives entities to gradually improve data quality and the coverage of the calculation of metrics.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Disclosure on anticipated financial effects are difficult to attain and based upon so many uncertainties, assumptions and estimations that the resulting information will lack in both reliability and comparability. The overall usefulness of the information will therefore be low. In addition, the information aligns poorly with financial reporting, where there is no similar disclosure. While these complications applies to both quantitative and qualitative disclosures on anticipated financial effects, we nevertheless favor option 2. However, EFRAG should preferably abandon these disclosures altogether as the cost of obtaining the information exceeds the benefits for users.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	We are generally concerned that the costs of the information does not motivate the benefits for users. Some of the information is also difficult or impossible to obtain. The information required in paragraph 40a for example - if an entity has taken climate change adaptation into account as an integral part of the construction of an asset. How should the requirement to disclose a monetary amount before such actions are taken be met? The information on revenue from business activities at material physical risk in paragraph 40d risk becoming a theoretical construction with little information value. Within, for example, a business segment the activities may be related to both assets at material physical risk and to other assets. How is an entity going to distinguish activities at risk from other activities and also separate revenue before climate change adaption from those activities? And in what way will users benefit from information that is based on such a theoretical construct?			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	A widely recognised global sustainability reporting framework based on effective and decision useful standards that will function well on global capital markets is key for the achievement of global climate agreements and targets. An international standard setter, such as the ISSB, has the practical ability to obtain the necessary support and acceptance needed to back up such a reporting framework. Principally, we therefore believe EU should strive for full convergence with the ISSB standards. However, considering the objective of simplification and that the long-term ambition to achieve and maintain a high level of interoperability between ESRS and the ISSB standards remains intact, we find the proposed reliefs that go beyond S1 and S2 well balanced.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	General comment: The 57% reduction in mandatory datapoints does not correspond to an equal reduction in reporting burden as a large part of the more demanding disclosures and administrative requirements in the ESRS framework remain intact. There is significant room for further reductions on metrics, please consider the proposals for simplification jointly developed by BusinessEurope, EBF, Insurance Europe and EFAMA. When deliberating additional reductions, EFRAG should adopt a cost-benefit approach and remove such disclosures whose costs clearly exceed the benefits of the information. Particular comment regarding ESRS 2: Despite our comment above, we generally welcome the amendments of ESRS 2 and that the datapoints in the standard are now subject to information materiality.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	22.E1.	Comments on deleted datapoints in ESRS E1	I disagree	General comment: The 57% reduction in mandatory datapoints does not correspond to an equal reduction in reporting burden as a large part of the more demanding disclosures and administrative requirements in the ESRS framework remain intact. There is significant room for further reductions on metrics, please consider the proposals for simplification jointly developed by BusinessEurope, EBF, Insurance Europe and EFAMA. When deliberating additional reductions, EFRAG should adopt a cost-benefit approach and remove such disclosures whose costs clearly exceed the benefits of the information. Particular comment regarding ESRS E1: Swedish Enterprise is particularly concerned with the information on anticipated financial effects (E1-11), please see our answer to question 20 above.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	22.E2.	Comments on deleted datapoints in ESRS E2	I disagree	General comment: The 57% reduction in mandatory datapoints does not correspond to an equal reduction in reporting burden as a large part of the more demanding disclosures and administrative requirements in the ESRS framework remain intact. There is significant room for further reductions on metrics, please consider the proposals for simplification jointly developed by BusinessEurope, EBF, Insurance Europe and EFAMA. When deliberating additional reductions, EFRAG should adopt a cost-benefit approach and remove such disclosures whose costs clearly exceed the benefits of the information. Particular comment regarding ESRS E2: EFRAG should consider further simplifications and improvements of the E2-5 disclosure on substances of concern and substances of very high concern. We suggest further alignment with REACH and clarifications regarding the application of the disclosure for entities whose main activity is not within the chemical industry.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	22.E3.	Comments on deleted datapoints in ESRS E3	I disagree	General comment: The 57% reduction in mandatory datapoints does not correspond to an equal reduction in reporting burden as a large part of the more demanding disclosures and administrative requirements in the ESRS framework remain intact. There is significant room for further reductions on metrics, please consider the proposals for simplification jointly developed by BusinessEurope, EBF, Insurance Europe and EFAMA. When deliberating additional reductions, EFRAG should adopt a cost-benefit approach and remove such disclosures whose costs clearly exceed the benefits of the information.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	22.E4.	Comments on deleted datapoints in ESRS E4	I disagree	General comment: The 57% reduction in mandatory datapoints does not correspond to an equal reduction in reporting burden as a large part of the more demanding disclosures and administrative requirements in the ESRS framework remain intact. There is significant room for further reductions on metrics, please consider the proposals for simplification jointly developed by BusinessEurope, EBF, Insurance Europe and EFAMA. When deliberating additional reductions, EFRAG should adopt a cost-benefit approach and remove such disclosures whose costs clearly exceed the benefits of the information.			

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Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	22.ESS.	Comments on deleted datapoints in ESRS E5	I disagree	General comment: The 57% reduction in mandatory datapoints does not correspond to an equal reduction in reporting burden as a large part of the more demanding disclosures and administrative requirements in the ESRS framework remain intact. There is significant room for further reductions on metrics, please consider the proposals for simplification jointly developed by BusinessEurope, EBF, Insurance Europe and EFAMA. When deliberating additional reductions, EFRAG should adopt a cost-benefit approach and remove such disclosures whose costs clearly exceed the benefits of the information.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	22.S1	Comments on deleted datapoints in ESRS S1	I disagree	General comment: The 57% reduction in mandatory datapoints does not correspond to an equal reduction in reporting burden as a large part of the more demanding disclosures and administrative requirements in the ESRS framework remain intact. There is significant room for further reductions on metrics, please consider the proposals for simplification jointly developed by BusinessEurope, EBF, Insurance Europe and EFAMA. When deliberating additional reductions, EFRAG should adopt a cost-benefit approach and remove such disclosures whose costs clearly exceed the benefits of the information. Particular comment regarding the S1 standard: EFRAG should look into the disclosure on persons with disabilities (S1-11) which is particularly burdensome and also highly problematic from an integrity point of view. To collect such highly personal information from employees may be considered as a discriminatory act in itself. In addition, the information required to disclose the average number of training hours per employee (S1-12) is costly and difficult to collect for entities and the relevance and decision usefulness of the information is questionable.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	22.S2	Comments on deleted datapoints in ESRS S2	I disagree	General comment: The 57% reduction in mandatory datapoints does not correspond to an equal reduction in reporting burden as a large part of the more demanding disclosures and administrative requirements in the ESRS framework remain intact. There is significant room for further reductions on metrics, please consider the proposals for simplification jointly developed by BusinessEurope, EBF, Insurance Europe and EFAMA. When deliberating additional reductions, EFRAG should adopt a cost-benefit approach and remove such disclosures whose costs clearly exceed the benefits of the information.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	22.S3	Comments on deleted datapoints in ESRS S3	I disagree	General comment: The 57% reduction in mandatory datapoints does not correspond to an equal reduction in reporting burden as a large part of the more demanding disclosures and administrative requirements in the ESRS framework remain intact. There is significant room for further reductions on metrics, please consider the proposals for simplification jointly developed by BusinessEurope, EBF, Insurance Europe and EFAMA. When deliberating additional reductions, EFRAG should adopt a cost-benefit approach and remove such disclosures whose costs clearly exceed the benefits of the information.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	22.S4	Comments on deleted datapoints in ESRS S4	I disagree	General comment: The 57% reduction in mandatory datapoints does not correspond to an equal reduction in reporting burden as a large part of the more demanding disclosures and administrative requirements in the ESRS framework remain intact. There is significant room for further reductions on metrics, please consider the proposals for simplification jointly developed by BusinessEurope, EBF, Insurance Europe and EFAMA. When deliberating additional reductions, EFRAG should adopt a cost-benefit approach and remove such disclosures whose costs clearly exceed the benefits of the information.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	22.G1	Comments on deleted datapoints in ESRS G1	I disagree	General comment: The 57% reduction in mandatory datapoints does not correspond to an equal reduction in reporting burden as a large part of the more demanding disclosures and administrative requirements in the ESRS framework remain intact. There is significant room for further reductions on metrics, please consider the proposals for simplification jointly developed by BusinessEurope, EBF, Insurance Europe and EFAMA. When deliberating additional reductions, EFRAG should adopt a cost-benefit approach and remove such disclosures whose costs clearly exceed the benefits of the information.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	Principally we believe that the move from "may" to "shall" datapoints is contrary to the objective of simplification.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	The introduction of new datapoints is contrary to the objective of simplification. However, the new datapoint in ESRS 2 General Disclosures that requires the entity to state that the general requirements of ESRS 1 have been applied is justified from a simplification point of view and therefore acceptable.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	We welcome the clarification that ESRS is a fair presentation reporting framework. To meet the concerns that it may be challenging to demonstrate fair presentation in relation impact materiality for relevant stakeholders, we suggest that EFRAG clarifies that, while stakeholder dialogue informs the process, the responsibility for the report, and thus the assessment of fair presentation, rests with the reporting entity's management. We propose that BP-1 of ESRS 2 is amended to make clear that the identification and grouping of stakeholders is determined from the perspective of the management.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	The reason for this amendment is not clear. We are hesitant to introduce amendments and new definitions that may alter reporting processes and the gathering of data if there is no evident simplification effect.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	We agree with the proposed change, that we expect will be a minor simplification in comparison with the current methodology.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	If the PAIs are not relevant in practice there is a need to review the SFDR in order to streamline the flow of information, ensure decision usefulness and avoid unnecessary reporting.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	We believe that EFRAG should refrain from reviewing the AR at this stage due to the tight time frame.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	It is not clear from EFRAGs proposal weather an entity that wishes to disclose adjusted pay gap will still be able to do so. We agree with the removal of voluntary disclosures within the ESRS standards, but entities should nevertheless be able to disclose additional information in their sustainability reports. For example, adjusted pay gap may for some entities be considered material information. These entities should be able to disclose this metric as an entity-specific disclosure.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Despite the need for further simplifications, we generally welcome the amendments of ESRS 1. Please see question 11 for our suggestions for further clarifications.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Despite the need for further simplifications, we generally welcome the amendments of ESRS 2 and that the datapoints in the standard are now subject to information materiality.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	There is still substantial room for further simplifications. Swedish Enterprise is particularly concerned with the information on anticipated financial effects (E1-11), please see our answer to question 20 above.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	There is room for further simplifications. EFRAG should particularly look into further simplifications and improvements of the E2-5 disclosure on substances of concern and substances of very high concern. We suggest further alignment with REACH and clarifications regarding the application of the disclosure for entities whose main activity is not within the chemical industry.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	There is room for further simplifications.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	There is room for further simplifications.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	There is room for substantial simplifications of the S1 standard. The disclosure on persons with disabilities (S1-11) should be removed as it is particularly burdensome and problematic from an integrity point of view i.e. there is not only legal problems with the information but also ethical. To collect such highly personal information from employees may be considered as a discriminatory act in itself. In addition, the information required to disclose the average number of training hours per employee (S1 12) is costly and difficult to collect for entities and the relevance and decision usefulness of the information is questionable.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	There is room for further simplifications.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	There is room for further simplifications.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	There is room for further simplifications.			
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	There is room for further simplifications.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Confederation of Swedish Enterprise	Business association (other than association of financial institution)	Sweden	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Swedish Enterprise finds the proposed changes to ESRS 1 and the simplification of the DMA process a positive step towards a more simplified, effective and relevant reporting framework. Generally, the proposed amendments make the standards more concise and easier to understand. However, there is room for additional reliefs in mandatory datapoints in the topical standards. The 57% reduction in datapoints does not correspond to an equivalent effect on the total reporting burden on companies. When deliberating further reductions, EFRAG should consider the proposals for simplification jointly developed by BusinessEurope, EBF, Insurance Europe and EFAMA.			
Survey	CNA	Business association (other than association of financial institution)	Italy	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We welcome the simplifications, but question whether a formal DMA is necessary at this stage. The materiality principle alone could suffice, while DMA might be better introduced gradually or as guidance once practices are more mature.			
Survey	CNA	Business association (other than association of financial institution)	Italy	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	We consider the new guidance on remediation, mitigation, and prevention actions largely unnecessary. It adds complexity without improving the relevance or comparability of reported information.			
Survey	CNA	Business association (other than association of financial institution)	Italy	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We agree that the proposed amendments improve readability, support concise reporting, and enhance connectivity with corporate reporting, providing preparers with appropriate flexibility to focus on relevant information.			
Survey	CNA	Business association (other than association of financial institution)	Italy	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	While the amendments simplify some aspects, the layering of requirements remains complex. More guidance or further simplification is needed to reduce preparers' effort while ensuring relevant and comparable disclosures.			
Survey	CNA	Business association (other than association of financial institution)	Italy	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	CNA	Business association (other than association of financial institution)	Italy	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	All this effort increases the degree of complexity.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CNA	Business association (other than association of financial institution)	Italy	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The proposed reliefs are welcome and address key preparers' concerns, but overall reporting remains burdensome. Further simplification or additional practical reliefs would better balance reduced effort with transparency and ESG objectives.			
Survey	CNA	Business association (other than association of financial institution)	Italy	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	CNA	Business association (other than association of financial institution)	Italy	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree				
Survey	CNA	Business association (other than association of financial institution)	Italy	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree				
Survey	CNA	Business association (other than association of financial institution)	Italy	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We agree that emphasizing fair presentation can support more effective use of the materiality filter and reduce unnecessary reporting. However, clear guidance and examples are needed to mitigate legal and audit risks and ensure consistent application.			
Survey	CNA	Business association (other than association of financial institution)	Italy	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	While an exception for financial institutions may be justified, it could set a precedent for other entities with only indirect GHG impacts, potentially reducing comparability. Clear limits and alternative disclosures are needed to maintain transparency and consistency.			
Survey	CNA	Business association (other than association of financial institution)	Italy	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	Not necessary			
Survey	CNA	Business association (other than association of financial institution)	Italy	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	We note the deletion of the voluntary adjusted gender pay gap datapoint. While maintaining alignment with the Pay Transparency Directive, removing it may limit insights into pay equity by employee category or country. Consider retaining it as optional for enhanced transparency.			
Survey	CNA	Business association (other than association of financial institution)	Italy	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	The replacement of former payment practice datapoints may reduce transparency on SME engagement. We are concerned it may not fully meet CSRD objectives regarding SME protection and suggest clarifying or supplementing reporting requirements for SMEs.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CNA	Business association (other than association of financial institution)	Italy	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	CNA	Business association (other than association of financial institution)	Italy	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	CNA	Business association (other than association of financial institution)	Italy	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	CNA	Business association (other than association of financial institution)	Italy	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	CNA	Business association (other than association of financial institution)	Italy	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	CNA	Business association (other than association of financial institution)	Italy	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	CNA	Business association (other than association of financial institution)	Italy	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	CNA	Business association (other than association of financial institution)	Italy	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CNA	Business association (other than association of financial institution)	Italy	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	CNA	Business association (other than association of financial institution)	Italy	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	CNA	Business association (other than association of financial institution)	Italy	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	CNA	Business association (other than association of financial institution)	Italy	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	CNA	Business association (other than association of financial institution)	Italy	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Despite welcome simplifications for the DMA, companies already reporting under ESRS will see little immediate relief. We support the option for a top-down approach but recommend removing conditional wording: •AR 18 for 1.48: "Unless more investigation is necessary" •ESRS 1.48: "may avoid". This clarification will help streamline reporting and reduce audit burden. However, several provisions risk ambiguity and divergent interpretations, potentially triggering disputes with auditors: •3.2 (22): "The information shall be presented either at topical level or at impacts, risk and opportunity level." Clarify that reporting at either IRO or topic level is acceptable. •3.3.1 (34): "Actual impacts in the reporting period include both newly arisen impacts and those persisting from previous periods." Without specifying the relevant number of past periods, interpretation remains too broad. Companies should be free to assess material past impacts pragmatically, consistent with a principles-based approach. We recommend deleting this sentence. •Par. 30/AR6: Assessing impacts across multiple tiers of the value chain is unworkable. Reporting should focus on tier-1 chains, and only when sufficient confidence exists regarding an impact's occurrence, severity, and likelihood. Finally, while we agree with using reasonable, supportable information without undue cost or effort, the link to Chapter 3.7 is unclear. Companies should be allowed flexibility to define the most relevant level of aggregation or disaggregation for material IROs, whether by topic or business line.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The approach proposed by EFRAG appears complicated. Excluding all mitigation actions from the assessment of impacts in the reporting period could result in over-reporting. Preparers could report many potential negative impacts that are not material due to low likelihood and severity. This seems to differ from how IROs are managed, e.g. in bank's risk reports (risk is material after considering mitigating actions). We recommend that credible mitigating and remediating actions (e.g. implemented/decided policies, budgets) are always factored in. Appendix C is overly complex. The weight of "mitigation or prevention actions taken to reduce the severity and/or likelihood of potential negative impacts" should be clarified. The preparer can consider the effect of these actions in assessing the materiality of the impact, but it doesn't clarify how relevant this is when assessing materiality. The distinction between positive and negative impacts should be clarified to ensure consistentapplication. We recommend a more flexible, principle-based framework rather than the Appendix C's prescriptive approach. Judging the expected effectiveness of the actions is subjective and could be legally sensitive (also ESRS 2 GDR-A Par.37b). The term "expected outcomes" should be removed throughout. ESRS 1 Para. 35 lacks clarity: What defines a "significant" mitigation or prevention action? Any future mitigant requires ongoing action even if it is simply training regarding policies. This does not make them invalid, where there is an intent (policy, budget etc.) to ensure their availability. The paragraph should adapt accordingly. In ESRS 1 Par.36 the 2nd & 3rd sentence seem contradictory. Whereas legally required actions cannot be considered positive impacts, but actions mitigating impacts of upstream suppliers can. This is should be clarified. ESRS 1 is not clear how to perform the materiality assessment of risks. If impacts are assessed based on a "net" perspective, also risks should be assessed on a net basis.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We generally welcome the increased flexibility introduced through the proposed amendments to the ESRS Sustainability Statements. The possibility of including an executive summary and the emphasis on using appendices to separate detailed information from key messages can be helpful steps toward improving readability and structure. The option to include non-material information, if presented clearly, is a good step to maintain continuity for stakeholders. However, we understand these changes primarily as clarifications rather than substantial simplifications. From our perspective, they do not result in significant relief in terms of implementation effort or reporting complexity. We do not consider that the removal of data points can be considered deletions, as they were duplicated in the first place. Additionally, certain disclosure requirements continue to be embedded in application requirements, which could benefit from further reduction efforts. Please ensure that that application requirements don't consist of any disclosure requirements.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The restructuring of the architecture and the clarified interaction between ESRS 2 and the topical standards enhance the overall readability and usability of the standards. The simplification of the GDR, the reduction of mandatory datapoints for policies, actions, and targets (PATs), and the removal of overlapping topical specifications contribute to a clearer and more accessible framework. The shift towards a more principles-based approach and the ability to report PATs at a higher aggregation level reflect a pragmatic and proportionate response to the challenges identified during the first-time application. This supports more effective and relevant sustainability reporting while maintaining the necessary level of comparability and transparency. However, we do not agree to maintain the requirement to disclose which topics are not covered by PAT. This would lead to 'empty' information, which contradicts the ESRS revision purpose. However, some changes introduce behavioral requirements. ESRS 1, Paragraph 84c requires adjusting the base year of the target following a major acquisition or disposal. This constitutes a behavioral requirement, contradicting Paragraph 5 stating that "the ESRS do not mandate behavior but set Disclosure Requirements[...]". Moreover, this is inconsistent with the possibility of investments or divestments being part of the business strategy to achieve the target. Regarding the presentation of metrics and monetary amounts, the requirement to adjust the base year and the comparative information provided following "major acquisition or disposals" is unclear and potentially problematic. For example, there are no criteria for assessing what is a "major" acquisition or disposal, and the phrase "adjust the base year" is not clear in whether it is referring to adjusting the base year or the value associated with that base year in relation to presenting progress against targets. We recommend that "major" be revised to "material" and "adjust the base year" be clarified by including "value".			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We broadly agree that the proposed amendments will improve the clarity and accessibility of the ESRS. The removal of "may disclose" datapoints and the clearer separation between mandatory and non-mandatory content contribute to a more structured and comprehensible standard. However, we would recommend eliminating all the unclear terms like "shall consider" "may present", "may implement", "may include" and other ambiguous terms. These should be avoided and clarified in order not to create confusion and avoid misunderstandings with the auditors. The revised layout—particularly the relocation of mandatory Application Requirements, directly under the relevant Disclosure Requirements—makes the legal text easier to follow and reduces the need to navigate back and forth within the document. However, while the structure and readability have improved, the overall reporting requirements remain largely unchanged. As such, the simplification primarily supports better orientation within the standards rather than reducing the reporting burden itself. Moreover, we would like to flag that new mandatory disclosures have been added – clearly against the request of the EU commission and the aim of the revision to reduce reporting burden. Additional mandatory data points should be removed completely. The application requirements should not include any mandatory requirements. They should be seen as a guidance to follow while preparing the disclosures. Application requirements should not be included in the main body of the disclosure requirements Mandatory disclosure requirements should be part of the main body of the standard. Currently, the mandatory application requirements also consist of certain "may" or "shall consider" requirements. These should be omitted for the CSRD report without keeping an audit trail.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We consider the introduction of Non-Mandatory Illustrative Guidance (NMIG) and its exclusion from the Delegated Act a useful addition to the ESRS framework. The separation of mandatory and non-mandatory content improves the structure and readability of the standards. NMIG can serve as an orientation tool—especially for preparers in the early stages of implementation—by illustrating how disclosures might be structured or interpreted in practice. We recommend: •That the non-binding nature of NMIG remains clearly communicated and consistently understood by both preparers and auditors. •That there should be no implicit expectation that the examples provided must be followed or justified if not applied. •An explicit statement saying that the NMIG cannot be used for audit purposes and the separation of the NMIG from the legislative text would support this. •Avoiding guidance that references external standards, instead embedding directly into the standard setter's guidance itself. •The guidance should be fully aligned with the standards themselves and subject to robust due process in its development, to ensure it does not have unintended consequences, further complicated principles-based standards, and/or add to reporting burden. Otherwise, the intended simplification effect could be undermined by new uncertainties or perceived pressure to align with the illustrative content. Nonetheless, we view the "Flowchart for determining disclosures under the ESRS" to be very useful when it was a part of ESRS 1. We suggest reinserting this.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	We strongly welcome the proposed burden reliefs as a meaningful step toward reducing the complexity and effort in ESRS reporting. 1.The "undue cost or effort" relief is particularly valuable, offering prepares a practical way to justify omissions or limitations when data collection would require disproportionate resources. However, it may increase the burden of proof if auditors challenge whether sufficient effort has been made to fulfill reporting requirements. 3.We appreciate the removal of the systematic preference for direct data in value chain metrics. Allowing estimates based on practicality and reliability better reflects the current state of data availability and maturity across the value chain, reducing effort in future reporting cycles. While these reliefs do not change the scope of reporting obligations, they provide greater flexibility in how requirements can be met and documented, supporting a more proportionate ESRS implementation. We invite greater clarity on when and how the relief applies to ensure that auditors do not request mandatory disclosure subject to relief. The relief should be useable for any metric, as value chain information often relies on estimations that lack reliability and consistency. 6.The amendments made to the anticipated financial effects do not solve the issue of data availability and reliability, as assumptions for this data point will vary so widely that any comparison between companies would be misleading. 7.Regarding the proposed relief for acquisitions, the one-year timeframe for integrating (or excluding) a subsidiary for sustainability reporting purposes is often insufficient and unrealistic. Greater flexibility should be offered to disclose metrics once the subsidiary is fully integrated. It should be clarified that reliefs do not contradict fair presentation, allowing companies to protect sensitive information without being pressured by auditors to report under this clause.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We consider the proposed relief to be a practical and necessary addition. It acknowledges the real-world limitations many preparers face, especially in complex areas such as value chain reporting. The relief ensures that data collected for reporting is robust and reliable. Forcing the collection of weak data undermines 1) high quality reporting, 2) comparability, 3) avoiding legal risks linked to the disclosure of unreliable metrics and 4) might lead to distorted or misleading representation of the information. The relief helps companies to tackle the current lack of methodologies for some indicators and bridges preparers until methodologies are available. A relevant issue is the reporting of SVHC and SHC substances. Due to the highly specific nature of European chemical legislation, reliable data collection is currently feasible primarily within Europe. The relief allows us to transparently report metrics based on a partial scope e.g., limited to European operations, while outlining actions to improve coverage over time. We support allowing companies to exclude joint operations they don't control from environmental metric calculations (E2-E5). However, we seek clarification on the definition of "joint operations." We also support extending this relief to E1, aligning with the flexibility to disclose only "reasonable and supportable information available without undue cost or effort." We support not imposing a time limit on this relief, allowing organizations to decide when to take action. In cases like chemical data collection, expanding scope may only be possible if non-European regulations align with EU standards, which is beyond a company's control and cannot be planned within a fixed timeframe.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	We strongly oppose both mandatory quantitative and qualitative disclosures of anticipated financial effects. The underlying data is often unclear, and the risks cannot be reliably isolated due to a lack of mature and established methodologies, making any form of disclosure - whether narrative or numeric - legally risky and prone to misinterpretation. Such information lacks comparability and does not offer decision-useful insights to report to users from our point of view. Moreover, IFRS already define when future risks must be reflected in financial reporting, e.g. through recognition and measurement criteria. Sustainability reporting should not override or extend these principles through financial disclosure requirements in the sustainability statement. We therefore recommend that this disclosure requirement be removed entirely or made explicitly optional. It should also be noted that even for a qualitative statement on anticipated financial effects a quantitative assessment needs to be done. Also, qualitative information is subject to a high level of uncertainty but there is less likelihood of unjust comparison. This begs the question of what use this information could have for any stakeholder, esp. capital market participants. EFRAG could allow for the voluntary disclosure of information on anticipated financial effects if undertakings want to provide information to external stakeholders.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	We strongly oppose both mandatory quantitative and qualitative disclosures of anticipated financial effects. From our perspective, there is currently no reliable method to link specific climate-related risks or opportunities to financial metrics like assets, liabilities, or revenue. The complexity and lack of integration between sustainability and financial systems make such quantification impractical. Without this linkage, even qualitative disclosures carry significant legal uncertainty and risk of misinterpretation. Comparability across organizations is also limited due to unclear guidance on the level of detail for such disclosures. Capital market participants typically rely on standardised models and data, which are not meaningfully enhanced by inconsistent, company-specific disclosures. The practical use of such granular data remains questionable and does not justify the significant effort required from companies. We therefore advocate for the removal of the mandatory reporting of anticipated financial effects. completely. EFRAG could allow for the voluntary disclosure of information on anticipated financial effects if undertakings want to provide information to external stakeholders. It is crucial not to require the disclosure "before considering adaptation/mitigation actions", as this would not add value for readers and does not reflect how business strategy is defined. In fact, mitigation actions are often embedded within the strategy, structural in nature, and linked to multiple risks. Therefore, it would be overly complex and unreliable to conduct a hypothetical exercise calculating monetary amounts that are neither estimable nor dependable. For less technical readers, such assessments could be misleading, especially since they are not accounted for in the financial statements. For more details on the respective paragraphs see attached Excel file.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	1.Fair presentation in the ISSB standard applies only to financial materiality; extending it further could create problems (see Q.25). Guidance is unclear on prioritising user needs when conflicts arise between financial and non-financial users. Excessive disaggregation, for example, increases reporting burden while reducing usefulness. ESRS should prioritise primary users (e.g. investors). 2.IFRS permits any GHG boundary, while ESRS mandates financial control, diverging from the GHG Protocol. To ensure alignment, companies should be allowed flexibility to choose boundaries consistent with the Protocol. 3.Relief clauses in the simplified standard are welcome, but the revision timeline for Level 1 remains unclear. 4.Maintaining these reliefs is vital, as ESRS go beyond climate, where methodologies are less advanced and flexibility is essential. 5.Agree. 6.We support referencing SASB Standards and IFRS Industry-based Guidance as sources of disclosure to enhance transparency and interoperability with ISSB. 7.Agree. 8.Agree. 9.To further improve interoperability with IFRS, EFRAG should add reliefs on (1) commercially sensitive information and (2) proportionality to skills, capabilities and resources available. 10.Additional improvements: 11.Ensure all climate-related financial disclosure elements in IFRS S2 (e.g. financed emissions, carbon credits, resilience analysis) are cross-referenced in ESRS E1 or explicitly scoped out to avoid gaps. 12.Provide an interoperability mapping showing, datapoint by datapoint, how ESRS requirements correspond to IFRS S1/S2. 13.Where ESRS includes EU-specific concepts (e.g. double materiality), clarify how these complement rather than contradict ISSB.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	We acknowledge and welcome the improved structuring and consolidation of the ESRS requirements. The clearer separation and grouping of datapoints, especially the removal of voluntary datapoints and the streamlining of narrative PAT disclosures, enhances the usability of the standards. However, we would like to emphasise that the reduction in the number of datapoints does not necessarily translate into a proportional reduction in the substantive reporting scope or effort. In our view, the overall scope and complexity of the disclosures remain largely unchanged. The deletion of datapoints primarily affects how requirements are presented, not what is required. This means that preparers will still need to collect and disclose a substantial amount of data, and the core reporting obligations are largely preserved. The deletion of duplicated datapoints does not represent a reduction in effort. Based on the Exposure Draft, we do not expect a significantly reduced reporting volume under the amended ESRS. Instead, the changes may help reduce effort in data collection, documentation, and coordination with auditors. For example, the introduced options for burden reliefs may simplify internal discussions and reduce the need to justify the omission of non-material items. It is important that this distinction is clearly communicated: while the number of datapoints has decreased, the underlying disclosure obligations remain intact. This will help manage expectations and avoid misinterpretations regarding the actual simplification impact of the amendments. Moreover, we do have strong concerns regarding the new mandatory disclosure requirements that have been introduced and would request deleting them all to fulfill the purpose of the revision of the ESRS.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	22.E1.	Comments on deleted datapoints in ESRS E1	I disagree	See comments in "Comments on deleted datapoints in ESRS2"			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	22.E2.	Comments on deleted datapoints in ESRS E2	I disagree	See comments in "Comments on deleted datapoints in ESRS2"			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	22.E3.	Comments on deleted datapoints in ESRS E3	I disagree	See comments in "Comments on deleted datapoints in ESRS2"			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	22.E4.	Comments on deleted datapoints in ESRS E4	I disagree	See comments in "Comments on deleted datapoints in ESRS2"			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	22.E5.	Comments on deleted datapoints in ESRS E5	I disagree	See comments in "Comments on deleted datapoints in ESRS2"			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	22.S1	Comments on deleted datapoints in ESRS S1	I disagree	See comments in "Comments on deleted datapoints in ESRS2"			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	22.S2	Comments on deleted datapoints in ESRS S2	I disagree	See comments in "Comments on deleted datapoints in ESRS2"			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	22.S3	Comments on deleted datapoints in ESRS S3	I disagree	See comments in "Comments on deleted datapoints in ESRS2"			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	22.S4	Comments on deleted datapoints in ESRS S4	I disagree	See comments in "Comments on deleted datapoints in ESRS2"			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	22.G1	Comments on deleted datapoints in ESRS G1	I disagree	See comments in "Comments on deleted datapoints in ESRS2"			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We strongly disagree with the introduction of new mandatory datapoints that have not been proven necessary. Adding untested requirements at this critical stage poses a significant liability to the strength, coherence, and successful implementation of the CSRD. It contradicts the simplification mandate and risks undermining reliable sustainability reporting. We do not agree with the decision to make "Nature of incidents" and "Number of incidents" within ESRS G1 paragraph 14 (confirmed incidents of corruption and bribery) mandatory. Firstly, making additional quantitative datapoints mandatory will increase burdens. Quantitative data collection requires IT development or manual reporting, which are costly and time consuming. Secondly, the "may" provision for such sensitive data points allowed for necessary discretion. The specific context of each incident, might not be adequately conveyed by a simple numerical count or a brief description. The focus should be on the effectiveness of management systems in preventing and addressing corruption, not a potentially reductive tally of past failings. G1 Training datapoint will add complexity as companies evaluate the risk exposure of functions individually and then derive training needs from that. In cross-functional training settings it is close to impossible to derive that information. This data point should not be made mandatory. For G1 paragraph 14, it's unclear how materiality should be assessed—by monetary value or other criteria? What incidents need reporting (e.g., court decisions)? This datapoint should also be deleted.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We strongly disagree with introducing new mandatory datapoints that have not been comprehensively tested by "Wave 1" companies. Adding untested requirements at this stage threatens the strength, coherence, and successful implementation of the CSRD. We particularly object to ESRS E2-4, which is unworkable, unmeasurable, and unauditable: 1.Beyond company control – secondary microplastics occur post-consumer (UV radiation, abrasion, degradation), outside company influence. 2.Impossible data collection – no methodologies exist to reliably estimate how many products enter the environment or the volume of secondary plastic releases. 3.Auditability concerns – without standardised methods, reported figures would be speculative and unverifiable, undermining audit credibility. Furthermore, new concepts intended as reliefs—such as "fair representation," "Gross vs Net," or amending base years after acquisitions—risk adding complexity and burden without addressing these datapoints. Other new requirements that should be eliminated include: •ESRS E5-4 para. 15(e): % of sustainably sourced materials by weight. •ESRS E1-2 para. 19: introduction of "spatial resolution." •ESRS E1-3 para. 21(c): ability to adapt strategy and business model to climate change over time. •ESRS E1-5 para. 24(c): stricter provisions on financial resources for climate actions. •ESRS E1 AR 26: new disaggregation for CO2 emissions. •ESRS G1-2 para. 10(c): extension of training to "business conduct" beyond corruption and bribery.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We welcome the explicit inclusion of the fair presentation principle in the ESRS, as it reinforces the goal of supporting relevant, decision-useful reporting rather than checklist compliance. It should be read alongside ESRS 1 Par. 21a to ensure only material information is reported. Both fair presentation and materiality assessment should focus on the usefulness of information for intended users. By emphasising fair presentation, the ESRS encourages preparers to exercise judgment, prioritising disclosures that enhance transparency and accountability. This reduces unnecessary reporting, especially when omitting non-material datapoints. However, challenges remain. The concept requires a precise definition to avoid subjectivity and minimise audit burden. Without clear guidance, it risks undermining the DMA's rigour. Past experience with similar notions (e.g. représentation fidèle in audit standards) shows auditors may use vague terms to challenge sound DMA conclusions, creating subjective disputes on materiality. Clear guidance on how companies can demonstrate "fair presentation" to auditors would be valuable. Ambiguity could also pressure companies to disclose voluntary datapoints ("may disclose"), which auditors may then treat as mandatory for fair presentation—contradicting materiality-based reporting. Finally, fair presentation may increase Board accountability for the Sustainability Statement, requiring assurance not only of compliance but also of whether information is "fair" to all stakeholders. While established in financial reporting, its boundaries in sustainability remain unclear, creating a grey area that could lead to litigation if stakeholders dispute adequacy.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We acknowledge the challenges faced by financial institutions in setting absolute climate reduction targets. Much of the GHG accounting for FIs is spend-based, meaning increased financing can lead to higher reported absolute emissions, creating both a disincentive and a practical hurdle for target-setting. Nevertheless, absolute emission targets are essential for meeting global climate agreements. Relying only on intensity targets can obscure overall emissions increases as business expands. Financial institutions play a key role in driving absolute reductions in the real economy. As such, rather than viewing this as an exception, the focus should be on developing more robust and refined methodologies for FIs to measure and report absolute financed emissions, ensuring meaningful disclosures that align with global decarbonization goals.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	Some of our members disagree with the assertion that the change to the threshold for country-by-country disclosure in ESRS S1-5 and S1-7 will result in a limited burden due to the easy accessibility of information. While the intent to gather more granular data is understandable, this change will, in many cases, significantly increase both the reporting requirements and, crucially, the audit scope. Additionally, this extra level of detail may not always be relevant. The current disclosure let emerge the most strategic countries in terms of business or production which may differ from those with the highest headcount. Shifting from a "50 employees and 10% of total headcount" threshold to reporting for the "top 10 largest countries by employee headcount (if >50 employees)" will expand the number of countries for which many multinational companies must disaggregate data. Each additional country introduces distinct challenges in data collection. More importantly, this expanded reporting directly increases the audit scope. Sustainability reporting, especially social data like employee characteristics and collective bargaining, requires thorough verification. Gathering and validating this data across multiple jurisdictions, each with its own labor laws, data systems, and cultural differences, is far from "easily accessible." It involves understanding local HR systems, ensuring data consistency, and verifying compliance with country-specific regulations—an intricate process requiring significant auditor resources and time. Thus, the claim of limited burden is misleading. This change will add to the complexities and costs of both preparing and auditing sustainability statements, potentially slowing the assurance process and placing a substantial new burden on companies and auditors. We strongly suggest the inclusion of an additional option to avoid additional increases, to only mandate disclosure until the first of either threshold is hit. So, either 10% or the top 10 – whichever causes least burden.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	We recognise the importance of ensuring adequate wages globally but have serious concerns with the proposed benchmark hierarchy for non-EU wages in ESRS S1 AR 22. Placing living wage datasets as a "last resort" undermines comparability. It allows companies to report against statutory minimum wages, which may be insufficient, producing inconsistent and non-comparable data and limiting stakeholders' ability to assess social impact. We propose revised wording for AR 22, para. 32: for reporting outside the EEA, the first step should require an "adequate minimum wage" rather than a "statutory minimum wage," aligned with Directive (EU) 2022/2041. Without this, comparability will be lost as some companies report on "minimum" and others on "adequate" wages. A single authoritative reference is essential. Allowing companies to select different providers risks inconsistent disclosures. A common database of adequate wages across jurisdictions would ensure comparability and reduce company burden in determining adequacy. We also caution that the requirement for wages to be "periodically reviewed/adjusted every two years and take into account ILO principles" could create excessive workload. As the indicator covers the entire workforce, assessments would be required in all countries of operation. For firms active across multiple sectors, numerous collective agreements would also need review, potentially resulting in hundreds of checks.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	Yes, we should always consider the importance of feasibility and coherence in reporting according to different legislations. As such, removing some of the SFDR datapoints is clearly appropriate, the ESRS simplification will need to better co-ordinate with the required three yearly review of the SFDR.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	AR 26 should be reviewed to provide more practical and effective guidance. The current text does not sufficiently acknowledge the difficulty of setting standalone biodiversity targets or the interconnected nature of environmental issues. The revised guidance should explicitly allow companies to use cross-referencing, in order to explain how their existing or new targets under other the other topical environmental standards also address the drivers of biodiversity loss. This clarification is vital for two reasons: 1. Integrated management: Biodiversity loss is not an isolated issue. It is driven by factors like climate change, water use, and pollution. Allowing this cross-referencing enables companies to report on their environmental strategy in a holistic and integrated way, reflecting how these issues are managed internally. 2. Reporting efficiency: It avoids the need for companies to create separate, and potentially less meaningful, biodiversity-specific targets when their existing environmental objectives already contribute significantly to mitigating biodiversity impacts. This makes reporting more efficient and focused on substantive actions rather than a check-the-box exercise. This approach would make the guidance more pragmatic, reduce reporting burdens, and allow companies to provide a clearer narrative on their most significant contributions to protecting nature. Some member would not deem it appropriate to reinsert the AR 26, considering that the methodologies for defining biodiversity targets are not yet well defined and are often site-specific. Furthermore, in the absence of a mandatory biodiversity standard, we do not see the opportunity to refer to specific frameworks (which are still voluntary). The risk would be that each company could adapt these standards to its own needs by making reporting incomparable			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	No, we do not agree with deleting the voluntary datapoint. Instead, the adjusted gender pay gap should be mandatory, while the unadjusted gap should be voluntary or removed. 1.From 2027, the EU Pay Transparency Directive (2023/970) will require use of the adjusted pay gap. ESRS must align with EU law to ensure clarity and consistent datasets for stakeholders. 2.The adjusted pay gap is the only metric that reflects the principle of "equal pay for equal work or work of equal value." By accounting for factors such as role, seniority, location, and performance, it offers a precise, actionable measure of pay equity, enabling identification and correction of real disparities. The unadjusted gap, by contrast, conflates pay equity with gender representation, reflecting structural imbalances rather than discriminatory pay practices. Making it the sole mandatory metric risks misinforming stakeholders and unfairly penalising companies based on sector or workforce structure rather than actual pay policies. It should remain voluntary, as a complementary disclosure on representation. Finally, we regret the missed opportunity to improve clarity on what types of remuneration should be included in the calculation. Companies currently apply divergent definitions, resulting in non-comparable disclosures.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	We support the removal of the datapoint on "average time to pay an invoice," as it offered limited insights and was difficult to interpret usefully. A focus on PATs better aligns with fair presentation. The previous approach, framing SMEs as risky suppliers, added unnecessary barriers by introducing size-based vetting. However, we also question the relevance and practicality of the remaining datapoint on percentage of payments aligned with standard terms (former ESRS G1-6 §33b). This metric is difficult to consolidate, particularly in international contexts with no legal standard, and provides little meaningful insight into supplier relationships. The percentage of payments under "standard terms" is hard to interpret and yields no useful conclusions on supplier impacts. Categorisation of suppliers, such as SMEs, remains problematic. Financial systems rarely track supplier size, and implementation would require disproportionate effort. Similarly, reporting the number of legal proceedings due to late payments (former ESRS G1-6 §33c) is not decision-useful without qualitative context (e.g. reasons for delays or thresholds of materiality). For significant cases, this is already covered in legal risk reporting and need not be duplicated in sustainability reports. Finally, while qualitative information on payment practices can demonstrate SME protection, the calculation of G1-6 metrics is overly complex for international groups with diverse payment standards. Overall, deletion of the datapoint appears the most viable option.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The cross-cutting standard ESRS 1 remains critical, particularly regarding fair presentation, materiality, and provisions on gross versus net reporting. However, several concerns remain: •Aggregation/disaggregation: The disclosure requirement is highly subjective, risking interpretative challenges and disagreements with auditors. •Reporting boundaries: Scope of consolidation remains unclear. •Deleted sub-sub-topics: Attaching them in brackets after sub-topics increases reporting burden, as companies must still consider them in the DMA, making materiality harder to apply. •AR24: Could require DMAs at subsidiary level. We recommend deleting AR24 or clarifying that IROs need only be assessed at group level, unless subsidiaries have significantly different business models. •Positive impacts: The restriction to "impacts that derive from business activities, products and services" could prevent reporting of positive workforce impacts. •Para. 45(b): The requirement to use "reasonable and supportable evidence" to estimate severity/likelihood of impacts and financial effects will likely increase documentation burdens per IRO. •Paras. 51/52 and AR22/23: Could be interpreted as requiring materiality assessments deeper than site level. •Value chain assessments: Upstream/downstream materiality remains subjective and unclear. •Referencing existing reports: We recommend allowing references to legally mandated documents (e.g. Corporate Governance or Remuneration Reports) even with different assurance levels, reducing redundancy and avoiding inconsistencies.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Regarding ESRS 2, we recommend eliminating the disclosure on anticipated financial effects. Preparers are not equipped to provide reliable forward-looking financial data, and such disclosures may involve commercially sensitive information. The current approach risks overburdening companies and producing low-quality data. Additional concerns that increase reporting burden include: •Site IRO matching (AR 22): Will significantly increase workload, lengthen reports, and reduce readability. •Datapoint on sustainability goals for product/service groups (40a)i): Adds complexity without clarity. •Banned products datapoint: Definition remains unclear and should be deleted. •AR24: Although it allows IROs to be linked with policies/actions in topic-specific chapters, it still mandates duplicative descriptions in ESRS 2, offering no real relief. •Anticipated resources for actions: Disclosures on economic resources distort relevance, add detail, and misrepresent sustainability priorities; this requirement should be eliminated. •Targets: The expectation for both measurable and qualitative targets is contradictory; further guidance is needed. •DR 41(b): Requires disclosure of environmental conditions and characteristics of the area where impacts occur. This risks excessively granular reporting and is inapplicable to climate change (E1), since emissions are transboundary. The terms "environmental conditions" and "characteristics of the area" lack clarity and should be reconsidered. Overall, these provisions increase complexity without improving decision-useful reporting.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The current ESRS draft presents several issues that will create high in some cases even additional burden to preparers. The disclosures on anticipated effects should be changed (see question 20) and there is high uncertainty around the disclosures on the transition plan. There should be no new added disclosure requirements or datapoints.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Several issues should be highlighted: •Pollutant thresholds: Now less clear than before. •Local permits: Expanding disclosures to include local-level environmental permits broadens scope excessively and prevents standardisation. •Water treatment plants: Counting transfers to these facilities as pollution is illogical, since they are service providers for cleaning water. •Secondary microplastics: The new datapoint risks unreliable, inconsistent data and places a disproportionate burden on companies. •Primary microplastics: No clear alignment between REACH-SPM and ESRS methodologies, risking confusion. •Role differentiation: The draft introduces different obligations for manufacturers/importers and users. Many companies under REACH hold multiple roles for specific substances, but do not report the same flow twice. ESRS wording could force duplicate reporting, adding complexity and contradicting the legislator's intention to relieve non-chemical companies—while increasing burdens for chemical companies. •SVHC/SoC disclosures: Introduced without harmonised thresholds. While SVHC has a 0.1% limit in articles, no uniform rule exists for mixtures or SoC. Outside the EU, such data are not consistently available. Collecting and harmonising would require major effort. We recommend deleting this datapoint and relying on ECHA data for EU activities. •Impurities: It is unclear whether SVHC/SoC present only as impurities must be disclosed. Since impurities are not intentionally manufactured, such reporting may lack stakeholder value.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Reporting at site level will significantly increase the reporting burden for many companies.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	ESRS E4 raises significant concerns due to the level of detail required and the potential for excessive disaggregation. We do not agree with the approach for reporting at the site level for biodiversity. These requirements risk imposing disproportionate reporting efforts, especially in the case of biodiversity, where it remains unclear how to prioritize which sites to disclose. In particular, the newly introduced Application Requirement AR 8 in ESRS E4 would effectively require companies to conduct ad hoc analyses for hundreds of sites—specifically those not overlapping with biodiversity-sensitive areas—in order to identify a science-based buffer zone tailored to the ecological specificities of each site. Such a requirement represents an operational and documentation burden that is entirely disproportionate to the stated goal of simplification.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The draft introduces several issues that create additional challenges for companies: •New metrics (e.g. amended waste requirements) impose additional reporting burdens and are not aligned with other EU legislation (EU Waste Framework Directive). •The introduction of new terms such as "strategic" and "key" adds significant uncertainty due to their lack of clarity. •There is an increased burden in disclosing information related to radioactive waste. •Glossary terms are often defined in a circular manner. For example, the circular material use rate is described as the ratio of circular use of materials to overall material use, yet the key definition of what qualifies as "circular" is omitted. •Waste definitions and categories based on European standards are expected to be applied globally, which is unrealistic and not useful in a broader context. •There is inconsistency between EU Directive 2008/98/EC and the ESRS regarding whether energy recovery (thermal incineration) should be classified as recovery or not.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	For social standards the removal of the term "severe" from the disclosure requirements for human rights incidents across all social standards is particularly concerning. Without a clear limitation to the most serious cases, companies may be required to report even minor or less relevant incidents. This broad scope risks undermining the materiality of disclosures and contradicts the objective of simplification. Maintaining a focus on severe human rights incidents is essential to ensure that reporting remains meaningful, proportionate, and aligned with the principles of relevance and efficiency. Additionally, the inclusion of contractors in own workforce increases the reporting burden. We think that non-employee related disclosures should be eliminated or made voluntary. Additionally, health and safety related metrics and definitions in the glossary should be reviewed as there are still terms which are not clearly defined and/or consistently used on this topic.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See comment in ESRS S1. Moreover, there is no explanation of legitimate representative and credible proxies.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See comment in ESRS S1			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See comment in ESRS S1 The reduction of duplicated ESRS 2 disclosure requirements has led to the standard being more readable and comprehensible.			
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	European Round Table for Industry	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The glossary still requires significant review to incorporate new terms. It is critical for both preparers and auditors, yet contains errors (e.g., "materiality consists of financial materiality and materiality" in double materiality). Specific comments include: •ESRS 1, para. 11: The requirement for sector comparability is challenging due to business model variations. This may create issues for auditors. We suggest removing this or changing it to 'may' with NMIG as a minimum. •ESRS 1, para. 84(c): We disagree with this provision which mandates organizational change. Adjusting baseline years should be determined by company policies, not mandated. For example, many companies achieve target progress by reshaping portfolios. Para. 72's relief, requiring inclusion in the "subsequent" period, is impractical. •ESRS 1, para. 84(c) wording: This specific language is not found in IFRS S2, although it originates from the GHG Protocol. •ESRS 1, para. 70: We disagree with the revised lease treatment in ESRS 1, as it creates challenges in data collection and traceability. We recommend basing reporting on operational control, not legal ownership, to better reflect impact management and reduce reporting burdens. Further clarification on leased assets in paragraph 70 is needed. •We also want to flag references to the 1.5°C target in the E1 transition plan provisions, particularly the long-term temperature goals of the Paris Agreement. While this is a Level 1 issue, we believe it warrants further review. •Value Chain: Assessing value chain impacts and data collection beyond Tier 1 remains difficult. Quantitative evaluation is often complex and insignificant, so reporting material facts when known is more practical than detailed assessments.			
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	We support strengthened emphasis on materiality of information in ESRS 1. However, we have concerns regarding paragraph 21(b). First, it will be hardly possible for undertakings to dismiss information as not material as it can never be verified that nobody requires this information. Consequently, companies may feel compelled to include information that they would not consider material otherwise. Second, it introduces differences to IFRS, diminishing interoperability. To enhance practicability and interoperability with IFRS, we propose either deleting paragraph 21(b) entirely; or amending it as follows: "it could reasonably be expected to be necessary for users of general purpose sustainability statements to understand the undertaking's material impacts and how it identifies and manages them." Regarding "Materiality of information as a general filter for reported information" it should be clarified that it applies to all DR / AR and single datapoints; all requirements throughout the standards should be worded in a way that they are subject to it (e.g. interaction of ESRS 1 3.5. and 3.3.1). Identical wording in paragraph 21 and paragraph 37 risks conflating the concepts of materiality of information and financial materiality. For conceptual clarity, they should be differentiated and duplications avoided. We welcome the addition in ESRS 1 AR 16 as it is a promising move toward harmonizing financial and sustainability reporting requirements. Financial reporting, particularly in financial statements, often presents financial risks on a net basis, reflecting their economic net effects. Allowing net risk disclosure in sustainability reporting can therefore enhance consistency with financial reporting. It also aligns with ISSB standards, which do not mandate a net or gross perspective. We propose integrating internal opportunity management into the provision as well to ensure consistency with established opportunity management and reporting practices. This would contribute to minimizing reporting burden and strengthen consistency across financial and sustainability disclosures.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	Overall, we would like to highlight that this newly introduced guidance introduces three additional assessment layers for the assessment of actual and potential impacts which significantly increases effort and penalizes wave 1 companies that have already implemented a sophisticated materiality assessment process, methodology, and governance setup. This clearly goes against the European Commission mandate of simplification. 1. Regarding ESRS 1 – 34: In practice, this distinction of actual negative impacts before and after mitigation or remediation measures is highly complex and often difficult to operationalize, particularly when impacts evolve over time or when mitigation is embedded in ongoing processes. The current wording may lead to significant documentation burden and interpretive uncertainty, especially in audit contexts. 2. Regarding ESRS 1 - 35: We welcome the proposed reliefs regarding the double materiality assessment. However, the requirement to report potential impacts subject to "significant ongoing mitigation or prevention efforts" in its current form leaves interpretive uncertainty that may lead to disproportionate complexity in application as well as difficulties in audit contexts. 3. Regarding Appendix C, There are several issues with its interpretation. The definition of occurrence within the reporting year is unclear and not meaningful, as typically impacts persist several reporting periods and mitigation actions are usually already in place for several years. Separating the assessment prior to and after mitigation is in practice very difficult. Moreover, it is questionable in how far reporting on impacts that are already well mitigated will be of use for users of the sustainability report. Hende, we propose to delete detailed guidance in ESRS 1 paragraphs 34-35 and Appendix C. We suggest an ongoing dialogue on this issue and to give market practice time to evolve as this will address currently existing divergence in practice.			
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Regarding ESRS 1 - 103.: In order to align the wording with the CSRD requirement, we strongly recommend replacing "sustainability statement" with "sustainability report" Regarding ESRS 1 - 108.: We welcome the proposed amendment to paragraph 108. However, it remains unclear whether the additional information included in the sustainability statement formally constitutes part of the audited content. We recommend clarifying whether under takings have the option to include or exclude such information from the audit scope, and how this decision should be documented or disclosed.			
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	While we generally agree with the implemented changes regarding the architecture and interaction between ESRS 2 and the topical standards, especially deleting most topical specifications to GOV, SBM, and IRO, some prescriptive disclosure requirements on PAT level have been introduced that we cannot support and that were not required in the current standards. These specifically pertain to GDR-M, paragraph 41. Firstly, paragraph 41 (a) now requires, for each metric, information on data types and sources used as input to the calculation. While these disclosures are still subject to the concept of information materiality, providing information on data types and sources is not relevant for most metrics and certainly does not add additional value to users of sustainability statements. We therefore suggest deleting 'data types and sources used as input to the calculation' from the prescriptive requirements of the provision. Secondly, paragraph 41 (b) introduces new requirements for all environmental metrics regarding information on the specific environmental conditions and characteristics of the area where the impact is occurring. Such information is often not available, also is it near impossible to determine the area where the impact is occurring with precision – as such the required information would by highly judgmental, subject to significant uncertainties and therefore likely to not meet the criterion of faithful presentation. 41 (b) also creates additional requirements that were not present in set 1 by advocating such information for all environmental metrics, which also includes value chain metrics. We therefore suggest deleting subparagraph 41 (b) entirely.			
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I disagree	We support the objective of eliminating "may disclose" datapoints to enhance focus and reduce confusion. We also welcome the relocation of all mandatory disclosure requirements into the main body of the standards, along with the placement of application requirements directly below each relevant DR and Chapter in ESRS 1. We appreciate the efforts to improve language consistency, clarity, and conciseness. Nonetheless, we caution that changes to established terminology should be implemented with care. Many undertakings are already preparing or reporting under the original version of the ESRS, and terminology updates—even if well-intentioned—may introduce additional interpretation challenges or perceived reporting burdens if not clearly aligned with prior guidance. We also would like to highlight the following inconsistencies: • Usage of "material topics" vs. "material impacts, risks and opportunities": While ESRS 1 introduce a clarification that reporting undertakings shall report on material impacts, risks and opportunities but may choose to organize their reporting based on topic-level, several sections in the different documents use a wording that may suggest otherwise (e.g. ESRS 1-8: "[Draft] Amended ESRS 2 General disclosures establishes Disclosure Requirements (DRs) on the information that the undertaking shall provide for topics related to material impacts, risks and opportunities on the reporting areas of (i) governance, strategy, impact, risk and opportunity management, as well as (ii) policies, actions, targets and metrics.") The standards should overall be checked in this regard to ensure consistent wording. It should be ensured that throughout the standards, in all DRs only "material IROs" is used. • Adverse vs. negative impacts: it should be avoided to introduce different wordings for the same issue.			
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We welcome a strict and clear separation of mandatory and voluntary disclosure requirements, keeping in the standards all "shall" requirements and moving all "may" requirements to the NMIG. We also agree with EFRAG'S recommendation that the EC shall not include this content in the Delegated Act as it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. In this regard, it must be ensured that the NMIG does not introduce contradictory explanations in comparison with the ESRS.			

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Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	Overall, assessing achieved burden reliefs is difficult as several requirements were merged or differently organized instead of deleting them. We fully welcome the introduction of the "undue cost or effort" exemption, which offers much-needed flexibility for preparers facing disproportionate costs—particularly for complex data collection and metric calculations. We regret that relief for partial data coverage (ESRS 1 paragraph 91) explicitly excludes ESRS E1-8 (GHG emissions). GHG emissions accounting and calculation is the one metric area generally most subject to high measurement uncertainties, often unavailable and unreliable direct or estimated data, and high cost and effort requirements. As paragraph 91 is drafted, relief for metrics would not be possible for GHG emissions – as such full coverage would be required, irrespective of cost and effort considerations or the reliability of estimates. This creates a misguiding incentive for GHG emissions to achieve full data coverage with low-quality estimates, rather than prioritizing high-quality, verified data for management purposes, such as target setting. Using sector averages for low-quality data areas is simple, but investors need to differentiate companies to identify risks and oppor tunities. We therefore strongly recommend removing the exclusion of this concept for GHG emissions. "ESRS 2 AR 16 should explicitly state that it applies only to material risks and opportunities to ensure clarity and consistency with the materiality principle. Finally, the requirement of ESRS 1 paragraph 74 that sustainability reporting has to match financial reporting periods is unfeasible for investments, since investee data are only available after publication, inevitably creating a time lag. Hence "including for the calculation of metrics" should be deleted or the phrase "where possible/feasible" should be added as for emission calculation, usually e.g. extrapolations or prior year data have to be used.			
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	Unfortunately, the provision of ESRS 1 paragraph 92 is presented as a relief, however seems to establish disclosure requirements on joint operations over which the undertaking has operational control for [Draft] Amended ESRS E2 Pollution, [Draft] Amended ESRS E3 Water, [Draft] Amended ESRS E4 Biodiversity and ecosystems and [Draft] Amended ESRS E5 Resource use and circular economy, which contradicts the defined consolidation scope. Regarding ESRS E1, the comment in the Log of Amendments (ESRS 1) raises concerns regarding deviations to IFRS S2, although IFRS S2 does not prescribe an operational control approach ("This relief respond to concerns about data availability. For ESRS E1 this is not applicable as this would introduce a difference with IFRS S2"). Further explanation is therefore requested. For further comments on ESRS 1 paragraph 91, please note our answer on Question 17.			
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	We support the simplification of disclosure requirements for anticipated financial effects due to the complexity, uncertainty, and sensitivity of corresponding quantitative data. We would have preferred this topic to be introduced as a phase-in provision under the revised ESRS. As this has not been considered it results in significant additional effort for companies at this stage Option 1 raises several concerns, including high estimation uncertainty. Further, while option 1 is substantially aligned with the IFRS relief, it includes deviations that may lead to additional reporting burden and efforts for undertakings aiming to comply with both standards. If option 1 is implemented, we therefore suggest to fully align option 1 with the IFRS provisions, i.e. by: (1) deleting the specification that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Even though such a relief would also be applicable under IFRS, any difference in the wording of the provisions can create additional effort on the reporting undertaking's side. (2) including the provision that the undertaking may omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information. We cannot agree to the concern that the relief is not compatible with entities that are expected to be in scope of the amended ESRS. This judgement should be at the undertaking's discretion. Even though larger undertakings can be expected to have the necessary skills, capabilities, and resources, there may be cases in practice where such preconditions are not existent, given the complexity and lack of maturity for related disclosures. Choosing from the two options as they are provided, we recommend implementing Option 2, which focuses on qualitative disclosures and allows voluntary quantification.			
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	We appreciate the effort to simplify the disclosure requirements on Anticipated Financial Effects, particularly through the reduction in scope from the previous E1-9. However, we believe that further adjustments are needed to fully balance reporting effort with users' needs. Firstly, in line with the recommendation to establish option 2 for disclosures on anticipated effects (ESRS 2 paragraph 23), the DR and AR E1-11 should be classified as voluntary "may" provisions. Regarding paragraph 40 and 41: If option 1 is selected (ESRS 2 paragraph 23) we strongly recommend aligning the requirement with the provision on the DMA approach. If based on the specified financial perspective mitigation actions can be considered, this provision should also be aligned with that approach: Delete "before considering climate change mitigation actions". In view of paragraph 40 (b), the level of detail required for specifying the location is challenging to determine, and the term "key assets" allows for varying interpretations, potentially leading to ambiguity and inconsistency across the industry. With regard to 41 (c), while narrowing the scope to encompass only "real estate used as loan collaterals" is generally a positive direction, disclosing a breakdown of any within these assets by energy-efficiency class would not always provide material information. Regarding paragraph 42: • In case option 1 is selected (ESRS 2 paragraph 23): The wording of the DR "amount and percentage of assets or revenue derived from its business activities" suggests that information related to current but not anticipated financial effects is to be provided. We assume this as misleading and suggest deleting this DR. •Due to business sensitivity, the quantification of anticipated financial effects should be limited to risks remaining after mitigation actions and should not include a quantification of potential opportunities. •Moreover, the requirements should be aligned with other regulation, particularly Solvency II and EBA.			

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Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We appreciate EFRAG's efforts to enhance interoperability with IFRS S1 and S2. Still, there remain critical areas with deviations: Regarding IFRS S1, we see interoperability issues with the amended ESRS implementation of information materiality, cf. our response to question 11. Regarding IFRS S2, the requirements concerning financial and operational control (E1 AR 18 – AR 20) diverge significantly from IFRS S2, where undertakings have the flexibility to choose their preferred approach. This dual approach may result in inconsistencies in reporting and interpretation. Due to the features of the business model and prudential requirements, insurers are often forced to act as majority investors, which leads to the existence of financial control without being able to exercise operational control over related sustainability matters. Therefore, the requirements for (re)insurance undertakings should be specified to be based on the principle of actual control over investments. If this proves unfeasible, the require ment should be fully aligned with IFRS S2 or the current wording of the ESRS should be maintained. Further deviations to IFRS 2 related to the requirements around anticipated financial effects are still a concern, cf. our response to question 20. The inclusion of anticipated financial effects considerations to perform the resilience analysis (E1 AR 8 for par. 20) is another critical area that does not align with IFRS S2. It was not included in the original ESRS, introduces complexity and additional burdens for undertakings. Lastly, ESRS require companies to report on Energy consumption and mix metrics, while IFRS S2 does not. In conclusion, while the proposed amendments represent significant progress towards interoperability, addressing these critical areas will be essential to achieving a more consistent and aligned framework with IFRS standards. Further dialogue and refinement are needed to ensure that the simplification objectives do not compromise the integrity and comparability of sustainability reporting.			
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	We support the systematic reduction in mandatory and voluntary datapoints as a necessary and proportionate response to concerns around reporting complexity, excessive granularity, and the potential administrative burden for preparers. We welcome the prioritization of quantitative datapoints over detailed narrative explanations and the clear distinction between mandatory and voluntary requirements. However, we observe that some paragraphs in the ESRS text remain unclear or primarily descriptive, such as ESRS 1 paragraph 27, AR 16 related to paragraph 42, and AR 20 related to paragraph 49. Likewise, expressions like "is useful information" (e.g., ESRS 2, AR 32 to paragraph 37) or "is a possible aspect to cover" (e.g., AR 33 to paragraph 37) continue to appear. These formulations do not fully support the goal of simplifying the standards and may lead to uncertainty regarding the actual requirements for undertakings. Additionally, even the conceptual framework concerning "topics to be reported on" or "material IROs" could benefit from further clarification or streamlining. Finally, it is important to note that a 57% reduction in mandatory datapoint will not necessarily translate into a proportional decrease in report length or reporting burden. While we welcome the notable reductions in certain topical standards, significant concerns remain regarding newly introduced concepts and methodologies that may, in fact, increase the reporting effort.			
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	As a general principle, we oppose the introduction of new mandatory datapoints as part of EFRAG's simplification of the ESRS. The revised ESRS should focus on simplification, and converting 'may' datapoints into 'shall' requirements contradicts the European Commission's mandate. This being said, we can agree with the changes done to the requirements in E3 (water withdrawal and water discharges) and E4 (Transition plan). However, we strongly oppose the introduction of new metrics in G1, since this clearly goes against the mandate of simplification and reduction of reporting burden.			
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We oppose the introduction of new mandatory datapoints. The revised ESRS should prioritize simplification, and adding new mandatory requirements runs counter the European Commission's mandate. If these datapoints are retained, we recommend the following: Regarding ESRS 2 BP 1, while we appreciate the streamlined 'comply or explain' approach to only state deviations from the ESRS 1 General requirements provisions, we would find it useful to provide that information in the relevant context and to not list all the details in the first section. We do not agree with the new provisions introduced by paragraph 5, as it creates duplicated information throughout the Sustainability Statement. For example, if the reporting undertaking makes use of the relief for metrics with a partial scope (ESRS 1 paragraph 91),or changes sustainability information due to a restatement need or error correction (ESRS 1 paragraph 95-97), sufficient transparency will be provided for the metrics concerned, i.e. by providing contextual information, disclosing the partial scope, and correcting/restating the previous reporting period figures. Following the new paragraph 5 and stating that the reporting undertaking has applied these "provisions" just creates duplicates and redundant information not helpful for readers and users. We therefore suggest limiting the disclosures required by paragraph 5 to those that do not create duplicated/redundant information. Otherwise, mandating such disclosure may introduce unnecessary complexity and reporting burden without significantly improving transparency. We recommend confirming that these detailed requirements are not intended to change current practice but simply formalize existing flexibility. New DR in E2-4 and E5-4 are not applicable for insurance undertakings, therefore, no objections. New DR in E5- 5 is meaningful and we agree.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We welcome that fair presentation has been explicitly included in the ESRS which also contributes to alignment with the ISSB standards and appreciate the aim to simplify reporting and provide more flexibility. However, as it is currently drafted there is a high risk for the fair presentation principle to even aggravate the reporting burden instead simplifying reporting. The current wording would result in an additional compliance approach due to additional auditor scrutiny. Given that the (amended) ESRS are written as a compliance framework, fair presentation may require additional disclosures that are not required by the individual requirements of the ESRS by reference to a "view" of fairly presenting impacts, risks, and opportunities. This can lead to additional requirements with respect to entity-specifics, transitional provisions, or the NMIG. IFRS and ESRS have fundamental differences in this regard. Under IFRS S1, fair presentation is about sharing relevant information on sustainability risks and opportunities that impact an entity's financial prospects, focusing on cash flows and capital costs. This is directly linked to financial statements. ESRS, however, require fair presentation not only on risks and opportunities but also of all material impacts (and effects of risks and opportunities beyond the direct implications on the financial statements), which is almost impossible to assess, let alone prove with sufficient evidence to the auditor. Given these differences, the wording needs careful adjustment.To ensure that the principle supports a more management-driven, judgment-based reporting approach, we recommend clarifying its context in ESRS 1, paragraph 17 as follows: „Fair presentation gives undertakings flexibility in complying with reporting requirements as it allows deviations from a given requirement in consider ation of the double materiality approach and materiality of information as a general filter for reported information as well as additional information in the context of reporting on entity-specific topics"			
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Overall, the need to disclose absolute values is understood. However, disclosure of absolute values alongside GHG emissions intensity targets presents significant challenges for financial institution due to two main reasons: 1. Fail to comply with qualitative characteristic of information: Estimating absolute targets involves assumptions about portfolio composition, production capacity, market shares, and emission intensity, leading to unreliable results and unmeaningful disclosures. On top of that, absolute targets may capture total impact but fail to consider business growth, potentially creating an unlevel playing field if exceptions are made only for financial institutions. 2. Key role to support the transition: The approach adopted by financial institutions makes it possible to reconcile the two objectives by distinguishing between financing oriented towards fossil fuel sectors which requires gradual de-commissioning and supporting sectors currently reliant on fossil fuels whose challenge is to invest in their technological transformation and thus reduce this dependence (e.g. electrification of vehicles). By setting GHG emissions intensity targets, financial institutions can finance companies committed to decarbonization without sectoral limits imposed by absolute targets, aligning with their role in supporting substantial investment flows needed for transitions. The current wording of the paragraph suggests that one must have an absolute target expressed in intensity terms, rather than allowing for an intensity target that is supported by absolute values. One has to read AR 12 to understand that targets may also be expressed in intensity values. We strongly recommend amending the wording as follows: "(a) GHG emission reduction targets for Scope 1, 2 and 3, either separately or combined…" to clarify this.			
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	We support efforts to improve the availability and comparability of country-level social data where it is relevant for users. However, the change in definition/threshold of significant headcount for the metrics regarding characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1) leads to additional effort as it triggers changes in methodology and additional disclosure requirements. In particular, with respect to S1-5 and S1-7 this additional effort to collect the relevant data is considerable. We also disagree with the new threshold for country-by-country disclosure as it significantly increases the burden of global data collection and the number of data points to be disclosed. The burden of global data collection is significantly increased when metrics on employees are collected primarily by operating entity rather than by country, which is the case in many companies for internal steering purposes. And an increased number of data points to be disclosed reduces the readability and conciseness of the final Sustainability Statement. Both aspects contradict the aim of the Omnibus initiative to simplify it and therefore, we disagree with the new threshold.			
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	We support the objective of promoting fair and transparent wage practices and welcome the reference to international frameworks. However, amend ments do not achieve simplification; instead, considerable additional effort is expected as the requirements regarding permissible sources (e.g. for living wage estimates in countries outside the EU) have been changed requiring review whether or not previously used sources can still be used. From a cost-benefit perspective, the DR on adequate wages (i.e. ESRS S1 paragraph 32 and related AR) appears to be inefficient for the insurance industry, as the substantial effort required to verify adequate wages yielded results indicating that fair compensation is not a significant concern in this sector. As a result, the disclosure should be limited to defined sectors, as follows: "For defined critical sectors, percentage of employees paid below an adequate wage by country". Besides this, we disagree with the requirements of new AR 22 (b), in particular: • the addition in AR 22 (b) i) regarding statutory minimum wage that it is "periodically reviewed/adjusted every two years and takes into account the ILO wage setting principles" and • the newly introduced last sentence of AR 22 (b) that the adequate wage benchmarks outside the EU "should take into account both needs of workers and their families, as well as economic factors, as stated in the ILO Minimum Wage Fixing Convention No.131". We contend that it is not the responsibility of individual undertakings to ensure this, and a list of applicable adequate wages should be provided by EFRAG.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	We support the objective of maintaining alignment between ESRS and SFDR frameworks. Generally, PAI indicators should remain as companies have integrated or plan to integrate most PAI indicators in their investment decision making processes or are relevant for their engagement strategies. PAIs are better understood and known by customers than other elements of disclosure. Retail customers well understand the PAI themes on GHG, biodiversity, waste, water and social and employee matters. Overall, supporting information needs of financial market participants under Regulation (EU) 2019/2088 (SFDR) is a key objective of CSRD/ESRS reporting. A dynamic and consistent link between ESRS and SFDR PAI indicators is essential, especially when considering the planned revision of the SFDR in the Commission work program. PAI reporting under SFDR at entity level should be removed by group aggregated disclosure, i.e. upon (group aggregate) PAI disclosure under CSRD, the Art. 4 SFDR requirement for entity level disclosure should be deemed as complied with. We disagree with the current formulation of ESRS S1paragraph 46(b), S2 paragraph 19, S3 paragraph 19 and S4 paragraph 15 for the following reasons: • Amended wording replaces "number of severe human rights [incidents/issues]" with "number of human rights [incidents/issues]." This broadens the scope from substantiated, high-impact cases to potentially all recorded incidents, regardless of severity. It also undermines alignment with SFDR PAI Indicator #14, which refers to "severe human rights issues and incidents". We recommend reintroducing the qualifier "severe" to ensure conceptual clarity and consistency. • ESRS S2, S3 and S4 are not classified as metric-containing standards (ESRS 2 AR 37). However, the phrase "disclose these" in DR S2-3 paragraph 19, DR S3-3 paragraph 19 and DR S4-3 paragraph 15 implies quantitative disclosure, creating confusion about whether these should be treated as metrics and how they fit into the overall metrics and targets framework.			
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We support the review of AR 26 in Amended ESRS E4, insofar as it contributes to the overall simplification of the standard and maintains a degree of methodological guidance that can assist undertakings in defining relevant biodiversity and ecosystem-related targets. This being said, the current target-setting guidance in E4 AR 26 is primarily oriented towards the real economy, focusing on direct actions such as habitat restoration or number of projects/sites, which are applicable to production sectors. However, for financial institutions, biodiversity targets are rather connected to portfolio alignment, sector inclusion, engagement targets, or impact reduction based on metrics disclosed by investees, empha sizing the shift of capital flows rather than direct operational control. Therefore, any guidance included in a revised AR 26 on target setting will struggle to capture the diverse requirements across sectors. Given this disparity, we suggest not including specific target guidance in the ESRS, allowing flexibility for each sector to define targets that are relevant to their unique roles and impacts on biodiversity and ecosystems.			
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	We welcome the deletion of this voluntary data point.			
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	We welcome the inclusion of paragraph 33(b) in the revised ESRS G1, which introduces a clear requirement to disclose standard payment terms by supplier category, including SMEs, and the percentage of payments aligned with those terms.			
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Regarding ESRS 1 paragraph 59: In order to ensure a faithful presentation, the word "usually" in the first sentence should enable financial institutions to account for own operations in a way that suits their business model, i.e. financial and non-financial investments should be exempted. To enhance clarity, we suggest the following rewording: „ 59. In the case of group reporting, the reporting undertaking, depending on its business model, usually considers as part of its own operations: the assets and liabilities, income and expense of the parent undertaking and its subsidiaries, located in or outside the EU, as determined in accordance with the applicable accounting requirement…". We welcome the clarification in ESRS 1 paragraph 59 sentence 3 according to which the "undertaking may exclude from the sustainability reporting boundary a subsidiary that has been excluded from the scope of the consolidated financial statements due to its non-materiality from a financial perspective […]" as it reduces uncertainty and can significantly lower the burden of reporting. However, it should be clarified that the undertaking would not be expected to reassess every non-consolidated subsidiary regarding their non-materiality for sustainability. As the current wording can be interpreted as having to re-assess every non-material subsidiary to reach a conclusion whether there are or are not specific facts and circumstances regarding material IROs, a clarification is needed. ESRS 1 paragraph 70 should be revised to explicitly allow exceptions beyond leased as-sets, including fully consolidated assets solely held for investment purposes. It should be clarified in ESRS 1 chapter 5.3 that exceptions other than leased assets (ESRS 1 paragraph 70) and long-term employees benefit fund (ESRS 1 paragraph 71) are permissible if they can be reasoned and enable more accurate sustainability reporting.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Gesamtverband der Deutschen Versicherungswirtschaft e.V. (GDV)	Association of financial institutions	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Overall, consistency is needed in the use of terms "May" and "Shall", other terms like "can" should not be used. Regarding ESRS1: •Chapter 3 conflates 'topics' with 'IROs'. A reporting undertaking may have a single IRO in a broader topical area without the whole topic being material. Conflating both terms can increase reporting effort through additional auditor scrutiny. Therefore, more consistent and clearer segregation between 'topics' and 'IROs' is necessary. •In paragraph 25 clarification is necessary that financial materiality arises only from risks and opportunities, not from impact. •Paragraph 26 should acknowledge that undertakings may start their materiality assessment from either impact or financial perspective, de pending on existing processes. •Regarding paragraph 38: Clarification is needed if it is sufficient to reference the risk and opportunity report to meet the requirement of addressing materiality beyond consolidation scope, as this report typically also covers business relationships? •AR15 should be deleted as assessing forward-looking financial effects based on impacts is difficult to operationalize and contradicts the reliefs in AR16. •AR16 should include opportunities. •In chapter 3.5 clarification is needed that specifications described under 3.3.1 are to be read in conjunction with 3.5 to make clear that e.g. paragraph 31 only applies for impacts that the undertaking did not identify as material in the first step. •In paragraph 47, internal expert judgment should be recognized as a valid source of "reasonable and supportable information". •The wording in AR19 is ambiguous regarding necessary or expected usage of quantitative information or scoring. To ensure clarity and consistent application, we recommend revising the text as follows: "The use of quantitative information or quantitative scoring is not a prerequisite. A qualitative analysis may be sufficient for the undertaking to reasonably conclude that the impacts, risks and opportunities related to a given topic are material or not material."			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We support the use of reasonable and supportable information available without undue cost or effort (ESRS 2 paragraph 47 & chapter 7.3), as well as ESRS 1 paragraph 48 on materiality based on the business model while excluding peer analysis. We also welcome the recent simplifications to the ESRS, which represent a positive step forward. However, important coherence issues remain. The revised definition of materiality in paragraph 21 does not sufficiently simplify the DMA or provide clarity. It should more explicitly derive from what is material to users of financial and sustainability statements, enabling undertakings to apply a clear standard based on their specific situation, relevant financial reporting rules, or risk programmes. It is unclear how the top-down approach aligns with chapter 3.7 on "aggregation, disaggregation and group reporting." Preparers may no longer consistently apply the top-down approach, as different levels of disaggregation may be required for reporting. We recommend granting undertakings discretion to define the appropriate level of disaggregation. While we welcome the removal of sub-sub topics, they remain in brackets in Appendix A and in several "Objective" sections (e.g. Appendix A E4 still refers to "Drivers of biodiversity and ecosystem change (terrestrial and marine habitat change, invasive species)."). This risks obliging preparers to assess each sub-sub-topic individually. We recommend deleting such references to avoid unnecessary burden. On the DMA, we stress it must remain a principles-led process that enables contextual judgment and a meaningful connection to strategy. Auditors should assess the soundness of the methodology, not challenge its outcomes. Companies should not be required to provide detailed methodological disclosures or scoring, especially where topics are clearly material or immaterial. Finally, we recommend making disclosures on positive impacts and opportunities voluntary (placed in NMIG) and clarifying that partial materiality declarations within (sub)topics are permitted, supported by narrative explanation.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	We are concerned that the new guidance obliges companies to apply a gross approach to topics because it disregards ongoing mitigation actions inherent to responsible business operations in regulated industries. This is impractical and distorts reporting. We recommend a more flexible, principles-based approach rather than a prescriptive one. Real business practice is to evaluate impacts after accounting for credible and effective prevention and mitigation measures. Industrial companies invest heavily in regulatory compliance, site-level controls, monitoring systems, and global frameworks (e.g., ISO, OGMP 2.0). These measures are audited, budgeted, and improved. A gross-only assessment inflates disclosures with hypothetical risks already managed, creating burden and misrepresenting actual exposure. A net approach ensures disclosures remain decision-useful, rewarding companies for data-backed mitigation efforts. It avoids duplicative statutory-only exercises. Appendix C provides some clarity but remains complex and difficult to apply. For actual impacts, assessing materiality "before" remediation is challenging if timing or effectiveness is unclear, leading to diverging interpretations between preparers and auditors. For potential impacts, the rule to disregard significant ongoing actions introduces similar judgment challenges. The distinction between structural and ongoing actions is interpreted differently by preparers and auditors, reducing comparability. The definition of potential should be limited to cases where no prevention or mitigation action has been taken. The gross-net principle also creates unintended consequences. As mitigation measures evolve, companies may feel obliged to redo their DMA annually, shifting topics in and out of the threshold. Framing materiality around gross impacts risks turning the exercise into a theoretical checklist, disconnected from accountability, comparability, and faithful representation. E.g. Safety topics will be reported regardless, as they are priorities even without annual incidents. Finally, risk evaluation remains insufficiently defined. Without clarification, auditors may impose approaches inconsistent with residual risk methods, undermining connectivity with annual financial reporting. We recommend removing Appendix C.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We welcome EFRAG for improving the readability and overall flow of ESRS 1. The inclusion of the Application Requirements (ARs) within the connected topics has made the necessary information available in situ, contributing to the consistency of the document. However, we would like to point out that the use of certain terms remains inconsistent. For example, the term "significant" is not clearly defined, yet it appears in several places. Similarly, the use of expressions such as "unless not appropriate" and "where applicable" leaves a wide margin for interpretation. We agree that confirming the two approaches to the Double Materiality Assessment (DMA) provides undertakings with an appropriate level of flexibility. However, the introduction of the gross-net principle goes against this spirit and further reduces alignment with the single materiality evaluation used in ISSB standards and broader corporate reporting principles. We also recommend the removal of ESRS 1, paragraph 108 (new). This provision allows for disclosures unrelated to material topics, risking the inclusion of non-essential information. Such disclosures undermine the principle of materiality and obscure key information. Removing this datapoint would better support concise reporting and avoid cluttering sustainability statements.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	In general, PATs have been simplified, and we agree on the main changes. However, ESRS 1 Paragraph 84(c) requires adjusting the base year of the target following a major acquisition or disposal. Firstly, this constitutes a behavioural requirement, which contradicts Paragraph 5 stating that "the ESRS do not mandate behaviour but set Disclosure Requirements[...]". Secondly, it is inconsistent with the possibility of investments or divestments being part of the business strategy to achieve the target. ESRS 2 AR 35 the disclosure on resources allocation (in particular, capital expenditure and operating expenditure) should be "may". We further suggest that additional datapoints be deleted or moved to NMIG where they obscure more relevant disclosures, are duplicative, or overly prescriptive. For example, ESRS 2 paragraph 38 a–c (resources allocated to key actions) requires detailed financial data tracked at project level and reconciliation with financial statements, adding significant burden. Likewise, GDR-M paragraph 41 b duplicates 41 d and should be removed. Finally, ESRS 1 paragraph 40 should be clarified to confirm that disclosure of topical metrics is always subject to double materiality and the materiality of information. Overall, while the restructuring has simplified PATs and improved connectivity, important inconsistencies remain. Addressing these issues would better balance preparation effort with the need for relevant and comparable information. what hap			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	In general, we agree with the improvements performed and welcome the proposed amendments aimed at enhancing the clarity and accessibility of the ESRS. However, further simplification and precision are needed to improve usability and avoid confusion, particularly with auditors. Unclear and contradictory terminology should be eliminated. For instance, terms such as "shall consider" create ambiguity: "shall" implies mandatory action, while "consider" suggests discretion. This phrasing leaves room for interpretation and could result in inconsistent application or auditor disputes. Similarly, application requirements (ARs) that use "may" should be removed, as "may" implies voluntary action, which contradicts the stated objective of eliminating voluntary disclosures. Clear, mandatory language is essential to ensure consistency and enforceability across undertakings. Clarification of key terminology is required. For example, the term "significant" is currently ambiguous. We recommend explicitly stating that undertakings determine significance based on their specific business model and context, ensuring disclosures remain relevant, material, and decision-useful. These targeted adjustments will simplify the Standards, improve their practical application, and ensure the framework remains principles-based, enforceable, and aligned with the goal of reducing complexity for preparers while maintaining comparability and reliability for users.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We strongly support excluding the NMIG from the Delegated Act to ensure it is clearly interpreted as non-mandatory. Indeed, the NMIG should remain a helpful reference tool for preparers, not a regulatory requirement. Its placement is important: by keeping it outside the Delegated Act, it is clear to assurance providers and auditors that the NMIG is not a compliance checklist. This distinction preserves the flexibility and usefulness of the NMIG, allowing companies to apply it in ways best suited to their context without creating unintended obligations. We therefore support EFRAG's recommendation and emphasize that exclusion of the NMIG from the Delegated Act is necessary to safeguard its role as non-authoritative, practical guidance.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	Relief clauses play a fundamental role, especially in the first reporting years, as they allow companies the necessary time to collect and consolidate data. It would be ineffective and disproportionate to require data solely for the sake of comparability when the underlying information is not yet sufficiently mature to ensure reliability – thereby defeating the real objective of comparability itself. Below, further explanation supporting why the use of reliefs is extremely important for preparers, in particular: Relief for metrics in the value chain: Collecting quantitative data from actors within the value chain can be particularly burdensome. Therefore, the possibility to use estimates focused on the most relevant parts of the value chain is crucial. Relief for acquisitions/disposals: Companies need sufficient time after an acquisition to set up systems for collecting sustainability data and to organize the information flow for reporting. It is estimated that at least six months are required for these activities; hence, the relief provides an adequate time frame to initiate high-quality data collection. Relief for data quality on metrics: Please refer to the comment provided in response to question 18. Relief for commercially sensitive information: Undertakings should not be required to disclose information that could undermine their competitive position. This is a reasonable and proportionate measure to balance transparency with legitimate business confidentiality.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We strongly support the relief mechanisms provided in the revised ESRS, as they are essential for ensuring robust, reliable, and decision-useful sustainability reporting. The relief for lack of data quality is particularly important to allow companies the time needed to build reliable data systems and develop meaningful trends. Sustainability data must be collected consistently over several years to establish credible baselines and trajectories. Forcing the disclosure of incomplete or unreliable data does not strengthen reporting; rather, it risks undermining: The quality and integrity of reporting, The comparability of disclosures across companies, and Legal certainty, by exposing companies to risks linked to the publication of unreliable metrics. Relief provisions also play a key role in addressing the current lack of methodologies for certain indicators. They provide an essential bridge for preparers until recognized methodologies are developed and adopted, ensuring reporting remains feasible without creating undue burden. We particularly support ESRS 1, paragraph 92, which acknowledges the practical limitations of data availability in joint operations where the undertaking lacks operational control. Allowing the exclusion of such operations from environmental metrics is a pragmatic solution that enhances reporting feasibility and avoids duplicative or misleading disclosures. We endorse ESRS 1, paragraph 91, which permits the use of metrics based on a partial scope of calculation. This flexibility is vital in the early years of reporting, when data systems are still evolving. Importantly, the requirement for companies to disclose the scope limitations and outline plans to improve data coverage ensures transparency and demonstrates continuous progress. In sum, these reliefs strike the right balance: they safeguard reporting quality, comparability, and legal certainty while supporting preparers in gradually building the systems and methodologies to meet regulatory requirements.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	We disagree with the current approach requiring companies to choose between: (1) providing quantitative data or (2) providing only qualitative data with the option to voluntarily add quantitative information. EFRAG's outreach highlighted significant divergence among stakeholders, with no clear consensus on either option. This lack of consensus demonstrates that neither option provides a workable solution for all stakeholders. We therefore recommend removing the provision and allowing voluntary disclosure of both qualitative and quantitative information. This flexibility is necessary given the lack of mature methodologies, the uncertainty and subjectivity of assumptions, the sensitivity of information involved, and most importantly, the significant legal risks. These risks are particularly acute where disclosures include financial data not reported in official financial statements and not reliably estimable. Such disclosures should fall under the remit of financial boards to ensure consistency with financial reporting requirements. Finally, we recommend exempting private subsidiaries, particularly foreign-owned ones, from anticipated financial effect disclosures. These entities do not independently raise capital or engage investors, and their sustainability risks are already captured at the group level. Requiring subsidiary-level reporting adds no value, creates duplicative burdens, and addresses a problem that does not exist.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Disclosure "before considering adaptation/mitigation actions" should not be required, as this does not reflect how business strategy is defined and adds little value for users. Mitigation measures are embedded in corporate strategy, structural in nature, and linked to multiple risks. Attempting to calculate hypothetical monetary amounts before mitigation is complex, unreliable, and not estimable. For less technical readers, such disclosures could be misleading, especially as they are not recognized in financial statements. In particular, ESRS E1 41(d) would create confusion by requiring disclosure of potential liabilities not recognized under financial reporting standards. While we acknowledge EFRAG's reduction in disclosure requirements for anticipated financial effects, the remaining provisions in paragraphs 40 and 41 remain problematic. Allowing preparers to comply through qualitative disclosures (Option 2) would reduce costs and address concerns about requiring more granular financial data than mandated under IFRS or U.S. GAAP. Requiring disclosure of the "percentage of assets at material physical risk" exceeds what is necessary, creates inconsistency with financial reporting, and confuses users. These clauses are difficult to implement given market volatility and frequent changes. They could also lead to legal liabilities as forward-looking statements, increase exposure to litigation, and are nearly impossible to verify or audit. Requiring financial disclosures in greater detail than current financial reporting could cause competitive harm. Such information may not be relevant to users or aligned with how management measures performance, particularly if absent from financial statements. There is no reliable or comparable method to link climate-related risks or opportunities to financial metrics such as assets, liabilities, or revenue. This information should instead be embedded in a financial reporting framework and disclosed in the notes to financial statements. We strongly recommend limiting anticipated financial effect disclosures to qualitative information only.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	1. Fair presentation in the ISSB standard is only on financial materiality, so extending this concept could create problems (see question N. 25) 2. IFRS allows to have any GHG boundary while here financial control is mandatory, failing to align to the GHG Protocol. 3.The relief clauses introduced by the simplified standard are welcome and needed by preparers. 4.It is very important to maintain these additional reliefs in the IFRS because in the ESRS we go beyond climate aspects, where methodologies are less advanced, and these clauses are needed. 5. agree 6. agree 7. agree 8. agree			

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Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	It is true that some simplifications have been introduced, particularly in the structure and presentation of the reporting framework. Flexibility introduced in how information is presented in the sustainability statement will also help improve usability, and the relief allowing for exclusion of joint operations over which the undertaking does not have operational control from the calculation scope of environmental metrics will reduce effort to obtain data from partners. However, in practice, the overall reporting effort will not change significantly. While the format of the PATs may be streamlined, many of the underlying metrics remain the same. Quantitative datapoints have been prioritised, and most of the requirements removed are narrative-based DRs that were of lower importance. As a result, preparers will still need to collect and disclose a substantial amount of data, and the core reporting obligations are largely preserved. We suggest a further detailed review of the "shall" disclosure requirements to remove those that are not decision-useful, are of lower priority while creating undue burden for preparers, or that risk obscuring more relevant disclosures. To truly align with the European Commission's objective of simplifying and streamlining the ESRS framework, further reductions are necessary. As currently designed, the changes fall short of meaningfully reducing complexity and administrative burden.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	It is important to recall that this revision was intended as a simplification exercise. These six datapoints are not the only additions; concepts such as "fair presentation," requirements to amend the base year for targets in cases of major acquisitions add further complexity. If the gross approach were adopted, it would add burden by obliging disclosure of hypothetical risks already addressed through mitigation. Each of these elements burden preparers beyond the datapoints under discussion, and risks undermining the overarching objective of simplification. In this context, we stress the importance of avoiding duplication and over-prescription. We specifically propose removing ESRS G1 paragraph 10(c). This requirement is unnecessarily detailed and is already addressed under ESRS G1 paragraph 9, which mandates disclosure of business conduct actions in line with ESRS 2 GDR-A. Retaining both paragraphs creates overlap without adding value, and risks confusing preparers and assurance providers about the scope and distinctiveness of required disclosures. We also have significant concerns with ESRS G1 paragraph 14 on "confirmed incidents" of corruption and bribery. While we support transparency, requiring disclosure of internally confirmed violations risks self-incrimination, undermines the presumption of innocence, and creates misleading data. Companies with robust controls may appear to have more incidents simply because they detect and investigate them more thoroughly. These disclosures are highly sensitive, difficult to standardise, and of limited value to external users. We therefore recommend retaining paragraph 14 as voluntary. If kept mandatory, its scope should be narrowed to avoid requiring details that could expose companies to legal liability. In summary, while we support the revised approach to the six datapoints, we caution against incremental complexity from new concepts and prescriptive overlaps. Eliminating redundant requirements, such as paragraph 10(c) and 14, would help keep the Standards clear, proportionate, and aligned with the intended goal of simplification.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	In addition to the four new datapoints already identified, further mandatory disclosures have been added within certain Disclosure Requirements (DRs). These additions run counter to the intended goal of simplification, as they increase complexity rather than streamlining the reporting process. Microplastics (ESRS E2 – 16(d)) The disclosure of secondary microplastics is presented by EFRAG as a clarification of existing Set 1 requirements. However, this interpretation is legally flawed and conflicts with the Commission's simplification mandate. The original Set 1 requirement addressed emissions, generation, and use within an undertaking's own operations. The new datapoint extends reporting obligations into the downstream value chain, introducing significant complexity and going beyond clarification. In practice, disclosures on secondary microplastics are neither scientifically nor technically supportable. There are no widely accepted methodologies for calculating such emissions, which depend on highly variable assumptions (e.g., degradation, wear, usage conditions). EFRAG itself acknowledges this gap, effectively relegating disclosures to qualitative narratives that add burden without delivering actionable or comparable insights. The amended draft also risks duplication and misalignment with other EU frameworks (e.g., REACH Annex XVII, Entry 78), while adopting an overly broad definition of microplastics (synthetic polymer microparticles). Moreover, the lack of measurability undermines auditability and legal reliability. We therefore strongly recommend removing paragraph 16(d) on secondary microplastics as well as related definitions in Annex II (including synthetic polymer microplastics and secondary microplastics). We also recommend amending the definition of 'dependencies' as follows: "The situation of an undertaking being directly dependent on natural, human and/or social resources for its business processes."			

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Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	We do not support the introduction of a "fair presentation" regime into the ESRS framework. While the concept is well established in financial reporting, its application in sustainability reporting raises significant challenges and risks. The primary concern is the increased accountability of Board members for the Sustainability Statement. Under a fair presentation regime, Boards would not only need to ensure compliance with reporting standards but also demonstrate that disclosures are presented in a manner deemed fair to all relevant stakeholders. Given the less-defined boundaries of sustainability reporting compared to financial reporting, this creates a grey area that significantly increases the risk of litigation if stakeholders contest the adequacy of the information provided. Moreover, sustainability data differs fundamentally from financial data. It is often forward-looking, qualitative, and heavily reliant on professional judgment, rather than verifiable, historical records. In particular, impact materiality within ESRS covers environmental and social dimensions that extend beyond financial relevance, where established practices and assurance methodologies are still lacking. Applying a fair presentation requirement in this context risks disproportionate legal, assurance, and reputational exposure for preparers. Audit firms themselves have indicated that such a regime could complicate assurance engagements, especially given the absence of a common European standard for sustainability review. Embedding "fair presentation" as a legal requirement may inadvertently trigger regulatory enforcement and assurance challenges without improving reporting quality. Instead, enforcement should remain focused on the qualitative characteristics already embedded in ESRS—relevance, comparability, verifiability, and understandability. These principles already provide a sound basis for reliable and decision-useful reporting. Assurance can be effectively conducted against these standards, without introducing additional, ill-defined obligations that could create uncertainty, inconsistency, and unnecessary legal risks for undertakings.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets Absolute emissions targets are not decision-useful in this context. The GHG Protocol, while the accepted basis for reporting, has significant limitations when applied to target-setting: it can double-count across Scopes 1, 2, and 3, fails to capture avoided emissions, and lacks product-level granularity. This penalises companies that scale low-carbon solutions such as hydrogen, LNG switching, or carbon capture, while discouraging innovation. Intensity targets, by contrast, provide a more accurate and comparable view of performance, reflecting efficiency and progress without distorting incentives. For financial institutions, requiring associated absolute values would add burden without improving transparency and risks misleading stakeholders.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	We are concerned that the revised workforce disclosures introduce a level of detail that is not necessarily relevant or decision-useful, particularly for multinational companies. The requirement to disclose employee numbers per country with more than 50 employees may add little value, as in practice these employees may be concentrated in a single region (e.g., Europe) without enhancing the reader's understanding of global workforce distribution. A more representative and meaningful approach would be to return to the previous version of the disclosure, which required companies to report on countries where there are more than 50 employees representing at least 10% of the total workforce. This ensures focus on material geographies while avoiding unnecessary granularity. We recommend deleting DR S1-5, as it lacks a clear link to a specific material sub-topic and does not deliver decision-useful information beyond the limited context of secure employment. We also recommend removing the requirement to disaggregate employees by contract type (permanent, temporary, non-guaranteed). While well-intentioned, this requirement offers limited value to users and creates disproportionate complexity for preparers. Contract categories are defined differently across jurisdictions, leading to inconsistencies and undermining comparability. Moreover, workforce composition often fluctuates throughout the year, particularly in industries with seasonal demand or project-based work, which reduces the reliability of such disclosures. Without harmonized definitions, there is a significant risk of misinterpretation. The burden of aligning and reporting these figures across multiple jurisdictions outweighs the benefits, especially for multinational undertakings. If EFRAG decides to retain this split, it is crucial that clear, standardized definitions are provided to ensure consistency and comparability across companies and sectors. In summary, workforce disclosures should strike a balance between relevance, comparability, and feasibility. We recommend focusing on disclosures that provide meaningful insight into workforce structure while avoiding prescriptive requirements that increase burden without delivering added value to users.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	It is necessary to provide greater clarity in the description of how the adequate wage is calculated in non-EU countries. Allowing companies to rely on differing benchmarks risks inconsistency and incomparability across geographies and undertakings. Given that definitions and calculations of living/adequate wages vary significantly by country, clearer expectations or a reference framework from EFRAG would be valuable. This could take the form of a single authoritative reference source or a commonly accessible database, ensuring comparability while avoiding excessive prescription. Such an approach would also reduce the burden on companies to independently determine what constitutes an adequate wage in each jurisdiction where they operate.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	It is necessary to provide greater clarity in the description of how the adequate wage is calculated in non-EU countries. Allowing companies to rely on differing benchmarks risks inconsistency and incomparability across geographies and undertakings. Given that definitions and calculations of living/adequate wages vary significantly by country, clearer expectations or a reference framework from EFRAG would be valuable. This could take the form of a single authoritative reference source or a commonly accessible database, ensuring comparability while avoiding excessive prescription. Such an approach would also reduce the burden on companies to independently determine what constitutes an adequate wage in each jurisdiction where they operate.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	It would not be appropriate to reinsert the AR 26 considering that the methodologies for defining biodiversity targets are not yet well defined and are often site-specific. Furthermore, in the absence of a mandatory biodiversity standard, we do not see the opportunity to refer to specific frameworks (which are still voluntary). The risk would be that each company could adapt these standards to its own needs by making reporting incomparable. Finally, also in the light of the simplification process, we should not add guidance from non-mandatory frameworks. In addition, ESRS should not dictate how entities set targets, as this would amount to a behavioural requirement rather than a disclosure standard.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	We do not agree with the proposed dual requirement for both adjusted and unadjusted gender pay gap disclosures. Only one metric should be required, ideally allowing undertakings some flexibility to determine an appropriate approach. There are two main reasons for this. First, starting in 2027, the EU Pay Transparency Directive (EU 2023/970) will require companies to report using the adjusted pay gap indicator. To ensure consistency and avoid confusion, it is preferable for ESRS to be consistent with this Directive. Requiring disclosure of both adjusted and unadjusted data risks creating conflicting narratives, making it more difficult for stakeholders to reconcile and interpret results. An adjusted indicator often provides more meaningful insights, as it accounts for legitimate explanatory factors such as job level, experience, location, and performance. This ensures a fairer and more accurate representation of pay equity across organizations. While gender pay gap reporting has been important in drawing attention to workplace disparities, the unadjusted metric often produces oversimplified and misleading results. By failing to account for legitimate differences, it risks distorting stakeholder understanding and diverting attention away from genuine equity issues. It also imposes unnecessary administrative burdens on preparers. A more constructive alternative would be to transition toward voluntary, context-sensitive reporting for gender-related disclosures beyond the adjusted pay gap. This would allow companies to provide relevant insights tailored to their unique workforce composition, industry characteristics, and strategic priorities, while respecting the principle of materiality. Voluntary disclosure fosters transparency by enabling organizations to communicate progress when it aligns with their values and stakeholder expectations, rather than through rigid, one-size-fits-all metrics.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The cross-cutting standard ESRS 1 remains critical, as it sets the foundation for sustainability reporting. We continue to have significant concerns with the provisions on fair presentation, the gross versus net approach to materiality, and requirements on aggregation/disaggregation. These elements remain highly subjective and risk creating interpretative challenges and inconsistent application across undertakings. The lack of clarity could lead to disagreements with auditors, undermining comparability and increasing assurance costs without improving reporting quality. On value chain reporting, we request that EFRAG limit the scope of the impact materiality assessment to entities with which an undertaking has a direct contractual relationship. For large multinational organizations, value chains are highly complex and global. Tracking and assessing impacts beyond direct contractual partners presents substantial practical, operational, and methodological challenges, particularly given the absence of consistent data availability and supplier transparency. In many cases, undertakings lack leverage to influence or collect reliable information from actors further down the supply chain, resulting in disclosures that are burdensome to produce yet incomplete or inaccurate. We also recommend deleting ESRS 1 §68, which adds confusion, and aligning §§123 and 127 with the "stop-the-clock" and "quick fix" directives to avoid conflicting interpretations. To address this, we propose revising Amended ESRS 1 paragraph 30 to clarify: The impact materiality assessment corresponds to the identification of information that relates to the undertaking's material actual or potential, positive or negative impacts on people or the environment over the short, medium or long term. Impacts include those connected with its own operations, products, or services, including through business relationships in its upstream and downstream value chain. Business relationships are limited to direct contractual relationships. Such clarification would enable preparers to focus reporting where they have the greatest visibility and influence, improving data quality, easing application, and ensuring more effective reporting outcomes.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We recommend eliminating the disclosure requirement on anticipated financial effects in ESRS 2. Preparers are not yet sufficiently equipped to provide reliable forward-looking financial data and there are significant concerns that such disclosures could expose commercially sensitive information. In practice, the current formulation risks overburdening companies with requirements that cannot be met at the desired level of quality. This may result in disclosures that are speculative, inconsistent, and potentially misleading for users, undermining the reliability and decision-usefulness of sustainability reporting. We strongly encourage the removal of this requirement until more robust methodologies, systems, and assurance practices are in place. Regarding ESRS 2 GDR-P for S1-S4, we note that the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises are important international frameworks, but they are not legally binding on businesses. To ensure both accuracy and legal clarity, we recommend amending the reference in the disclosure requirement. Specifically, when describing an undertaking's overarching human rights policy, the current wording "committing to implement" these frameworks should be replaced with "committing to respect for human rights aligned with" these frameworks. This is consistent with our concern raised under the SFDR datapoints (Q29) regarding human rights policies, where overly prescriptive wording risks creating unintended behavioural requirements. This revision would ensure alignment with international best practice, while avoiding the implication that undertakings are legally bound to implement instruments that have no binding legal force. It also ensures consistency with the language commonly used in corporate human rights commitments, providing clarity for preparers and auditors while supporting meaningful transparency. Eliminating anticipated financial effect disclosures and refining the language on human rights commitments would enhance the feasibility, accuracy, and credibility of ESRS 2 reporting requirements, while maintaining interoperability with ISSB standards.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We applaud EFRAG for streamlining and improving the readability of ESRS E1. We believe that the recent edits have indeed enhanced the balance between simplification and the achievement of EU objectives. However, we would like to note that certain articles risk distorting this balance. For example, various requirements related to the disclosure of financial resources not only make it difficult for undertakings to provide this information but may also create confusion with disclosures on IROs. Furthermore, AR13 potentially contradicts the requirements of the GHG Protocol. Additionally, some of the information requested is already covered under the EU Taxonomy reporting requirements, leading to redundancy. This could be further streamlined — for instance, §42 could be removed entirely.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	ESRS E2 raise concerns due to the level of detail required and the potential for excessive disaggregation. These requirements could result in disproportionate reporting efforts, especially for large companies, and may not yield meaningful insights for stakeholders. For detailed feedback please look at the excel file.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	ESRS E4 still raise concerns due to the level of detail required and the potential for excessive disaggregation, as it is not clear how to prioritize sites for disclosure. Moreover, the new requirement of the buffer zone (ESRS 4 AR 8) would lead to excessive burden for companies. These requirements could result in disproportionate reporting efforts, especially for large companies, and may not yield meaningful insights for stakeholders. For detailed feedback please look at the excel file.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	For all the social standards, we stress the importance of maintaining reference to "severe" human rights incidents within the disclosure requirements. Removing the qualifier "severe" significantly broadens the scope of reportable incidents. Given the breadth and complexity of the human rights domain, removing "severe" risks obliging undertakings to disclose numerous less relevant or minor issues. This would dilute the significance of reporting and create confusion during the selection of information to be disclosed. Importantly, this expansion contradicts the spirit of the ESRS simplification by adding unnecessary reporting burden. A focus on severe human rights incidents ensures that disclosures remain meaningful, proportionate and aligned with the principles of relevance, efficiency, and decision-usefulness. This is consistent with our concern raised under the SFDR datapoints (Q29), where removing the qualifier "severe" would broaden scope in a way that undermines clarity and proportionality. On S1 (Own Workforce), we recommend excluding "non-employees" from the scope of reporting. Non-employees should in principle fall under S2 (Workers in the Value Chain), as they are contractors and thus part of the value chain. However, current drafting creates ambiguity: S1 paragraph 7 includes "non-employees" in own workforce, while S2 paragraph 7 provides that all workers not included in own workforce are to be reported under S2. This overlap generates confusion and could also create unintended legal implications, even though S1 paragraph 7 clarifies that reporting does not affect status under labour law. In practice, metrics for non-employees are monitored under site contractor management systems. Expanding S1 to require full reporting on this group would necessitate major system and process revisions across operating and office assets, disproportionate to the reporting value delivered. We therefore recommend clarifying that non-employees should be covered under S2 only, ensuring consistency, avoiding duplication, and preserving alignment with how companies manage and monitor contractors in practice.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	For all the social standards, we stress the importance of maintaining the reference to "severe" human rights incidents within the disclosure requirements. Removing the qualifier "severe" significantly broadens the scope of reportable incidents. Given the breadth and complexity of the human rights domain, such an approach risks obliging undertakings to disclose numerous less relevant or minor issues. This would not only dilute the significance of reporting but also create confusion during the selection of information to be disclosed. Importantly, this expansion contradicts the spirit of the ESRS simplification exercise by adding unnecessary reporting burden. A focus on severe human rights incidents ensures that disclosures remain meaningful, proportionate, and aligned with the principles of relevance, efficiency, and decision-usefulness. On ESRS 2, we applaud EFRAG for streamlining and improving the readability of ESRS S2. We believe that the recent edits have indeed enhanced the balance between simplification and the achievement of EU objectives. However, we would like to note that certain articles risk distorting this balance. For example, we advocate for the removal of the requirement for direct engagement with VCWs (§14), as it is impractical for our industry. We also recommend removing the requirement to extend the undertaking's grievance mechanism to VCWs (impractical and adds conflict of interest between HR of the undertakers and their suppliers), given that a whistleblowing mechanism is already in place and could be further clarified in §19.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	For all the social standards, we stress the importance of maintaining the reference to "severe" human rights incidents within the disclosure requirements. Removing the qualifier "severe" significantly broadens the scope of reportable incidents. Given the breadth and complexity of the human rights domain, such an approach risks obliging undertakings to disclose numerous less relevant or minor issues. This would not only dilute the significance of reporting but also create confusion during the selection of information to be disclosed. Importantly, this expansion contradicts the spirit of the ESRS simplification exercise by adding unnecessary reporting burden. A focus on severe human rights incidents ensures that disclosures remain meaningful, proportionate, and aligned with the principles of relevance, efficiency, and decision-usefulness.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	For all the social standards, we stress the importance of maintaining the reference to "severe" human rights incidents within the disclosure requirements. Removing the qualifier "severe" significantly broadens the scope of reportable incidents. Given the breadth and complexity of the human rights domain, such an approach risks obliging undertakings to disclose numerous less relevant or minor issues. This would not only dilute the significance of reporting but also create confusion during the selection of information to be disclosed. Importantly, this expansion contradicts the spirit of the ESRS simplification exercise by adding unnecessary reporting burden. A focus on severe human rights incidents ensures that disclosures remain meaningful, proportionate, and aligned with the principles of relevance, efficiency, and decision-usefulness.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The changes introduced in ESRS G1 have indeed improved the balance between simplification and the achievement of EU objectives. Nevertheless, we would like to highlight opportunities for further simplification and strengthening of this balance. We believe that undertakings should be allowed to determine which roles within their organisation are most at risk and therefore subject to training (§10c), rather than prescribing specific roles such as board members. Additionally, we find the disclosure of the highly detailed information required in §17 to be impractical, as undertakings may be part of multiple organisations across various countries and participate in numerous discussions, either individually or as a group. Requiring such a level of detail for each of this activity would significantly inflate the volume of information in the annual report.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Incident should be changed to reflect that not all complaints are necessarily incidents as they may not be substantiated. Add "substantiated" before "complaint." Value Chain should be changed to eliminate point iii. regarding "the financing, geographical, geopolitical and regulatory environments in which the undertaking operates". This point is broad and can lead to inconsistent reporting.			
Survey	IOGP Europe	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		On Reporting Boundary: We welcome the relief clause of paragraph 92 ESRS 1 (data of joint operations). If this relief clause were to be deleted, it is essential that it is explicitly stated that for fair presentation, for specific sectors, environmental data can be disclosed on an operated boundary. That said, the current phrasing "may exclude joint operations over which it doesn't have operational control" is not an operational boundary defined or used by the industry. We propose amending to: "For the environmental metrics disclosed in accordance with ESRS E2 Pollution, ESRS E3 Water, ESRS E4 Biodiversity and ecosystems and ESRS E5 Resource use and circular economy, the undertaking may adopt an operational control (consolidation) boundary." Value Chain: The assessment of impacts in the value chain and data collection, especially beyond Tier 1, remains a critical issue. About evaluation, quantitative evaluation is usually very complicated and not significant at the reporting level. It would make more sense to report material facts when material impacts are known without carrying out quantitative assessments. SOC/SVHC: It is still extremely complicated to consolidate the quantities of these kinds of substances as also for SOC it is very difficult. to classify It makes sense to disclose which SOC/SVHC substances are being used and what the company is doing to replace or reduce their use, rather than collecting quantities, which is very complicated given the wide variety of regulations across countries, including differences in usage limits for mixtures containing these substances.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	LMU	Academia	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	On a positive note, the writing is clearer and more concise. Regarding impact materiality, section 3.3. of ESRS 1 remains abstract and overly ambiguous. The latter is particularly problematic from an academic perspective as it impinges on the quality and usability (see references in Q 34 for references elaborating on this) of the disclosed data for research purposes such as the creation of dataset and the testing of hypotheses. One example of this is the amended paragraph 28 (formerly 42) that pertains to the setting of thresholds for identifying material information. The problem here is that both in the original and the revised standard features no reference to methods, scientific or public databases or other sources from where such thresholds could be taken. Consequently, undertakings are required to set their own thresholds, which will likely result in disclosures that are hard to compare and aggregate. What is more, as impact materiality, unlike financial materiality manifests itself not at the level of the undertaking but the geographically specific ecosystem (for E topics) or the administrative boundaries of a nation-state or sub-national entity (for S and G topics), putting the responsibility of setting thresholds to undertakings may result in the loss of information on impacts that are material if their sources are distributed across facilities belonging to different companies. In this context the deletion of paragraph 28 from Set 1 on the approach employed to on the materiality filter is also problematic, because it removes a datapoint that would allow to assess and compare the quality and trustworthiness of the reported information from different undertakings.			
Survey	LMU	Academia	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	While the language of the paragraphs is somewhat complicated, I support that gross impacts shall be reported separately from remediation actions and that each datapoint should have its own timestamp. The rationale for separating the two variables from a research perspective is that it increases comparability and allows for more nuanced research questions addressing factors that influence the size of impacts, the size of mitigation actions and the interactions between both. If net measures were reported, instead, a differentiation between whether small impacts were the results of non-invasive operations or remediation actions could not be undertaken.			
Survey	LMU	Academia	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	I understand that the proposed changes relate to style and structure rather than to content and data generation and presentation aspects. As such, from a research perspective there are no objections and any improvements in human and machine-readability are to be welcomed.			
Survey	LMU	Academia	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Consolidating overlapping disclosure requirements to ESRS 2 and putting method and data collection guidance into ARs rather than separate datapoints is generally a good development as it increases the clarity of the reported data. This also matters for academic users, who can then better interpret the disclosed values. One negative development from a research perspective is, however, the removal of the datapoint relating to the procedures for site-screenings. I understand that this datapoint has not been carried over from topical standards (e.g. E2) to ESRS 2. Removing this information has negative impacts for researchers, who will be deprived of a datapoint that could be leveraged to assess data quality and that could potentially serve as a point of connection with other datasets – including satellite imaginary and other earth-observation data – thus decreasing interoperability. While in the Basis for Conclusions the discussions on ESRS 2 seem to suggest that a "list of sites" disclosure with information about whether the respective site was considered material would be undesirable, from a research perspective that emphasizes completeness and interoperability, this type of disclosure would actually be very useful. This is because by having georeferenced sites, connections with other spatial datasets such as earth observation data or administrative data could be established. Using this connection could then be leveraged to assess and verify whether the disclosed values and/or the classification of a site as (non-)material is credible. Furthermore, from a data quality perspective, having some explicit information about the scope of sites is essential to know whether the disclosed values are complete. At the very least aggregate information about the scope of sites on which there is information vs. the ones where there is none and whether there are any systematic biases (e.g. country, size, sector, technology) regarding inclusion should be provided.			
Survey	LMU	Academia	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The removal of the category of "may datapoints" is positive as those caused confusion and could have contributed to diverging, non-comparable reports. The wording has also become clearer in general. However, the move to more principles-based reporting has also led to examples and method explanation being in part removed or put into the NMIG. While from a researcher/data user perspective this is, at first, not problematic, there is the danger that data preparers might disclose idiosyncratic information that is hard to compare and aggregate as guidance and examples are harder to find.			
Survey	LMU	Academia	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	From a research perspective the NMIG do only matter indirectly insofar as their use or non-use could influence the comparability and quality of disclosures. As such, my main comment would that they should probably be presented more as a Question-Answer document for preparers and less as a residual category for datapoints that were deleted.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	LMU	Academia	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	The proposed reliefs will negatively impact data quality by allowing for incomplete and inconsistent disclosures thus making it very hard to impossible for researchers to construct comparable datasets (i.e. the burden is shifted to data users, not reduced). Importantly, the lack of expiry dates for the reliefs means that there is no incentive to improve data collection efforts. And while each of the reliefs creates problems by itself the combined effect will likely be multiplicative. A potential improvement would be to include a detailed list of (georeferenced) sites and activities that are in and out of scope whenever a relief is used. 1.Undue cost or effort The relief fails to provide any references for what might be "undue cost or effort", thus leaving it at the discretion of the undertaking. As a consequence, the relief can be used as a smokescreen to not disclose values that do not present favorable developments. Indeed, the literature on voluntary sustainability disclosures has documented such a positive news bias. From a research perspective the relief risks decreasing the completeness of information and might even introduce systematic (non-random) bias. 2.Partial scope of metrics Partial metrics are risky if not accompanied by very specific information what is in and excluded. This is because uninformed users – or LLMs – might take partial information as being representative of the whole entity, even if partial disclosures are biased. Analyzing and acting on biased information might, in turn, lead to inaccurate results and misguided policy or investment actions 3.No preference for direct data This relief offers a perverse incentive for companies with worse than average performance in their value chain to use sector averages rather than improving their performance through engaging with suppliers. 7. Excluding acquired and divested subsidiaries could result in "lost" or "double-counted" assets.			
Survey	LMU	Academia	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	The relief allows for incomplete disclosures if companies have doubts about data quality. While the intention of this relief is understandable (better no data than low quality data), in its current form it risks repeating the mistakes of older standards that led to inconsistent reporting. A big problem of the relief is that there is no time limit on companies to fix incomplete disclosures, meaning that they can do partial reporting forever. Another problem is that partial reporting might open the door to selecting artificially positive developments in a subset of operations thus leading to greenwashing. Incomplete reporting means that comparability between organizations using different subsets becomes hard if not impossible. If this relief is maintained, it should be accompanied by provisions that force reporters to be very transparent about what is included and excluded in the disclosures. Also clear time limits should be set for the use of the relief. In case particular metrics show a substantial use of this relief across companies, it would be up to EFRAG to check whether the datapoint should be amended, removed or whether additional guidance is necessary.			
Survey	LMU	Academia	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Anticipated financial effects are particularly interesting to check and critically evaluate what and how risks and impacts of climate change are assessed and managed. An important research gap that could be closed by these disclosures is whether and how adaptation actions and investments (at site level) and mitigation actions and investments influence valuations and the pricing of financial instruments. Contributions from the emerging field of spatial finance are of particular interest in this context. In addition, critical scholars could evaluate biases and regional disparities in financial effects assessments that are currently only implicitly made by companies.			
Survey	LMU	Academia	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	The location disclosure on physical risks is particularly important in this context.			
Survey	LMU	Academia	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Aligning the GHG boundary with the financial control approach from the GHGP is a positive development from a researcher perspective as it increases comparability across geographies and, importantly, also time with regards to earlier partly voluntary reports. The emphasis on materiality as filter would, in principle, be able to make for more consistent disclosures. However, the still ambiguous definition of impact materiality stands in the way of that. Reliefs resulting in incomplete disclosures without additional information on which assets and operations are in or outside the scope of reporting are problematic from a data quality and researcher perspective independently of whether they are also part of the IFRS. As such, I strongly reject their inclusion.			
Survey	LMU	Academia	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	LMU	Academia	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	To answer this question it is first necessary to define what the ESRS "are". From a research perspective, the ESRS are building blocks to an information system about the interactions between undertakings' (and their financiers') operations, decisions and plans, on the one hand, and the environmental, social and political systems in which they are embedded on the other hand. Having such an information system then allows public and private entities to target regulatory interventions or financing and researchers to uncover links between company-level attributes and environmental, social and governance impacts. Against this background the question then becomes whether the reduced scope of datapoints is able to fulfill the function of contributing to an information system. To answer this question in the affirmative, two conditions should be fulfilled. First, the topical datapoints should accurately represent the most relevant aspects regarding the interaction of undertaking and the system it is embedded in. As I am not an expert on all the covered topics, I cannot comment on whether and to what extent the ESRS achieve this. Second, an information system requires high quality data that is complete, unambiguous, meaningful and correct (Wang and Wong 1996) to deliver on its purpose. Judged on these criteria, the revised ESRS do not fulfill the requirements of contributing to an information system that is fit for purpose, because several datapoints that help to ensure or at least to assess data quality have been either deleted or remain ambiguous. This applies inter alia to the still ambiguous definition of impact materiality, the removal of information on the nature of the materiality assessment (see Q 11) and removal of site screening which violates completeness (Q 14). Furthermore, the various reliefs and options for partial disclosures run counter to the principle of completeness (see Q 17, Q 18).			
Survey	LMU	Academia	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	The additional datapoints make formerly implicit aspects explicit thus adding to transparency. In particular, the inclusion of biodiversity aspects into the transition plans is welcome. This is because transition plans – especially if disaggregated at site level – allow for assessing the credibility of companies' plans by checking their interaction with political and physical dependencies as demonatrated amongst other by the work of the EC's DG JRC on climate transition plans.			
Survey	LMU	Academia	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	The new datapoints are clearly defined and measure the aspects which they seek to represent in an appropriate way. Consequently, their addition increases the use value of the ESRS for researchers.			
Survey	LMU	Academia	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	In principle, this emphasis on fair presentation could contribute to more consistent disclosures. As the definition of impact materiality remains, however, ambiguous different interpretations and practices might lead to diverging disclosures. Relatedly, overly narrow or company-centric (rather than ecosystem or social systems based) interpretations of materiality might result in underreporting and, thereby, the loss of information.			
Survey	LMU	Academia	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Intensity metrics or targets (e.g. tco2e / EUR) measure efficiency not total physical effects. Setting (and achieving) intensity targets thus does only tell us about the whether the financed companies become more resource efficient and not whether they reduce the planetary pressures for which absolute emissions and not their relation to human conceptions of financial value matter. In addition, market volatilities or inflation can affect the monetary unit in the denominator, thereby introducing noise. Having only intensity metrics thus does not allow to really compare the ambition of financial institutions, nor does their success or failure in achieving these targets necessarily allow to make inferences about emission reductions in the real world. A second aspect that speaks against the exemption is that excluding financial institutions from absolute target setting is that it inhibits cross-sector comparisons.			
Survey	LMU	Academia	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The new definition of the threshold is simpler to interpret and to communicate.			
Survey	LMU	Academia	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	While I cannot comment on the subject matter any revised metric should make sure that it does not aggregate measures that are defined differently. As a last resort solution, two metrics on adequate wages (EU, non-EU) could be disclosed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	LMU	Academia	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	The interoperability with the SFRD is crucial to build up an information system that spans the link from financial allocations via company operations to environmental and social systems' risks and impacts. I think that the revised version managed to largely retain this link while streamlining the wording and datapoints.			
Survey	LMU	Academia	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Biodiversity targets (and metrics under E-4-5 for that matter as well) require additional guidance to reduce the risk that companies use aggregate metrics and models that rely on black-boxed data and assumptions to produce aggregate indicators. Points that EFRAG should consider when drafting guidance is that any metrics and targets related to ecosystem restoration need to explicitly include time and space. Regarding time, the restoration timeframe of a given ecosystem needs to be accounted for. Regarding space, geography and type of an ecosystem are aspects that do not lend themselves easily to aggregation. Measurable biodiversity targets should involve targets on reducing key biodiversity pressures (reducing land use change, GHG emissions, pollution, etc.). These should be completed by commitments to not operate in key biodiversity hotspots. Suggestions from data providers and specialized consultancies to express biodiversity targets in single synthetic measures such as "MSA x ha x year" or "PDF x ha x year" should be rejected. Such measures are based on coarse, global, and modelled pressure-impact relationships and are thus very misleading.			
Survey	LMU	Academia	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	On E4-5 Metrics Allowing companies to self-select the metrics that they want to disclose on site-specific biodiversity impacts could lead to measurement problems. There will be no comparability and very likely a positivity bias with self-created metrics. One suggestion would be to emphasize metrics on pressures (land use, pollution) that can be reported in base units from the SI list or units that can be derived from these.			
Survey	LMU	Academia	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		My answers to this questionnaire are largely on data quality considerations regarding sustainability disclosures and an emphasis on georeferenced disclosures. The latter matter from a perspective of construct validity, allow for great interoperability with existing datasets from remote sensing and administrative data and enable users outside of the financial system (e.g. environmental agencies, urban planners) to use the data for their activities. I elaborate in more detail on these points in Sommer and Dimmelmeier (2025) https://greendia.de/wp-content/uploads/2025/09/greendia_efrag_policy_brief_09_11.pdf and in Dimmelmeier, Sommer and Cooke (2024). https://sustainablefinanceobservatory.org/resource/reframing-the-eu-landscape-for-corporate-sustainability-information/			
Survey	Allianz SE	Insurance	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	We generally agree that Chapter 3 of ESRS 1 is clearer and better organized. We are supportive of a simplified DMA process, strengthened information materiality filter and clearer articulation of IRO-topic relations. However, major issues remain regarding clarity and the potential for further simplification: (1) We welcome that the concept of information materiality has been strengthened. However, in its renewed form, we deem it still not sufficient to allow for a more principles-based view and application of the ESRS and creates interoperability issues with IFRS. Particularly, paragraph 21 (b) implements practical challenges. First, it is almost impossible to prove what kind of information 'is necessary' for users, as necessity generally is a subjective criterion. Some users may deem very detailed and highly granular information as necessary to understand the undertaking's impacts, risks, and opportunities and how it identifies and manages them, while other users may find overly detailed information to obscure relevant facts, therefore deeming it 'necessary' to provide crisp and to-the-point disclosures without granular details. The 'necessary' evidence will therefore prove impossible to justify in practice towards auditors. Second, the sub-paragraph (b) also introduces differences to IFRS, which complicates interoperability. We therefore suggest deleting paragraph 21 (b) and keeping only 21 (a). Alternatively, we suggest to amend the wording as follows. 21(b) - It could reasonably be expected to be necessary for users of general purpose sustainability statements to understand the undertaking's material impacts, risks, and opportunities and how it identifies and manages them. (2) We note the lack of amendments to ESRS 2 IRO-1, which would have allowed for less prescriptive disclosure requirements. (3) Appendix A should be relocated to the NMIG, as it provides non-binding guidance to support the application of provisions.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Allianz SE	Insurance	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	The new guidelines introduce three additional assessment layers for the assessment of actual and potential impacts – (1) the need to perform an effectiveness test of actions, (2) the requirement to distinguish between significant ongoing vs. temporary actions, and (3) the necessary differentiation in the assessment and disclosures between current and future reporting years – all of which were not present in the set 1 ESRS. We expect a significant increase in reporting burden through these additional layers, as they require supportable evidence and will be subject to high auditor scrutiny. This would particularly penalize wave 1 companies that have already implemented a sophisticated and comprehensive materiality assessment process, methodology, and governance setup. As such, the introduction of the new guidelines is clearly against the European Commission mandate of simplification. Our suggestion is to completely remove the new guidelines on gross vs. net, i.e. paragraphs 34/35 and Appendix C of ESRS 1, and give the market practice time to evolve, which by itself will address currently existing divergence in practice. Regarding paragraph 36 and the clarification of positive impacts, we agree with the addition, as it provides helpful guidance on the matter of understanding positive impacts.			
Survey	Allianz SE	Insurance	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We strongly welcome the increased flexibility introduced by the amendments, particularly the ability to use appendices and sub-parts. The possibility of including an executive summary is also a useful addition to enhance relevance and conciseness, and we urge that this be allowed in a free format. However, we note that EFRAG has introduced additional obligations (ESRS 1, paragraphs 11 and 113) regarding the connections within the sustainability statement, with other corporate documents, and between PAT and IROs. Even if these obligations require only reasonable and sensible information, they still represent an objective additional reporting burden which would punish first movers and contradicts the Omnibus mandate on reducing the reporting burden. ESRS should leave it to the reporting corporate to secure completeness and compliance with disclosure requirements but give room for corporates as to how information is represented and where it is placed.			
Survey	Allianz SE	Insurance	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	While we agree with the implemented changes regarding the architecture and interaction between ESRS 2 and the topical standards, especially deleting topical specifications to GOV, SBM, and IRO, major concerns remain: Some prescriptive disclosure requirements on PAT level have been introduced that we do not agree with and that were not required in Set 1 of the standards. These additional information would not add value for decision making. These specifically pertain to GDR-M, paragraph 41. Firstly, paragraph 41 (a) now requires, for each metric, information on data types and sources used as input to the calculation. Providing information on data types and sources is not relevant for most metrics and certainly does not add additional value to users. We therefore suggest deleting 'data types and sources used as input to the calculation' from the prescriptive requirements of the provision. Secondly, paragraph 41 (b) introduces new requirements for all environmental metrics regarding information on the specific environmental conditions and characteristics of the area where the impact is occurring. Such information is often not available, also is it nearly impossible to determine the area where the impact is occurring with precision – as such the required information would by highly judgmental, subject to significant uncertainties and therefore likely to not meet the criterion of faithful presentation. 41 (b) also creates additional requirements that were not present in set 1 by advocating such information for all environmental metrics, which also includes value chain metrics. We therefore suggest deleting subparagraph 41 (b) entirely. The ESRS 2 IRO-1 disclosure requirements (paragraph 26) are still overly technical with little information value for users. Such technical information about the process and methodology of the double materiality assessment should continue to be shared with auditors for evidence but should not form a mandatory part of the disclosures.			
Survey	Allianz SE	Insurance	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We support eliminating most "may disclose" datapoints to enhance focus and reduce confusion. We welcome the relocation of all mandatory disclosure requirements into the main body of the standards, along with the placement of application requirements directly below each relevant DR and Chapter in ESRS 1. However, our remaining concerns include: 1) Some "may disclose" datapoints remain (e.g., ESRS 1.114, 1.115) and should be reconsidered to ensure consistency in mandatory reporting. 2) ARs are intended to constitute mandatory requirements, and that all guidance or illustrative examples should be moved to the NMIG. -Changes to established terminology should be approached with caution, given that many undertakings are already preparing or reporting under the original ESRS. The consistent use of "material IROs" should be ensured across the standards, avoiding references to "material topics," and wording should not alternate between "adverse" and "negative" impacts. 3) We remain concerned by the wording of certain ARs. Expressions such as "shall consider" create ambiguity, as it is unclear how "consideration" can be measured or audited, and such phrasing risks prescribing behavior in contradiction with ESRS 1 paragraph 5.			
Survey	Allianz SE	Insurance	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We welcome a strict and clear separation of mandatory and voluntary disclosure requirements, keeping in the standards all "shall" requirements and moving all "may" requirements to the NMIG. However, the revised standards introduces the new term "can", e.g AR4 "biodiversity and ecosystem scenario analysis can inform the identification […]". It is unclear if this is a mandatory or voluntary requirement. In general, EFRAG should refrain from introducing new terminology in the revised standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Allianz SE	Insurance	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We generally support the introduced horizontal reliefs (including "undue cost or effort" and "reasonable and supportable information"). However, financial sector firms face ongoing challenges in accessing high-quality value chain data. These practical challenges raises two concerns with the introduced burden reliefs in the revised ESRS: -Relief for lack of data quality on metrics: See our answer to the next question -Restatement needs for change in estimates: ESRS 1 paragraph 94(b) requires restatements of comparative figures for any change in estimates. Data quality from third parties – essential for calculating financed emissions – continues to develop and there will be a natural evolution in data quality. This issue is pertinent financial sector firms. It is common practice to report financed emissions using the fair value of the balance sheet and the latest emissions data of investee entities, which may be many months out of date. In a subsequent reporting period, there is more up-to-date emissions data relating to the prior period for those assets under management and paragraph 94(b) requires the prior period metrics to be revised using the up-to-date information. However, this same data is used to determine the current year financed emissions. This means that the difference between current year estimate and revised prior year financed emissions reflects changes in portfolio composition or fair value movements only – not actual change in emissions. Such a requirement leads to recurring, year-on-year restatements, which in our opinion is not in line with the qualitative characteristics of information, namely relevance and allowing for comparative and predictive value. As such, we suggest to reword 94(b): "identified new information in relation to the estimated figures disclosed in the preceding period, and the new information provides evidence of circumstances that existed in that period, unless the new information is reflective of time lags in data."			
Survey	Allianz SE	Insurance	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	We support the introduction of the 'undue cost or effort' relief and welcome its consistent application. Furthermore, we agree that flexibility without a fixed time limit provides companies with realistic pathways. We see however major remaining concerns: -The relief introduced through paragraph 91 of ESRS (note that paragraph 91 addresses the relief, not paragraph 92) is per definition not applicable to GHG emissions. However, GHG emissions accounting and calculation is the one metric area generally most subject to high measurement uncertainties, often unavailable and unreliable direct or estimated data, and high cost and effort requirements. In the way paragraph 91 is phrased, the relief for metrics would not be possible for GHG emissions – as such full coverage would be required, irrespective of cost and effort considerations or the reliability of estimates. Regulation should emphasize accuracy and reliability of reported data, ensuring that the mandatory use of estimates is limited to where it enables enhancing the understanding of the company's activities. Paragraph 91 creates a misguiding incentive for GHG emissions to achieve 100% data coverage with low-quality estimates, rather than prioritizing high-quality, verified data for management purposes, such as target setting. Using sector averages for low-quality data areas is simple, but investors need to differentiate companies to identify risks and opportunities. We fully support the relief concept of paragraph 91 and strongly call for removing the exclusion of this concept for GHG emissions. -Paragraph 91 specifies that in certain cases the respective metric can only be "partially estimated". There might however also be cases where the metric cannot be estimated or needs to be estimated entirely, if no real data is currently available. We therefore suggest to rephrase the wording to "(...), but the corresponding metric can currently only be entirely, partially, or not estimated at all."			
Survey	Allianz SE	Insurance	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	We see major challenges and issues with the concept of (anticipated) financial effects in general. As such, Option 1 raises several concerns, namely: -Lack of clarity relating to the scope of this requirement in the light of anticipated financial effects that are included in the management report / risk report of the undertaking -Absence of (standardized/harmonized) methodologies and comparable data to determine anticipated financial effects -High level of (measurement) uncertainty resulting in lack of usefulness of the information -Lack of comparability -Sensibility of this information, as it specifically also goes far beyond the usual planning horizon that undertakings have in place While Option 1 provides (permanent) reliefs it would still result in the need for further documentation while the disclosure outcome are expected to be similar to Option 2 (i.e. limited quantitative disclosure due to the reasons listed above). As such, we support Option 2, as it provides a more balanced and realistic approach. It acknowledges the practical challenges, legal risks and audit impracticability of disclosing forward-looking financial information and allows time for the development of reliable data and methodologies. It is important to note that Option 2 needs to be extended to ESRS E1 as well, as it is currently only anchored in ESRS 2.			
Survey	Allianz SE	Insurance	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	We welcome and appreciate the effort to simplify the disclosure requirements on Anticipated Financial Effects, particularly through the reduction in scope from the previous E1-9. However, we believe that adjustments are needed to fully balance reporting effort with users' needs: -40(a) and 41(a): The disclosure of "assets at material physical/transition risk" should not be mandatory, as there is no established standard for these indicators. Without such a standard, there is a risk that the disclosure will only be of very limited relevance to stakeholders. In addition, the required granularity in terms of regions and economic sectors is too high. There is a risk of disproportionately extensive reporting. -40(b): The level of detail required for specifying the location is challenging to determine and results in unnecessarily detailed reporting, and the term "key assets" allows for varying interpretations, potentially leading to ambiguity and inconsistency across the industry. -40(d) and 41(e) Mandatory disclosures should, if at all, only include those indicators that are also part of financial reporting. For Allianz, for example, "revenue at risk" is not such an indicator. -41(c): Real estate assets constitute only a minor portion of total assets for insurance companies in general. Therefore disclosing a breakdown of any within these assets by energy-efficiency class would not provide material information to stakeholders. -41(f): The disclosure of "stranded assets" should not be mandatory, as there is no established standard for this indicator. Without such a standard, there is a risk that the disclosure will only be of very limited relevance to stakeholders. In general, we would suggest adding a relief to the detailed datapoints that allows omission when there is no reasonable and supportable information derived from the reporting undertaking's business plans to be used as input in the calculation of anticipated financial effects.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Allianz SE	Insurance	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	While we acknowledge and appreciate the efforts made by EFRAG to enhance interoperability with the ISSB's Standards IFRS S1 and S2, there are still critical areas where deviations occur that need to be addressed to ensure a more seamless alignment. Regarding IFRS S1, we see interoperability issues with the amended ESRS implementation of information materiality. Please see question 11 for details. Regarding IFRS S2, firstly, the requirements concerning financial and operational control (E1 AR 18. For para. 32/ E1 AR 19 for para. 32/ E1 AR 20 for para 32) diverge significantly from IFRS S2, where undertakings have the flexibility to choose their preferred approach. This dual approach may result in inconsistencies in reporting and interpretation, requiring the need of a careful review to ensure clarity and uniformity. Secondly, the deviations related to the requirements around anticipated financial effects continue to be a concern. Please refer to the response in question 20 for further details. Additionally, the inclusion of anticipated financial effects considerations to perform the resilience analysis (E1 AR 8 for par. 20) is another critical area that does not align with IFRS S2. This new consideration, not included in the original ESRS, introduces complexity and additional burdens for undertakings. In conclusion, while the proposed amendments represent significant progress towards interoperability, addressing these critical areas will be essential to achieving a more consistent and aligned framework with IFRS standards. Further dialogue and refinement are needed to ensure that the simplification objectives do not compromise the integrity and comparability of sustainability reporting. Notwithstanding the above, we want to reiterate that fundamental concepts of ESRS like maintaining reporting over full value chain including scope 3 and the fundamental concept of DMA should always remain core.			
Survey	Allianz SE	Insurance	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Allianz SE	Insurance	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	We support the systematic reduction in mandatory and voluntary datapoints as a necessary and proportionate response to concerns around reporting complexity, excessive granularity, and the potential administrative burden for preparers. We welcome the prioritization of quantitative datapoints over detailed narrative explanations and the distinction between mandatory and voluntary requirements. However, we see remaining major concerns: -It is important to note that a 57% reduction in mandatory datapoints will not necessarily translate into a proportional decrease in report length and burden. While we welcome the notable reductions in certain topical standards, significant concerns remain regarding newly introduced concepts and methodologies that may, in fact, increase the reporting effort (see our detailed responses to the other survey questions). -The simplification and reduction of datapoints has also been accomplished by merging, rephrasing, and restructuring many if not all disclosure requirements and datapoints. This represents significant additional effort for first year reporting under the revised ESRS for Wave 1 undertakings that have already published set 1 ESRS compliant sustainability statements – as each change, even a simple restructuring or addition/deletion of words, requires a re-assessment of already conducted and established standard interpretation.. It also led to unclear and primarily descriptive paragraphs, such as ESRS 1 paragraph 27 and AR 20 related to paragraph 49, on assessing the undertakings' materiality. -Expressions like "is useful information" (e.g., ESRS 2, AR 32) or "is a possible aspect to cover" (e.g., AR 33) continue to appear. These formulations may lead to uncertainty regarding the actual requirements for undertakings. Additionally, even the conceptual framework concerning "topics to be reported on" or "material IROs" could benefit from further clarification or streamlining.			
Survey	Allianz SE	Insurance	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	While we agree with and support the changes done to the requirements in E3 (water withdrawal and water discharges) and E4 (Transition plan), we do not support the introduction of new mandatory metrics in G1 , since this contradicts the mandate of simplification and reduction of reporting burden.			
Survey	Allianz SE	Insurance	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Regarding ESRS 2 BP 1, we do not agree with the new provisions introduced by paragraph 5, as it creates duplicated information throughout the Sustainability Statement. For example, if the reporting undertaking makes use of the relief for metrics with a partial scope (ESRS 1 paragraph 91), or changes sustainability information due to a restatement need or error correction (ESRS 1 paragraph 95-97), sufficient transparency will provided for the metrics concerned, i.e. by providing contextual information, disclosing the partial scope, and correcting/restating the previous reporting period figures. Following the new paragraph 5 and stating that the reporting undertaking has applied these "provisions" just creates duplicates and redundant information not helpful for readers and users. We therefore suggest limiting the disclosures required by paragraph 5 to those that do not create duplicated/redundant information with already existent disclosure requirements in the revised standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Allianz SE	Insurance	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	We welcome the clarification that the ESRS are designed and already included a fair presentation principle which is being achieved by complying with the ESRS. However, discussions about the draft ED indicate that the proposed wording could lead to unintended consequences, misinterpretations and finally, new complexity which would contradict the intended goal of Omnibus. The current ESRS are generally perceived by auditors as a compliance framework. Auditors generally recognize that fair presentation frameworks involve more than mere compliance and often include additional requirements. The issue is the auditor's understanding of a 'framework': If the revised ESRS determine a fair presentation framework – in contrast to the current ESRS – this would very likely not result in a significant reduction of the reporting burden as intended by EFRAG. Auditors understand that omitting information under a fair presentation framework would require additional efforts for both preparers and auditors, which is clearly not intended by EFRAG. Therefore, the wording around fair presentation and EFRAG's intention behind it, which we fully support, should be further clarified. We deem such clarification necessary -in the legal wording of the standard itself -the basis for conclusion, and -as well as in existing FAQs relating to the concept of fair presentation. The wording should explicitly outline that fair presentation is embedded into the standards as a principle, not a framework. Fair presentation (in the meaning of the ESRS) might require both, omitting requirements due to the outcome of the double materiality analysis or applying the materiality of information filter, or adding e.g. entity-specific information in order to properly reflect the business model of the reporting undertaking. It should become clear that fair presentation will be achieved by complying with the ESRS and it is intended to simplify reporting and not add burden.			
Survey	Allianz SE	Insurance	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	The disclosure of absolute values alongside GHG emissions intensity targets presents significant challenges for financial institution and it fails to comply with qualitative characteristic of information: Estimating absolute emissions associated with an intensity target involves assumptions about portfolio composition, production capacity, market shares, and emission intensity, leading to unreliable results and unmeaningful disclosures. On top of that, absolute emissions associated with an intensity target may capture total impact but fail to consider business growth, potentially creating an unlevel playing field if exceptions are made only for financial institutions. We agree with the exception for financial institutions due to the unique role they play in facilitating sectoral transitions.			
Survey	Allianz SE	Insurance	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	We disagree with the new threshold for country-by-country disclosure as it 1) significantly increases the burden of global data collection and 2) the number of data points to be disclosed. Reg 1) The burden of global data collection is significantly increased when metrics on employees are collected primarily by operating entity rather than by country, which is the case in many companies for internal steering purposes. Reg 2) An increased number of data points to be disclosed reduces the readability and conciseness of the final Sustainability Statement.			
Survey	Allianz SE	Insurance	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	We partly disagree with the amended Adequate wage benchmark outside the EU outlined in the new AR 22 (b). In particular, we disagree with -the addition in AR 22 (b) i) regarding statutory minimum wage that it is "periodically reviewed/adjusted every two years and takes into account the ILO wage setting principles". We contend that it is not the responsibility of individual undertakings to ensure this. -the newly introduced last sentence of AR 22 (b) that the adequate wage benchmarks outside the EU "should take into account both needs of workers and their families, as well as economic factors, as stated in the ILO Minimum Wage Fixing Convention No.131". Again, we contend that it is not the responsibility of individual undertakings to ensure this.			
Survey	Allianz SE	Insurance	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	1/ PAI indicators are generally supported and should be kept. 2/ Companies have integrated or plan to integrate most PAI indicators in their investment decision making processes or are relevant for their engagement strategies. Also, PAIs are better understood and known by customers than other elements of disclosure. The PAI themes on GHG, biodiversity, waste, water and social and employee matters are well understood also by retail customers. 3/ Consistency of the Sustainable Finance regulatory framework is key, especially with respect to the SFDR revision. PAI reporting under SFDR at entity level should be removed by group aggregated disclosure, i.e. upon (group aggregate) PAI disclosure under CSRD, the Art. 4 SFDR requirement for entity level disclosure should be deemed as complied with.			
Survey	Allianz SE	Insurance	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	The current target-setting guidance in E4 AR 26 is primarily oriented towards the real economy, focusing on direct actions such as habitat restoration or number of projects/sites, which are applicable to production sectors. However, for financial institutions, biodiversity targets are rather connected to portfolio alignment, sector inclusion, engagement targets, or impact reduction based on metrics disclosed by investees, emphasizing the shift of capital flows rather than direct operational control. Therefore, any guidance included in a revised AR 26 on target setting will struggle to capture the diverse requirements across sectors. Given this disparity, we suggest not including specific target guidance in the ESRS, allowing flexibility for each sector to define targets that are relevant to their unique roles and impacts on biodiversity and ecosystems.			
Survey	Allianz SE	Insurance	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Allianz SE	Insurance	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Own operations: We appreciate the inclusion of the term "usually" in paragraph 65, as it acknowledges exceptions to the general rule that the financial consolidation scope aligns with the own operations of the reporting undertaking. Additionally, we express our gratitude to EFRAG for incorporating paragraph 70 on leased assets, which highlights one of these exceptions. To enhance clarity and prevent misinterpretations, we propose two minor amendments: 1) Clarify that the exceptions mentioned in paragraph 70 are not exhaustive. We recommend adding the phrase "leased assets and other fully consolidated investments in real assets held solely for investment purposes" to paragraph 70. Alternatively, this addition could be included in the recitals to prevent the misunderstanding that paragraph 70 offers a comprehensive list. 2) Emphasize that the principle introduced in paragraph 70 is a universal principle applicable across all topical standards. In particular, it should be explicitly stated that the lessor should report emissions from leased assets as Scope 3 emissions, while the lessee reports these emissions as Scope 1 and 2.			
Survey	Allianz SE	Insurance	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Allianz SE	Insurance	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Allianz SE	Insurance	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Allianz SE	Insurance	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Allianz SE	Insurance	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Allianz SE	Insurance	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Allianz SE	Insurance	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Overall feedback to S standards: alignment with CSDDD: oConsistency and compatibility between CSRD and CSDDD needs to be ensured, othrough use of consistent definitions, osupport for risk-based due diligence and such processes qualifying as "actions" in the system of PAT in addition to preventive and remedial actions. oallowing different granularity of materiality in S1/S2/S3 to align with CSDDD principle of risk-based due diligence.			
Survey	Allianz SE	Insurance	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Allianz SE	Insurance	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Allianz SE	Insurance	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Allianz SE	Insurance	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Allianz SE	Insurance	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Allianz SE	Insurance	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The revised ESRS E1 address the user needs adequately. From a user perspective, we would like to share the following additional suggestions: 1)Topics not included in (both revised and old) ESRS that are useful/ needed from user perspective: - Engagement strategy and relevant engagement activities for all E standards - Information on direct and indirect public advocacy activities for E topics and how the company monitors and aligns these activities with its commitments, such as aligning with the objectives of the Paris Agreement (E1) and the Global Biodiversity Framework (E4). - G1: Information on company's exposure to high-risk activities or regions prone to corruption, involvement in ongoing corruption controversies, or allegations of unethical or illegal practices 2) Data points that are needed from user perspective that have been deleted in the revised ESRS: - Climate change: - Clear request for long term targets to 2030 and 2050: E1 34 d) "GHG emission reduction targets shall at least include target values for the year 2030 and, if available, for the year 2050. - Explicit commitment to Just transition (S1 AR 10) now moved into NMIG - Deletion of total GHG emissions data point (E1 44 d) – which is no effort for a company to report on but crucial for data providers and rating agencies. - Governance: ESRS G1-1.10 (c) ff. information on whistle-blower protection			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We welcome the simplification of material information as a key principle and the flexibility introduced by the top-down approach, including the focus on reporting IROs at the management level. Nonetheless, it's our view that the criteria for determining material IROs and related topics are unclear and clearer definition with illustrative example would be needed to avoid complexity and excessive granularity. Furthermore, ESRS 1 (paras 48 a), 48 b) and AR 19) encourages excessive qualitative assessment of IROs reducing the quality of DMA process, strengthening burdens for auditors since would require additional efforts to assess the sufficiency of the analysis performed by undertakings to reasonably conclude on IROs as material. Therefore, guidance is needed on when qualitative analysis alone is sufficient. We discourage the introduction of the DMA to all datapoints of ESRS 2, hard to be applied considering that ESRS 2 sets out general disclosure requirements that apply across sustainability topics and defines the undertakings' reporting process for the ultimate identification of material information to be disclosed. Contrariwise, we encourage including clear examples on how DMA can apply to all datapoints of ESRS 2. We discourage including non-material information in the sustainability reporting, as this would be against the principle of materiality and could result in obscuring material information. In addition, it will even increase burden for undertakings, as unhelpful practices of reporting non-material information will likely spread across preparers. If such information is nonetheless included, even though it is outside the mandatory framework, it is our view that this should not be subject to mandatory assurance. Finally, we note the wording included in some datapoints (i.e. "significant", "key", "major"), might cause confusion and inconsistent application among entities. We recommend replacing them with the word "material" to improve consistency with the concept of materiality of information.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	ESRS 1 para. 34-35 provide useful principles on considering remediation actions in assessing severity and likelihood of actual and potential negative impacts. However, ESRS 1 para. 35 references to "supportable evidence" raises doubts about whether mitigating and preventive actions without adequate evidence can be considered. Conversely, while Appendix C should focus on clear principles and examples, it is overly detailed, prescriptive and complex for preparers, causing varied interpretations. Indeed, there is no clear guidance on when the approach should be on a gross or a net basis. A notable concern is the differing treatment of one-off versus ongoing actions (impacts addressed by completed actions should be assessed after mitigation, while those requiring ongoing actions should be assessed before mitigation). This can lead to reporting bias, making static solutions seem more attractive, even if ongoing actions are more effective in practice. We therefore noted the following points of clarification: - in some cases, the treatment of the scenarios in the appendix C are inconsistent with our understanding of the ESRS 1 paragraph 34 and 35. To be noted that wave 1 undertakings mostly used gross approach in their first sustainability reports; -more guidance is needed on what constitutes 'significant ongoing actions', particularly the connection between policies and ongoing actions in AR12; -the definition of the baseline value against which past negative impacts need to be reported. Currently, these considerations apply only to impacts, not risks and opportunities. We recommend a general principle equally covering impact risks and opportunities, to ensure consistent application across the double materiality spectrum. We therefore disagree with the proposed modification and suggest providing clear and detailed guidance together with practical considerations, either directly within the body of the standard as Application Requirements, or alternatively in an appendix to the standard.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We agree with the inclusion of an "executive summary" at the beginning of the sustainability statement. However, it should be clarified that, if used, the executive summary shall adhere to principles of materiality and qualitative characteristics. Its content shall be fully supportable within the context of the entire sustainability statement and include only information already disclosed in detail elsewhere in the report. More criteria related to the structure and content of the executive summary are therefore needed also in light of the assurance. We disagree with the provision in ESRS 1 para 109 allowing the executive summary to be placed outside the sustainability statement, such as in another section of the management report. The executive summary shall be an integral part of the sustainability statement to help users navigate the report effectively. Given that the Association has expressed an unfavourable position on the digital tagging of sustainability information, it should be noted that the inclusion of the executive summary must also consider the implications of digital tagging required under the CSRD. The current tagging structure, as defined by the ESEF Regulation, does not support tagging by hyperlinked information outside the document itself. Finally, we disagree with the proposal to use appendices for reporting detailed information separately from key messages (except for taxonomy templates). The CSRD requires the sustainability statement to have a "binding" content within the management report. Allowing such flexibility risks undermining comparability amongst reports and may compromise the accuracy and completeness of the information. Furthermore, with reference to the connectivity with corporate reporting, the use of hyperlinks or appendices could reduce the overall clarity and understandability of information. It is also worth noting that financial reporting follows a strict and binding content structure, without such flexibility.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We agree with the proposed amendments to the ESRS; the simplification of general disclosure requirements, the reduction of mandatory data points ("shall"), the reorganization of mandatory and applicative content are positive elements that promote the understanding and applicability of the standards. Particularly, we support the introduction of General Disclosure Requirements (GDR), consistent with the intent to encourage reporting on IROs at the level at which they are managed and to discourage too granular information. However, we recommend further clarifying what is intended by reporting PATs on IROs at the level they are managed or for groups of IROs – without this, it would not likely be clear to an undertaking what is expected. We agree disclosing policies, actions, targets and metrics information at different level of aggregation (addressing its material IROs i.e. at topic or a sub-topic level). Following the removal of the MDR, the general disclosures could be structured by moving policies and actions into the Strategy area alongside ESRS 2 SBM 3, which already requires disclosure about the effects of IROs on an entity's strategy and how its strategy addresses or plans to address them, reinforcing the principle of reporting about policies at the strategic level. Furthermore we welcome the reductions of DRs in policies, actions and targets to eliminate redundancies and to improve clarity and overall readability as well as with the provision that the undertaking may disclose the information just once related to the same policies, actions, metrics and/or targets across more than one material impact, risk and/or opportunity (or topic), discouraging repetition or, in case of topics not covered by implemented PAT, presenting this information in a single place alongside the list of IROs (or topics) avoiding unnecessary repetition. Conversely, we suggest maintaining disclosure of a timing for adoption.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Extensive changes have been made to the overall structure, disclosure requirements and related guidance in a very short timeframe. While we observe that clarity has been improved, there is insufficient time to consider the implications across 12 standards. We welcome the principle that ARs are streamlined and do not include additional disclosure requirements but include (mostly) "shall requirements" needed to fulfil the objective of the DRs. However, the work to determine what should remain in ARs as 'shall' and what should be moved to NMIG was done in a very short timeframe. We recommend EFRAG validate that "hierarchy" is consistently applied across the standards and check: 1) all "shall disclose" ARs are embedded within the the standard after the related DR; 2) all "may disclose" datapoints have been deleted from mandatory material except for those gathered in NMIG or reformulated as supporting methodological elements within the standard without representing new information requirement; 3) using "shall consider" was one of difficulty in the first application; we recommend clarifying this language. As indicated in Q16, the content of the NMIG often addresses some relevant questions regarding the implementation of each topical standard and includes "how to report" guidelines and examples of possible items to cover when disclosing in accordance with a mandatory datapoint. For such reason, we suggest reviewing NMIG moving, to the extent needed, the most relevant illustrative and supporting materials within the body of the standard in association with the DR to which is related to and then removing the content from the NMIG: including part of such guidance within the standards could enhance clarity, while this additional guidance might be confusing. We believe disclosure requirements of the global baseline should be included as mandatory DRs/ARs in the ESRS to the extent they are consistent with the EU context.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We agree with the approach to include only the mandatory ("shall") ARs in the main body of the standards. We acknowledge that while some ARs are not designated as "shall" requirements, including certain "may" ARs included in the NMIG that can be useful to provide important application guidance for users. Indeed, the NMIG contains helpful materials such as support to the implementation questions and illustrative contents anchored to "mandatory" DRs/ARs which would be helpful to re-integrate on the main standards. Therefore, as a general observation, we suggest EFRAG reviews the NMIG to ensure it does not include guidance that goes beyond what is required in the mandatory DRs/ARs included in the main standards. Furthermore, we observe that moving some ARs into the NMIG does not always simplify the ESRS content, as these ARs often provide explicit and clear guidance linked to specific paragraphs. Moreover, past experience shows that developing such materials separately from the standards has caused confusion and difficulties in interpreting ESRS provisions - such as the Implementation Guidance on value chain and materiality assessment - and in disclosing mandatory information, jeopardizing the simplification effort. Given the above-mentioned considerations, we recommend a detailed review of the NMIG content to consider moving certain specific elements back into the standards and deleting the NMIG. Suggestions on what to re-integrate into the standards have been provided in the "Amended ESRS Exposure Draft July 2025 Public Consultation Survey Excel Template for comments on paragraph level". In case NMIG still remain as guidance for preparers, we recommend not to include it within the Delegated Act and we suggest EFRAG delay issuance of any NMIG after the ESRS are finalised by the European Commission, to allow EFRAG to update the guidance for additional points of interpretation or other questions that arise in the implementation process.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	While we recognise the need for relief for specific circumstances (such as impracticability of obtaining data, or challenges arising from new IROs or business transactions), we do not support the proposed new reliefs on removing the preference to use direct data and permission to report "partial scope" (for example, instead of using estimation), or excluding data on activities that do not significantly drive IROs: we are concerned that the introduction of these reliefs could undermine the usefulness of information to users, and encourage selective reporting. We do not think that such reliefs should be included as permanent provisions for preparers as we expect that over time there should be less needed to apply them as practice matures. Instead, we recommend the introduction of a general relief based on a principle that the undertaking explains why it could not make full disclosure in specific circumstances such as impracticability of obtaining data, or other specific circumstances, together with an explanation as to why the full disclosure could not be made and when the undertaking expects to comply in full. In relation to the relief on acquisitions and disposals, we welcome such flexibility as certain information may take longer to be elaborated and integrated within the strategy and the business model of the undertaking. However, such simplification might create a misalignment with the financial consolidation perimeter and other reporting. At this regard we suggest introducing specific provisions in relation to the timing of the acquisition/disposal (i.e. excluding an acquisition/disposal if occurred during the second half-year while including an acquisition/disposal if occurred during the first half-year). Finally, we disagree with the relief introduced by ESRS 1 para. 73 as reintroduces the requirement excluded at par. 72; furthermore, the definition of "significant event", "major" transactions and "available information" is too vague and uncertain.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We acknowledge the intention to provide relief for lack of data quality on metrics as a useful proportionality mechanism, in connection with both own operations and value chain metrics. However, we recommend introducing a clear definition and detailed explanation of "undue cost or effort", aligned with the concept reflected in IFRS S1, according to which "applying a requirement is impracticable when the entity cannot apply it after making every reasonable effort to do so". Practical considerations should include specific examples (e.g, when quantitative information rely on processes not yet implemented, or reporting metrics not required by regulations, or complex estimations needing external expert). This relief should also be time-limited, similarly to the existing ESRS 1 relief for 'value chain' datapoints. Such simplification risks reducing incentives to improve data availability, which is essential for transition objectives and providing useful information to users. Particularly, we disagree with ESRS para. 91, which allows the undertakings to use reliable direct or estimated data only for part of the reporting boundary or value chain if material IROs are identified. It should also be considered that the relief mechanism as currently envisaged and the concept of "undue cost or effort" may pose challenges for assurance providers in assessing whether the information omission is justified and in assuring partially estimated metrics. While we support targeted burden relief to keep reporting proportionate and achievable, we emphasise the need to maintain high standards of relevance and reliability to ensure quality sustainability reporting. Any additional relief for data quality should be clearly justified to prevent arbitrary or indefinite omissions.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	Information on anticipated financial effects is valuable to investors and has been identified to be integral to the global baseline. However, we recognise that this is a complex and difficult area for preparers and that practice is largely nascent. Therefore, we welcome the inclusion of a range of reliefs to ensure proportionate application of the requirements, consistent with the provisions of the ISSB standards. At this stage, we support Option 2 and an extention of the transitional provision in ESRS (Appendix C ESRS1), given the limited usefulness of quantitative data and the sensitivity of certain disclosures. Indeed, calculating and disclosing quantitative information for anticipated financial effects could provide little information value to investors, due to the lack of mature methodologies and the inability for many undertakings to measure them. Within the extent of Option 2, we suggest including specific requirements (for qualitative information) such as identifying line items, totals and subtotals within the related financial statements that are likely to be affected, or have been affected, by that risk or opportunity. At the end of the transitional provision, as practice matures, we support moving to Option 1 to achieve full alignment with the global baseline, subject to the development of guidance on appropriate methodologies on the presentation of anticipated financial effects.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	Considering the content of question 19, disclosures regarding anticipated financial effects, once fully implemented, are primarily intended for investors. Achieving global comparability is therefore especially desirable. Accordingly, we strongly encourage EFRAG to align these disclosures with ISSB standards. While we acknowledge the provision allowing for disclosure within a range, further enhancements are needed to facilitate interoperability. For example, differences in the treatment of mitigation when reporting monetary amounts or the percentage of assets exposed to significant physical risk would be likely to result in inconsistent reporting outcomes under the different frameworks, which may affect comparability. Further, we remain concerned that the revised requirements, particularly the inclusion of loan collaterals (E1.41(c)), may introduce unnecessary complexity—especially for entities lacking centralised data collection systems. We suggest relocating such details to illustrative guidance (i.e. NMIG). As with other standards, several terms require clarification. For example, the phrase "leverages on the process" in paragraphs 40(e)/41(g) of ESRS E1 lacks clear definition, creating potential challenges for consistent interpretation and auditability. We recommend either clarifying or removing such requirements. Finally, the use of "aligned" in paragraph 42 in reference to business activities and climate-related opportunities appears unduly restrictive and may be difficult to substantiate or audit without further guidance. The current language also does not sufficiently address how potential adverse impacts should be reported in relation to opportunities. We encourage providing a clearer definition of "aligned" and addressing the treatment of adverse impacts. Overall, while we support the efforts already made towards simplification, further revisions are needed to ensure clarity, practicality, and global comparability in disclosures.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We do welcome the amendments presented to align the provisions and avoid unnecessary differences between the ESRS and the ISSB. Particularly, despite the difference in materiality perspective which was not changed (ESRS relies on double materiality - in contrast to IFRS that relies on financial materiality only) the concept of the "materiality of information" has been reinforced (ESRS 1 Chapter 3.1 new par. 21) becoming a general filter for the reported information, meeting users' needs and expectations and aligning to ISSB. Some existing differences related to the ESRS E1 and ISSB S2 have been addressed, such as the revision of the languages to adopt the same terminology of ISSB (i.e. transition plans, resilience, internal carbon pricing, anticipated financial effect/opportunities); the removal of MDR would permit EFRAG to align the content areas with the ISSB's approach. However there remain some differences: some disclosure requirements and reliefs/proportionality mechanisms have partially been brought into the proposals, but not fully or without the complete accompanying application guidance; furthermore, the allowance for the inclusion of non-material information (ESRS 1 para. 108), if confirmed, would undermine the core principle of materiality - the cornerstone of ESRS - and could weaken interoperability with the ISSB standards; some of the information required by ESRS E1-11 are additional with respect to ISSB S2. Failure to achieve the greatest possible alignment between ESRS and ISSB standards would be contradictory with the objective of reducing the reporting burden. Consideration should be given to undertakings that will be required to disclose under both frameworks, as well as the difficulties to obtain exemptions for subsidiaries in jurisdictions with mandatory ISSB application. Considering some misalignments will inevitably persist, we believe it's essential to update the interoperability guidance to provide concrete support for preparers applying both the frameworks.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	We believe that the reduction of mandatory datapoints proposed in the EDs is an acceptable compromise between the objective of simplification and the information needs of users of the sustainability report.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	22.E1.	Comments on deleted datapoints in ESRS E1	I agree	We believe that the reduction of mandatory datapoints proposed in the EDs is an acceptable compromise between the objective of simplification and the information needs of users of the sustainability report.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	22.E2.	Comments on deleted datapoints in ESRS E2	I agree	We believe that the reduction of mandatory datapoints proposed in the EDs is an acceptable compromise between the objective of simplification and the information needs of users of the sustainability report.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	22.E3.	Comments on deleted datapoints in ESRS E3	I agree	We believe that the reduction of mandatory datapoints proposed in the EDs is an acceptable compromise between the objective of simplification and the information needs of users of the sustainability report.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	22.E4.	Comments on deleted datapoints in ESRS E4	I agree	We believe that the reduction of mandatory datapoints proposed in the EDs is an acceptable compromise between the objective of simplification and the information needs of users of the sustainability report.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	22.E5.	Comments on deleted datapoints in ESRS E5	I agree	We believe that the reduction of mandatory datapoints proposed in the EDs is an acceptable compromise between the objective of simplification and the information needs of users of the sustainability report.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	22.S1	Comments on deleted datapoints in ESRS S1	I agree	We believe that the reduction of mandatory datapoints proposed in the EDs is an acceptable compromise between the objective of simplification and the information needs of users of the sustainability report.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	22.S2	Comments on deleted datapoints in ESRS S2	I agree	We believe that the reduction of mandatory datapoints proposed in the EDs is an acceptable compromise between the objective of simplification and the information needs of users of the sustainability report.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	22.S3	Comments on deleted datapoints in ESRS S3	I agree	We believe that the reduction of mandatory datapoints proposed in the EDs is an acceptable compromise between the objective of simplification and the information needs of users of the sustainability report.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	22.S4	Comments on deleted datapoints in ESRS S4	I agree	We believe that the reduction of mandatory datapoints proposed in the EDs is an acceptable compromise between the objective of simplification and the information needs of users of the sustainability report.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	22.G1	Comments on deleted datapoints in ESRS G1	I agree	We believe that the reduction of mandatory datapoints proposed in the EDs is an acceptable compromise between the objective of simplification and the information needs of users of the sustainability report.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We believe that the decision to add new mandatory datapoints to ESRS E3, ESRS E4 is acceptable. On the specific proposal to require mandatory disclosure of a transition plan for biodiversity and ecosystems if such a plan exists, we are concerned by difficulties in assessing whether an undertaking plan would be considered a "transition plan" (as opposed to an extension of strategic policies, actions and targets). If mandating disclosure, we think it is important that the standards include within the glossary the definition of transition plan for biodiversity and ecosystems. With regard to the proposal to add to ESRS G1 a mandatory datapoint that provides for the separate indication of the participants to the training activity, we believe that this change does not add relevant information, entailing a burden both for preparers in the collection of detailed information, especially within groups, and, consequently, for assurance providers who must then verify the information provided". Regarding the proposal to add to ESRS G1 a quantitative mandatory datapoint on confirmed incidents of corruption and bribery, we recommend that the definition of corruption and bribery be better clarified in particular when the company operates in different jurisdictions. We also recommend clarifying what constitutes a "confirmed incident", in case of more than one level of judgment.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	In general, we consider the proposal to add new mandatory datapoints acceptable; however, we note the need for further action on the changes introduced to the Disclosure Requirement DR ESRS E2-4 and DR ESRS E5-4. With reference to DR ESRS E2-4, we note that paragraph 16 requires to provide information on secondary microplastics resulting from the degradation of the reporting entity's products; however, neither paragraph 16(c) nor paragraph 16(d) mention the secondary microplastics produced by the entity itself but only refer to the downstream value chain. We recommend that EFRAG reconsider this limitation and consider extending these datapoints to its own operations as well. With reference to the introduction of the new requirement in paragraph 15(c) of ESRS E5, we note that this datapoint can be difficult to apply in practice for entities operating outside the EU. The definitions of 'critical and strategic raw material' refer to EU legislation that identifies them according to EU political priorities. It is not clear how an entity with operations outside the EU should apply these definitions. In addition, the indicator may be difficult to calculate and considerations relating to the confidentiality and sensitive nature of the information requested are likely to be raised. It would be desirable that, alternatively, the new requirement be removed, or that its application be clarified directly in the standard.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	We disagree with introducing the principle of "fair presentation" as it does not represent an element of simplification in the implementation of the standards. Quite to the contrary, it may increase efforts and costs for preparers (including with respect to assurance costs) and add complexity in assessing and disclosing material topics and information beyond what the standards require - in a context where information is not limited to primary users/investors, as it is in the case with the ISSB standards. The CSRD is built on a compliance-based model, and not on the principle of fair presentation as in financial reporting. If the EU legislator intended to apply the " fair presentation" principle also to sustainability reporting, it would have done so as explicitly as with financial reporting. In addition, introducing a fair presentation framework would imply an assurance conclusion that is inconsistent with the CSRD requirements. The concept of fair presentation sometimes is not well understood in practice which might lead to the gross misconception that fair presentation is "less than compliance". It should also be considered that if the fair presentation requirement is applied broadly to all relevant stakeholders, the scope of information to be disclosed in the sustainability statement could become virtually unlimited. For these reasons, we strongly recommend removing all references to fair presentation in ESRS 1 and clarifying that the purpose of the sustainability reporting is to ensure the compliance with the CSRD and of ESRS. We consider such approach fully appropriate in the context of the existing legal framework; furthermore, it has to be taken into account that sustainability reporting is still significantly less mature than financial reporting and requires further education for preparers and all players involved before the notion of "fair presentation" is sufficiently stabilized.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We consider acceptable the proposal to exempt financial entities from the obligation to report GHG emission reduction targets if they have only set emission intensity targets. We believe, in fact, that the reporting of objectives expressed in absolute terms implies the use of complex estimates and, therefore, difficult to verify them. In addition, the targets expressed in absolute values by financial entities would risk being misleading as they may result in double counting, especially with reference to scope 3 emissions. In addition, requiring disclosure of absolute value targets when an entity has only set intensity targets requires the entity to perform additional analysis solely for the purposes of the disclosure, which might not produce meaningful information to users. In this perspective, we believe that reporting only on the objectives expressed in terms of intensity may be sufficient to provide relevant information for users of the sustainability report of financial entities.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	We agree with the change in the threshold for reporting data at the individual country level in the DRs ESRS S1-5 and S1-7. The new approach, which includes the 10 countries with the highest number of employees (provided that each has at least 50 employees), ensures greater representativeness of information. We consider that this change will provide more transparent and easily interpretable data for stakeholders, contributing to a more effective communication; at the same time, it ensures the completeness of information by limiting the possibility of excluding countries in which the company/group is present with a significant number of employees. We are aware that, in some cases, the change could lead to an increase in the number of countries to be reported, resulting in greater efforts in data collection and preparation. However, we believe that the benefit in terms of transparency and availability of relevant information outweighs the additional burden, especially considering that such data is generally already available within companies and therefore easily accessible.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	We agree with all three critical points raised by EFRAG SRB members. On the other hand, we believe that the request for alignment/reference of collective agreements or estimates on the minimum wage mentioned in points i), ii) and iii) with the ILO principles can represent a guarantee of the adequacy of the calculation methodology adopted. However, the methodology for the calculation of adjusted wages as amended and defined in § AR 22 (b) of ESRS S1 is not entirely consistent with the objective of the DR as it allows the use of the statutory minimum wage established by legislation or collective agreements, provided that these are reviewed and take into account the ILO principles on wage determination. Moreover, the reference to be used is not entirely clear, since § AR 22 (b) mentions the "ILO principles on wage determination" in point (i) of the paragraph, and the "ILO principles for the estimation of a living wage" in point (ii). It is therefore useful to clarify the methodology (e.g. ILO) to be used, to strengthen the guarantee of adequacy and ensure the correct application of the calculation, and to develop more guidance in order to make these references effectively used by companies in a consistent manner. Given the complexity of the issue and the fact that a benchmark for the appropriate salary is not always available, it is recommended to emphasize, within the DR, the importance of providing sufficient qualitative information to explain the methodology applied. Finally, we believe that the field test envisaged to assess the adequacy and applicability of the methodology is a necessary exercise, especially if implemented on a large scale, to include as many exceptional cases as possible. This will help to verify the correctness of the methodology adopted or, possibly, to highlight the critical application issues.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	We agree with the approach taken for the integration of SFDR PAIs into the ED ESRSs. Reducing data points can simplify reporting without compromising investors' information needs. For example, the consolidation of human rights in a single data point (ESRS 2 GDPR-P) is consistent with the UN Guiding Principles (UNGP) and the OECD Guidelines, making information more relevant and accessible. We agree that this simplification facilitates data collection and reporting, without excluding elements that are significant for SFDR. It also highlights the link with human rights policies, making the topic more understandable for both companies and external stakeholders. At the same time, we believe that the transparency and reliability of information, particularly on human rights, has been strengthened, without compromising the purpose of the SFDR. However, to further improve the effectiveness of the system, we suggest some additional interventions: •Greater granularity: provide more specific guidance on when to disaggregate data by stakeholders (e.g., employees, workers in the value chain, community, consumers). •Operational support: provide a connection table between the ESRS datapoints and the SFDR indicators, to facilitate alignment and understanding. •Ensure that all PAIs in Table 1 of EU Reg 2022/1288 are included among the mandatory datapoints; the same specific obligation could instead be exceeded for the PAIs in Tables 2 and 3 of EU Reg 2022/1288) where they are not already covered by other datapoints of the amended ESRS. These elements would help to ensure a balance between simplification, transparency and information relevance, strengthening the consistency of the system with the objectives of European legislation.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	We acknowledge that the requirements in E4-4 have been largely removed, and that the purpose of AR 26 is to provide methodological guidance on what biodiversity and ecosystems-related targets can cover. We support the inclusion of methodological guidance, either in application requirements or illustrative guidance. We recommend that reference is made to established market practices and guidance, especially where methodologies from the Science Based Targets Network (SBTN) exist for freshwater, land, and ocean targets. Science-based targets, as defined by the SBTN, are measurable, actionable, and time-bound objectives grounded in the best available science. Companies should be encouraged to apply leading external frameworks—such as the SBTN guidance for land and biodiversity, the Kunming-Montreal Global Biodiversity Framework (GBF) targets, and the Taskforce on Nature-related Financial Disclosures (TNFD) target-setting guidance.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	The total elimination of the voluntary datapoint on the adjusted gender pay gap reduces the analytical capacity and meaningfulness of the information, especially in cases where the unadjusted measurement alone is not able to adequately represent specific situations — for example, in the presence of large differences in the composition of the workforce or national contexts. Therefore, instead of considering the voluntary nature of such requirement in NMIG, since not binding in nature, we propose including such requirement in the ESRS standard, in line with the current ESRS S1. For this reason, we propose that the adjusted indicator be maintained at least as a voluntary or alternative methodology, to be used if the unadjusted is not applicable or not sufficiently representative. In this way, a balance could be found between the need for simplification and transparent information. To this end, it would be necessary to provide more guidance on the calculation methodology to be applied for the adjusted gender pay gap, to ensure greater comparability and reliability of the information reported.			
Survey	ASSIREVI - Association of the Italian Audit Firms	Auditor	Italy	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	The revision of ESRS G1, with the deletion of paragraphs 14 and 33(a) on payment practices and their replacement with PAT provisions and the new paragraph 33(b) dedicated to SMEs, leads to a significant reduction in transparency on aspects relevant to SMEs, such as cash flow stability. Reducing the number of data points from 4 to 2 limits the level of detail available, generating partial information that lacks context and a clear methodology. While this simplification may ease the burden on SMEs, it risks reducing the responsibility of large companies towards SMEs. Moving datapoints in PAT provisions can also lead to confusion, as it does not offer clear objectives or structured criteria for reporting, making it difficult for external stakeholders to correctly interpret the published data. The state of play of the 2024 reports showed a lack of comparability of the indicator relating to payment practices; therefore, it would be necessary to define a standard methodology to be applied. We believe that the current provisions alone can lead to narrative disclosures that are too generic, with a low degree of verifiability and comparability. To ensure consistency with the objectives of the CSRD, in particular the effective protection of SMEs, it would be appropriate to reintroduce clear and measurable indicators, proportionate to the effort required to preparers, and integrate them with the new regulatory provisions.			
Survey	ICAEW	Auditor	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	We acknowledge that more prominence has been given to the materiality of information as a general filter. This is welcome. It helps to clarify the reporting purpose and will be an important improvement over the existing standards. However, while the text of the revised standard appears simpler, in our view the underlying assessment remains complex. We believe that EFRAG could more clearly articulate the DMA process. The process could be explained with reference to the definition of materiality in the ISSB Standards so that preparers better understand the differences between the two approaches in practice. We also suggest the use of diagrams is explored to help communicate the concept more clearly and reduce the risk of differences in interpretation. We note that there are requirements, for example the reporting metrics required by ESRS S1 Own Workforce, which appear more prescriptive than we would expect from a principles-based approach under a fair presentation framework. The fact that these requirements introduce reporting thresholds (i.e. a breakdown by country for those countries in which 10% or more of the undertaking's employees are located) appears inconsistent with an emphasis on the materiality of information as a general filter. We are concerned that, as a result of the above, the application of ESRS will be treated by preparers as more as a compliance exercise than one where materiality is at the forefront of decisions about what to disclose. If so, this is likely to diminish significantly the usefulness of the information disclosed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ICAEW	Auditor	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	We suggest that EFRAG revises paragraphs 34-36 of ESRS 1 and the accompanying guidance in Appendix C, which we find to be overly complex and difficult to interpret. We have also heard concerns that the comparability of information disclosed by companies within the same industry sector could be undermined as a result of preparers interpreting the standard in different ways. We would like to see a clearer set of principles that help preparers consider how to address mitigation actions and allow for the application of judgement in respect of fact and circumstances. We suggest that EFRAG considers possible simplification though the alignment of ESRS requirements with the interpretation given by the ISSB's Transition Implementation Group (TIG). This concluded that judgements about whether to disclose information about risk mitigation activities should be based on whether omitting, misstating or obscuring such information could reasonably be expected to influence the decisions of primary users. EFRAG may also want to consider this in the context of risks and opportunities as well as impacts.			
Survey	ICAEW	Auditor	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We find the standards (commenting on ESRS 1 and ESRS 2 only) to be an improvement from the existing ESRS and are particularly pleased to see the removal of 'may disclose' datapoints, as well as the relocation of the 'shall disclose' datapoints to the main body of the standard. The fact that there have been significant changes to the standards, however, means there could be unintended consequences and new questions of interpretation (as raised in our answers to Q11, Q12, Q25). We urge EFRAG to carefully consider all feedback received.			
Survey	ICAEW	Auditor	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	Ultimately, we would strongly favour the use of ISSB Standards as a baseline for the ESRS, whereby amendments and additions are made for requirements over and above the ISSB's global baseline. This would help to simplify the standards, reduce unnecessary divergence, and enable users to more clearly understand the reporting of sustainability information. Although this approach has not been taken forward, we believe there is still significant scope for greater alignment and suggest this is prioritised to reduce complexity and confusion for both preparers and users. We are particularly concerned by the proposed reliefs that would result in new and significant interoperability differences and suggest that these are reconsidered. We would also like to see greater alignment in the following areas: •ESRS 1, paragraph 21. The language used to define material information is similar but not the same as the ISSB's language, resulting in questions over interpretation. •ESRS 1, paragraph 28. The setting of qualitative and/or quantitative thresholds to determine IROs is likely to constitute a fundamentally different approach to the ISSB. •ESRS 1, paragraph 34 –36. The gross versus net considerations regarding impact materiality may benefit from being aligned with the ISSB's TIG interpretation on the matter to reduce confusion. •ESRS 2, paragraph 23 on anticipated financial effects. We would like to see requirements here aligned as closely as possible with the ISSB Standards, including with IFRS S1 paragraph 37(b) that requires an entity to use an approach that is commensurate with the skills, capabilities and resources that are available to the entity. •ESRS E1, AR19-20, GHG emission boundary – instead of mandating a single financial control approach, we would prefer interoperability to be prioritised and call for full alignment with the approach in GHG Protocol/IFRS S2 provisions.			
Survey	ICAEW	Auditor	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We consider that ESRS should be a fair presentation framework and are supportive of amendments to clarify this. However, we note that the language used to describe what is meant by fair presentation differs from the ISSB's definition. We would support full alignment with the ISSB's language, which mirrors the financial reporting definition and is therefore widely understood. We also suggest that EFRAG reviews the implications of clarifying the fair presentation framework within the context of other requirements. For example, requirements to provide entity-specific information is already embedded within the fair presentation requirement (as it is in the ISSB Standards), and is therefore difficult to understand why it remains a separate requirement. Similarly, it is difficult to understand how the proposed relief regarding the reporting of acquisitions and disposals interacts with the fair presentation framework. We would expect that a reporting entity that makes a material acquisition or disposal during the year should disclose sustainability information related to that acquisition under a fair presentation framework. We accept that it may be difficult to acquire that information at the same level of detail as businesses owned for a full year but would expect that reasonable estimates should be possible and that uncertainties associated therewith could be disclosed and, where necessary, restated later. This would more closely mirror fair presentation requirements in financial statements.			
Survey	IBAT	NGO	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. 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More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	The proposed changes do not go far enough to resolve the core issues with the DMA process: the vague definition of materiality, the complex language and requirements that add unnecessary burden. The ESRS should focus solely on the ESG factors explicitly mentioned in the CSRD. Notably, social reporting standards should be based only on the 24 social and human rights factors specified in Art. 29b para 2 lit. b) of CSRD. The social sub-topics listed in the ESRS ED, such as privacy, adequate housing, water, and sanitation, remain problematic because they have no explicit basis in the CSRD. The wording in amended ESRS 1.21(b) on information materiality is a major concern as it could unintentionally expand reporting obligations. The current text states that information is material if it is "necessary for users... to understand the undertaking's material impacts, risks and opportunities". This definition is too unclear; it does not specify user knowledge or provide clear criteria for what makes information "necessary". To fix this, we recommend defining information materiality based on the concept of "decision-usefulness," a familiar principle from financial reporting. The criterion in ESRS 1.21(a), which currently applies only to financial reporting users, should be extended to all users to create a consistent framework. Additionally, the Appendix C of ESRS 1, are unnecessarily complex and should be removed. More accessible and explicit guidance is needed to ensure a consistent and efficient process that does not require excessive resources for the DMA itself.			
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	No, we do not agree that the new guidelines sufficiently clarify how to consider remediation, mitigation, and prevention actions in the DMA. Instead of simplifying the process, the guidance adds significant complexity, which could lead to overreporting and leaves companies at the discretion of auditors. Appendix C, while intended to address the gross versus net impact, is overly detailed and may not be feasible for companies to implement without manual solutions. We propose a more flexible approach that allows for the integration of effective mitigation actions and controls. It remains unclear when a mitigation or prevention action is considered "significant," which leaves companies without clear criteria. This ambiguity may force companies to report a high number of potential negative impacts, even if they are non-material, and risks undervaluing the strategic role of regulation. It is also unclear whether globally valid guidelines remain acceptable as a mitigating factor under ESRS 1 para 36.			
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The proposed amendments introduce some positive changes that improve the structure and user-friendliness of the standards. Grouping Disclosure Requirements (DRs) and Application Requirements (ARs) together enhances readability and coherence. Additionally, the explicit option to include an executive summary and use appendices improves the structure and readability of reports. The introduction of the "undue cost or effort" relief is a crucial step towards providing companies with the necessary flexibility to address practical reporting challenges related to data collection, value chain scope, and metrics. While these changes are welcome, they are viewed primarily as clarifications of existing options rather than substantial simplifications that lead to significant relief in implementation effort or reporting complexity. The duplication of information remains a concern, particularly within the Policies, Actions, and Targets (PAT) sections, and this must be addressed consistently in the design of future disclosure requirements. For the amendments to truly promote more relevant and concise reporting, they must focus on simplifying the underlying requirements themselves, not just the presentation of the final report.			
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I disagree	Despite the efforts, the amendments fail to deliver significant relief in practice, especially for social standards. For instance, the number of Disclosure Requirements (DRs) in ESRS S1 was only reduced by one, and this was only achieved by merging two standards rather than by genuinely simplifying the content. We believe the current structure maintains an unnecessary level of complexity. The cross-references required throughout the topical standards to the General Disclosure Requirements (GDR) from ESRS 2 should be removed to streamline the process. Furthermore, the repetitive disclosure for communication channels regarding policies, which is reiterated across ESRS S1 to S4, should be either removed or at least streamlined within ESRS 2 to avoid duplication and reduce the reporting burden.			
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I disagree	The amendments fail to simplify by introducing new obligations and definitions that complicate reporting. For example, the requirement of the "top 10 countries" breakdown in social disclosures introduce additional, often unclear concepts across the standards. The changes expand the scope and granularity of disclosures in certain areas. This is evident in removal of the term "severe" for human rights incidents in social standards. This change could force companies to report on a wide range of incidents, rather than focusing on the most critical cases, which contradicts the simplification goal. The proposed social standards, in particular, offer only limited relief and fail to genuinely simplify the reporting process. This undermines the stated objective of reducing the administrative burden on companies.			
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Eliminate the Non-Mandatory Implementation Guidance (NMIG) to avoid implicit obligations under a non-mandatory status. If retained, it must remain outside the Delegated Act.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The introduction of the "undue cost or effort" relief is a critical step towards acknowledging the practical challenges of sustainability reporting. This measure provides much-needed flexibility for companies when collecting data, particularly for metrics and value chain information. We also support the relief for a lack of data quality, which allows for partial scope reporting while requiring companies to disclose actions for future improvements. Despite these positive changes, the amendments still fall short of providing sufficient relief. The definition of "reasonable" effort is open to differing interpretations, which could lead to disagreements with auditors. Clearer, more specific guidance is needed to ensure consistent application and to prevent a new source of complexity. Further simplification is essential for supply chain reporting. Companies should be required to report only on their own targets, actions, policies, and metrics. Data from the supply chain should be required only to the extent that it directly relates to the company's own commitments. Companies should not be obligated to collect detailed, granular data from suppliers or customers, as this is often not feasible or proportionate. The relief measures should also apply to smaller subsidiaries (e.g., those with fewer than 50 or 20 employees). These subsidiaries face similar challenges as SMEs in gathering sustainability data, and their inclusion in relief provisions would significantly reduce the burden on corporate groups.			
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	While we support the general principle of the data quality relief, it does not strike an acceptable balance for social standards and is too limited in its scope. We consider the proposed relief to be a practical and necessary addition. It acknowledges the real-world limitations many preparers face, especially in complex areas such as value chain reporting. We generally support the newly proposed relief for lack of data quality as outlined in ESRS 1, paragraph 91. However, we suggest extending the relief in paragraph 92 to also include relevant metrics under ESRS S1-S4. This would promote consistency across reporting requirements and further reduce complexity in cases where operational control is limited. The reason for excluding these standards from the relief is not apparent. Furthermore, the relief lacks clarity and presents interpretation risks, as there is still potential for disagreement with auditors on what constitutes a "reasonable" effort to improve data quality. The standards must also set realistic expectations for ESG data, particularly from extended value chains, as it will never reach the same level of precision as financial data.			
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	We disagree with both Option 1 and Option 2. We believe the requirement for disclosing anticipated financial effects should be removed entirely. These disclosures are neither feasible nor reliable for reflecting a company's financial situation and pose serious legal risks related to financial statements. The underlying data for these disclosures is often unclear, and risks cannot be reliably isolated. This makes any form of disclosure—whether narrative or numeric—legally risky and prone to misinterpretation. Adding such a speculative requirement to sustainability reporting is inconsistent with established financial practices, as there is no comparable requirement for "anticipated financial effects" for non-ESG topics. For many non-listed companies, this information has limited relevance and is not decision-useful for stakeholders. The projections are highly subjective, which would likely reduce comparability across firms rather than improve it. Furthermore, quantitative disclosures of long-term financial effects are inherently speculative, uncertain, and resource-intensive, especially for family-owned or privately held companies. If the requirement is retained, Option 2 must be fully aligned with ISSB requirements to ensure interoperability and avoid creating additional burdens for companies that report on both standards.			
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	We strongly oppose both quantitative and qualitative disclosures of anticipated financial effects. From our perspective, there is currently no reliable method to link specific climate-related risks or opportunities to financial metrics like assets, liabilities, or revenue. The complexity and lack of integration between sustainability and financial systems make such quantification impractical. Without this linkage, even qualitative disclosures carry significant legal uncertainty and risk of misinterpretation. Comparability across organizations is also limited due to unclear guidance on the level of detail for such disclosures. Capital market participants typically rely on standardised models and data, which are not meaningfully enhanced by inconsistent, company-specific disclosures. The practical use of such granular data remains questionable and does not justify the significant effort required from companies. We therefore advocate for the reporting of anticipated financial effects to be either deleted completely or made entirely voluntary.			
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	No, we do not agree that these exceptions are appropriate and justified. The move of six "may" datapoints to "shall" contradicts the EU's simplification agenda and unnecessarily increases the reporting burden by introducing more binding requirements. For example, mandating the disclosure of training for the procurement team in ESRS G1 10(c) is questionable. In our view, this datapoint does not necessarily create significant added value, as the assignment of responsibilities within a company can be highly individualized. The focus should remain on key positions in terms of compliance training, rather than prescribing specific teams.			
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We do not support the introduction of new data points. They impose significant additional effort on reporting entities without a corresponding increase in decision-useful information. We demand careful consideration of the cost-benefit ratio of expanding disclosure requirements, as the current framework already places substantial demands on preparers.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	We are concerned that the introduction such a principle may not lead to simplification and could increase legal risks and audit costs, particularly for sustainability reporting where practices are less mature. Adopting a fair presentation framework will be difficult for auditors, making it harder for them to demonstrate due diligence. This principle is less familiar to non-finance employees, which could lead to uncertainty and inconsistent application within companies. The explicit requirement for fair presentation could significantly increase the responsibilities of Board members regarding the sustainability statement. If interpreted broadly, this could create an open-ended obligation, making the scope of disclosure virtually unlimited and increasing the risk of litigation if stakeholders challenge the adequacy of disclosures. Unlike financial reporting, the boundaries of fair presentation are much less defined in the context of sustainability, which complicates the verification of first-wave reports, especially given the lack of a common European sustainability audit standard. In practice, the principle may not provide a significant additional benefit, as disclosures are already largely determined by the materiality analysis itself.			
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I would like to skip this question and provide my feedback in Part 3				
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The methodology fails to provide clear guidance on how to deal with subnational agreements outside the EU, which is essential for consistent application. More detailed information is required on the benchmarks to be used for calculating adequate wages within the EU, particularly when national or sectoral agreements differ. Without these clarifications, the comparability of wage disclosures will remain limited across companies and regions. Additionally, the methodology's reliance on whether the statutory minimum wage accounts for ILO wage-setting principles is problematic, as these principles are not relevant to the estimation of living wages. ESRS must not turn voluntary international instruments into mandatory reporting tools for companies.			
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	This disclosure requirement does neither help nor simplify implementing the reporting obligation as set in the CSRD in a meaningful way and hence is considered superfluous and disproportionate. Despite the CSRD requirement of "equal pay for work of equal value," the focus of the reporting standard is on the unadjusted pay gap, which obscures the fact that equal work is already paid equally within companies, especially when covered by collective agreements, as is required by law. The unadjusted gender pay gap is a false indicator that fails to reflect pay discrimination. Its calculation is based on a general consideration of all employees and ignores important factors such as work experience, job type, sector, and qualifications, which distorts the reporting.			
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	We do not support the inclusion of SMEs as a separate category in the disclosure of standard payment terms. This approach is problematic for two main reasons. First, the definition of SMEs varies across different national legislations and often relies on a combination of several parameters, which makes a unified reporting requirement complex and impractical. Second, companies are already compliant with their respective national legal requirements concerning payment terms for SMEs, which makes this additional disclosure redundant. Instead of adding reviving disclosure burdens, the standards should focus on providing a clear and principles-based framework for reporting on supplier relationships that avoids such unnecessary and complex breakdowns.			
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The proposed amendments do not sufficiently address the significant implementation problems inherent to the social standards. The number of disclosure requirements has been reduced by only one, which was achieved by merging two standards rather than by genuinely simplifying the content. Companies will continue to face major hurdles in providing the required disclosures due to lack of data, non-uniform methodologies, legal hurdles, high costs, a lack of comparability, and sensitive information. A primary challenge is the lack of uniform methodologies for social reporting, which undermines the comparability of data. For instance, in social protection, companies often report on compliance with national legal requirements that vary widely, making direct comparison impossible. The same problem exists with metrics like the gender pay gap, where the focus on unadjusted numbers can obscure the fact that equal pay for equal work is already a legal requirement. This approach is not applicable to the logic of most companies, which use a monthly or yearly earnings basis, not gross hourly earnings. Furthermore, the standards fail to provide a practical framework for handling sensitive information and legal hurdles. Disclosing data on disability inclusion, wage equity, and diversity is complex and can be subject to privacy regulations. This can also be considered commercially sensitive. The high costs associated with collecting, verifying, and reporting this information are disproportionate to the decision-useful insights provided to stakeholders. These issues demonstrate that the social standards have not been sufficiently simplified and leave companies with an immense burden.			
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The proposed disclosure requirements for workers in the value chain are disproportionate and go far beyond the requirements set by the CSRD. The standard requires companies to collect detailed, reliable data on a vast number of workers in their value chains, which can include millions of individuals across multiple countries. This is practically impossible and goes against the principle of proportionality. For instance, it is unreasonable to expect companies to assess the effectiveness of communication channels for all value chain workers or to collect data on whether they trust these processes. Mandating such far-reaching co-determination and third-party influence on company structures interferes with the right to entrepreneurial independence and fundamental freedom of decision-making. National laws already provide numerous opportunities for workers to report grievances, and imposing additional channels only creates more bureaucracy without adding value. Many workers in the value chain are independent entrepreneurs, so there is no thorough transparency about their workforce beyond basic compliance with human rights and labour standards. The standards need to show greater consideration for the level of leverage that companies have in reality. In practice, reporting can only be done in a more general way, based on a risk-based approach focused on material issues.			
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The standard remains overly granular and prescriptive in certain areas, leading to a significant administrative burden. The definition of "affected communities" is still too broad and leaves disproportionate room for interpretation. For example, the definition neglects that communities in the supply chain can extend across different geographical borders or have different social affiliations. Furthermore, the standard's focus on non-binding international instruments, such as the OECD Guidelines for Multinational Enterprises, is a concern. These frameworks are not meant as corporate policy instruments, and making compliance with them obligatory or a de facto standard is not acceptable. While we call on companies to adhere to the UN Guiding Principles on Business and Human Rights, this must be in line with the clear division of responsibilities between states and companies. Requiring companies to report on their compliance with legal requirements has no added value. In addition, the communication of policies to affected communities in the supply chain may be challenging in practice, for example, due to issues of literacy or indigenous languages at times without a written language. Therefore, the standard should specify whether the policies themselves are required to be communicated or whether their relevant content should be communicated in an accessible way.			
Survey	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	While we support the objective of increasing transparency, the proposed amendments to ESRS S4 are still not aligned with the CSRD and fail to simplify reporting. This standard uses the term "consumers and end-users," which is not consistent with the CSRD's focus on "customers" and the management of relationships with them. This topic is inadequate as a sector-agnostic disclosure as a requirement for all companies, as it risks raising the reporting burden significantly regardless of the company's sector. In addition, reporting on compliance with legal requirements has no added value, as the entire lifecycle of products and services is already regulated by law, and companies already demonstrate compliance. Then the standard is not consistent with the principle of voluntariness for CSR frameworks. While many companies already have governance structures based on voluntary frameworks like the UN Guiding Principles and the OECD Guidelines, making compliance with these frameworks obligatory is unacceptable. These are not meant to be corporate policy instruments. Adherence to the UN Guiding Principles must also respect the division of responsibilities between states and businesses, as clearly highlighted in the UNGPs.			
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Double materiality is essential and must remain at the heart of the ESRS framework and European Union sustainability regime for corporate reporting to be credible and useful. The principle of "materiality of information" is concerning since it introduces a further filter for companies to not report information. For example, it represents a step backwards from ID-177, which says that most S1 metrics must be reported if S1 Own Workforce is material. It is essential to maintain the principle of fair presentation in the reporting standards. It is positive that the revision of the AR 16 list of topics has maintained all of the sub-subtopics for S1 + S2. These are based on the list of social topics in the CSRD and should all be maintained. The emphasis on aggregation (as opposed to disaggregation) is concerning, as disaggregated information (both site-specific and country-specific) is key to understanding the distribution of IROs.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	It is important that companies report not just their net impact – the gross impact should be reported, and the recommended text preserves this principle.			
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The proposed changes are helpful. However, para 113 is difficult to understand: "113. If the description of the material impacts, risks and opportunities prepared in accordance with [Draft] Amended ESRS 2 IRO-2 is not presented alongside the respective policies, actions and targets, the undertaking shall make explicit which policies, actions and targets relate to which material impacts, risks, or opportunities, in accordance with paragraph 22." Para 22 addresses the issue of appropriate aggregation or disaggregation of information on material impacts, risks and opportunities and their management, without setting any rules regarding the location of such disclosures depending (or not) on the level of aggregation.			
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The Exposure Draft removes duplications between the cross-cutting and topical standards. The preservation of the 4-part architecture in the social standards is important to respect the distinctiveness of different affected stakeholder groups. However, we have two critical concerns. First, the original DR in environmental standards concerning screening of sites in materiality assessment were replaced by an application requirement to ESRS 2 IRO-1. This in effect makes transparency on this aspect optional. Consideration of local context is a key element of an appropriate materiality assessment. This should be both recognised in Chapter 3 of ESRS 1, and in ESRS 2 IRO-1, which should include an explicit datapoint on how the undertaking screened its locations and value chains. We welcome that E standards provide a clearer reference on the importance of disaggregation of disclosures, but this can only be done well if locations are properly screened. Second, we strongly recommend adding an explicit reference to the disclosure of relevant, entity-specific metrics directly in S standards. The fact that S2, S3 and S4 do not include any metrics should not imply that entity-specific metrics for S topics should not be disclosed.			
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The "may" (voluntary) data points should not be eliminated. In many cases they are "shall" in GRI standards, so it is important to keep them to align with GRI standards. Also, many of them were originally proposed as mandatory by EFRAG to the EC. The first wave of reports show that many companies have reported some "may" data points. Retaining them would help ensure standardization/comparability between company reports. Almost all of the datapoints for non-employee workers are voluntary, thus most datapoints for this vulnerable group of workers has been lost. Also, important datapoints on full time versus part time workers has been eliminated.			
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	S1	It is concerning that mandatory guidance in the Set 1 ESRS has been downgraded to "non-mandatory". Mandatory guidance is key to ensuring comparability and completeness of sustainability reporting. At a minimum, Non-mandatory Implementation Guidance (NMIG) should be included in the Delegated Act, and ideally called Mandatory Implementation Guidance. A major point of concern is that ID-177, which provided guidance that most S1 metrics should be reported if S1 Own Workforce is material, has now been downgraded into NMIG. Instead, EFRAG should preserve and promote the guidance that most S1 metrics shall be reported.			
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	As a whole the reliefs go too far, overshooting the balance between cost/effort and transparency. There is a danger of enabling green/social washing. The relief for "undue cost or effort" is too vague thus leaving too much room for interpretation. The relief for direct data for value chain reporting is too extensive, as direct data is key for transparency. The relief for reporting on operations which are not "significant drivers of IROs" also opens up too much leeway for interpretation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	These combined reliefs overshoot the balance between transparency and cost/effort and risk enabling green/social washing. At a minimum, there should be a time limit introduced for these reliefs on value chain metrics.			
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ability to estimate financial effects is critical for the undertaking's ability to integrate sustainability into its business strategy considerations, planning and risk management. It is also key for the determination of financial materiality, including in terms of overreporting topics as financially material. Reporting on financial effects is crucial to achieving the objective of putting sustainability reporting on the same level as financial reporting and integrating both. The European Union has recognised the value of a double materiality approach to corporate reporting which requires disclosure of both material environmental and social impacts, risks and opportunities as well financially material data, It is important to keep the requirement on businesses to analyse and understand the financial effects of their business model. This will ensure investors have access to credible data as well as providing the underpinning for future business planning.			
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	ESRS reliefs should not go beyond those set in IFRS. The principle of fair presentation needs to be protected to provide transparency on all material IROs. As noted in the response to question 15, it is also important to consider interoperability with GRI when considering changes to the ESRS, rather than only considering ISSB's standards.			
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	22.S1	Comments on deleted datapoints in ESRS S1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The reduction in the number of mandatory and voluntary datapoints goes far beyond striking an acceptable balance. As mentioned above, the voluntary datapoints should be maintained to provide alignment with GRI, which is currently in the process of strengthening its labor standards, as well as guidance and standardization for companies reporting more than just the mandatory datapoints. An explicit quantitative goal of 50%+ reductions was never set by the European Commission for EFRAG. A number of S1 datapoint metrics have been eliminated which should be reinstated: •S1-5 Employees: gender breakdown for zero-hour employees •S1-8 Diversity: age distribution; •S1-10 Social protection: reinstatement of retirement •S1-12: Training and development: gender breakdowns, •S1-13 Health and safety: fatalities from ill-health for non-employees and other workers on site; •S1-14 Work-life balance: employees that took family related leave;			
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Adding a datapoint on training of the procurement team is needed to support the implementation of human rights in the supply chain. The addition of a datapoint on confirmed incidents of bribery is needed to improve transparency on the effectiveness of bribery/corruption policies and measures.			
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Agree that the following mandatory datapoint should be added: ESRS 2 General disclosures – BP 1 the undertaking shall state that the general requirements of ESRS 1 have been applied for the preparation of its sustainability statement			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	The "fair presentation" principle is essential to reduce the risk of green/social washing, as it emphasizes the full disclosure of all material impacts, risks and opportunities and their management. It is not understandable why this principle is under attack, as it is included as one of the general principles of the Accounting Directive.			
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	It is essential that financial institutions disclose absolute targets to assess how their strategies align with the economy-wide transition to net zero. Absolute targets are relevant for users of sustainability statements and for understanding the real-world climate impact of financed activities. While intensity measures provide insights into efficiency, they can mask rising absolute emissions in growing portfolios or sectors. Granting an exemption would also undermine fairness in a sector-agnostic standard. Other industries could equally argue for exceptions based on their own difficulties, reducing comparability across sectors. Moreover, absolute financed emissions are already recognised in existing standards and regulations: the SBTi financial sector net-zero standard, the UNEP FI/NZBA recommendations, and EU SFDR all require or encourage absolute emissions disclosure. Exempting banks would risk misalignment and reduce the usefulness of reported data for stakeholders, including asset owners who depend on it for their own disclosures.			
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The "top 10" threshold for reporting country-level data on employment, collective bargaining and social dialogue is a major improvement over the current 10% employment threshold. An analysis of the first sustainability statements from Wave 1 companies shows that the current 10% threshold results in country-level disclosures on as little as 21% of total employees. More country-level information is needed to understand the distribution of impacts across countries, as well as whether employment thresholds for specific labour rights have been exceeded. The new threshold does not require additional effort/cost by companies, since they must gather country-level data anyways to calculate the global figures. Furthermore, it does not result in extra datapoints, since the information currently is (and can be under the revised ESRS) reported as one table.			
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	An analysis of the first year ESRS reports shows that most companies are simply reporting that they pay minimum wages, whereas the intention (as outlined in the ESRS Basis for Conclusions) is that companies should be enabled to disclose commitments to paying a wage "sufficient to support themselves and their families in dignity" as well as the extent to which they do this. This shows that the methodology for non-EU countries needs to be changed. Furthermore, the new ILO agreement on a methodology for living wages needs to be taken into account. While the proposed new methodology takes a step forward in both regards, two key changes are needed: •The methodology for reporting on 'adequate wages' should measure actual wages against an adequate/living wage for all employees, not only those within the EU. In particular, for employees outside the EU, the methodology should allow employees' actual wages to be measured: oA) against the local legal minimum wage only when this is set in line with the ILO principles on estimating living wages; or oB) against living wage estimates that are set in line with ILO principles on estimating living wages. •Companies should be able to rely on local legal minimum wages or living wage estimates when the authorities or organisations that set them provide public evidence of their alignment with the ILO principles for estimating living wages. Furthermore, the transitional provision for the EU needs to be reinstated, as not all Member States have transposed the Adequate Minimum Wage Directive.			
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	The new, simplified framework makes it easier for companies to report on these SFDR-related matters in a way that corresponds to how their policies are set. For users, this consolidation makes it easier to locate the relevant information. However, the SFDR datapoints are very helpful and should only selectively be amended.			
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	The unadjusted gender pay gap should be kept as mandatory, since the methodology for calculating it is clear. The adjusted pay gap figure as voluntary. In practice many companies are reporting both figures, which is useful for improved transparency. However, since the methodology for calculating the adjusted figure is not standardized, the unadjusted should be kept mandatory.			
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS 1: As detailed above, cumulative impact of the various reliefs is concerning.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS 2: The improved language on DMA is welcomed, including on the engagement with workers' representatives.			
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS S1: The proposed "top 10" threshold for the reporting of country-level information for employee headcount, collective bargaining and social dialogue is a significant improvement over the current 10% employment threshold. Country-level information needs to be reported in more detail, and on other metrics as well, in order to have more transparency on the distribution of impacts across countries. In the metrics, voluntary datapoints need to be reinstated as well as the datapoints on gender breakdowns, workforce age distribution, etc. detailed above need to be reinstated. The proposed new methodology for adequate wages outside of the EU also needs attention, and the transition language for EU member states needs to be reinstated, since the Adequate Minimum Wage Directive has not been implemented in some Member States. We would also like to reiterate our longstanding demand for including franchise workers in the S1 definition of own workers, as well as the need for sector-specific standards to supplement the Set 1 sector-agnostic standards.			
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS S2: We are concerned that the loss of many specific datapoints related to workers in the value chain will mean that disclosures about material impacts, risks and opportunities become more generic and have less information about the specific stakeholder groups because specifications about the level of granularity have been deleted. Many of the points that are being deleted from ESRS S2 had originally been included because they reflected effective practice in relation to improving supply chain labour rights, for example, AR 6 awareness of the impacts on value chain workers from an undertaking's strategy or business model, AR 20 illustrating how the perspectives of value chain workers have informed specific decisions or activities of the undertaking and AR 25 which looks at retaliation and whether workers can use grievance mechanisms confidentially.			
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS S1, S2, S3, S4: An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS S1, S2, S3, S4: An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	SZEF - Szakszervezetek Együttműködési Fóruma	Trade union	Hungary	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The definition of own workforce should be expanded to include franchise workers. The term "non-employees" should be supplemented with the phrase "non-employee workers" or "non-employee workers in own workforce".			
Survey	Global Legal Entity Identifier Foundation	Other - please specify (required)	Switzerland	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The Global Legal Entity Identifier Foundation (GLEIF) welcomes the simplification of the European Sustainability Reporting Standards (ESRS) to make sustainability reporting more manageable for companies while maintaining its objectives under the EU Green Deal. Background on the LEI The Legal Entity Identifier (LEI) is a 20-character, alpha-numeric code based on the ISO 17442 standard which connects to key reference information that enables clear and unique identification of legal entities. Its quality and availability as a public good are maintained by GLEIF on behalf of the Regulatory Oversight Committee (ROC) composed of seventy supervisors worldwide, including the European Commission (EC). The role of the LEI in supporting ESRS Although the current simplification efforts do not address identification, GLEIF believes that the use of the LEI can further streamline reporting under the ESRS: - Interoperability: The LEI can support interoperability between financial and non-financial data of companies, enabling seamless linkage across datasets. This is particularly valuable for double materiality and the value chain disclosures, which require consistent entity identification across different jurisdictions and sectors. - Reducing fragmentation: By embedding the LEI into sustainability reports, companies can reduce reconciliation errors and manual data matching. Each entity becomes uniquely and globally identifiable, simplifying the process of aggregating and comparing data. - Enhancing automation and analytics: Use of the LEI facilitates automated data processing and advanced analytics, supporting regulators and investors in the development of climate risk models and supply chain impact assessments. - Global alignment: Integrating the LEI into disclosures supports the ESRS's ambition to remain interoperable with global frameworks, and aligns with recommendations from the Financial Stability Board to use the LEI in climate-related financial disclosures. Conclusion By incorporating the LEI, the ESRS can further reduce complexity, enhance data reliability, and ensure its continued global relevance in sustainability reporting.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ZIA | Zentraler Immobilien Ausschuss e.V.	User Association	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Appreciation of Simplification Efforts The German Property Federation (ZIA) expressly welcomes the fact that EFRAG has initiated simplification processes for the ESRS and issued corresponding exposure drafts. This initiative demonstrates the necessary awareness of the challenges faced by market participants in implementing the CSRD and their wish to reduce effort and complexity. In practice, it has become clear that implementing the detailed reporting requirements entails an excessive burden that is no longer proportionate to the benefit. As a result, companies risk diverting already scarce resources into producing reports instead of allocating urgently needed capacity to in-house climate action tasks such as identifying measures, project planning and technical implementation. The ESRS exposure drafts must ensure that the administrative burden of sustainability reporting does not remain disproportionate. Protection Against Regulatory Circumvention We view as particularly critical the risk that reliefs from the CSRD omnibus are undone through the back door via banking reporting requirements. Not only large companies, but also small and medium-sized enterprises are affected when information demands are passed along the value chain. The so-called trickle-down effect should be limited. The standards achieved in the simplified ESRS must not be undermined through other regulatory channels. Positive Examples and Requests As a positive example, we refer to ZIA's work on practicable sustainability KPIs for the real estate industry, which has developed practice-oriented and focused approaches for the sector. We call on EFRAG, when finalising the simplified ESRS, to consider: •Focus on material data points rather than exhaustive completeness •Take into account the capacities of real estate companies •Protect against the trickle-down effect onto smaller and medium-sized enterprises The sustainability transformation will only succeed through proportionate, focused standards that free up resources for actual emissions reduction.			
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Despite the welcome simplifications for the double materiality assessment, the burden faced by companies already report based on ESRS will not change significantly in the short term. 2. This is a valuable clarification for companies in streamlining the reporting and reducing the audit burden. 3. Some of the wordings lack clarity and invites interpretation, which could create divergent approaches between reporting companies and might cause discussions with the auditor. In particular: 3.2 (22): "The information shall be presented either at topical level or at impacts, risk and opportunity level". It should be clarified that presenting data at either the IRO or topic level should be acceptable. •3.3.1 (34): "Actual impacts in the reporting period include both newly arisen impacts and those persisting from previous periods". The lack of specification over how many previous periods should be included leaves far too much room for interpretation. Companies should have the ability to pragmatically assess material impacts from previous periods that remain relevant, in line with a more principles-based approach. The sentence should be removed. •Par. 30/AR6 – Identifying (and assessing for severity and likelihood) whether impacts occur that may be connected to an undertaking's products through multiple tiers of the value chain remains a requirement that cannot practically be executed. We recommend focusing on tier-1 value chains and reporting only if there's sufficient confidence about the impact's occurrence, severity, and likelihood. 4. Confirmation is needed that "non-material" information should not be subject to the assurance regime applicable to the CSRD. 8. We agree on using reasonable, supportable information without undue cost or effort, but it's unclear how this aligns with Chapter 3.7. The level of aggregation or disaggregation should be determined by the level most relevant to the material IRO.			
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The approach proposed by EFRAG appears complicated. Excluding all mitigation actions from the assessment of impacts in the reporting period could result in over-reporting. Preparers could report many potential negative impacts that are not material due to low likelihood and severity. This seems to differ from how IROs are managed, e.g. in bank's risk reports (risk is material after considering mitigating actions). We recommend that credible mitigating and remediating actions (e.g. backed by implemented/decided policies, budgets, action plans) are always factored in to provide useful information to users.			
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We generally welcome the increased flexibility introduced through the proposed amendments to the ESRS Sustainability Statements. The possibility of including an executive summary and the emphasis on using appendices to separate detailed information from key messages can be helpful steps toward improving readability and structure. The option to include non-material information, if presented clearly, is a good step to maintain continuity for stakeholders. However, we understand these changes primarily as clarifications rather than substantial simplifications. From our perspective, they do not result in significant relief in terms of implementation effort or reporting complexity. We do not consider that the removal of data points can be considered deletions, as they were duplicated in the first place. Additionally, certain disclosure requirements continue to be embedded in application requirements, which could benefit from further reduction efforts. Please ensure that that application requirements don't consist of any disclosure requirements.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The restructuring of the architecture and the clarified interaction between ESRS 2 and the topical standards enhance the overall readability and usability of the standards. The simplification of the General Disclosure Requirements, the reduction of mandatory datapoints for policies, actions, and targets (PATs), and the removal of overlapping topical specifications contribute to a clearer and more accessible framework. The shift towards a more principles-based approach and the ability to report PATs at a higher aggregation level reflect a pragmatic and proportionate response to the challenges identified during the first-time application. This supports more effective and relevant sustainability reporting while maintaining the necessary level of comparability and transparency. However, we do not agree to maintain the requirement to disclose which topics are not covered by PAT. This would lead to 'empty' information, which contradicts the ESRS revision purpose. However, some changes introduce behavioral requirements. ESRS 1, Paragraph 84c requires adjusting the base year of the target following a major acquisition or disposal. This constitutes a behavioral requirement, contradicting Paragraph 5 stating that "the ESRS do not mandate behavior but set Disclosure Requirements[...]". Moreover, this is inconsistent with the possibility of investments or divestments being part of the business strategy to achieve the target. Regarding the presentation of metrics and monetary amounts, the requirement to adjust the base year and the comparative information provided following "major acquisition or disposals" is unclear and potentially problematic. For example, there are no criteria for assessing what is a "major" acquisition or disposal, and the phrase "adjust the base year" is not clear in whether it is referring to adjusting the base year or the value associated with that base year in relation to presenting progress against targets. We recommend that "major" be revised to "material" and "adjust the base year" be clarified by including "value".			
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We broadly agree that the proposed amendments will improve the clarity and accessibility of the ESRS. The removal of "may disclose" datapoints and the clearer separation between mandatory and non-mandatory content contribute to a more structured and comprehensible standard. However, we would recommend eliminating all the unclear terms like "shall consider" "may present", "may implement", "may include" and other ambiguous terms. These should be avoided and clarified in order not to create confusion and avoid misunderstandings with the auditors. The revised layout—particularly the relocation of mandatory Application Requirements, directly under the relevant Disclosure Requirements—makes the legal text easier to follow and reduces the need to navigate back and forth within the document. However, while the structure and readability have improved, the overall reporting requirements remain largely unchanged. As such, the simplification primarily supports better orientation within the standards rather than reducing the reporting burden itself. Moreover, we would like to flag that new mandatory disclosures have been added – clearly against the request of the EU commission and the aim of the revision to reduce reporting burden. Additional mandatory data points should be removed completely. Furthermore, it is not helpful to have mandatory requirements as part of the application requirements as these could easily be missed when checking the completeness of the CSRD narrative against the "shall" disclosure requirements. Instead, the suggestion is to include mandatory disclosure requirements as part of the main body of the standard. For mandatory application requirements, it should be made clear that if evidence needs to be kept showing that we followed the mandatory application requirements. The mandatory application requirements also consists of certain "may" or "shall consider" requirements. These should be omitted for the CSRD report without keeping an audit trail.			
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We consider the introduction of Non-Mandatory Illustrative Guidance (NMIG) and its exclusion from the Delegated Act a useful addition to the ESRS framework. The separation of mandatory and non-mandatory content improves the structure and readability of the standards. NMIG can serve as an orientation tool—especially for preparers in the early stages of implementation—by illustrating how disclosures might be structured or interpreted in practice. We recommend: •That the non-binding nature of NMIG remains clearly communicated and consistently understood by both preparers and auditors. •That there should be no implicit expectation that the examples provided must be followed or justified if not applied. •An explicit statement saying that the NMIG cannot be used for audit purposes and the separation of the NMIG from the legislative text would support this. •Avoiding guidance that references external standards, instead embedding directly into the standard setter's guidance itself. •The guidance should be fully aligned with the standards themselves and subject to robust due process in its development, to ensure it does not have unintended consequences, further complicated principles-based standards, and/or add to reporting burden. Otherwise, the intended simplification effect could be undermined by new uncertainties or perceived pressure to align with the illustrative content. Nonetheless, we view the "Flowchart for determining disclosures under the ESRS" to be very useful when it was a part of ESRS 1. We suggest reinserting this.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	We strongly welcome the proposed burden reliefs as a meaningful step toward reducing the complexity and effort in ESRS reporting. 1.The "undue cost or effort" relief is particularly valuable, offering prepares a practical way to justify omissions or limitations when data collection would require disproportionate resources. However, it may increase the burden of proof if auditors challenge whether sufficient effort has been made to fulfill reporting requirements. 3.We appreciate the removal of the systematic preference for direct data in value chain metrics. Allowing estimates based on practicality and reliability better reflects the current state of data availability and maturity across the value chain, reducing effort in future reporting cycles. While these reliefs do not change the scope of reporting obligations, they provide greater flexibility in how requirements can be met and documented, supporting a more proportionate ESRS implementation. We invite greater clarity on when and how the relief applies to ensure that auditors do not request mandatory disclosure subject to relief. However, we do not agree with the exception for Scope 3 GHG emissions. Value chain information should not be mandatory for any metric, as it often relies on estimations that lack reliability and consistency. 6.The amendments made to the anticipated financial effects do not solve the issue of data availability and reliability, as assumptions for this data point will vary so widely that any comparison between companies would be misleading. 7.Regarding the proposed relief for acquisitions, the one-year timeframe for integrating (or excluding) a subsidiary for sustainability reporting purposes is often insufficient and unrealistic. Greater flexibility should be offered to disclose metrics once the subsidiary is fully integrated. It should be clarified that reliefs do not contradict fair presentation, allowing companies to protect sensitive information without being pressured by auditors to report under this clause.			
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We consider the proposed relief to be a practical and necessary addition. It acknowledges the real-world limitations many preparers face, especially in complex areas such as value chain reporting. The relief ensures that data collected for reporting is robust and reliable. Forcing the collection of weak data undermines 1) high quality reporting, 2) comparability, 3) avoiding legal risks linked to the disclosure of unreliable metrics and 4) might lead to distorted or misleading representation of the information. The relief helps companies to tackle the current lack of methodologies for some indicators and bridges preparers until methodologies are available. A relevant issue is the reporting of SVHC and SHC substances. Due to the highly specific nature of European chemical legislation, reliable data collection is currently feasible primarily within Europe. The relief allows us to transparently report metrics based on a partial scope e.g., limited to European operations, while outlining actions to improve coverage over time. We support allowing companies to exclude joint operations they don't control from environmental metric calculations (E2-E5). However, we seek clarification on the definition of "joint operations." We also support extending this relief to E1, aligning with the flexibility to disclose only "reasonable and supportable information available without undue cost or effort." We support not imposing a time limit on this relief, allowing organizations to decide when to take action. In cases like chemical data collection, expanding scope may only be possible if non-European regulations align with EU standards, which is beyond a company's control and cannot be planned within a fixed timeframe.			
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	We strongly oppose both quantitative and qualitative disclosures of anticipated financial effects. The underlying data is often unclear, and the risks cannot be reliably isolated due to a lack of mature and established methodologies, making any form of disclosure - whether narrative or numeric - legally risky and prone to misinterpretation. Such information lacks comparability and does not offer decision-useful insights to report to users from our point of view. Moreover, IFRS already define when future risks must be reflected in financial reporting, e.g. through recognition and measurement criteria. Sustainability reporting should not override or extend these principles through financial disclosure requirements in the sustainability statement. We therefore recommend that this disclosure requirement be removed entirely or made explicitly optional. It should also be noted that even for a qualitative statement on anticipated financial effects a quantitative assessment needs to be done. Also, qualitative information is subject to a high level of uncertainty but there is less likelihood of unjust comparison. This begs the question of what use this information could have for any stakeholder, esp. capital market participants.			
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	We strongly oppose both quantitative and qualitative disclosures of anticipated financial effects. From our perspective, there is currently no reliable method to link specific climate-related risks or opportunities to financial metrics like assets, liabilities, or revenue. The complexity and lack of integration between sustainability and financial systems make such quantification impractical. Without this linkage, even qualitative disclosures carry significant legal uncertainty and risk of misinterpretation. Comparability across organizations is also limited due to unclear guidance on the level of detail for such disclosures. Capital market participants typically rely on standardised models and data, which are not meaningfully enhanced by inconsistent, company-specific disclosures. The practical use of such granular data remains questionable and does not justify the significant effort required from companies. We therefore advocate for the reporting of anticipated financial effects to be either deleted completely or made entirely voluntary. It is crucial not to require the disclosure "before considering adaptation/mitigation actions", as this would not add value for readers and does not reflect how business strategy is defined. In fact, mitigation actions are often embedded within the strategy, structural in nature, and linked to multiple risks. Therefore, it would be overly complex and unreliable to conduct a hypothetical exercise calculating monetary amounts that are neither estimable nor dependable. For less technical readers, such assessments could be misleading, especially since they are not accounted for in the financial statements.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	1.Fair presentation in the ISSB standard pertains only to financial materiality, so extending this concept could create problems (see question N. 25). There is unclear guidance on prioritizing user needs when conflicts arise between financial and non-financial users. For example, excessive disaggregation can increase the reporting burden and reduce usefulness. The ESRS should address such conflicts, prioritising primary users (e.g., investors). 2.IFRS allows for any GHG boundary to be used while the use of financial control is made mandatory by the ESRS, failing to align to the GHG Protocol. To ensure greater alignment with IFRS companies should be provided the flexibility to choose the boundary in line with the GHC Protocol. 3.The relief clauses introduced by the simplified standard are welcome and needed by preparers however the timeline for proposed revision for Level 1 remains unclear. 4.It is very important to maintain these additional reliefs because in the ESRS we go beyond climate aspects, where methodologies are less advanced, and these clauses are needed. 5.Agree 6.Therefore, we support the reference to SASB Standards and IFRS Industry-based Guidance as a source of possible disclosure to enhance transparency and interoperability with ISSB standards. 7.Agree 8.Agree In order to assure more interoperability with IFRS, EFRAG could also add reliefs on (1) commercially sensitive information and (2) commensurate with skills, capabilities and resources available. Ideas for additional improvements: •Ensure that all climate-related financial disclosure elements in IFRS S2 (e.g. financed emissions, use of carbon credits, resilience analysis) are clearly cross-referenced in ESRS E1 or, where appropriate, explicitly scoped out to avoid interpretative gaps. •Provide an interoperability mapping that shows, datapoint by datapoint, how ESRS requirements correspond to IFRS S1/S2. •Where ESRS include EU-specific concepts clarify how these complement rather than contradict ISSB disclosures.			
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	We acknowledge and welcome the improved structuring and consolidation of the ESRS requirements. The clearer separation and grouping of datapoints, especially the removal of voluntary datapoints and the streamlining of narrative PAT disclosures, enhances the usability of the standards. However, we would like to emphasise that the reduction in the number of datapoints does not necessarily translate into a proportional reduction in the substantive reporting scope or effort. In our view, the overall scope and complexity of the disclosures remain largely unchanged. The deletion of datapoints primarily affects how requirements are presented, not what is required. This means that preparers will still need to collect and disclose a substantial amount of data, and the core reporting obligations are largely preserved. The deletion of duplicated datapoints does not represent a reduction in effort. Based on the Exposure Draft, we do not expect a significantly reduced reporting volume under the amended ESRS. Instead, the changes may help reduce effort in data collection, documentation, and coordination with auditors. For example, the introduced options for burden reliefs may simplify internal discussions and reduce the need to justify the omission of non-material items. It is important that this distinction is clearly communicated: while the number of datapoints has decreased, the underlying disclosure obligations remain intact. This will help manage expectations and avoid misinterpretations regarding the actual simplification impact of the amendments. Moreover, we do have strong concerns regarding the new mandatory disclosure requirements that have been introduced and would request deleting them all to fulfill the purpose of the revision of the ESRS.			
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We strongly disagree with the introduction of new mandatory datapoints that have not been proven necessary. Adding untested requirements at this critical stage poses a significant liability to the strength, coherence, and successful implementation of the CSRD. It contradicts the simplification mandate and risks undermining reliable sustainability reporting. We do not agree with the decision to make "Nature of incidents" and "Number of incidents" within ESRS G1 paragraph 14 (confirmed incidents of corruption and bribery) mandatory. Firstly, making additional quantitative datapoints mandatory will increase burdens. Quantitative data collection requires IT development or manual reporting, which are costly and time consuming. Secondly, the "may" provision for such sensitive data points allowed for necessary discretion. The specific context of each incident, might not be adequately conveyed by a simple numerical count or a brief description. The focus should be on the effectiveness of management systems in preventing and addressing corruption, not a potentially reductive tally of past failings. G1 Training datapoint will add complexity as companies evaluate the risk exposure of functions individually and then derive training needs from that. In cross-functional training settings it is close to impossible to derive that information. This data point should not be made mandatory. For G1 paragraph 14, it's unclear how materiality should be assessed—by monetary value or other criteria? What incidents need reporting (e.g., court decisions)? This datapoint should also be deleted.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We strongly disagree with the introduction of new mandatory datapoints that have not undergone comprehensive testing by "Wave 1" companies. Adding untested requirements at this critical stage poses a significant liability to the strength, coherence, and successful implementation of the final CSRD. Specifically, we strongly object the inclusion of ESRS E2-4. This requirement is entirely unworkable, unmeasurable, and un-auditable for several fundamental reasons: 1.Beyond company control: secondary microplastics primarily occur post-consumer, primarily due to UV radiation, abrasion, and biological degradation, outside the company's control. 2.Impossibility of data collection: it is currently impossible to estimate how many of a company's products end up in the environment as there are no established or practical methodologies to reliable estimate the volume of secondary plastics releases in the environment. 3.Auditability concerns: without robust and standardized data collection methods, reported figures on secondary microplastics would be speculative and unverifiable, creating challenges for auditors and undermine the credibility of the reporting process. Moreover, we must not underestimate that new concepts intended to provide relief, such as "fair representation", "Gross Vs Net" or the need to amend the base year for targets in case of major acquisition are all new concept, which will introduce further complexity for preparers adding further burden not linked to these specific datapoints. there are other examples of new requirements that should be eliminated. For instance: •ESRS E5-4, para. 15 (e) percentage of sustainably sources materials by total weight. •ESRS E1-2 para. 19: introduces 'spatial resolution'. •ESRS E1-3 para. 21 c): asks for the ability to adapt strategy and business model to climate change over time. •ESRS E1-5 para. 24 c): introduces more challenging provisions on financial resources for climate change actions. •ESRS G1-2 para. 10 c): extends the training activities beyond corruption and bribery.			
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We welcome the explicit inclusion of the fair presentation principle within the ESRS, as it reinforces the standards' purpose of supporting relevant, decision-useful sustainability reporting rather than checklist-driven compliance. This principle should be interpreted alongside the criteria for material information in ESRS 1 Par. 21a, aiming to ensure that only material information is reported. Both fair presentation and materiality assessment should focus on the usefulness of information to the report's intended users. By emphasising fair presentation, the ESRS framework encourages preparers to exercise professional judgment, prioritizing disclosures that truly enhance transparency and accountability. This reduces unnecessary reporting efforts, especially when justifying the omission of non-material datapoints. However, several issues arise. The "fair presentation" concept needs a precise definition to avoid subjectivity and minimize audit burden. Without clear guidance, it risks undermining the DMA's methodological rigor. Past experiences with similar concepts in national audit standards (such as "représentation fidèle") show that auditors can use vague terms to challenge sound DMA conclusions, leading to subjective debates on materiality that are not aligned with the prescribed framework. Additionally, this ambiguity could pressure companies into disclosing voluntary datapoints ("may disclose"), which may then be deemed necessary by auditors for "fair presentation," effectively making them mandatory. This contradicts the goal of materiality-based reporting. Furthermore, fair presentation could increase Board members' accountability for the Sustainability Statement. They must ensure not only compliance with standards but also that the information is presented fairly to all relevant stakeholders. While fair presentation is well-established in financial reporting, its boundaries in sustainability reporting are less defined, creating a grey area that could lead to litigation if stakeholders dispute the adequacy of the provided information. We recommend that "fair presentation" be explicitly defined as a filter to taking into consideration the specific business model and activities of the undertaking.			
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We acknowledge the challenges faced by financial institutions in setting absolute climate reduction targets. Much of the GHG accounting for FIs is spend-based, meaning increased financing can lead to higher reported absolute emissions, creating both a disincentive and a practical hurdle for target-setting. Nevertheless, absolute emission targets are essential for meeting global climate agreements. Relying only on intensity targets can obscure overall emissions increases as business expands. Financial institutions play a key role in driving absolute reductions in the real economy. As such, rather than viewing this as an exception, the focus should be on developing more robust and refined methodologies for FIs to measure and report absolute financed emissions, ensuring meaningful disclosures that align with global decarbonization goals.			
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	Some our members disagree with the assertion that the change to the threshold for country-by-country disclosure in ESRS S1-5 and S1-7 will result in a limited burden due to the easy accessibility of information. While the intent to gather more granular data is understandable, this change will, in many cases, significantly increase both the reporting requirements and, crucially, the audit scope. Additionally, this extra level of detail may not always be relevant. Shifting from a "50 employees and 10% of total headcount" threshold to reporting for the "top 10 largest countries by employee headcount (if >50 employees)" will expand the number of countries for which many multinational companies must disaggregate data. Each additional country introduces distinct challenges in data collection. More importantly, this expanded reporting directly increases the audit scope. Sustainability reporting, especially social data like employee characteristics and collective bargaining, requires thorough verification. Gathering and validating this data across multiple jurisdictions, each with its own labor laws, data systems, and cultural differences, is far from "easily accessible." It involves understanding local HR systems, ensuring data consistency, and verifying compliance with country-specific regulations—an intricate process requiring significant auditor resources and time. Thus, the claim of limited burden is misleading. This change will add to the complexities and costs of both preparing and auditing sustainability statements, potentially slowing the assurance process and placing a substantial new burden on companies and auditors. We strongly suggest the inclusion of an additional option to avoid additional increases, to only mandate disclosure until the first of either threshold is hit. So, either 10% or the top 10 – whichever causes least burden.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	We recognise the critical importance of ensuring adequate wages globally. However, we have significant concerns regarding the proposed benchmark hierarchy for non-EU wages in ESRS S1 AR 22. The current hierarchy, which places living wage datasets as a "last resort," undermines comparability. It permits companies to report against statutory minimum wages that may be insufficient, resulting in inconsistent and incomparable data. This hampers stakeholders' ability to make fair assessments of a company's social impact. We propose revised wording for AR 22, para. 32. For reporting outside the EEA, the first step should require an "adequate minimum wage" rather than a "statutory minimum wage," and it should align with the definition of adequate wages in Directive (EU) 2022/2041. Without this adjustment, comparability will be impossible, as some companies will report on 'minimum wage' while others will report on 'adequate wage.' It is essential to have a single, authoritative reference for defining an adequate wage. Allowing companies to choose different providers could lead to inconsistent and non-comparable disclosures, ultimately compromising data quality. Creating a common database of adequate wages for all companies to refer to is critical. This would ensure comparability across jurisdictions and reduce the burden on companies in determining what constitutes an adequate wage in each country where they operate. Moreover, we anticipate that an extensive workload could emerge from the following phrase "periodically reviewed/adjusted every two years and takes into account the ILO wage setting principles." Indeed, as the indicator covers the entire workforce, an assessment would have to be conducted in all countries of operation to check the fulfilment of these two new criteria. Furthermore, should a company operate in different sectors of activity, it might have several collective agreements to check within a single country. Ultimately, this could lead to hundreds of checks to be performed.			
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	Yes, we should always consider the importance of feasibility and coherence in reporting according to different legislations. As such, removing some of the SFDR datapoints is clearly appropriate, the ESRS simplification will need to better co-ordinate with the required three yearly review of the SFDR.			
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	It would not be appropriate to reinsert the AR 26, considering that the methodologies for defining biodiversity targets are not yet well defined and are often site-specific. Furthermore, in the absence of a mandatory biodiversity standard, we do not see the opportunity to refer to specific frameworks (which are still voluntary). The risk would be that each company could adapt these standards to its own needs by making reporting incomparable. In the light of the simplification process, guidance from non-mandatory frameworks should not be added. AR 26 should be reviewed to provide more practical and effective guidance. The current text does not sufficiently acknowledge the difficulty of setting standalone biodiversity targets or the interconnected nature of environmental issues. The revised guidance should explicitly allow companies to use cross-referencing, in order to explain how their existing or new targets under other the other topical environmental standards also address the drivers of biodiversity loss. This clarification is vital for two reasons: 1. Integrated management: Biodiversity loss is not an isolated issue. It is driven by factors like climate change, water use, and pollution. Allowing this cross-referencing enables companies to report on their environmental strategy in a holistic and integrated way, reflecting how these issues are managed internally. 2. Reporting efficiency: It avoids the need for companies to create separate, and potentially less meaningful, biodiversity-specific targets when their existing environmental objectives already contribute significantly to mitigating biodiversity impacts. This makes reporting more efficient and focused on substantive actions rather than a check-the-box exercise. This approach would make the guidance more pragmatic, reduce reporting burdens, and allow companies to provide a clearer narrative on their most significant contributions to protecting nature.			
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	No, we do not agree with the deletion of the voluntary datapoint. We would advocate for the opposite approach: the adjusted gender pay gap should be the mandatory datapoint, while the unadjusted gap should either be made voluntary or eliminated for the following reasons: 1.Starting in 2027, the European Directive on Pay Transparency (EU Directive 2023/970) will require the use of the adjusted pay gap indicator. The ESRS must align with EU legislative requirements to avoid confusion and ensure stakeholders can interpret and reconcile consistent data sets. 2.The adjusted pay gap is the only metric that truly reflects the principle of "equal pay for equal work or work of equal value." By accounting for factors like role, seniority, location, and performance, it provides a precise and actionable measure of pay equity, enabling companies and stakeholders to identify and address real pay discrepancies. The unadjusted pay gap is a blunt tool, conflating pay equity with overall gender representation. It often reflects structural imbalances, not discriminatory pay practices. Making it the sole mandatory metric risks misinforming stakeholders and penalizing companies based on their sector or structure, rather than actual pay policies. For meaningful reporting, the adjusted pay gap is the more accurate metric. The unadjusted gap, though useful for representation discussions, should remain a voluntary, complementary disclosure. Moreover, we regret that the opportunity to revise the metric to become more useable was not seized to introduce greater clarity concerning the types of remunerations to be taken into account when calculating the metric. This has resulted in companies calculating the gap using different definition resulting in non-comparable information disclosed by companies.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	We support the removal of the datapoint on "average time to pay an invoice," as it provided limited insights and was difficult to interpret in a decision-useful way. A focus on PATs aligns more closely with a fair presentation approach. The previous stance, which framed SMEs as risky suppliers, created unnecessary barriers by introducing a new layer of vetting based on supplier size. However, we also question the relevance and practicality of the remaining datapoint on percentage of payments aligned with standard terms (former ESRS G1-6 §33b) which has been difficult to consolidate. This metric lacks clarity, particularly in international contexts where no legal standard exists, and doesn't provide meaningful insights for evaluating supplier relationships. The percentage of payments made under "standard terms" is hard to interpret and doesn't yield useful conclusions regarding impacts on suppliers. Additionally, the categorization of suppliers (e.g., SMEs) remains problematic. Financial systems do not always track suppliers by size, and implementing such a classification would require significant effort. Similarly, the requirement to report the number of legal proceedings due to late payments (former ESRS G1-6 §33c) is not decision-useful on its own. Without qualitative context, such as reasons for delays or materiality thresholds, the raw number lacks relevance. For material cases, this information is already covered in legal risk reporting and should not be repeated in the sustainability report. Lastly, while the qualitative information on payment practices is relevant to indicate how the protection of SME's is tackled within the company, the calculation of the G1-6 metrics is overly complex for international groups operating with a great variety of payment standards. As a consequence, we consider the deletion of the related datapoint appears to be the most viable option.			
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The cross-cutting standard ESRS 1 remains particularly critical, especially regarding the concept of fair presentation and the materiality approach, including the provisions on gross versus net reporting. However, a number of issues remain: •The disclosure requirement on the level of aggregation and disaggregation continues to be highly subjective, potentially leading to interpretative challenges and potential disagreements with auditors. •Scope of consolidation/reporting boundaries remain unclear. •Attaching the deleted sub-sub-topics in brackets after the sub-topics will effectively increase the reporting burden as it still necessitates considering all these in the DMA but makes it harder to apply materiality to exclude information. •AR24 might necessitate a DMA at subsidiary level. We recommend removing AR24 or clarifying that IROs that are material do not need to be identified to individual subsidiaries (which would be impractical for any group with multiple subsidiaries), but should be about whether any subsidiary have significantly different business models and therefore exposures, to the rest of the group. •"Only impacts that derive from business activities, products and services" will in practice likely forbid companies to report positive impacts on own workforce. •45 (b) on using reasonable and supportable evidence to estimate the levels of severity and likelihood of impacts and the likelihood and magnitude of financial effects of risks and opportunities. This will likely increase the practice of having to provide more evidence per IRO. •Par. 51/52 and AR 22/23 could be interpreted to require companies to dive even deeper than site level in their materiality assessment. •Materiality assessment of material upstream/downstream value chain remains very subjective/unclear as part of the exposure drafts. •We advocate for referencing legally mandated documents in the directors' report, even with different assurance levels. This reduces redundancy, avoids unnecessary extensions, and mitigates inconsistencies, with examples.			
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	we recommend eliminating the disclosure on anticipated financial effects. Preparers are not yet adequately equipped to provide reliable forward-looking financial data, and such disclosures may involve commercially sensitive information. The current approach risks overburdening companies and generating low-quality data. Additionally, several other issues contribute to the reporting burden: •The site IRO matching suggested or mandated by certain standards will significantly increase the reporting burden, lengthen reports, and reduce readability and relevance (AR 22). •The new, non-disclosed datapoint on sustainability goals associated with groups of products or services (40a)i) adds complexity without clarity. •The inclusion of banned products as a datapoint remains problematic due to its unclear definition and should be deleted. •AR24 allows the IRO description to be presented with policies, actions, and targets in topic-specific chapters, but still mandates an IRO description in ESRS 2, which does not provide relief and simply maintains the status quo. •More disclosures are being requested regarding anticipated resources for actions, which increases complexity. Eliminate information on economic resources dedicated to actions, as it misleads relevance perception, adds unnecessary detail, and doesn't accurately reflect the importance of sustainability-related actions. •The expectation to provide both measurable and qualitative targets appears contradictory, or additional guidance is needed to clarify expectations. •In ESRS 2, the DR 41 (b) – for each metric the undertaking shall disclose, for environmental metrics, the specific environmental conditions and characteristics of the area where the impact is occurring - has been added and it is not clear and could lead to very granular reporting. Furthermore, this provision cannot be applicable for Climate Change E1, since emissions are a transboundary phenomenon and their impact is not location-based, unlike biodiversity E4. Overall, the expressions "environmental conditions" and "characteristics of the area" lack clarity and should be reconsidered.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The current ESRS draft presents several issues that create confusion and complexity for companies: •The thresholds for pollutants are more unclear than before. •The inclusion of transfers to water treatment plants as pollution is illogical, as these plants are service providers for cleaning water. •The introduction of a new data point on secondary microplastics poses a risk of unreliable and inconsistent data, placing a disproportionate burden on companies. •There is no clear alignment of the reporting methodology for primary microplastics between REACH-SPM and ESRS, which can lead to confusion. •The revised drafting introduces significant role-differentiation (manufacturer/importer and user). While companies under REACH may hold multiple roles, these apply to specific substances and do not require duplicate reporting of the same material flow. However, the ESRS wording could be interpreted as requiring companies to report identical flows multiple times under different roles, leading to duplication and complexity that contradicts the legislator's intention of relieving non-chemical companies. In practice, this risks increasing obligations for chemical companies. •The ESRS draft introduces disclosure obligations for Substances of Very High Concern (SVHC) and Substances of Concern (SoC) without clear, harmonized thresholds. While a 0.1% threshold is set for SVHC in articles, no uniform rule exists for SVHC in mixtures or for SoC, creating uncertainty around reporting obligations. While these data are subject to mandatory reporting within the EU under REACH, outside the EU, they are not consistently available. Collecting and homogenizing this data would require significant effort. We recommend deleting this data point and referring to data available from ECHA for EU-based activities. •The draft does not specify whether SVHC/SoC present only as impurities in substances must be disclosed, creating uncertainty, as impurities are not intentionally manufactured and may not provide meaningful information for stakeholders.			
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Reporting at site level is unacceptable and will significantly increase the reporting burden.			
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	ESRS E4 raises significant concerns due to the level of detail required and the potential for excessive disaggregation of IROs unto site levels or even below. These requirements risk imposing disproportionate reporting efforts, especially in the case of biodiversity, where it remains unclear how to prioritize which sites to disclose. In particular, the newly introduced Application Requirement AR 8 in ESRS E4 would effectively require companies to conduct ad hoc analyses for hundreds of sites—specifically those not overlapping with biodiversity-sensitive areas—in order to identify a science-based buffer zone tailored to the ecological specificities of each site. Such a requirement represents an operational and documentation burden that is entirely disproportionate to the stated goal of simplification. It risks undermining the usability and clarity of the sustainability statement, especially when the prioritization logic is not clearly defined.			
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The draft introduces several issues that create additional challenges for companies: •New metrics impose additional reporting burdens. •The introduction of new terms such as "strategic" and "key" adds significant uncertainty due to their lack of clarity. •There is an increased burden in disclosing information related to radioactive waste. •Glossary terms are often defined in a circular manner. For example, the circular material use rate is described as the ratio of circular use of materials to overall material use, yet the key definition of what qualifies as "circular" is omitted. •Waste definitions and categories based on European standards are expected to be applied globally, which is unrealistic and not useful in a broader context. •There is inconsistency between EU Directive 2008/98/EC and the ESRS regarding whether energy recovery (thermal incineration) should be classified as recovery or not.			
Survey	BASF SE	Preparer (non-financial preparing a sustainability report)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	For social standards the removal of the term "severe" from the disclosure requirements for human rights incidents across all social standards is particularly concerning. Without a clear limitation to the most serious cases, companies may be required to report even minor or less relevant incidents. This broad scope risks undermining the materiality of disclosures and contradicts the objective of simplification. Maintaining a focus on severe human rights incidents is essential to ensure that reporting remains meaningful, proportionate, and aligned with the principles of relevance and efficiency. Additionally, the inclusion of contractors in own workforce increases the reporting burden. We think that non-employee related disclosures should be eliminated or made voluntary. Additionally, health and safety related metrics and definitions in the glossary should be reviewed as there are still terms which are not clearly defined and/or consistently used on this topic.			
Survey	XBRL US	Other - please specify (required)	United States	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	When undertakings prepare narrative facts, it is important that they be discretely presented so that data consumers can easily identify and extract data from reported information consistently and accurately. This approach will ensure comparability across reporting entities. The approach proposed, breaking the sustainability statement into four parts, will make it easier for undertakings preparing their information and for investors and others using the data.			
Survey	XBRL US	Other - please specify (required)	United States	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We agree with the ESRS approach to preparing the data in structured, machine-readable Inline XBRL format. This is not a change from the prior requirements, but we want to reiterate that structuring and standardizing the reported data using XBRL is important to ensuring that the goals of understandability, clarity and accessibility are met.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	XBRL US	Other - please specify (required)	United States	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	We strongly support enabling full interoperability with ISSB. Undertakings that are tasked with reporting to another regulatory following ISSB standards should be allowed to submit the same report to CSRD to satisfy EU reporting requirements as well.			
Survey	XBRL US	Other - please specify (required)	United States	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	We agree with adopting the same reporting framework as that used for IFRS 1 and IFRS 2 so that data reported is interoperable and undertakings can reduce reporting burden by using the same report.			
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The TNFD has concerns about the excessive flexibility introduced by these simplifications: -A 'top-down' approach (as provided in AR 17 for para. 48 (a) of ESRS 1 ED) will introduce a risk of incomplete identification of material nature-related IROs. The TNFD therefore suggests to delete this possibility and only include 'bottom-up' approach. -For what relates to para. 22, ESRS 1 Exposure Draft (on the relationship of IROs, and topics to be reported): oPresentation of the information at the topical level rather than at the IRO level would diverge from the TNFD recommendations and reduce transparency of information when aggregated at the level of the topic; oLack of consideration of dependencies at the same level of IROs in disclosure is not aligned with the recognition of the relevance of dependencies on natural, human and social resources as originating material risks and opportunities in paras. 40-41, ESRS 1 ED. -On the new/updated chapter 3.7 on the level of aggregation, disaggregation and group reporting, and specifically AR 23 for para. 52, the TNFD notes that a disaggregation of the information on material IROs by site would support alignment with the TNFD. The TNFD encourages EFRAG to consider requiring that the site information always be disclosed alongside the individual IROs, as it is the case for the recommendations of the TNFD (especially at the level of the metrics). The new paragraph and application requirement alone is not deemed sufficient to replace the individual topical standard's requirement for screening of sites as part of the former topical IRO-1 provisions in Set 1.			
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The TNFD raises concerns on the deletion of: -IRO-1: disclosure of how a company has: oScreened its site locations and business activities, which has been removed for E2 and only retained but significantly streamlined for ESRS E3 and E4. The TNFD also does not deem the new AR 22 of ESRS 2 to sufficiently cover this aspect, as it does not explicitly ask companies to disclose whether and how the undertaking has screened its site locations and business activities. oConsidered dependencies, especially in ESRS E4 – this provision has been deleted and not transposed to ESRS 2; oConsidered systemic risk in ESRS E4 : – this provision has been deleted and not transposed to ESRS 2, creating a misalignment with the TNFD. -Provisions around biodiversity targets (PAT), on which the TNFD notes: oThe removal of specification of alignment of a target with the GBF and EU policy is a reduction in alignment with the TNFD. oThe removal of the requirement to specify geographical scope may result in a loss of usefulness of the disclosure. oIn the new general provisions on the disclosure of targets (para. 43, ESRS 2 ED), ESRS now state that targets may be qualitative, whereas the TNFD glossary specifically defines a target as quantitative. oThe new general provisions on the disclosure of targets as part of ESRS 2 remove the disclosure of involvement of stakeholders in target-setting, which reduces alignment with TNFD. oThe TNFD agrees with the decision to move the datapoints on ecological thresholds from the topical standards to ESRS 2, but notes that this has led to loss of specification about the information on these thresholds.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	As stated in its 10 July letter and subsequent technical note, the TNFD suggests a holistic aggregation of the environmental standards E2, E3, E4 and E5, which present a combination of environmental assets (e.g. freshwater resources, ecosystems), drivers of nature change (e.g. pollution, resource use), thematic issues (biodiversity) and response strategies (circular economy). The TNFD acknowledges, however, that aspects of E5 may warrant distinct treatment given its specific focus on resource use and the circular economy. The TNFD believes that this approach would align with the need and urgency for a holistic, science-based and practical approach to nature-related corporate reporting and contribute to the overall objective of simplification while retaining appropriate coverage of all of the overriding objectives of the EU Green Deal. For more information on TNFD's proposal, please refer to the technical note sent to EFRAG on 19 September: https://tnfd.global/tnfd-input-into-the-simplification-esrs-csrd-omnibus-package/			
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E4	The TNFD welcomes the introduction of a NMIG to assist companies in their identification and assessment of IROs, based on the extensive use and positive feedback on the TNFD's LEAP approach to support TNFD-aligned disclosures. However, the TNFD notes that the creation of this guidance resulted in most of the 'may datapoints' being deleted from the main text of the standards, including metrics on impacts on biodiversity and ecosystems, for which now the main text of ESRS E4-5 only includes a general provision without any additional specification on the type of metrics, and the removal of the terms land-use change, freshwater-use change and/or sea-use change. This reduces alignment with TNFD core global disclosure metrics C1.0 and C1.1 and leaves companies with little direction on the issues that should be measured. The TNFD welcomes the use of 'shall' rather than 'may' for all these metrics, but believes that the guidance now moved to the NMIG should be expanded and moved back to the main text of the standard. In particular, the TNFD suggests for NMIG 17 for para. 21, where a general reference to TNFD is added, be adjusted to: -Make explicit reference to TNFD's core global disclosure metrics for all drivers of biodiversity and ecosystem change (terrestrial and marine habitat change, invasive species), which are in the scope of ESRS E4; and -Move this reference to the main text of the standard, e.g. as part of AR 9 for para. 21 of ESRS E4 Exposure Draft, by changing the wording from 'might consider' to 'shall consider'. For more information on TNFD's suggestion to incorporate all its core disclosure metrics (and especially the ones related to drivers of nature/biodiversity change) into ESRS, please refer to the technical note sent to EFRAG on 19 September: https://tnfd.global/tnfd-input-into-the-simplification-esrs-csrd-omnibus-package/			
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The TNFD believes that quantitative disclosures of anticipated financial effects should remain mandatory rather than voluntary, and hence chooses Option 1. A summary of TNFD's rationale for this preference is provided below : -Anticipated – along with current – financial effects of nature-related risks are a core part of the TNFD disclosure recommendations (the TNFD includes 2 core metrics on 'vulnerability' to nature-related physical and transition risks). -While acknowledging that quantification of nature-related financial effects may be a source of concern given the potential for measurement uncertainty, the TNFD notes that examples of quantitative estimates have been presented in recent TNFD reporting and case studies. -Quantitative financial effects disclosures are also key for investors to evaluate how financial position and performance can be affected by nature-related risks and opportunities, and make informed decisions. For more information on TNFD's views on the disclosure of anticipated financial effects, please refer to the technical note sent to EFRAG on 19 September: https://tnfd.global/tnfd-input-into-the-simplification-esrs-csrd-omnibus-package/			
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	The TNFD Secretariat welcomes EFRAG's efforts to enhance interoperability with the ISSB's Standards, and recognises the progress made through the changes introduced under Lever 6. We agree that achieving interoperability with IFRS S1 and S2 is critical, both to reduce reporting burden for companies operating across jurisdictions and to ensure that European companies remain comparable to global peers. In our view, the proposed Amendments represent a reasonable step towards balancing simplification objectives with interoperability. However, we encourage EFRAG to continue prioritising alignment with IFRS S1 and S2 wherever possible, as this will strengthen the credibility and global relevance of the ESRS framework and provide decision-useful information to investors			
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	22.ESRS2	Comments on deleted datapoints in ESRS 2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The TNFD supports EFRAG's efforts to reduce the reporting burden by streamlining the number of datapoints, particularly where this removes duplications or overly prescriptive narrative requirements. We recognise that such simplification can help undertakings focus on reporting decision-useful information in a more efficient and consistent manner. At the same time, we encourage EFRAG to ensure that this reduction does not come at the expense of alignment and consistency with the TNFD recommendations, particularly in relation to nature-related disclosures, including disclosure metrics, where the need for structured and comparable data remains critical. TNFD's detailed comments and concerns on individual datapoints we suggest be retained are included in Part 3.			
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	The TNFD supports the additions related to environmental standards, and does not have a view on the other adjustments related to standards beyond E. In particular: -ESRS E3 Water - Own operations total withdrawal (Amended ESRS E3 paragraph 28 (c): we agree with the move from 'may' to 'shall' as it reinforces the alignment with TNFD metric C3.0 -ESRS E3 Water – Own operations total discharges (Amended ESRS E3 paragraph 17): we agree with the move from 'may' to 'shall' as it reinforces the alignment with TNFD metric C3.0 -ESRS E4 Biodiversity and ecosystems- Disclosure of transition plan for biodiversity and ecosystems: we agree with EFRAG's position that including and disclosing nature in transition plans is an emerging practice, including through TNFD pilot testing now complete. The TNFD will release its final guidance on nature in transition plans on 4 November 2025.			
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	The TNFD agrees with the additions for environmental standards (E2 and E5) as they support and enhance alignment with the TNFD metrics. In particular, the TNFD welcomes: -The addition of a new qualitative datapoint on secondary microplastics in ESRS E2-4 and the explanatory definition of microplastics, as we believe it enhances alignment with TNFD metric C2.3. -The inclusion of the description of key materials in ESRS E5-4 paragraph 15(a) (revised) as we believe it enhances alignment with TNFD metric C2.3 . -The new addition of paragraph 18 (e) which requires a description, as we believe it enhances alignment with TNFD metric C2.2.			
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	The TNFD supports the provision of guidance on what biodiversity and ecosystems-related targets can cover. The TNFD strongly suggests the inclusion of additional text and guidance at least as part of AR 5 for para. 17 of ESRS E4 Exposure Draft, e.g. by pointing to the relevant content from science-based frameworks such as the Science Based Targets Network (SBTN). As biodiversity is location-specific, appropriate targets will differ depending on the local context, and guidance such as that developed by SBTN can aid companies in ensuring they have a robust, science-based approach to identifying the targets needed.			
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Comment related to all standards selected: While the TNFD Secretariat supports the aim of simplification of the current Exposure Drafts, it is important that revisions do not undermine the good level of commonality with the TNFD already achieved in Set 1, as demonstrated in the correspondence mapping published with EFRAG in 2024. We also reiterate our proposal, as outlined in the letter sent by the Taskforce co-chairs on 10 July and the technical note sent by the TNFD Secretariat on 19 September, to consolidate ESRS E2–E5 into a single integrated nature-related standard, consistent with the TNFD approach. In the TNFD's view, our suggestions would align with the need and urgency for a holistic, science-based and practical approach to nature-related corporate reporting and contribute to the overall objective of simplification while retaining appropriate coverage of all of the overriding objectives of the EU Green Deal.			
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	35.ESRS2_GOV-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The TNFD does not support the proposed removal of the following requirements as they result in reduced alignment with TNFD Governance pillar: •Number of executive members •Number of non-executive members •Description of management's role in governance processes, controls and procedures used to monitor, manage and oversee impacts, risks and opportunities •Description of how oversight is exercised over management-level position or committee to which management's role is delegated •Information about reporting lines to administrative, management and supervisory bodies. •Disclosure of how dedicated controls and procedures are integrated with other internal functions •Disclosure of how administrative, management and supervisory bodies and senior executive management oversee setting of targets related to material impacts, risks and opportunities and how progress towards them is monitored.	ESRS2	GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	35.ESRS2_GOV-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The TNFD does not support the proposed removal of the following requirement as it results in reduced alignment with TNFD Governance pillar : •Disclosure of whether, by whom and how frequently administrative, management and supervisory bodies are informed about material impacts, risks and opportunities, implementation of due diligence, and results and effectiveness of policies, actions, metrics and targets adopted to address them.	ESRS2	GOV-2 - Integration of sustainability-related performance in incentive schemes	
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	35.ESRS2_GOV-3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The TNFD does not support the proposed removal of the following requirement as it results in reduced alignment with TNFD Governance pillar : •Whether and how and sustainability-related performance metrics are considered as performance benchmarks or included in remuneration policies.	ESRS2	GOV-3 - Statement on due diligence	
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	35.ESRS2_SBM-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The TNFD asks EFRAG to carefully reconsider the removal of the following information about engagement with key stakeholders as it results in reduced alignment with TNFD Governance pillar: -How the stakeholder engagement is organised; its purpose; and how its outcome is taken into account by the undertaking (Set 1 para. 45 (a) (iii-v), ESRS 2) -A description of the understanding of the interests and views of its key stakeholders as they relate to the undertaking's strategy and business model, to the extent that these were analysed during the undertaking's due diligence process and/or materiality assessment process (Set 1 para. 45 (b), ESRS 2).	ESRS2	SBM-2 - Interests and views of stakeholders	
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	35.ESRS2_SBM-3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The TNFD does not support the proposed removal of the following requirements as it results in reduced alignment with TNFD Strategy pillar: •Disclosure of reasonably expected time horizons of material impacts.	ESRS2	SBM-3 - Interaction of material impacts risks and opportunities with strategy and business model, and financial effects	
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	35.ESRS2_IRO-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The TNFD welcomes the 'elevation' of the LEAP reference from each individual topical standard at the level of ESRS 2. However, the TNFD notes few aspects that have been raised as part of the Excel template as they pertain to AR 22 for para. 26 specifically. The TNFD also does not support the proposed removal of the following requirements as they reduce alignment with TNFD: •Description of how likelihood, magnitude, and nature of effects of identified risks and opportunities have been assessed. •Description of extent to which and how process to identify, assess and manage impacts and risks is integrated into overall risk management process and used to evaluate overall risk profile and risk management processes. •Description of extent to which and how process to identify, assess and manage opportunities is integrated into overall management process. •Description of how process to identify, assess and manage impacts, risks and opportunities has changed compared to prior reporting period.	ESRS2	IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	35.ESRS2_GDR-T.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	There is a weakening of the language on reporting of progress and review of targets (paragraphs 80.i and 80.j of Set 1), reducing alignment with the TNFD recommended disclosure Metrics and Targets C: oParagraph 80.i previously asked about whether the target or metrics had changed since the last report. This is a broader requirement than the TNFD recommended disclosure, which only asks "If the organisation exceeded or fell short of the target trajectory or is projected to do so, an explanation of the reasons and disclosure of any resulting adjustment or resetting of targets from the prior period". However, the replacement text in ESRS 1 and BP-2 appears to focus on rectification of errors and changes in data, rather than revision of targets per se. oParagraph 80.j previously asked about, "the performance against its disclosed targets, including information on how the target is monitored and reviewed and the metrics used, whether the progress is in line with what had been initially planned, and an analysis of trends or significant changes in the performance of the undertaking towards achieving the target". This was slightly more specific than the TNFD recommended disclosure, which asks for disclosure information on, "Performance against the target relative to the baseline or reference condition on a historical and current year basis, updated annually, and expected performance against targets for the following year, where appropriate". However, the ESRS text in the amended ED has now been reduced, in new paragraph 42, to "overall progress and effectiveness towards the adopted targets over time. This includes - where applicable - whether the progress is aligned with related action plan and/or whether any significant facts and circumstances related to the action plan affect the achievement of the target." This misses the frequency of reporting and expected future performance.	ESRS2	General Disclosure Requirement for targets - GDR-T	
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	35.E2-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Topical standard E2 Exposure Draft completely removes the site screening requirement that was instead included in Set 1 (Set 1 para. 11 (a), ESRS E2). While the Basis for Conclusions notes that 'the removal of the site screening requirement was particularly requested and driven by the lack of observed reporting practices', the TNFD would like to point to the high number of examples of TNFD reporting and location-specific nature-related materiality assessments conducted by companies adopting the LEAP approach for their DMA, and would urge EFRAG to consider re-instating this provision. For related data showing uptake and examples, please see the TNFD 2025 status report: https://tnfd.global/release-of-tnfd-status-report-highlights-significant-market-momentum-on-nature-related-issues/ and TNFD case study library and example reports on the TNFD website: https://tnfd.global/	E2	Disclosure Requirement E2-2 - Actions and resources related to pollution	
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	35.E2-4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Rather than removing important specifications that would guide undertakings in the identification of relevant metrics, the TNFD suggests EFRAG consider simplification of datapoints for E2 by explicitly aligning the nature-related metrics listed under DR E2-4 and E2-5 with the pollution-related 'core global metrics' (C2.0, C2.1, C2.3, C2.4) from the TNFD that apply to all sectors on a comply or explain basis.	E2	Disclosure Requirement E2-4 - Pollution of air, water and soil	
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	35.E2-5.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Rather than removing important specifications that would guide undertakings in the identification of relevant metrics, the TNFD suggests EFRAG consider simplification of datapoints for E2 by explicitly aligning the nature-related metrics listed under DR E2-4 and E2-5 with the pollution-related 'core global metrics' (C2.0, C2.1, C2.3, C2.4) from the TNFD that apply to all sectors on a comply or explain basis.	E2	Disclosure Requirement E2-5 - Substances of concern and substances of very high concern	
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	35.E3-4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Rather than removing important specifications that would guide undertakings in the identification of relevant metrics, the TNFD suggests EFRAG consider simplification of datapoints for E3 by explicitly aligning the nature-related metrics listed under DR E3-4 with the water-related 'core global metrics' (C3.0, C3.1) from the TNFD that apply to all sectors on a comply or explain basis. We note the deletion of paragraph 28(e) which reduces alignment as this is where the identification of water source could have been covered. We agree with the inclusion of paragraph 17 to replace AR32. The removal of ESRS E3 paragraph AR10 and AR15 removes alignment with TNFD metric C3.1. We note that ESRS E5 paragraph 38(b) partially covers this, but only for materials sustainably sourced, which only aligns with the second half of TNFD metric C3.1.	E3	Disclosure Requirement E3-4 - Water metrics	
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	35.E4-5.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Rather than removing important specifications that would guide undertakings in the identification of relevant metrics, the TNFD suggests EFRAG consider simplification of datapoints for E4 by explicitly aligning the nature-related metrics listed under DR E4-5 with the biodiversity and ecosystems change-related 'core global metrics' (i.e. all the ones related to drivers of nature change excluding climate change and pollution – C 1.0, C1.1, C3.0, C3.1) from the TNFD that apply to all sectors on a comply or explain basis. Additionally, the deletions of Set 1 para. 39 of ESRS E4 and Set 1 para. 40(d) and 41(b)(i) remove any alignment with TNFD placeholder indicators C4.0 and C5.0. These are TNFD placeholder indicators that the TNFD encourages organisations to consider and report against where possible. The TNFD recommends that EFRAG continue to learn from the work of the Nature Positive Initiative (NPI) as it progresses to build consensus on state of nature metrics for these placeholder indicators. The deletion of ESRS E4 paragraph AR 12 further limits the alignment with TNFD metric C3.1, as it removes the requirement to report how procurement meets sustainability requirements that are relevant to TNFD. We therefore do not support this change.	E4	Disclosure Requirement E4-5 - Metrics related to biodiversity and ecosystems change	
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	35.E5-4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Rather than removing important specifications that would guide undertakings in the identification of relevant metrics, the TNFD suggests EFRAG consider simplification of datapoints for E5 by explicitly aligning the nature-related metrics listed under DR E5-4 and E5-5 with the resource use and circular economy-related 'core global metrics' (C2.2, C2.3, C3.1) from the TNFD that apply to all sectors on a comply or explain basis. Additionally , the TNFD does not support the proposed removal of the following requirement as it reduces alignment with TNFD Risk and Impact Management pillar: •Description of methodologies used to calculate data and key assumptions used.	E5	Disclosure Requirement E5-4 - Resource Inflows	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom	35.ESS-5.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Rather than removing important specifications that would guide undertakings in the identification of relevant metrics, the TNFD suggests EFRAG consider simplification of datapoints for ESS by explicitly aligning the nature-related metrics listed under DR ESS-4 and ESS-5 with the resource use and circular economy-related 'core global metrics' (C2.2, C2.3, C3.1) from the TNFD that apply to all sectors on a comply or explain basis. Additionally , the TNFD does not support the proposed removal of the following requirements as it reduces alignment with TNFD metric C2.3: Disclosure of materials that are present in waste. We also note that: -The change of wording from 'incineration' to 'thermal based disposal' is a slight misalignment with the TNFD core metric C2.3 but do not consider this to be substantial. We support the new addition of paragraph 37(a) which requires a description. -By deleting the description of materials designed along circular principles, there is no longer alignment with the second half of TNFD core metric C2.3 which asks for percentage of plastic that is reusable, compostable, technically recyclable and recyclable in practice and at scale. However, we note that this is still partially covered in revised paragraph 36(c).	ESS	Disclosure Requirement ESS-5 - Resource outflows	
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We recognise the effort made to simplify the double materiality assessment (DMA) process in Chapter 3 of ESRS 1, and we appreciate the emphasis on streamlining disclosures. However, from a due diligence standpoint aligned with the OECD Due Diligence Guidance, UN Guiding Principles on Business and Human Rights (UNGPs), and the GOTS Due Diligence Framework, several concerns remain: 1.Materiality must not dilute impact assessment. The proposed simplification risks weakening the visibility of actual and potential adverse human rights and environmental impacts, particularly where stakeholder consultation or rights-holder engagement is insufficiently integrated into materiality determination. 2.Due diligence must not equal to materiality filter. As clarified in OECD and UNGP frameworks, and operationalised in GOTS certification requirements, due diligence and materiality are related but distinct concepts. Due diligence requires identifying and addressing salient risks regardless of financial materiality, while ESRS 1 may risk overlooking this by prioritising information relevance to users over harm to affected stakeholders. 3.Need for clarity on severity criteria. GOTS supports a robust DMA process when it reflects severity and likelihood, as required under GOTS 7.0 Chapter 4 and our Due Diligence Handbook. Chapter 3 of ESRS 1 would benefit from explicit references to severity as a threshold for impact materiality, to ensure compatibility with existing responsible business conduct frameworks. 4.Recommendation: Reintegrate explicit references to internationally recognised due diligence standards (e.g. UNGPs, OECD) in Chapter 3, particularly where companies are expected to identify salient impacts prior to applying materiality filters.			
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Global Standard welcomes the effort to clarify how prevention, mitigation and remediation measures are to be considered within the DMA process (Paragraphs 34–36 and Appendix C). However, from the perspective of the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Due Diligence Guidance, the current guidance raises several concerns: 1.Remediation is not equal to reduced materiality: According to the UNGPs, the existence of mitigation or remediation measures does not eliminate the materiality of an adverse impact. Paragraph 35, which appears to allow undertakings to downgrade severity on the basis of actions taken, risks undermining the principle of stakeholder-centred, risk-based due diligence. 2.Backward-looking bias: The current wording places emphasis on measures already in place, potentially shifting attention away from potential or unresolved impacts. This is problematic where mitigation is not yet effective or outcomes have not been verified. 3.Lack of effectiveness assessment: While companies may report on actions, there is no explicit requirement to evaluate their effectiveness through measurable outcomes or feedback from affected stakeholders. This is an essential component of credible due diligence. Recommendation: Paragraphs 34–36 should be reframed to clarify that mitigation and remediation may influence prioritisation, but cannot negate the obligation to transparently disclose ongoing or potential risks, particularly where impacts remain only partially addressed. In addition, EFRAG should explicitly recognise the role of credible voluntary sustainability standards (VSSs), such as GOTS, which has undergone the OECD Alignment Assessment. Recognising such schemes as supporting evidence of due diligence systems would reduce duplication, promote convergence and help undertakings demonstrate robust alignment with international frameworks.			
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We acknowledge that the proposed amendments offer improved structural clarity and increased flexibility for undertakings. However, several elements raise concerns from a human rights and environmental due diligence perspective. 1.Flexibility must not come at the expense of rigour: GOTS-aligned due diligence, following the UN Guiding Principles and the OECD Due Diligence Guidance, prioritises transparency on actual and potential adverse impacts over selective or outcome-based disclosures. Excessive flexibility, especially in materiality filtering and cross-referencing with general management disclosures, may result in omissions of salient impacts that are critical for rights-holders and civil society. 2.Connectivity should preserve stakeholder salience: While promoting coherence with financial and strategic disclosures is valuable, alignment with broader corporate reporting must not dilute stakeholder-centred reporting. 3.Need for sector specificity: Flexibility can be effective only if sector-specific risks are not overlooked. This is particularly important in textile supply chains, where risks such as forced labour, gender-based violence, land rights violations and chemical exposure are prevalent. GOTS provides contextualised guidance on these risks and encourages ESRS to take a similar approach to ensure meaningful and comparable reporting. Recommendation: Flexibility should be maintained, but disclosures must be more firmly anchored in internationally recognised due diligence expectations. EFRAG should also consider recognising voluntary sustainability standards (VSSs), such as GOTS, which have been assessed against the OECD framework, as supporting tools that companies can use to demonstrate robust due diligence practices.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We appreciate the intention behind the amended ESRS to strike a balance between the reporting burden on undertakings and the need for relevant and comparable sustainability information. However, from a due diligence perspective grounded in the UN Guiding Principles, the OECD Due Diligence Guidance several tensions remain. 1.There is a risk of under-disclosure. Reduced prescriptiveness may allow undertakings to omit or downplay material negative impacts, particularly where double materiality assessments rely heavily on internal definitions or lack robust stakeholder input. GOTS requires certified entities to identify and disclose salient risks regardless of internal prioritisation frameworks. 2.Preparation effort is essential for credible due diligence. While simplification can enhance accessibility, robust sustainability disclosure, especially on human rights and environmental risks, necessarily requires effort and investment. GOTS views comprehensive risk identification and stakeholder engagement as essential components of both due diligence and credible reporting. 3.There is a need for consistent minimum expectations. For information to be comparable across companies and sectors, a certain level of baseline prescriptiveness is required. GOTS addresses this through its harmonised certification system, which sets minimum requirements that apply across diverse geographies and operations. Recommendation: ESRS should ensure that flexibility in reporting format or presentation does not compromise the quality or completeness of disclosures. Prescriptive elements related to impact identification, stakeholder engagement, and due diligence steps should be maintained or strengthened. EFRAG should also consider recognising credible voluntary sustainability standards (VSSs), such as GOTS, as supporting instruments that help companies demonstrate alignment with international due diligence frameworks.			
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We appreciate the intention behind the amended ESRS to strike a balance between the reporting burden on undertakings and the need for relevant and comparable sustainability information. However, from a due diligence perspective grounded in the UN Guiding Principles, the OECD Due Diligence Guidance several tensions remain. 1.There is a risk of under-disclosure. Reduced prescriptiveness may allow undertakings to omit or downplay material negative impacts, particularly where double materiality assessments rely heavily on internal definitions or lack robust stakeholder input. GOTS requires certified entities to identify and disclose salient risks regardless of internal prioritisation frameworks. 2.Preparation effort is essential for credible due diligence. While simplification can enhance accessibility, robust sustainability disclosure, especially on human rights and environmental risks, necessarily requires effort and investment. GOTS views comprehensive risk identification and stakeholder engagement as essential components of both due diligence and credible reporting. 3.There is a need for consistent minimum expectations. For information to be comparable across companies and sectors, a certain level of baseline prescriptiveness is required. GOTS addresses this through its harmonised certification system, which sets minimum requirements that apply across diverse geographies and operations. Recommendation: ESRS should ensure that flexibility in reporting format or presentation does not compromise the quality or completeness of disclosures. Prescriptive elements related to impact identification, stakeholder engagement, and due diligence steps should be maintained or strengthened. EFRAG should also consider recognising credible voluntary sustainability standards (VSSs), such as GOTS, as supporting instruments that help companies demonstrate alignment with international due diligence frameworks.			
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The Global Standard recognises the value of the NMIG as a tool to support implementation and improve the accessibility of the ESRS. By providing examples and methodological explanations, the NMIG can assist undertakings, particularly smaller entities and those in complex value chains, in interpreting disclosure requirements and aligning them with recognised due diligence expectations. This is especially relevant for narrative disclosures on policies, actions and targets, where practical illustrations can enhance understanding and comparability. At the same time, the absence of a clear legal status creates ambiguity and may lead to inconsistent use of the NMIG. Some companies may treat it as binding, while others may ignore it entirely. This could undermine both comparability and trust in the reporting system. The Global Standard therefore considers it important that the NMIG remains explicitly non-mandatory but with transparent communication on its role as a supporting reference, not an additional layer of reporting obligations. Furthermore, the NMIG could be strengthened by including sector-specific examples that address common risk areas, such as labour rights, chemical management and water use in the textile sector. Recognising voluntary sustainability standards such as GOTS as valid reference points within NMIG would provide preparers with concrete and internationally aligned examples of how to operationalise due diligence and disclose effectively. In this sense, the Global Standard sees NMIG as a valuable complement to the ESRS, provided its role is clearly defined and it is leveraged to enhance clarity without creating hidden compliance expectations.			
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	GOTS supports efforts to streamline reporting requirements and reduce disproportionate burdens, particularly for small and medium-sized enterprises and for actors operating in complex global value chains such as those found in the textile sector. However, from a due diligence perspective aligned with the OECD Guidelines, the UN Guiding Principles and the GOTS Due Diligence Framework, important reservations remain. Some of the proposed reliefs, including the expanded use of estimates, the exclusion of parts of the value chain and the new cost-or-effort exemption, risk leaving critical adverse impacts unreported, especially in upstream or outsourced operations. The introduction of partial disclosures also threatens comparability. Allowing exclusions based on control arrangements, such as joint ventures, or thresholds for identifying impacts, risks and opportunities could result in inconsistent datasets across companies. Relief mechanisms should therefore be limited to cases where materiality is not compromised and should always be accompanied by narrative explanations of the limitations, methodologies and improvement actions. In this way, the amended ESRS can maintain necessary flexibility while preventing strategic under-reporting and preserving the stakeholder-oriented transparency that underpins the EU Green Deal and international due diligence frameworks.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	GOTS recognises the challenges that undertakings face in collecting reliable metric data, particularly in complex global value chains where upstream and downstream information is often difficult to obtain. The inclusion of a relief for lack of data quality in ESRS 1 paragraph 92 offers flexibility that is especially relevant for small and medium-sized enterprises and for suppliers operating in less data-transparent contexts. At the same time, from a due diligence perspective aligned with the UN Guiding Principles, the OECD Due Diligence Guidance and the GOTS Due Diligence Framework, concerns remain regarding accountability and comparability. The absence of a time limit for applying this relief creates the risk of prolonged reliance on partial disclosures without sufficient incentive for improvement. Although undertakings are required to disclose actions to enhance data coverage, this safeguard may not be strong enough to ensure progress. For GOTS-certified entities, risk-based due diligence already requires identification and management of impacts even when data are imperfect, applying a precautionary principle. The Global Standard therefore recommends retaining the relief to support practicality, but pairing it with clearer safeguards. These could include an explicit expectation of progressive improvement, a maximum number of reporting cycles under which the relief may be applied unless fully justified, and a requirement for narrative disclosures on methodologies and limitations. Such conditions would preserve the usefulness of the relief while avoiding the erosion of transparency and comparability.			
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Global Standard supports Option 1 as the more balanced approach to disclosing anticipated financial effects. We recognise that companies face real challenges in providing quantitative information, including immature methodologies and uncertainties in long-term forecasting. Nevertheless, from the perspective of the UN Guiding Principles and the OECD Due Diligence Guidance, some level of quantitative disclosure is essential for accountability and comparability. Quantitative disclosures help stakeholders, including investors, understand the scale and significance of sustainability risks and impacts. Option 1 enables flexibility by allowing omission of quantitative information where uncertainty is high or inputs are not available from business plans, but it does not eliminate the expectation to report entirely. This creates the right incentive for undertakings to build internal systems and methodologies over time. By contrast, Option 2, which limits reporting to qualitative information with optional quantitative disclosure, risks undermining comparability and discouraging improvement in data practices. The Global Standard therefore recommends adopting Option 1, with strengthened guidance on acceptable estimation methods, progressive improvement pathways and illustrative sector-specific examples. For high-risk industries such as textiles and apparel, this could include examples of financial impacts linked to raw material volatility, water scarcity or labour rights violations.			
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	GOTS recognises the importance of providing users, in particular investors and financial institutions, with disclosures on anticipated financial effects linked to climate transition and physical risks. The revised ESRS E1-11, including paragraphs 40 to 42, represents a simplification by reducing datapoints, while still retaining essential information. From the perspective of the GOTS Due Diligence Framework, which is aligned with the UN Guiding Principles and the OECD Due Diligence Guidance, the balance between simplification, reporting effort and user needs is only partially achieved. For companies in the textile sector, many of the remaining datapoints under paragraphs 40 and 41 are still difficult to quantify due to the absence of harmonised methodologies and the reliance on region-specific climate projections. This risks limiting comparability and creating uneven disclosures across undertakings. While quantitative information is critical, qualitative narrative also has strategic value, for example when companies disclose adaptation measures such as sourcing more resilient fibres or investing in water reduction technologies. Paragraph 42, which requires companies to explain data sources, is positive, but would be more effective if combined with explicit disclosure of plans to improve traceability and coverage over time. The Global Standard therefore recommends retaining the key disclosures under paragraphs 40 to 42 but strengthening the supporting guidance. This could include practical methodologies, sector-relevant examples and narrative pathways that reflect both current limitations and progressive improvement. In this way, the disclosures can be made more feasible while preserving their value for comparability and decision-making.			
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Global Standard supports greater international convergence of sustainability reporting standards where this enhances comparability, clarity and accountability. The amendments made to improve interoperability between ESRS and IFRS S1 and S2, such as the alignment of greenhouse gas emission boundaries, the introduction of IFRS-style reliefs and the use of common terminology, are positive steps. At the same time, from the perspective of the UN Guiding Principles and the OECD Due Diligence Guidance, several risks remain. The adoption of a general materiality filter, reflecting the IFRS approach, may reduce the visibility of adverse impacts on affected stakeholders, particularly where these are not financially material. GOTS requires companies to identify and disclose salient risks regardless of their financial significance, and this principle should be preserved in ESRS. Similarly, the introduction of certain reliefs that go beyond IFRS S1 and S2, such as allowing partial metric scopes without time-bound corrective measures, risks creating divergence in practice and weakening accountability. Finally, while the permanent reference to SASB Standards may help companies identify sector-specific information, these standards do not always align with the risk-based due diligence model. For high-risk industries such as textiles, sectoral frameworks like GOTS provide stronger alignment with international expectations. The Global Standard therefore recommends that EFRAG maintain its efforts to harmonise with IFRS S1 and S2 but ensure that interoperability does not weaken the core principle of impact materiality. Interoperability should not only serve the needs of investors but also support companies in demonstrating alignment with internationally recognised due diligence standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Global Standard understands the rationale for making six datapoints mandatory and agrees that these can be justified as exceptions within the broader simplification process. In particular, reporting on water withdrawals and discharges, the disclosure of biodiversity transition plans, and specific indicators on business conduct are aligned with internationally recognised due diligence expectations and reflect key sustainability priorities. However, these disclosures support transparency in areas that are especially relevant to high-risk sectors such as textiles. Water withdrawals and discharges are essential for understanding pressures on ecosystems in production hubs, and biodiversity transition plans are critical for aligning business strategies with global expectations on nature. Similarly, procurement training and disclosure of confirmed incidents of corruption or bribery reflect important elements of supply chain due diligence and responsible business conduct. At the same time, challenges remain. Smaller actors in global supply chains may face difficulties in developing and reporting on biodiversity transition plans, and disclosures on confirmed incidents of corruption or bribery require clarity on definitions and thresholds to ensure consistency. The Global Standard therefore recommends retaining these six datapoints as mandatory, while ensuring that practical guidance is provided to support implementation. Guidance should also recognise credible voluntary sustainability standards such as GOTS, which already require monitoring and reporting on water use, chemical management and business conduct, and can therefore help undertakings meet these disclosure obligations effectively.			
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	We recognise that the general principle of the amendments was to avoid introducing new mandatory datapoints, and therefore any exceptions should be carefully justified. The inclusion of four new "shall disclose" datapoints should be considered in this light. While additional requirements can strengthen transparency, they also raise questions of proportionality and consistency. New datapoints are appropriate where they fill a genuine gap in disclosure objectives and are directly linked to due diligence steps such as identifying salient risks, engaging stakeholders or tracking outcomes. Where datapoints serve primarily to increase comparability or reinforce existing disclosures, the benefit may not outweigh the added burden, particularly for small and medium-sized entities in global supply chains. The Global Standard therefore recommends that any new mandatory datapoints be accompanied by a clear explanation of their rationale, how they relate to internationally recognised due diligence standards and how they are expected to improve sustainability reporting in practice. EFRAG should also consider recognising credible voluntary sustainability standards such as GOTS as sources of supporting evidence. This would allow companies already operating under rigorous certification systems to demonstrate compliance more efficiently, while ensuring that the overall reporting framework remains coherent and avoids duplication.			
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We recognise the value of clarifying that ESRS is a fair presentation framework, particularly if this encourages companies to move away from a checklist mentality and towards disclosures that are more relevant, balanced and aligned with due diligence processes. This approach reflects the spirit of the UN Guiding Principles and the OECD Due Diligence Guidance, and which emphasises the importance of reporting that captures both the quality of processes and the significance of impacts. At the same time, there are risks that should not be overlooked. The exercise of judgement required under a fair presentation approach can create uncertainty, particularly for impact materiality where established reporting practices are still limited. For small and medium-sized enterprises in global supply chains, the risk of increased audit costs and legal exposure may lead to over-reporting as a defensive strategy, which could undermine the simplification objective. Furthermore, giving too much discretion to preparers risks weakening the visibility of adverse impacts on rights-holders if companies choose to frame materiality too narrowly. The Global Standard therefore supports the principle of fair presentation but recommends that it be supported with clear guidance, including examples that illustrate how to apply it in high-risk sectors such as textiles. Safeguards should ensure that fair presentation is consistently applied in a manner that upholds the dual materiality principle and maintains transparency on salient human rights and environmental risks. Recognition of credible voluntary sustainability standards such as GOTS could also help undertakings demonstrate fair presentation in a way that is consistent with internationally recognised due diligence expectations.			
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We do not support an exemption for financial institutions from disclosing absolute greenhouse gas emission targets when they have only set intensity targets. While we recognise the methodological challenges of calculating absolute portfolio emissions, exempting financial institutions from this requirement would weaken climate accountability and create an uneven standard compared to other sectors. Absolute emissions are necessary to capture the full scale of impacts. Intensity targets may demonstrate efficiency gains, but they can mask situations where overall emissions continue to rise due to portfolio growth. Without disclosure of absolute targets, stakeholders cannot properly assess whether financing activities are aligned with transition pathways consistent with the Paris Agreement. The Global Standard therefore recommends that financial institutions be required to disclose both intensity and absolute measures wherever possible. If significant uncertainties remain, undertakings should explain their assumptions, outline methodological limitations and set out time-bound plans for improving accuracy over reporting cycles. In this way, transparency is preserved, comparability across sectors is maintained, and financial institutions are incentivised to strengthen their role in driving decarbonisation. Recognition of credible voluntary sustainability standards such as GOTS can also support institutions in demonstrating consistency with internationally recognised due diligence expectations.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	We support the intention behind increasing country-level visibility of employee-related disclosures, such as characteristics of the workforce, collective bargaining coverage and social dialogue. These are important indicators for understanding labour rights risks and ensuring accountability. The change to a threshold based on the ten largest countries by headcount has the potential to provide more consistent information, but the balance is only partly achieved. The new criterion may exclude countries where headcount is relatively small but where salient risks are high, as is often the case in textile supply chains. For example, a brand headquartered in Europe may employ only a modest number of people directly in high-risk sourcing countries such as Bangladesh or Ethiopia, but those contexts remain critical for assessing collective bargaining and social dialogue. A threshold based only on headcount risks obscuring issues that are material from a rights-holder perspective. The Global Standard therefore recommends refining the threshold so that the ten largest countries are disclosed, but with the option to add other countries where material risks are present, regardless of headcount. This would ensure that disclosures remain both consistent and responsive to stakeholder-relevant risks. Recognition of credible voluntary sustainability standards such as GOTS can provide companies with tools to identify high-risk geographies and ensure that disclosures reflect international due diligence expectations.			
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	We weclcome the effort to integrate ILO guidance into the methodology for calculating adequate wages outside the EU. This is consistent with the UN Guiding Principles and the OECD Due Diligence Guidance. However, the amended hierarchy in ESRS S1 AR 22 creates challenges that limit its effectiveness in ensuring transparency and comparability. Placing living wage benchmarks at the bottom of the hierarchy risks normalising the use of statutory minimum wages that fall well below adequacy. In many sourcing countries for textiles, statutory minimum wages do not provide for basic needs, and relying on them could undermine the credibility of the disclosure. Equally, the lack of a requirement to disclose which prong of the hierarchy was applied creates a gap in transparency that prevents comparability across undertakings and sectors. Without clarity on whether a company used statutory wages, negotiated wages or living wage benchmarks, stakeholders cannot properly assess the adequacy of wage policies. The Global Standard therefore recommends revising AR 22 to prioritise living wage benchmarks where available and to require disclosure of both the data source used and the rationale for its selection. This would ensure that companies do not rely on lower standards without explanation and would create greater consistency across disclosures. Recognition of credible voluntary sustainability standards such as GOTS, which already operationalise living wage requirements, would further support undertakings in aligning their reporting with international due diligence expectations.			
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We support a review of AR 26 in ESRS E4 to provide clearer and more up-to-date methodological guidance for setting biodiversity and ecosystem-related targets. The current application requirement usefully identifies certain areas, such as hectares restored or number of sites with improved ecological integrity, but it does not yet reflect the latest scientific frameworks or the complexity of value chain impacts in high-risk sectors such as textiles. The targets should be both measurable and relevant to the ecosystems affected by an undertaking's operations and supply chains. Textile production, for example, has significant upstream impacts on land use, water systems and chemical pollution, which must be addressed in a manner that is both science-based and stakeholder-relevant. Aligning AR 26 with frameworks such as the Science Based Targets for Nature (SBTN) would provide undertakings with clearer guidance on setting meaningful and credible targets. The Global Standard therefore recommends that AR 26 be revised to reflect the latest developments in biodiversity methodologies, to ensure that targets are measurable, time-bound and based on robust ecological indicators, and to encourage companies to disclose both baseline conditions and progress. Recognition of credible voluntary sustainability standards such as GOTS, which already require practices that protect biodiversity and ecosystems, would further help undertakings demonstrate alignment with international due diligence expectations.			
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree				
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Global Standard gGmbH	Other - please specify (required)	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
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Survey	Global Standard gGmbH	Other - please specify (required)	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
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Survey	EFPIA	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	"We welcome the clarifications and simplifications introduced, notably the option to publish non-mandatory information, the simplification of AR16, and the emphasis on avoiding excessive documentation. These measures should ease the reporting burden and strengthen the information materiality filter. However, several concerns remain: Double materiality must be maintained. We disagree with proposals to limit the CSRD to single financial materiality, as this would significantly reduce the scope and usefulness of sustainability disclosures for a wide range of users, including academics, NGOs, and other stakeholders. Double materiality should remain a core feature of the framework. Alignment with global standards while preserving double materiality. We support explicit recognition of the IFRS Sustainability Disclosure Standards (SDS) as the global baseline to improve comparability and reduce compliance costs. However, this must not come at the expense of double materiality. Alignment should focus on interoperability, allowing companies to meet both global and EU requirements. Definition of financial materiality. We recommend broader alignment with IFRS/ISSB's definition while maintaining flexibility for entities to apply the approach most suited to their structure and jurisdiction. IRO methodology and the gross perspective. The methodology for assessing Impact, Risk, and Opportunity (IRO) materiality remains unclear, particularly the interaction between severity and probability. Further guidance is needed to ensure assessments are based on a gross perspective to justify actions, targets, and metrics, and avoid confusion. Opportunities dimension. More guidance is also needed on how to identify and assess opportunities to improve consistency and comparability."			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	While the additional clarification for assessing actual impacts is welcome, the approach to potential impacts raises significant concerns. In particular, we do not support introducing new terms such as "significant ongoing mitigation," as they create uncertainty, add complexity, and risk misalignment with companies' existing risk management processes. We recommend that the standard: Respect existing frameworks: Allow companies to follow their existing risk management approaches when assessing impacts, ensuring consistency across reporting and avoiding unnecessary costs or duplication. Clarify gross impacts: Make clear that the starting point for assessing potential negative impacts should be based on gross impacts to ensure consistency and avoid underreporting. It would also be useful to provide examples of what gross impacts do not include — for instance, they should not assume a scenario in which a company operates without legally required pollution controls. Preserve gross perspective: Even when mitigation measures are considered, the standard should confirm that the gross perspective remains the baseline for assessment. Avoid prescriptive definitions: The standard should avoid prescriptive language on what constitutes "significant" mitigation or prevention. If EFRAG retains this concept, companies should have flexibility to explain their rationale for what qualifies, rather than applying a rigid definition. Acknowledge existing mitigation: Permit companies to consider all mitigation and prevention measures already in place when assessing potential negative impacts, without thresholds or qualifiers such as "significant." Where mitigation efforts are effective, companies should be able to disclose the net potential impact (based on severity and likelihood), rather than a gross impact that ignores existing measures.			
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	"We welcome the improvements in readability and conciseness, as well as the greater flexibility for companies to prepare sustainability statements that are better connected with corporate reporting. In particular, the possibility of including an executive summary is a practical and valuable addition that can help make sustainability reporting clearer for stakeholders. We also propose advocating for even more flexibility in how sustainability statements are structured — including the order and collation of standards — to support alignment with other reporting frameworks and reduce complexity for companies. At the same time, we remain concerned that the ESRS, even with these amendments, does not sufficiently align with global standards. We believe the ESRS should explicitly recognise the IFRS Sustainability Disclosure Standards (SDS) as the global baseline and move towards greater alignment to promote consistency, comparability, and efficiency for companies operating internationally."			
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	"The changes bring some benefits. In particular, the simplification of PAT requirements helps make reporting clearer and less heavy for companies. This is a positive step towards reducing the workload and achieving a better balance between ESRS 2 and the topical standards. At the same time, we are concerned about the duplication with the IFRS Sustainability Disclosure Standards (SDS). Many companies already report under IFRS/ISSB, and the overlap with ESRS means extra work, higher costs, and less efficiency. This duplication undermines the goal of simplification and makes reporting harder instead of easier. To strike the right balance, we believe ESRS should be better aligned with the IFRS SDS global baseline. This alignment should focus on identifying and addressing specific gaps between the standards to improve interoperability, while maintaining double materiality. Stronger alignment would reduce costs, avoid confusion, and improve comparability of reports across markets."			
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Overall we see the simplification efforts supporting clarity and better distinction between mandatory and voluntary information. However, the duplication the ESRS causes companies with complying with the IFRS Sustainability Disclosure Standards will cause undue cost and effort.			
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1; S1	All: While we understand the intent behind NMIG, we are concerned that non-binding guidance may be interpreted as binding by assurance professionals. However, in the absence of more detailed implementation guidance, the NMIG can be a useful tool to provide additional context and support companies on their maturity journeys. We therefore propose maintaining it as supporting, non-mandatory material, while ensuring its non-binding nature is clearly communicated. NMIG - ESRS S1It would be helpful to include a direct source for adequate wages			
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We support recognising the IFRS Sustainability Disclosure Standards (SDS) as the global baseline and promoting stronger alignment to reduce duplication and improve comparability. We welcome the option to estimate future actions and the clearer treatment of acquisitions and disposals, which simplify reporting. We share concerns regarding the partial scope of metrics, as the proposed relief could erode comparability and data quality if companies individually determine when estimation is too burdensome. Alignment efforts should focus on addressing these gaps while maintaining robust data quality, standardisation, and comparability. We also welcome other relief measures, such as transitional periods for acquisitions, and stress that improving data maturity should not create undue costs for companies.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	The notion of "undue cost and effort" will help simplify the reporting.			
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Removing the quantitative requirement until there is a standard market practice on measuring anticipated financial effects will avoid the risk of disclosing unreliable information. Option 2 also allows companies to use business judgement to determine which financial effect disclosures are most meaningful for stakeholders. This flexibility is important given that IFRS and ESRS reliefs are not fully aligned, as strict requirements would otherwise lead to duplication of effort.			
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	To achieve faithful representation, the quantitative requirement should be removed until there is a standard market practice for measuring anticipated financial effects. Unlike historical data, these disclosures rely on forward-looking assumptions about climate scenarios, technology, and regulation. Providing specific figures may create a false sense of precision and certainty, leading to flawed decisions. Without standardised methods, companies would use different models and assumptions, undermining comparability and risking selective disclosures. Until methodologies mature, qualitative disclosures—focused on processes, strategies, and management—are more reliable and informative.			
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	"We strongly support closer alignment with the IFRS Sustainability Disclosure Standards (SDS) and would prefer full adoption as the most effective way to ensure interoperability, comparability, and efficiency. While the proposed amendments improve interoperability, gaps remain. In particular, we recommend that ESRS should: Allow flexibility in the method used to measure emissions (equity share, operational control, or financial control), in line with the ISSB and GHG Protocol. The current ESRS E1 requirement to use operational control creates misalignment and increases reporting burden for companies reporting under both frameworks."			
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	The reduction of mandatory narrative datapoints does simplify the redaction of the report, especially for the first year, however none of the quantitative datapoints were removed which means the annual reporting burden will stay the same			
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	"While some of the new metrics are warranted, the terminology used is too ambiguous to serve as a required disclosure. In particular, the definitions of "anti-corruption and anti-bribery" and "employees" are unclear and could lead to reporting on cases unrelated to the company. Any disclosure of fines should be limited to final court decisions to avoid misinterpretation. We also note that increasing mandatory disclosures is not consistent with the simplification objectives. If retained, these datapoints should remain optional and classified as NMIG. While many of the datapoints may not require significant effort, the procurement team training requirement is new and would add to the reporting burden."			
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	"We are concerned about the introduction of new terms and concepts such as critical and strategic raw materials. These will be difficult for companies to define and measure within the available timeframe and will require significant additional work. Increasing mandatory disclosures in this area also runs counter to the simplification objectives. If not removed, we suggest these datapoints remain optional and reclassified as NMIG. At the same time, the datapoint on waste with an unknown destination is helpful, as it will improve data quality and comparability and the additions seem justified to provide clarity."			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	"The more explicit language on fair presentation and the use of business judgement is welcome, as it supports a more principle-based approach to disclosures, even if the standards remain detailed and granular. However, the effectiveness of this approach will depend heavily on how auditors interpret and apply the concept of fair presentation. Without consistent interpretation, there is a risk of variability in application and additional reporting burden."			
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	"A by-country breakdown of metrics may not provide the most meaningful information to users, as the relevance of data often depends on how a company's activities are organised. We believe disclosures would be more useful if structured around categories aligned with business organisation, rather than strictly by country. In addition, reporting disaggregated headcount data is complex and of limited value. Definitions of headcount can vary by country, creating inconsistencies, while the proposed threshold risks adding reporting obligations for countries that are neither material nor decision-useful. Moreover, changing the reporting approach would create an additional burden for wave 1 companies, which would have to alter reporting practices between year 1 and year 2. We therefore recommend that disaggregated social metrics remain optional and be reclassified as NMIG. Alternatively, flexibility could be introduced by requiring a breakdown only for countries where a majority of employees are based (e.g. covering 80% of the workforce), giving companies sufficient leeway to determine what is most practical to implement."			
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	We welcome the effort to provide more guidance on the calculation of adequate wages outside the EU, as this can support companies in improving reporting and comparability. However, this remains an area where practice is not yet settled, and imposing a calculation requirement at this stage risks producing inconsistent and unreliable results. An even more direct and standardised source of information would be needed to support meaningful disclosures and ensure comparability across companies and countries. Until such methodologies are mature, flexibility should be provided, and the requirement should not be mandatory.			
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	This regulation's scope is not settled for all financial institutions and therefore incorporating it through does not seem reasonable.			
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We see value in providing guidance for setting biodiversity- and ecosystem-related targets. However, we have two key concerns: Reference to ESRS sectors should be removed until the sector standards are finalised. Introducing such references prematurely creates uncertainty and risks inconsistency. A broader re-review of ESRS E4, including AR26, is needed to ensure full interoperability and alignment with existing frameworks such as the Taskforce on Nature-related Financial Disclosures (TNFD).			
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	A gender pay gap that takes into account the specificity of different geographies would be more helpful for comparability and for the monitoring of this issue. Even when adjusted by country, this does not adequately reflect wage gaps. Instead, it should ideally be weighted by job-levels in order to sufficiently say anything about wage gaps. This will be difficult to implement, but would be necessary to allow for useful reporting information, and thus further guidance would be welcomed.			
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	With respect to metric G1-6, we question the usefulness of the information. Unless benchmarks or best practice in terms of days for payment are established, many companies will continue to not find this data point relevant, and therefore limit comparability			
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	GDR-A: 38 (69 amended): Difficulties remain to define what constitutes "significant resources". Undergoing limited assurance on qualitative information, also means high burden to link relevant budgets with relevant actions and how to report on this year on year with changing budget constraints			
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	35.ESRS1_1.2.	Do you agree with the amendments of this chapter?	I agree	Changes here are reasonable as align better with IFRS Sustainability Standards where information is only required to be disclosed if material.	ESRS1	1.2 Drafting conventions	
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	35.E1-6.	Do you agree with the amendments of this chapter?	I disagree	The current approach restricts companies from updating their baseline year except in cases of major changes to boundaries, which may prevent the use of the most accurate and relevant data—especially when organizations improve data quality or undergo substantive changes that do not strictly meet the set criteria. To ensure that disclosed climate targets are both meaningful and credible, I recommend that the ESRS allow greater flexibility for companies to choose or revise their baseline year when justified by improvements in data or organizational structure, provided such changes are transparently disclosed and explained. This adjustment would enable more accurate reporting and better reflect business reality without compromising transparency or comparability.	E1	Disclosure Requirement E1-6 - Targets related to climate change	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	35.E3-4.	Do you agree with the amendments of this chapter?	I disagree	"While in general the reporting of water recycled/reused is beneficial to demonstrate proactivity in circular use of water within direct operations, efforts to standardize definitions within our sector have proven difficult due to the varied nature of processes (e.g. interpretation of volumes recirculated/reused for required cleaning steps). The work needed to harmonize on these definitions was not critical, as ultimately, recycling/reuse is one of several ways to enhance efficiency and the values that matter regarding impact to the basin are limited to withdrawals and discharges, and consumption as the calculated difference between those figures. WWF has fed back that a lack of clarity in the definition of 'stress' has resulted in challenges for some companies reporting. WWF Water Risk filter basin risk assessment provides measures focused on scarcity and quality as separate risks, while stress brings these risks together under one metric. We support the clarity that separating the risk scores brings for us, as the challenges have different impacts on our business and drive different action. Clarity is needed."	E3	Disclosure Requirement E3-4 - Water metrics	
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	35.E4-1.	Do you agree with the amendments of this chapter?	I disagree	Transition plan requirement is not clear and we understand the concept is still being shaped and thus our preference is to remove this requirement until it is sufficiently clear.	E4	Disclosure Requirement E4-1 - Transition plan for biodiversity and ecosystems	
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	35.E4-2.	Do you agree with the amendments of this chapter?	I disagree	The requirement for a biodiversity and ecosystems scenario analysis is very vague on how exactly it would work in practice. Would it include projected changes for climate, water risk, etc. for example. Our preference would be to remove this requirement till practice is settled.	E4	Disclosure Requirement E4-2 - Policies related to biodiversity and ecosystems	
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	35.E4-5.	Do you agree with the amendments of this chapter?	I disagree	"Para AR10 notes ""Where possible measurement at site using state of nature metrics is best suited to determine impact on biodiversity and ecosystems. Measurement at site is especially relevant where those sites are in or near biodiversity sensitive areas."" We completely disagree. Example to demonstrate: A) Site is next to a freshwater biodiversity sensitive area (e.g RAMSAR wetland) B) Untreated stormwater run-off is directed into wetland. Clear impact identified. How is measuring state of nature metrics (extent, type, condiiton of ecosystems) within the site boundary at all best suited to determine the impact on the freshwater biodiversity and ecosystems in this example? We would suggest the best measurement/metric to be used on-site is related to an actual identified impact (in this case, surface run off). Anything related to state of nature should be measured in the receiving environment (freshwater sensitive area). Even so, current state of nature metrics are terrestrial focused, not marine or freshwater. "	E4	Disclosure Requirement E4-5 - Metrics related to biodiversity and ecosystems change	
Survey	EFPIA	Business association (other than association of financial institution)	Belgium	35.E5-5.	Do you agree with the amendments of this chapter?	I disagree	"There are challenges with the definitions that require clarification. The definition of waste throught the GRI has been ""anything that the holder discards, intends to discard, or is required to discard"" since at least 2020. This seems to be in direct contradiction to the definition of preparation for reuse ""checking, cleaning, or repairing operations, by which products or components of products that have become waste are prepared to be put to use for the same purpose for which they were conceived"". If you intend to reuse an item ""for the same purpose for which they were conceived"", either within your site or beyond site boundaries, then it wouldn't be waste per our interpretation. This wasn't an issue before since companies could just not align to this portion of GRI. However, now with regulations coming into scope, this challenge is becoming more impactful. Suggest to advocate that preparation for reuse be removed completely, as something being reused = not waste, but rather contributing to the circular economy. The EU needs to provide clear guidance on how to measure recyclability and this should align with the recyclability methodology anticipated in 2028 under the EU Packaging and Packaging Regulation (PPWR). Specifically, this needs to include packaging formats for pharmaceutical packaging e.g. blisters etc. If recyclability rates for material in products must be reported then clear guidance on how to assess and measure recyclability of pharmaceutical devices e.g. inhalers should be provided. "	E5	Disclosure Requirement E5-5 - Resource outflows	
Survey	IDH	Business association (other than association of financial institution)	Netherlands	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	s an organization with over 13 years of experience working alongside leading companies on adequate and living wage practices, we strongly support the ESRS objective to ensure employees are paid an adequate wage. To meet this objective, it is important to clarify that statutory minimum wages cannot, on their own, be considered sufficient to demonstrate adequacy. In most jurisdictions, minimum wages fall below the level required for a decent standard of living, and therefore do not align with ILO principles or with the intent of the ESRS. For consistency with the benchmark hierarchy already set out, adequacy should be assessed against: -Wages established through collective bargaining agreements, or - Living wage benchmarks that directly reflect what workers and their families require for a decent standard of living. This approach is consistent with the ILO's agreed principles on estimating living wages, reduces the risk of discrimination between EU and non-EU employees, and ensures comparability and credibility in company reporting. It also reflects the practical experience of leading businesses that recognize living wage benchmarks as the most reliable measure of adequacy.			
Survey	IDH	Business association (other than association of financial institution)	Netherlands	35.S1-9.	Do you agree with the amendments of this chapter?	I disagree	3 years of experience working alongside leading companies on adequate and living wage practices, we strongly support the ESRS objective to ensure employees are paid an adequate wage. To meet this objective, it is important to clarify that statutory minimum wages cannot, on their own, be considered sufficient to demonstrate adequacy. In most jurisdictions, minimum wages fall below the level required for a decent standard of living, and therefore do not align with ILO principles or with the intent of the ESRS. For consistency with the benchmark hierarchy already set out, adequacy should be assessed against: - Wages established through collective bargaining agreements, or - Living wage benchmarks that directly reflect what workers and their families require for a decent standard of living. This approach is consistent with the ILO's agreed principles on estimating living wages, reduces the risk of discrimination between EU and non-EU employees, and ensures comparability and credibility in company reporting. It also reflects the practical experience of leading businesses that recognize living wage benchmarks as the most reliable measure of adequacy.	S1	Disclosure Requirement S1-9 - Adequate wages	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Double Materiality Research Chair (chaire-double-materialite.org)	Academia	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Overall, the Double Materiality Research Chair supports the balance found by EFRAG to simplify the DMA while maintaining its core requirements (assessment at the level of positive/negative impacts, risks and opportunities when this is most appropriate, definition of materiality thresholds, minimum reporting requirements to describe the DMA process and results). These minimum requirements are needed to ensure that the DM principle is fully embedded in the ESRS. However, areas for improvement are: 1)The DM research Chair strongly advises against the new differentiation between primary users and other users as regards the definition of materiality. The deletion of the notion of "decision-useful" for other users is inconsistent with the core concept of materiality itself that relates to decision-making. We believe that this change would be not compatible with the notion of double materiality. 2)Gap between disclosure on financial materiality thresholds (some good practices) and impact materiality thresholds (often generic). Companies almost never articulate impact thresholds with ecological thresholds, which stresses the important need for guidance . There is an opportunity for EFRAG and the EC to reflect on an ecological thresholds benchmark for companies. The Chair also regrets that many useful AR on how to conduct the DMA have been moved to NMIG (ex: consider river basin level for water-related issues). 3)IRO-1:there is much less information on social input parameters compared to environmental topics, because ESRS S1-4 do not contain any IRO-1 "reminders" today. Warning to maintain an incentive to disclose input parameters at topic level where this is most useful (to avoid boilerplate disclosures). 4)Companies tend to give less specific information on "effects of impacts on people and the environment" than on financial effects. EFRAG could reflect on guidance to improve reporting on this aspect and avoid unbalance between impact and risk disclosures.			
Survey	Double Materiality Research Chair (chaire-double-materialite.org)	Academia	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	The Double Materiality Research Chair does not support the proposed approach and strongly recommends retaining the actual ESRS methodology based on gross assessment of impacts. This is because: - Information on gross impact is important to understand the context of mitigation measures. For consistency reasons, risks and potential impacts should also be treated in a consistent manner (both on gross basis). - There is a risk that many negative impacts will be considered not material and information on these will be omitted (including information on the mitigation measures that the company considers successful!) as a result. This will be a significant reduction of relevant information for all stakeholders. Based on its assessment of companies' first DMA reporting, the Chair also suggests clarifying the approach in the ESRS. Indeed, while most companies used the "gross" approach, this methodology was not always clear for all companies. It might be useful to differentiate results from IRO-1 (prior to mitigation) and disclosures under SBM-3 (net financial effects, resilience after mitigation).			
Survey	Double Materiality Research Chair (chaire-double-materialite.org)	Academia	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS2	Cf. comment above: Companies almost never articulate impact materiality thresholds with ecological thresholds, which stresses the important need for guidance . There is an opportunity for EFRAG and the EC to reflect on an ecological thresholds benchmark for companies.			
Survey	Double Materiality Research Chair (chaire-double-materialite.org)	Academia	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The Double Materiality Research Chair is concerned by the application of the "undue cost or efforts" principle to the Double Materiality Assessment. EFRAG should better explain the implications of this relief to avoid undermining the robustness of the DMA which is at the core of the sustainability reporting. This relief on DMA could transfer the burden to stakeholders that will have further difficulties to access relevant information on companies' sustainability impacts and risks. A holistic approach to informing the examination of the burden for monitoring, controlling and mitigating companies I and Rs would be welcome.			
Survey	Double Materiality Research Chair (chaire-double-materialite.org)	Academia	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Overall, the Double Materiality Research Chair supports EFRAG's balance and believes that it is important for the EU standards to maintain some level of difference with the ISSB standards. In particular, it is key not to undermine the principle of double materiality: impact-related information is as important as financial-related aspects and it should not be presented apart because it might "obscure" financial-related information. This is why EFRAG should be careful when revising the double materiality definition in ESRS 1. The DM Research Chair regrets that the notion of "decision-usefulness" has been removed when referring to stakeholders other than investors, because it creates an unbalance between stakeholders (cf. Q11).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Double Materiality Research Chair (chaire-double-materialite.org)	Academia	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The Double Materiality research Chair is concerned by the new guidance on how to consider remediation actions in assessing materiality of negative impacts. The Chair also highlight areas for improvements in Q11). The Chaire has conducted an assessment of company's first sustainability statements focussed on the DMA (process and results). This study informed the Chair's answer to the EFRAG consultation. The study will be available in English on https://chaire-double-materialite.org/publications.html			
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The table provides a useful overview. However the column titled 'How to assess and what to report in future years' may cause confusion, as each 'future year' will eventually become the current reporting year. Restructuring the table to reflect a more time-neutral approach could enhance clarity and usability.			
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	An executive summary at the beginning of the sustainability statement is valuable for stakeholders - providing a clear and accessible overview of the key messages, without having to navigate the whole report			
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	It's positive that the 'may disclose' datapoints have been removed, as it was uncertain what their status and applicability was. We also appreciate language improvements which have enhanced clarity and readability.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We welcome the relief provided in ESRS 1 Para 91, which allows undertakings to report metrics based on partial data coverage where reliable data is only available for part of the reporting boundary/value chain. However we believe this relief should also apply to ESRS E1-6 GHG emissions which are currently excluded. Companies subject to CSRD should not be required to justify a broader scope or additional data collection efforts beyond what is already mandated by their climate commitments under internationally recognised standards. We request Para 91 be redrafted in more plain English in the interests of accessibility. Our understanding is that the intention of paragraph 91 is to clarify that both direct data and estimates can be used equally in reporting			
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	We welcome the reduction in data points. However, the majority of the removed data points are qualitative in nature or fall under the category of optional "may" disclosures. The quantitative data points, which typically require the most resources to collect and report, remain largely unchanged. The qualitative data points, which typically require the most resources to collect and report, remain largely unchanged. Therefore while the total number of disclosures has been reduced by 68%, this does not correspond to a proportional reduction in the reporting burden for companies.			
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	International and European standards should be aligned.			
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree				
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The ESRS E4 Biodiversity transition plan is controversial and might introduce additional bureaucratic burden. Therefore and in light of "simplification", introducing a biodiversity transition plan is to be rejected.			
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	E2-4 Secondary microplastics. The requirement to report on the amount of secondary is not meaningful as long as no harmonised methodology has been developed at EU level. Current methodologies are costly and often unreliable. The upcoming Regulation on preventing plastic pellet losses to reduce microplastic pollution explicitly states that a standardised methodology is necessary and Art. 13 of the proposal sets out requirements for development of such a standard. This reporting requirement should be postponed until a harmonised methodology is in place at EU level.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We believe that clear and practice guidance for auditors is essential to ensuring consistent and effective implementation of this principle, without which, there is a risk the concept could be interpreted as a need to include additonal information beyond what is material. A balance is needed to ensure fair presentation enhances the quality of reporting without adding unnecessary complexity.			
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	The goal must be to reduce emissions per activity. However, this must not lead to a decline in the level of business ambition, for example, in lending to agricultural businesses.			
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	EFRAG should refrain from reintroducing the previous AR 26 or any revised application requirements that prescribe how measurable biodiversity targets should be expressed. Given that biodiversity target-setting is a rapidly evolving area, references to "latest trends" may quickly become outdated and risk reducing flexibility for undertakings.			
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The proposed disclosure requirements for employees in the value chain are disproportionate and go far beyond the requirements of the CSRD. The proposals deeply interfere with the proportionality of data provision. Furthermore, this leads to far-reaching co-determination and influence on SMEs. This deep insight in the context of pure reporting impairs the right to entrepreneurial independence and fundamental freedom of decision-making and is rejected.			
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The ESRS must strive for greater coherence with existing environmental legislation to avoid double reporting, and reduced environmental burdens for companies. E.g. many quantitative data points (such as use of raw materials, water, chemicals, and energy; emissions to air, water and soil; and waste generation) are already required as part of environmental permits or must be made available on the Industrial Emissions Portal - therefore a 2nd review of this data should not be necessary. Moreover, building on existing business practices (such as leveraging certified ISO management systems which are internationally recognised) can significantly reduce the administrative burden for companies already applying them. Closer alignment of sustainability reporting with frameworks that rely on management systems (e.g. under the European accreditation regulation (EC) No. 765/2008) would streamline compliance and support broader EU policy objectives by reinforcing the role of verified sustainability data across regulatory domains. It is positive that EFRAG has focused on the "own operations" of undertakings. This could be strengthened even more to demonstrate that undertakings should first analyse their own operations before seeking information from the value chain.			
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	35.ESRS1_3.3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The wording has been improved. However, there are still some incertainties. For instance, AR 5 requires undertakings to adopt thresholds to determine which impacts will be covered in its sustainability statement without explaining the conditions/classifications for these thresholds. This seems a bit arbitrarily and gives leeway to each undertaking to decide. Additionally, AR 11 elaborates on the relevance of stakeholders within the MA but does not clearly state that no primary data is needed. At the same time, it is necessary to include relevant stakeholders (the value chain) in the materiality assessment. Furthermore, the undertaking should include how and to what extent the value chain was involved in the assessment of the materiality assessment of all relevant datapoints. Clearer language (in line with Chapter 5.2) would be appreciated.	ESRS1	3.3 Double materiality assessment	
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	35.ESRS1_5.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree		ESRS1	5. Reporting undertaking and upstream and	
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	35.ESRS1_5.1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree		ESRS1	5.1 Reporting undertaking and own operations	
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	35.ESRS1_5.2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree		ESRS1	5.2 Inclusion of value chain information	
Survey	Deutscher Bauernverband e.V.	Business association (other than association of financial institution)	Germany	35.ESRS1_5.3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree		ESRS1	5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	- Par. 21: Revision of the definition of materiality is welcome (information is material if its omission, misstatement, or concealment could influence the decisions of users of the reports and to understand the material IROs). However, it remains unclear how to interpret "necessary for users of general purpose" - Par. 22: Reporting at the topical or IRO level is useful - Par. 29: what is meant by "an update to take into account changed circumstances" -> specification needed - Par. 34: Actual impacts … include both newly arisen and those persisting from previous periods -> it has to be made clear how many previous periods need to be included_ - Par. 48: it is not clear what is meant by "a limited further assessment may be sufficient" - AR 18: Further specification is needed regarding the reliefs for detailed investigations when can these be used? How should it be documented? - Appendix A: With the sub-subtopics included in brackets the reduction is not really existing as companies will still have to gather IROs regarding those topics			
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	- Clarification regarding positive impacts is helpful. - Par. 34: overall, we appreciate the further specification regarding the consideration of remediation measures, however, there seems to be a contradiction between the first sentence "the severity of the impact shall be evaluated considering the outcome of any mitigation/prevention measures implemented before the impact occurred" and the rules in App. C. We would suggest for all negative impacts to be dealt with according to App. C. In order to generate meaningful reporting without any information that is not relevant it is important that companies are allowed to consider all mitigation/remediation actions. - Appendix C: it should be specified that regarding actual negative impacts the impact could also result from previous periods. - Par. 36: only remediation actions on negative impacts caused by compliance with law don't result in positive impacts, other remediation actions can result in positive impacts? Further specification would be appreciated.			
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	- Strengthening the fair presentation principle enables reports with more relevant content to be created. Creating an executive summary does not provide flexibility. Furthermore, an executive summary can help readers to better understand the report itself, however, it inevitably leads to unnecessary duplications.			
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Deletion of IRO, GOV, and SBM entries in the topical standards is reasonable as they were duplicated in ESRS topical standards. However, it is necessary that in the standards itself, in the NMIG and in the basis for conclusion it is clearly stated that it is enough to provide this information on a more aggregate level and that a duplication is not necessary. We welcome the changes regarding the GDR esp. the reduction allowing a more flexible approach for entities to adopt reporting to the business context. However, it is crucial that this higher level of requirements is accepted esp. by auditors without resorting to the previous specifications			
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Moving the AR from the end of the standards to the corresponding DR is very helpful. Furthermore, we welcome the deletion of the "may disclose" requirements as well as the inclusion of all "shall" requirements within the main body. However, we clearly oppose the new mandatory datapoints implemented in the drafts. There is no definition regarding "when applicable". We would like to suggest that reporting on such issues is only necessary if it is applicable. A company should not report any negative statements but instead simply not report. Furthermore, it is crucial that terms are clearly defined, for example: shall consider, may present, may implement, … -> if the same meaning is intended we suggest to always use the same term throughout the standards in order to avoid confusion.			
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We consider NMIG a helpful orientation tool within the ESRS framework. Its non-binding nature must be clearly emphasized and understood by all parties to avoid uncertainty or implicit pressure to comply. We support EFRAG's decision not to include NMIG in the delegated act.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Overall, we welcome the proposed simplication and consider it a meaningful step toward reducing the complexity associated with ESRS reporting. Implementing the principle of undue cost and effort does not necessarily provide any relief for wave 1 companies. On the contrary, it might increase the effort to prove sufficient effort has been made. Furthermore, we welcome the simplifications regarding metrics, however this might also lead to additional reporting effort as the assessment of whether data is available or not or whether the subsidiary impacts the IRO has to be documented. So not reporting about certain issues does not necessarily lead to less effort in preparation and documentation. The amendments made to the anticipated financial effects do not solve the issue of data availability and reliability, as assumptions for this data point will vary so widely that any comparison between companies would be misleading.			
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	It is to be welcomed that the scope of reporting is fundamentally that of financial control and that operational control should only be applied in cases of unfair presentation or complex structures. However, ESRS 1.92 is rather misleading while stating "the undertaking may exclude joint operations over which it does not have operational control" -> From our point of view, it seems to be intended to exclude operations under operational control and not only "joint operations". We would suggest to not only exclude joint operations. The principle of undue cost or effort is not clearly defined and leaves considerable room for interpretation, which can lead to uncertainty among companies and auditors. Implementing the principle of undue cost and effort does not necessarily provide any relief for wave 1 companies. On the contrary, it might increase the effort to prove sufficient effort has been made.			
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	Relief for anticipated financial effects: In general, we disagree with both options as qualitative and quantitative information is subject to high uncertainty. Additionally, there is no guidance on how to calculate or determine such information. It will lead to tremendous additional effort for companies as the underlying data is often unclear, there is no recognized method, and this information is likely not to be comparable amongst companies. However, if there is the necessity of such information, we would prefer Option 2 although even qualitative would be difficult to obtain. A as quantitative reporting would be based largely on estimates and assumptions and the added value (comparability, reliable information) would be low. Nevertheless, we also view this option critically, as qualitative reporting would also be associated with a high degree of uncertainty and would be virtually impossible without financial or quantitative data.			
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	ESRS E1 - 40. (a) -> high degree of estimation necessary, granularity and detail of data questionable, disclosures should always take into account adaptation measures already taken ESRS E1 - 40. (b) -> granularity of reported data to be discussed, it might not be helpful to publish lists of locations ESRS E1 - 40. (c) -> direct link between adaptation measures and single assets does not necessarily exist, therefore, such a linkage should not be artificially created only for reporting purposes ESRS E1 - 40. (d) -> high degree of estimation necessary, granularity and detail of data questionable ESRS E1 - 41. (a) -> high degree of estimation necessary, granularity and detail of data questionable, it is necessary to define when transition risks do occur ESRS E1 - 41. (b) -> direct link between adaptation measures and single assets does not necessarily exist, therefore, such a linkage should not be artificially created only for reporting purposes ESRS E1 - 41. (c) -> what is the added value of such reporting? ESRS E1 - 41. (d) -> disagree, if there is no accounting recognition criteria it is not useful to publish additional figures as this would have to be specifically explained ESRS E1 - 41. (e) -> disagree, significant effort, sensitive information ESRS E1 - 41. (f) -> high degree of estimation necessary, granularity and detail of data questionable ESRS E1 - 42. -> disagree, sensitive information In general the requirements are still very challenging, data availability seems questionable and therefore solid data is not readily available._ Furthermore, there is no feasible methodology for linking financial metrics and climate-related risks/opp.			
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Greater interoperability with ISSB standards seems advantageous. Aligning ESRS and ISSB will help prevent duplicate reporting, and preparers want ESRS to cover ISSB requirements			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	Overall comments: In general we welcome the deletion of datapoints, however we would like to highlight the following issues: -For some disclosure requirements only granular datapoints have been deleted, the overall reporting requirements remain unchanged. This might lead to the same reporting amount as before as the definition of the requirements is just more open now. -The changes made nonetheless lead to implementation efforts for companies to apply for the changes -Some mandatory datapoints have been shifted to NMIG it should be clearly enforced that NMIG are no reporting obligation but should help implementation -Additional new datapoints have been introduced, this clearly contradicts the EU mandate and these should therefore be deleted again			
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	For our own reporting the changes are not relevant as we either already reported according to the "may" disclosure requirements or the topics are not material. However, in general, we not think that additional "shall" disclosure requirements should be introduced. It would be preferable that these new requirements remain "may" disclosures.			
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	The EU mandate does not allow for additional datapoints as it will lead to further effort for companies. Especially the additional datapoints regarding E5 lead to further effort. Furthermore, critical und strategic raw material seems to be sensitive information, companies should not be required to publish such information.			
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We welcome the introduction of the fair presentation principle in the ESRS. We are of the opinion that it is positive to put focus on materiality and the management approach and therefore rather avoid mere tick-boxing to fulfill reporting obligations. In this context we would also like to emphasize that it is necessary to define a primary user for sustainability reporting so that the principle can be applied in practice. Otherwise, the application of the principle allows for considerable leeway in interpretation, as the ESRS do not clearly define the principle.			
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	We agree with the proposed changes.			
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	We agree with the proposed changes.			
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	Amendments and simplifications in the ESRS should not give rise to inconsistencies with other relevant EU legal frameworks (in particular the SFDR). Should the deletion of the terms 'severe' in S1-16 and "fatalities" in S1-13 result in additional burdens for undertakings, as they would then be required to identify and report human rights incidents or number of days lost under two concepts, such an amendment should not be pursued. If Input from investors or other evidence suggests that some of the Principal Adverse Indicators (PAI) are not considered relevant in practice (as you mentioned above), then the datapoints should be deleted in the SFDR legal framework.			
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	In general, aligning with common accepted frameworks may help to publish targets and also lead to comparability. However, we would also like to note that this might lead to companies not able to publish relevant data in early stages thus maybe discourage companies from further steps			
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	We are of the opinion that an adjusted gender pay gap delivers important insights for companies to truly control based on this information and in the best case scenario to close the gender pay gap. Therefore, we recommend to include the adjusted gender pay gap metric in the standard as a "may" requirement. However, it should remain voluntary.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	The G1-6 is not material for us, so this change hardly affects us. However, we do not think that a separate disclosure of a SME category is useful. Categories should be chosen according to relevance for the company			
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	-In general, we reject additional Datapoints -The site IRO matching in the case of some standards will lead to a significant increase in reporting burden			
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The glossary requires editorial revision.			
Survey	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		S1-S4: Severe human rights incidents: deletion of "severe" leads to difference to SFDR requirement and should therefore be changed again and "severe" should be added, otherwise, extended reporting burden			
Survey	ECIIA	Other - please specify (required)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ECIIA	Other - please specify (required)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree				
Survey	ECIIA	Other - please specify (required)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	ECIIA	Other - please specify (required)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	ECIIA	Other - please specify (required)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree				
Survey	ECIIA	Other - please specify (required)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	G1	Disclosure requirements Internal Audit is independent (see Three Lines Model above), is professional (certifications…) and is required to comply with the International Professional Practices Framework of the IIA, and with the IIA Code of Ethics, which is a statement of principles and expectations governing behaviour of individuals and organisations in the conduct of internal auditing. These principles and behaviours include integrity, objectivity, confidentiality, and competency. Internal Audit reports directly to the Governing Body (Audit Committee). To support statutory auditors in auditing the wider corporate information, we believe there should be an important and enhanced role for the work of Internal Audit. To support statutory auditors having a better understanding of the company's broader financial and non-financial risk landscape, the Chief Internal Auditor and the partner responsible for the external audit, should ensure appropriate and regular communication and sharing of information. In order to maintain both assurance functions' independence and objectivity, whilst external/statutory audit cannot receive direct assistance and cannot rely wholly on the work of Internal Audit, and vice versa (in accordance with our respective professional standards), statutory auditors should make appropriate use of Internal Audit reports, to place maximum reliance of the work performed and the related findings, also to get a better sense of a company's approach to key risk areas (e.g. ESG corporate culture, ..), whilst maintaining professional scepticism. As some areas might be "non auditable" because of the lack of standards, lack of data (mainly the soft(er) aspects of the information), it would be useful to define the level of assurance required. Maybe internal auditors are best placed to report on these elements (e.g.: diversity and equality, behavioural board culture,…) in their "insight" role. The collaboration should be validated by the Governing Body and be explicitly published in the governance disclosure.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ECIIA	Other - please specify (required)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	ECIIA	Other - please specify (required)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree				
Survey	ECIIA	Other - please specify (required)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	ECIIA	Other - please specify (required)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree				
Survey	ECIIA	Other - please specify (required)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	ECIIA	Other - please specify (required)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	ECIIA	Other - please specify (required)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	As the ESG Reporting is the result of internal processes, managed and controlled through the internal governance, risk management and control activities, Internal Audit's work is an important element of good governance. We strongly recommend to explicitly refer to the role of Internal Audit in the ESRS 2 and ESRS G1 when describing the monitoring and governance model related to the ESG information. The obligation to set up an Internal Audit function in organisations of a certain size, should be part of future regulations.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ECIIA	Other - please specify (required)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree				
Survey	ECIIA	Other - please specify (required)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	ECIIA	Other - please specify (required)	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	ECIIA	Other - please specify (required)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	ECIIA	Other - please specify (required)	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to ii)) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree				
Survey	ECIIA	Other - please specify (required)	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	ECIIA	Other - please specify (required)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	ECIIA	Other - please specify (required)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	ECIIA	Other - please specify (required)	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Focus should be placed on key outcomes and metrics, not exhaustive documentation. The proposed distinction between gross and net assessments of potential negative impacts creates distortions. Under the current draft, impacts mitigated by past one-off measures can be assessed on a net basis, while those requiring ongoing management must be assessed on a gross basis. This framework risks misleading investors, reducing comparability, and creating perverse incentives—rewarding outdated passive controls while penalizing companies that invest in modern, active risk management systems. As a result, identical risks may be treated differently, undermining the clarity and credibility of sustainability reports. We recommend that all potential negative impacts be disclosed on a gross basis to ensure comparability and transparency across companies and sectors. Net impacts should then be reported as a secondary disclosure layer, providing insight into the effectiveness of mitigation actions and residual risks. This approach reflects investor needs—gross impacts reveal systemic exposure, while net impacts highlight management accountability. It also aligns with the capabilities of impact measurement and valuation data providers such as GIST Impact, who already model both gross and net impacts consistently. By adopting a "gross-first" framework with net as supplementary, ESRS will avoid reporting paradoxes and deliver more reliable, decision-useful information to markets. We encourage the use of impact valuation and impact measurement tools for impact materiality assessment. ESRS does not prescribe fixed quantitative thresholds for impact or financial materiality; companies must justify their own. This flexibility creates comparability challenges and assurance risks. Companies need criteria to determine when an environmental or social impact is "material enough" to disclose. EFRAG should recommend impact measurement and assessment tools to determine an environmental or social impact materiality. We recommend that EFRAG highlights alignment with existing impact frameworks & standards adopted by the market (i.e. Capitals Coalition & Value Balancing Alliance)			
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The ESRS framework's emphasis on both financial and impact materiality is a major advancement. It encourages companies to assess and disclose sustainability matters that affect both enterprise value and broader societal outcomes. EFRAG should also focus more on both environmental and social impacts assessment and its valuation in assessing the materiality.			
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The ESRS framework's emphasis on both financial and impact materiality is a major advancement. It encourages companies to assess and disclose sustainability matters that affect both enterprise value and broader societal outcomes. EFRAG should also focus more on both environmental and social impacts assessment and its valuation in assessing the materiality.			
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We recommend a materiality-weighted approach to merging: datapoints should be merged only if they represent similar material impacts or risks. Effectiveness should be measured by how well the merged datapoints support impact valuation and comparability.			
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Context-specific narrative datapoints should be reclassified as "may disclose" or included as illustrative examples. This allows flexibility while retaining a core set of mandatory disclosures for comparability across entities and sectors			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	Clarify how to connect impact materiality with financial materiality while assessing anticipated financial affect. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS.			
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	Challenge with Anticipated financial effects: Lack of clarity on thresholds and calculation methods. Difficult to align with financial reporting standards. Suggestion for Anticipated Financial Effects: Adopt standardized valuation frameworks to quantify impacts in monetary terms. Clarify definitions and provide sector-specific guidance on thresholds			
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	DR: ESRS 2 – Business Model & Strategy DP: Detailed activity-level metrics (e.g., emissions per product line) Challenge: These metrics are costly and complex to obtain, especially for companies with diverse operations. EFRAG should encourage using estimations in absence of actual data that often exceeds decision-usefulness for most stakeholders. Suggestion: Prioritize aggregated metrics that offer comparability and strategic insight. Provide guidance on estimation methodologies (e.g., sector benchmarks, modeled data) where actual data is unavailable. Encourage use of impact valuation and impact measurement tools for impact materiality assessment. EFRAG should highlight alignment with existing standards adopted by the market (i.e. Capitals Coalition/IFVI, VBA)			
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	22.E1.	Comments on deleted datapoints in ESRS E1	I agree	DR: ESRS E1 – Climate Change DP: Actual vs. Anticipated Financial Effects. Challenge: Lack of clarity on thresholds and calculation methods. Difficult to align with financial reporting standards. Suggestion: Adopt standardized valuation frameworks to quantify impacts in monetary terms. Clarify definitions and provide sector-specific guidance on threshold			
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	22.S1	Comments on deleted datapoints in ESRS S1	I agree	DR: ESRS S1 – Own Workforce DP: Metrics on non-employee workers Challenge: Often voluntary and difficult to collect consistently. Suggestion: Retain only core workforce metrics and allow flexibility for others. Promote phased-in disclosures for complex social datapoints			
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	22.G1	Comments on deleted datapoints in ESRS G1	I agree	DR: ESRS G1 – Governance DP: Board-level sustainability oversight metrics Challenge: Overlaps with ESRS 2 governance disclosures. Suggestion: Clarify division of governance disclosures between ESRS 2 and G1. Use digital templates to streamline reporting.			
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	DR: S1 – Own Workforce DP: Narrative on workforce engagement Comment: Difficult to compare across sectors Suggestion: Provide structured templates for workforce-related disclosures			
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	Here EFRAG should release additional guidance on non-EU adequate wages in ESRS S1			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	Many datapoints derived from SFDR, BMR, CRR are not material for general-purpose sustainability reporting. Their inclusion has increased reporting volume without proportional value. Many datapoints derived from LSME & VSME standard that need to be highlighted. GIST Impact recommends: Separate these datapoints into a dedicated section or annex. Apply a "Comply or Explain" approach for financial institutions, with clear mapping tables. Ensure interoperability with financial reporting frameworks but avoid cluttering core sustainability disclosures.			
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	Leverage the LEAP approach for nature-related disclosures (E2–E5) to improve consistency and reduce duplication Promote interoperability between ESRS and TNFD metrics for biodiversity, water, and pollution.			
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	Adjusted gender pay gap and like that many datapoints derived from SFDR, BMR, CRR are not material for general-purpose sustainability reporting. Their inclusion should increase reporting volume without proportional value. Many datapoints derived from LSME & VSME standard that need to be highlighted.			
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The sustainability statement should be digitally integrated with the main financial report to enable seamless data flow, analysis, and comparability. A structured, machine readable format (e.g., XBRL tagging) should be mandatory to support automated data ingestion and reduce manual processing. This integration would allow stakeholders—including investors, regulators, and data providers—to analyze sustainability and financial performance holistically, improving decision-usefulness. Reporting Boundaries and Value Chain Clarity Clear and consistent guidelines on reporting boundaries are essential, especially for value chain disclosures. Preparers need clarity on how far upstream and downstream to report, and how to apply materiality filters across the value chain. The use of estimated data and modeled impacts should be explicitly permitted and supported with methodologies, particularly for SMEs and companies with limited access to supplier data. Materiality Assessment Disclosures The current requirements for disclosing the materiality with the IRO assessment process are overly complex and burdensome. This is despite decades of progress of organizations using impact valuation as a scientifically-supported approach to determining materiality. We recommend that EFRAG highlights alignment with existing impact frameworks and standards adopted by the market (i.e. Capitals Coalition and International Foundation for Valuing Impacts, Value Balancing Alliance) Procedural documentation should be minimized or moved to voluntary guidance, allowing companies to concentrate on decision-useful disclosures.			
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Redundancy Between ESRS 2 and Topical Standards There is significant overlap in disclosures related to policies, actions, and targets (PATs) between ESRS 2 and topical standards. A streamlined structure is needed, with clear mapping and consolidation of PAT disclosures to avoid duplication. This would reduce reporting burden and improve clarity for both preparers and users. Value Chain Reporting Challenges Data collection across the value chain remains one of the most difficult aspects of sustainability reporting. ESRS should provide sector-specific guidance, allow for proxy data, and encourage collaborative data sharing platforms. EFRAG should support the use of impact valuation models to estimate value chain impacts. Forward-Looking Information Disclosing forward-looking information is critical but currently too subjective and inconsistent. ESRS should adopt standardized frameworks for scenario analysis and future impact modeling. This aligns with global best practices and improves the reliability and auditability of such disclosures. Granularity vs. Decision-Usefulness Excessive granularity in some topical standards reduces the practical value of disclosures. ESRS should adopt a tiered approach, where core metrics are mandatory and granular details are optional or sector-specific. This would help preparers focus on material and comparable data, while still allowing flexibility for deeper reporting where relevant.			
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	GIST Impact	User (analyst, data provider, rating agency, etc.)	Switzerland	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Role of Data Providers can play a critical role in enabling high-quality, comparable, and forward-looking sustainability data. ESRS should recognize this role and encourage collaboration with data platforms, especially for value chain data, impact valuation, and digital reporting integration.			
Survey	PwC International Limited	Auditor	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	We are supportive of the proposed changes to the double materiality assessment (DMA). We believe, however, that there are some provisions that should be revised to enhance consistency in application of materiality of information and provide further clarity on the requirements. The materiality of information filter in ESRS 1 paragraph 21 is focused on the information needs of users. However, the standard for each group of users is different. We recommend the standard proposed for users of financial reports—information that "could reasonably be expected to influence decisions"—should be applied consistently to both groups of users. We also believe that ESRS 1 paragraph 36 should be updated to state the two circumstances that do not result in a positive impact: 1) an entity's mitigation or remediation actions in response to a negative impact and 2) when an entity is simply complying with laws and regulations. Further, we believe ESRS 1 AR 18 should be re-worded to state if an entity has identified an impact, risk, or opportunity (IRO) that is likely to be material, it does not need to perform the additional detailed analyses to support the conclusion. We also believe ESRS 1 AR 20 should be removed from the standard. The inclusion of ESRS 1 AR 20 could result in the expectation from auditors and other stakeholders that the general disclosure requirements represent material information and do not allow an entity to apply the materiality of information filter to the general disclosure requirements. Lastly, certain datapoints include qualifying language without any accompanying guidance. Examples include the use of words such as "significant", "key", and "major", which may cause confusion and inconsistent application among entities. We would recommend these terms are replaced with the word "material" to improve consistency with the concept of materiality of information.			
Survey	PwC International Limited	Auditor	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	We believe the new guidance on how to consider remediation, mitigation, and prevention actions related to impacts in the DMA is helpful for preparers. We believe that EFRAG should provide complimentary guidance on how to assess remediation, mitigation, and prevention actions for sustainability related risks. The guidance is not clear on how an entity should consider its policies in its double materiality assessment. ESRS 1 paragraph 35 states that when supportable evidence exists related to mitigation or prevention actions, an entity is allowed to reduce the severity or likelihood for potential impacts. However, if significant ongoing action is required, then those mitigation or prevention actions cannot be considered. There is a tension between these two statements. For example, if an entity requires employees to sign annual certifications related to understanding and compliance with ethical policies and there is no history of non-compliance, it is unclear on how to assess this information in the materiality assessment. We believe additional guidance as to what constitutes "significant ongoing action" would be helpful. PwC's Sustainability reporting guide section 4.3.2.5 provides our view on areas an entity may need to understand when determining whether a previous action relies on "significant ongoing action" to reduce the severity or likelihood of a potential impact. Additionally, ESRS 1 AR 12 discusses policies and implies that if policies are implemented, the policies may be considered in the materiality assessment. Consistent with the point above and the AR "policies are implemented through actions", so the relationship between implemented policies and ongoing actions needs to be clarified. We have separately provided our detailed comments on ESRS 1 Appendix C on potential impacts (see Appendix D). We believe that in some cases the treatment of the scenarios in the appendix are inconsistent with our understanding of ESRS 1 paragraphs 34 and 35.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	PwC International Limited	Auditor	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We believe the proposed amendments to the structure of the sustainability statement—including the 'executive summary' and use of appendices—would address many of the challenges that preparers faced in the initial year of reporting. Further, we believe this enhanced flexibility would support more relevant and concise reporting, improving overall reporting quality. We believe, however, that EFRAG should expand the guidance in Amended ESRS 1 paragraph 109 to require the content and preparation of the executive summary to be consistent with fair presentation on a standalone basis. This would help to support that information included in the executive summary is not misleading in isolation of the remainder of the report. Connectivity with the financial statements is an important foundational concept in ESRS. To help foster this connection, we recommend that EFRAG retain certain of the disclosures about connectivity that were included in ESRS 1 v1 to provide appropriate transparency about the level of consistency of data and assumptions between the financial statements and the sustainability statement. Specifically, we believe the following disclosures should continue to be required: Overall connectivity—We recommend retaining the broad overall requirement to cross-refer to the financial statements from the sustainability statement (that is, changing Amended ESRS 1 paragraph 114 to a 'shall' requirement). 'Indirect connectivity'—We believe the Amended ESRS 1 paragraph 115 disclosures should be required instead of optional to provide sufficient transparency about these relationships. Inconsistent information—We recommend that ESRS 1 retains an explicit requirement to explain significant data, assumptions, and qualitative information that are not consistent (consistent with second sentence of ESRS v1 paragraph 127). We believe the retention of these disclosures is critical to retaining appropriate emphasis on the importance of connectivity of information between the financial statements and the sustainability statement.			
Survey	PwC International Limited	Auditor	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We support the changes made to improve the interaction between ESRS 2 and the topical standards. We believe these changes meet the stated objective of simplifying the standards and will alleviate many of the difficulties encountered by wave 1 reporters in the first year of application of ESRS v1. Further, we believe that the elimination of the voluminous incremental detail required by certain of the topical standards on the topics of governance, strategy, and IRO management would enhance the focus on disclosure of material information about an entity's impacts, risks, and opportunities. We also support the streamlining of certain aspects of the new 'General Disclosure Requirements' for policies, actions, targets, and metrics which we believe would reduce complexity and ease application. We believe, however, that there is further opportunity for simplification by streamlining the guidance on the level of aggregation and disaggregation of reported information. As proposed, Amended ESRS 1 chapter 3.7 provides overall guidance on considerations in aggregating and disaggregating information for reporting. Amended ESRS 2 AR 12 and AR 24, however, also provide supplemental guidance focused on disclosures related to ESRS 2 SBM-2 and ESRS 2 IRO-2, respectively. We recommend deleting the application requirements in ESRS 2 and including the incremental concepts—including consideration of the nature of the matters and the level at which they are managed—directly in the guidance in ESRS 1. Ensuring all guidance on aggregation is discussed in a single location would add clarity in application. We also recommend deleting any references to aggregation of information at the level of a 'topic'. We are not aware of circumstances where providing these disclosures at the topic level would be appropriate and believe that this could result in obscuring material information.			
Survey	PwC International Limited	Auditor	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We believe the proposed amendments and restructuring of ESRS reflect significant progress in improving the useability of the standards, consistent with the stated objectives of the 'Omnibus' package. Specific changes that improve the understandability include the deletion of the 'may' disclosures, the clear delineation between disclosure and application requirements, and the mapping of application requirements to the related disclosure requirements. We believe these changes would benefit preparers in understanding the reporting requirements, especially in the first year of reporting. We believe it is important to note, however, that we would not expect the stated reduction in datapoints to directly translate to a proportionate reduction of effort in preparing the sustainability statement. In particular, many of the eliminated datapoints were voluntary, were merged with other requirements, or may need to be replaced with entity specific disclosures to the extent that the related impact, risk, or opportunity is material. Further, we believe that there is further opportunity for enhanced clarity in certain areas, including guidance around the reporting boundary. We recommend that EFRAG further clarify the reporting boundaries by providing guidance on specific structures, such as joint arrangements not accounted for using the equity method of accounting. As part of this effort, we believe that EFRAG should holistically assess the treatment of joint operations across the standards; pending this broader evaluation we recommend deleting ESRS 1 paragraph 92. In addition, from our experience, the use of the phrase 'shall consider' with respect to the greenhouse gas disclosures is one of the points of initial and ongoing difficulty in application of ESRS. We recommend EFRAG clarify this language as discussed in our comments related to ESRS E1-8 – Gross scopes 1, 2, 3 GHG emissions (see Appendix B).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	PwC International Limited	Auditor	United Kingdom	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The commingling of the 'may' or voluntary disclosures with the disclosure requirements in ESRS v1 confused preparers and made the standards unnecessarily complex. We support the changes made by EFRAG to remove the non-mandatory disclosures from the body of the standards. Certain of the 'may' guidance provided additional insight to preparers and could be helpful in the preparation of the sustainability statement. Therefore, we are also supportive of identifying a mechanism outside the body of the standards to convey this information to preparers. Consistent with the points highlighted by EFRAG—including the observation that the guidance may be helpful but could also require further analysis—we agree with its recommendation that the European Commission not include the NMIG content in the delegated act on the Amended ESRS. We believe additional time is needed to identify the appropriate structure for the NMIG, finalise the content, and support the appropriate quality. Preparers and other users also need more time to properly review and evaluate the information included in the NMIG. Thus, we recommend EFRAG delay issuance of any NMIG to ensure it is not a distraction given the tight timeline to produce the final recommendation on ESRS. In addition, postponing the release of the NMIG would allow time for EFRAG to update the guidance for additional points of interpretation or other questions that arise in the implementation process. For example, we encourage EFRAG to develop interpretative guidance on anticipated financial effects given the concerns expressed by stakeholders on the complexity and sensitivity of this information. We also recommend updating the interoperability guidance related to IFRS S2 and believe there may be guidance from ESRS S1 v1 Own workforce that could be incorporated in the NMIG to assist preparers.			
Survey	PwC International Limited	Auditor	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Broadly, we agree the reliefs provided in Amended ESRS 1 will be beneficial to preparers without reducing the usefulness of the sustainability reporting, with the exception of ESRS 1 paragraphs 91 and 92 which are discussed in questions 18 and 15, respectively. We support the inclusion of the concept of the use of reasonable and supportable information without undue cost or effort. This is a foundational concept used throughout corporate reporting, including within both the IFRS Accounting Standards and the IFRS Sustainability Reporting Standards. Its inclusion within ESRS would support connectivity with the financial statements and interoperability with the ISSB standards. We believe, however, that the principle of undue cost or effort is a general principle that should be expanded to apply across all aspects of reporting in accordance with ESRS. This would ease the reporting burden for preparers and recognise the evolving landscape of sustainability reporting, including the lack of availability of data in certain areas. ESRS 1 paragraph 87 appears to limit this principle to the list of areas provided. We believe that this paragraph should clarify that it is intended to provide a list of illustrative examples. Further, we believe that when an entity has omitted information from its sustainability statement due to the application of this principle, the entity should provide additional disclosures to provide transparency and relevant information to users (see Question 18). In addition, we believe the last sentence in ESRS 1 AR 24 should be deleted. We believe the requirement for an entity to provide information about only the activities that are relevant to the IRO is covered by ESRS 1 paragraph 90. ESRS 1 AR 24 is linked to the aggregation and disaggregation of information, and we do not believe this sentence is relevant to those concepts.			
Survey	PwC International Limited	Auditor	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	As noted in Question 17, we support applying the relief for reasonable information across all aspects of reporting in accordance with ESRS. We recommend, however, that EFRAG introduce appropriate guardrails to achieve the objectives of fair presentation, comparability, and other qualitative characteristics of information. We therefore recommend that EFRAG move the disclosure requirements from ESRS 1 paragraph 91 to ESRS 1 chapter 7.3. We believe the disclosures about the actions an entity has taken to increase the coverage and quality of reporting, the progress made during the reporting period, and the requirement to reassess if new data or inputs have become available at each reporting date should be required in all cases where the 'undue cost or effort' relief has been applied. In addition, we recommend EFRAG require qualitative disclosures about the information available and related limitations to provide additional context and transparency. Further, we recommend changes to the current requirements to disclose partial metrics. Instead, we believe that EFRAG should define the circumstances when partial metrics may be provided. Specifically, we recommend that the definition of a 'partial metric' should be foundationally based on all information related to a boundary that may be objectively defined (for example, the total amounts related to 3 out of 10 chemicals included in the substances of high concern, all information related to one geographic region when only that region requires disclosure of the underlying information, all entities in the value chain above a certain size). We recommend revising this provision because the current requirement could result in obscuring material information or the reporting of a metric that does not meet the qualitative characteristics of information. We also believe the reporting of a partial metric as proposed here is inconsistent with the concept of the reporting boundary.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	PwC International Limited	Auditor	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Broadly, we agree with the proposed Option 1. We support the requirements to provide quantitative disclosures about an entity's anticipated financial effects. Entities have long been required to make estimates about the financial effects of events for financial reporting purposes, such as impairment assessments, long term insurance liabilities, valuation of investments, etc. We appreciate that there is the potential for higher levels of estimation uncertainty over longer time horizons. We believe, however, the ability for entities to use scenario analysis and the option to provide a range rather than a single datapoint allow entities to manage this uncertainty. We also believe that providing quantitative information complements an entity's disclosure of its policies, actions, and targets and increases the credibility of the sustainability statement. Lastly, quantitative disclosure of financial effects would be interoperable with the ISSB standards. Consistent with the goal of interoperability, we recommend ESRS 2 paragraph 23 and the related ARs be updated to more closely align with the ordering, flow, and wording in IFRS S1 paragraphs 34 to 40. We believe alignment would make the guidance on current and anticipated financial effects disclosures easier to understand and apply as well as enhance interoperability. Notwithstanding these proposed changes, we support EFRAG's omission of the provision in IFRS S1 that permits an entity to exclude quantitative disclosures if it does not have the requisite skills, capabilities, or resources. We would generally expect entities of the size proposed to be subject to ESRS to have the skills, capabilities, and resources necessary to prepare quantitative disclosures. Additionally, entities would still be able to provide qualitative only disclosures if the criteria in Amended ESRS 2 AR 17 are met.			
Survey	PwC International Limited	Auditor	United Kingdom	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	The interaction between the anticipated financial effects disclosures required in ESRS 2 and those required in ESRS E1 is unclear. The standards should clearly state if the ESRS E1 disclosures satisfy the disclosures in ESRS 2 or are incremental to the disclosures in ESRS 2. In addition, although this is noted in Question 19, we believe that the standards themselves should clarify if the reliefs provided in ESRS 2 related to anticipated financial effects are also applicable to the anticipated financial effects disclosures required in ESRS E1 Climate change.			
Survey	PwC International Limited	Auditor	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We believe that the changes made in the Amended ESRS are directionally positive from the perspective of interoperability with the IFRS Sustainability Disclosure Standards and are a significant achievement. We also believe that EFRAG was effective in balancing interoperability with addressing urgent practice issues (such as leases), achieving simplification, and ensuring that jurisdiction specific requirements to the EU are addressed. Given the current maturity of sustainability reporting, we believe simplification of the standards is an important objective which will both reduce the reporting burden and improve accessibility for preparers while improving the quality of reporting provided to stakeholders. One of the ongoing challenges in application, however, is differences in wording between ESRS and the standards of the International Sustainability Standards Board (ISSB) for requirements that appear to be substantially similar. These differences create questions of interpretation and may result in different disclosures where no difference is intended. We recommend EFRAG further assess whether additional alignment may be possible in these areas. Further, there are certain areas where IFRS S1 provides further context on concepts included in ESRS (for example, related to 'fair presentation'). We believe that this guidance would be helpful to preparers (see also Question 25). In addition, more broadly, we believe that the lack of comparable updates to the ISSB standards creates significant challenges in achieving interoperability. To achieve effective interoperability or alignment that meets the needs of the applicable stakeholders, both parties need to agree to the changes. Because only EFRAG is currently in the process of updating its standards, the opportunity to achieve interoperability is limited to the ISSB standards as issued in 2023. Thus, we agree with EFRAG's conclusion that "further joint work…is necessary in the next phase" (Basis for Conclusions, paragraphs 92 and 101).			
Survey	PwC International Limited	Auditor	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	PwC International Limited	Auditor	United Kingdom	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Overall, we support simplification of the requirements and clarity and consistency in sustainability reporting. In EFRAG's discussion of these six proposed 'shall' requirements, they state that these datapoints "do not add new disclosure obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information". EFRAG also states that the purpose of changing these datapoints from 'may' to 'shall' is to improve the clarity of the reporting requirements. We support clarity and consistency of the disclosure requirements. If an entity determines that these datapoints are material, then the required datapoints would provide consistent information across entities. An entity applies the materiality of information filter across the standards and would not be required to disclose datapoints that are not material. We believe the feedback from users and preparers is important in the determination of whether these datapoints are likely to provide material information on the related sustainability topics.			
Survey	PwC International Limited	Auditor	United Kingdom	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Overall, we support simplification of the requirements and clarity and consistency in sustainability reporting. In EFRAG's discussion of the four new mandatory datapoints, they state that these datapoints "do not add new disclosure obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information". We support clarity and consistency of the disclosure requirements. If an entity determines that these datapoints are material, then the required datapoints would provide consistent information across entities. An entity applies the materiality of information filter across the standards and would not be required to disclose datapoints that are not material. We believe the feedback from users and preparers is important in the determination of whether these datapoints are likely to provide material information on the related sustainability topics.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	PwC International Limited	Auditor	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	We support the incorporation of fair presentation in Amended ESRS 1 as we believe it would provide more meaningful information to stakeholders and a potentially more complete view of an entity's impacts, risks, and opportunities. In addition, specifying that this is a fair presentation framework would enhance alignment with both the IFRS Sustainability Disclosure Standards—which are a fair presentation framework—and financial reporting. It is important to note, however, that we do not believe fair presentation will necessarily result in a reduction in the number of datapoints or further ease the reporting burden. An important concept in achieving fair presentation, however, is management's responsibility for the fair presentation of the information presented. We believe EFRAG should include a specific requirement to disclose that the statement has been prepared on a fair presentation basis in ESRS 2 BP-1. We also recommend certain changes to the proposed requirements to improve the operability of fair presentation and support the objectives of high-quality reporting. Specifically, we believe that the wording should be clearer in terms of what 'fair presentation' means and recommend that EFRAG incorporate additional wording from IFRS S1 paragraphs 11 to 16. For example, IFRS S1 paragraph 15(b) specifies that a fair presentation may require disclosures beyond the standards (that is, entity specific disclosures). This language clarifies the role of entity specific disclosures in a fair presentation framework. Further, although we support the provisions which would allow an entity to omit a disclosure when reasonable and supportable information is not available without undue cost or effort, we believe the current relief may provide flexibility that could result in conflict with a fair presentation. We believe additional disclosures should be required when this relief is applied to provide more transparency to users about the omitted information (see Question 18).			
Survey	PwC International Limited	Auditor	United Kingdom	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We recommend that EFRAG provide specific guidance on transition from ESRS v1 to the Amended ESRS, including whether comparative information is required, when previously reported information would need to be revised or restated, and whether an entity is permitted to omit previously reported information from the comparative period when a datapoint would no longer be reported. In addition, we recommend that EFRAG specifically consider the transition provisions currently included in Amended ESRS 1 Appendix D in light of the 'quick fix' legislation as well as the broader changes to ESRS. This type of transition guidance would ease the burden on preparers and provide a level of consistency as wave 1 reporters transition to the Amended ESRS. Further, given the range of definitions of 'net zero' and inconsistency in how this term is used in practice, we recommend that EFRAG restore a definition of 'net zero' to enable consistency and comparability across entities. In addition, we recommend EFRAG consider the language used in the 'Basis for Conclusions' to the Draft Amended ESRS and assess how the revisions are described, to confirm that the descriptions are an accurate reflection of the intent of the revision. The current Basis for Conclusions uses the term 'clarified' to describe many of the revisions made to the standards. This terminology is resulting in questions from wave 1 entities about the effect on 2025 reporting and whether these 'clarifications' should be viewed as part of the intent of the original provisions and thus applied as part of ESRS v1. As a result, we believe caution is needed to make sure new or changed provisions in the Amended ESRS are not described as clarifications.			
Survey	PwC International Limited	Auditor	United Kingdom	35.ESRS1_7.6.	Do you agree with the amendments of this chapter?	I agree	ESRS 1 paragraph 94(a) requires an entity to provide contextual information and restated comparative figures unless it is impracticable to do so when it has: Identified new information in relation to the estimate figures disclosed in the preceding period, and the new information provides evidence of circumstances that existed in that period (change in estimate) EFRAG should clarify this provision to allow users to understand the circumstances in which they are required to revise estimates. First, the standards should be clear that an entity is only required to revise estimates when there is a material change in the information underlying the disclosure. Further, EFRAG should also clarify what disclosures an entity should make when revising an estimate or restating for a prior period error. ESRS 2 paragraph 5(g) cross references ESRS 1 paragraphs 96 and 97, however neither ESRS 2 nor ESRS 1 contain specific guidance on what needs to be disclosed for changes related to errors and estimates beyond the requirement to restate the comparative. The datapoints which were previously in ESRS 2 paragraphs 13 and 14 should be reinstated.	ESRS1	7.6 Changes in the preparation or presentation of sustainability information	
Survey	PwC International Limited	Auditor	United Kingdom	35.E1-8.	Do you agree with the amendments of this chapter?	I agree	We believe further changes are needed to the guidance on reporting of greenhouse gas (GHG) emissions to address implementation issues faced by wave 1 reporters—including the meaning of 'shall consider' the Greenhouse Gas Protocol and around the minimum boundaries. We believe these issues would be substantially resolved and reporting of GHG emissions would be simplified—without meaningfully reducing the quality of the information provided—by better aligning ESRS with the GHG Protocol. We recommend EFRAG clarify the guidance to require an entity to apply the GHG Protocol standards (that is, an entity "shall apply the GHG Protocol"), except where the standards are in conflict with ESRS. Further, we believe ESRS should specify that an entity should determine its minimum boundaries for reporting in accordance with the GHG Protocol Scope 3 Standard, with one limited exception as noted below. The reporting of GHG emissions related to financial institutions and financial instruments has evolved significantly since the GHG Protocol Scope 3 Standard was issued. EFRAG addressed this in ESRS v1 through reference to PCAF Part A, however, this resulted in numerous questions in application. To simplify reporting we recommend EFRAG consider identifying the specific classes of financial activities for which disclosure of scope 3 emissions is required. This would be consistent with the approach taken in IFRS S2, although EFRAG should assess which asset classes it believes are appropriate. Further, EFRAG should consider adding an explanation in the Basis for Conclusions related to those that are excluded. In addition, ESRS E1 should specify that there is a rebuttable presumption that application of the specified minimum boundaries is consistent with fair presentation. This would support that entities are not required to identify additional emissions outside the minimum boundaries, with perhaps limited exceptions for unique circumstances.	E1	Disclosure Requirement E1-8 - Gross Scopes 1, 2, 3 emissions	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Fortum supports the proposed updates and the increased flexibility in the double materiality assessment. We appreciate that the core principles remain the same and find the proposed changes rather balanced and fit-for-purpose. We welcome the clearer and more prominent role of information materiality as a guiding filter for sustainability disclosures. That said, Fortum would like to express our concern that too much flexibility may reduce data comparability and lead to more stakeholder requests. In particular we disagree with point 4 above, the option to disclose non-material topics (ESRS 1, paragraph 108) where disclosures may be made based on the needs of specific users (e.g., investors), could open the door to additional reporting demands from users, increasing the burden on companies. We recommend limiting such additional disclosures to preserve the CSRD's initial goal that a CSRD-compliant sustainability statement should serve as a comprehensive and sufficient source of information for all stakeholders. This principle is a key benefit of harmonized reporting for large companies and should be maintained in the revised standards. We appreciate that the proposal still allows companies to conduct the DMA at a more detailed level if they choose. This flexibility is especially relevant for companies also subject to the CSDDD, as its impact assessment has many similarities with the DMA. Further aligning the Article 8 impact assessment under CSDDD with the DMA could ease companies' administrative burden. We also suggest further harmonizing key concepts like "value chain" and "chain of activities" so that a single assessment process could serve both frameworks. Since both frameworks draw on the UNGPs and OECD Guidelines for MNEs and share many methodological similarities, closer alignment of these processes would help ensure consistency, support mutual reinforcement between assessments, and reduce unnecessary duplication and burden for companies.			
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	Fortum finds the guidelines excessively complex and detailed, and sees that this detailed guidelines would make the materiality assessment more burdensome. We think that a more general guidance would be more appropriate. The preferred option would be to report the impacts (and risks) before mitigation/corrective actions, and explain how they will be mitigated/corrected. This would be a clearer way in our view and in line with general enterprise risk management practices. Additionally, there should be clearer guidance on when the impact is actual vs. potential, the proposal doesn't sufficiently clarify it.			
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	Fortum supports the proposals to improve the readability, conciseness and connectivity of ESRS Sustainability Statements. The possibility to include an executive summary is beneficial. Fortum has already earlier stated that the disclosure table formats should not be mandatory, rather companies should be allowed to present the required information in the most suitable format for them. We are pleased to see the added flexibility that preparers have in preparing their statements.			
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	Fortum finds it very important that the overlaps between the ESRS 2 and the topical standards have been addressed. Even if there still are some additional disclosure requirements in the topical standards, we find the proposed changes mainly beneficial. As Fortum has previously commented, the MDR disclosure requirements in the current ESRS 2 are too burdensome and detailed and lead to a lot of repetition when they need to be applied always when describing the policies, actions, metrics and targets under each topical disclosure. Additionally, the division of these requirements across multiple locations in the standard has not been user-friendly. A simplified structure will prevent users from having to check disclosure requirements in multiple locations. Also important that narrative information can be disclosed at aggregate level vs IRO level.			
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	Fortum supports the proposed changes.			
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Fortum doesn't support the proposal that part of the removed mandatory content is placed in "Non-Mandatory Illustrative Guidance" (NMIG). We don't understand the benefit with having this information in the draft. The legal status of the NMIG is unclear and would only make discussions with the auditors more challenging. We therefore propose to delete this content from the standards/delegated act.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Fortum has mixed feelings about the burden reliefs. Even if many of the proposals reduce the reporting burden, we have made a lot of efforts to collect this information. Some of the proposals however have clear benefits, e.g. the proposal that when disclosing financial effects, the information on investments and plans is now limited to those that are already announced. Although an understandable proposal, introducing the relief "undue cost or effort" might be open to interpretation.			
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	Fortum finds the proposed amendments mainly beneficial. The current rules for defining and reporting information from a company's value chain are overly complex. If the Omnibus proposal to limit larger companies' ability to request information from value chain is implemented, it would be particularly burdensome for these companies to report all the currently required value chain information. Fortum has already earlier proposed that the value chain definitions should be significantly simplified and better aligned with financial reporting and that the number of datapoints for which companies need to report value chain information should be limited to only essential information, such as scope 3 emissions.			
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	Fortum finds it problematic that neither option is aligned with the IFRS. An option that is completely aligned would clearly be the preferred option for companies reporting under both frameworks. The ESRS should at least be designed in such a way that companies adhering to them would also meet the IFRS reporting requirements.			
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	As we see it, the disclosure requirements remain pretty much the same and should therefore be further simplified e.g. by not requiring split of assets before and after actions. The ESRS should be designed in such a way that companies adhering to them would not need to consider additional data points when also reporting under IFRS.			
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	EFRAG has clearly considered in detail the interoperability between the ESRS and IFRS standards. While numerous adjustments have been made to enhance alignment, notable differences still remain. It would be beneficial for all stakeholders if these remaining gaps were addressed. At least, even if full interoperability would not be reached, the ESRS should be designed in such a way that companies adhering to them would not need to consider additional data points when also reporting under IFRS.			
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The starting point should be that no new mandatory datapoints are proposed. We however don't see any major challenges with the proposals.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The starting point should be that no new mandatory datapoints are proposed. We however don't see any major challenges with the proposals, except for E5-4 that might be challenging.			
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	Fortum supports clarifying that ESRS is a fair presentation reporting framework, as is the case for the IFRS standards. It is important to understand, as stated in the question, that confirming the fair presentation concept should reduce the check list mentality associated to the adoption of a compliance approach, and support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. It should be made clear that it must not lead to broader reporting burden beyond a compliance framework.			
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	Fortum disagrees with the proposal since we don't see the added value and since it would add the reporting burden especially for non-global companies. We propose to keep the current reporting rules.			
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	Fortum agrees with the proposed approach.			
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Fortum agrees with the proposal and supports the flexibility of the wording, since we don't support any fixed metrics on what the targets needs to include. We would like to underline that the targets should address the material impacts rather than some fixed attribute/metric, e.g. size of areas restored. A further review towards more methodology and framework-based target setting would also be appreciated.			
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	We support reporting requirements that are in line with the Pay Transparency Directive.			
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	Fortum supports the approach taken.			
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

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Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
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Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

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Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Fortum Oyj	Preparer (non-financial preparing a sustainability report)	Finland	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The XBRL / digital reporting requirement should not be made mandatory – consider whether AI could be used instead. Could EFRAG issue a (electronic) disclosure checklist to aid sustainability statement preparation?			
Survey	.	Consultant (including software vendor)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The top-down approach can lead to a lack of transparency and obfuscation, as topics can be excluded from the start. The outcome also heavily depends on who performs the assessment. If the analysis is conducted only at a high level, fewer experts may be involved, which in turn can result in less accurate and potentially incomplete findings. AR 21, related to paragraph 50 of ESRS 1, sounds confusing to me. "When a material impact, risk or opportunity relates to a particular sub-topic, the undertaking needs only to report the material information related to that sub-topic within the relevant topical standard." To me, this seems to clarify that a single material IRO is sufficient to make a sub-topic material. This, in turn, may lead to reporting on more sub-topics overall. In earlier versions of ESRS 1, this was not stated so clearly.			
Survey	.	Consultant (including software vendor)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	From my perspective, Annex C only adds further confusion. The process is designed in a very complex way. I would generally recommend working and assessing solely with the gross method. If the net method were to be permitted, the standards for evaluating mitigation measures would have to be the same for everyone in order to avoid a lack of transparency. Moreover, the actions may change over time in order to offset negative (actual and potential) impacts. This undermines comparability.			
Survey	.	Consultant (including software vendor)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	I do not see significant added value in including an executive summary, although I acknowledge this may be a matter of presentation preference. I also view the use of appendices with some caution, as important data points might be moved further back in the report. In addition, there is a risk that the executive summary, which could be formulated in a very positive manner, may not fully align with the actual data. Our aim should be to ensure that the sustainability report remains transparent and informative rather than taking on the character of a marketing document.			
Survey	.	Consultant (including software vendor)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	I find the separation between GDRs (ESRS 2) and the topical standards challenging. The topical standards refer directly to ESRS 2. However, it would be preferable to report directly on the IROs and the relevant GDRs within the topical standards. ESRS 2 should only cover general matters, not the topics of individual standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	.	Consultant (including software vendor)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	In my view, the rules concerning data collection along the value chain have been relaxed too much. The removal of the systematic preference for direct data may result in lower data quality and reduced comparability across undertakings. A stronger emphasis on obtaining direct data, where reasonably possible, would enhance the robustness of disclosures. The current approach to resilience analysis seems too limited. Restricting disclosures to qualitative information on risks only does not fully reflect the importance of resilience in sustainability reporting. A more comprehensive approach, including quantitative aspects, would provide stakeholders with a clearer picture of how undertakings are prepared to manage material sustainability challenges.			
Survey	.	Consultant (including software vendor)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	.	Consultant (including software vendor)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	2. The replacement of the ESRS E1 GHG emission boundary with the financial consolidation approach reduces complexity and enhances alignment with the GHG Protocol. However, this change comes at the expense of transparency. By limiting the requirement for operational control reporting to entities with more complex ownership structures, significant emissions may no longer be captured where companies exert substantial operational influence without financial control. This shift risks placing too much emphasis on financial reporting structures rather than on actual emission responsibility. As a result, stakeholders may gain an incomplete picture of where emissions truly occur and who has the capacity to mitigate them. A broader requirement for operational control reporting would strengthen accountability and ensure that sustainability disclosures reflect real-world impacts, not just financial boundaries.			
Survey	.	Consultant (including software vendor)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	.	Consultant (including software vendor)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	I welcome this approach.			
Survey	.	Consultant (including software vendor)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	I believe that the new data points are important for providing a better understanding of specific topics. They also reflect the feedback previously provided, ensuring that the disclosures are more relevant and aligned with stakeholder expectations.			
Survey	.	Consultant (including software vendor)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	I agree and have always considered ESRS a fair presentation framework. Explicitly requiring fair presentation should improve the materiality filter, enabling more relevant reporting and reducing excessive disclosures.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	.	Consultant (including software vendor)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	From a critical perspective, the arguments for an exception for financial institutions appear weak. While estimating absolute targets may involve assumptions, such complexity is common across all sectors. Omitting absolute targets risks masking the total climate impact and undermines transparency. Moreover, granting an exception could create an uneven playing field and reduce comparability between sectors. Overall, both intensity and absolute targets are necessary for a meaningful assessment of progress.			
Survey	.	Consultant (including software vendor)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	The amended ESRS S1 aligns with international standards, but better guidance is required to ensure consistent and meaningful reporting. Without clarification—particularly on wage thresholds, the methodology hierarchy, and disclosure of the methodology used—there is a risk of inconsistent application and reduced comparability across companies.			
Survey	.	Consultant (including software vendor)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	The adjusted gender pay gap provides greater transparency, as it reflects pay differences for comparable roles and qualifications, rather than just the overall average. Including this metric allows for a more accurate understanding of where pay disparities truly exist within the organization.			
Survey	.	Consultant (including software vendor)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The top-down approach can lead to a lack of transparency and obfuscation, as topics can be excluded from the start. The outcome also heavily depends on who performs the assessment. If the analysis is conducted only at a high level, fewer experts may be involved, which in turn can result in less accurate and potentially incomplete findings. AR 21, related to paragraph 50 of ESRS 1, sounds confusing to me. "When a material impact, risk or opportunity relates to a particular sub-topic, the undertaking needs only to report the material information related to that sub-topic within the relevant topical standard." To me, this seems to clarify that a single material IRO is sufficient to make a sub-topic material. This, in turn, may lead to reporting on more sub-topics overall. In earlier versions of ESRS 1, this was not stated so clearly.			
Survey	.	Consultant (including software vendor)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The difference between ESRS 1 and ESRS 2 remains unclear to me. The topics are almost the same and often repetitive. How do they differ from the Application Requirements (ARs)?			
Survey	.	Consultant (including software vendor)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	ESRS E1 has been significantly weakened. The transition plan should be mandatory for all companies.			
Survey	.	Consultant (including software vendor)	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	.	Consultant (including software vendor)	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	.	Consultant (including software vendor)	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	DR 4-1: I believe the Transition plan for biodiversity and ecosystems should be made mandatory to help keep the already exceeded planetary boundaries in check and to protect biodiversity and ecosystems.			
Survey	.	Consultant (including software vendor)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	.	Consultant (including software vendor)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	I believe that ESRS S1 addresses human rights violations in connection with environmental matters insufficiently.			
Survey	.	Consultant (including software vendor)	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	.	Consultant (including software vendor)	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	.	Consultant (including software vendor)	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	.	Consultant (including software vendor)	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	.	Consultant (including software vendor)	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	International Transport Workers' Federation	Trade union	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Double materiality is essential and must remain at the heart of the ESRS framework and European Union sustainability regime for corporate reporting to be credible and useful. Lobbying of EU institutions by US-based standard setters and asset managers should not be allowed to undermine this principle and further water down corporate accountability for significant environment and social impacts, including breaches of fundamental labour rights. Over this year, the process to identify material issues using the ESRS and the first reports prepared until the Corporate Sustainability Reporting Directive (CSRD) have provided an important basis to engage with multinational businesses so that they better understand and address the very real risks and impacts in relation to their own workforce and workers in the value chain. The principle of "materiality of information" is concerning since it introduces a further filter for companies to not report information. For example, it represents a step backwards from ID-177, which says that most S1 metrics must be reported if S1 Own Workforce is material. It is essential to maintain the principle of fair presentation in the reporting standards. It is positive that the revision of the AR 16 list of topics has maintained all of the sub-subtopics for S1 + S2. These are based on the list of social topics in the CSRD and should all be maintained. The emphasis on aggregation (as opposed to disaggregation) is concerning, as disaggregated information (both site-specific and country-specific) is key to understanding the distribution of impacts, risks and opportunities.			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	To be able to understand the information provided and place it in context, it is important that companies report not just their net impact – the gross impact should be reported, and the recommended text preserves this principle.			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	It is a mixed picture and some of proposed simplifications could be counter-productive when it comes to supporting relevant reporting. For example, from ITF's perspective, there was already considerable flexibility built into the ESRS and many companies have already invested time and resources in establishing capacity to better understand their impacts, risks and opportunities, especially in relation to human rights due diligence in the value chain, including being able to report in line with the CSRD. It would have been better to have let the system as introduced bed down and then evaluate its effectiveness, rather than changing the ESRS at such an early stage in the regulatory cycle, which will create further costs. In addition, we are very concerned that the broader Omnibus proposals around the value chain cap would be very restrictive and coupled with the proposed changes to the scope of CSRD could even undermine progressive actions by the European companies leading on human rights due diligence and targeted industry initiatives to improve labour rights in global supply chains and drive meaningful disclosure. We also note that para 113 is difficult to understand: "113. If the description of the material impacts, risks and opportunities prepared in accordance with [Draft] Amended ESRS 2 IRO-2 is not presented alongside the respective policies, actions and targets, the undertaking shall make explicit which policies, actions and targets relate to which material impacts, risks, or opportunities, in accordance with paragraph 22." Para 22 addresses the issue of appropriate aggregation or disaggregation of information on material impacts, risks and opportunities and their management, without setting any rules regarding the location of such disclosures depending (or not) on the level of aggregation.			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The Exposure Draft removes duplications between the cross-cutting and topical standards. The preservation of the 4-part architecture in the social standards is important to respect the distinctiveness of different affected stakeholder groups. However, we have two critical concerns. First, the original DR in environmental standards concerning screening of sites in materiality assessment were replaced by an application requirement to ESRS 2 IRO-1. This in effect makes transparency on this aspect optional. Consideration of local context is a key element of an appropriate materiality assessment. This should be both recognised in Chapter 3 of ESRS 1, and in ESRS 2 IRO-1, which should include an explicit datapoint on how the undertaking screened its locations and value chains. We welcome that E standards provide a clearer reference on the importance of disaggregation of disclosures, but this can only be done well if locations are properly screened. Second, we strongly recommend adding an explicit reference to the disclosure of relevant, entity-specific metrics directly in S standards. The fact that S2, S3 and S4 do not include any metrics should not imply that entity-specific metrics for S topics should not be disclosed.			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The "may" (voluntary) data points should not be eliminated. In many cases they are "shall" in GRI standards, so it is important to keep them to align with GRI standards which many EU companies are already familiar with and using and to support interoperability. Also, many of them were originally proposed as mandatory by EFRAG to the EC. The first wave of reports show that many companies have reported some "may" data points. Retaining them would help ensure standardization/comparability between company reports. Almost all of the datapoints for non-employee workers are voluntary, thus most datapoints for this particularly vulnerable group of workers has been lost. Also, important datapoints on full time versus part time workers has been eliminated.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	International Transport Workers' Federation	Trade union	United Kingdom	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	It is concerning that mandatory guidance in the Set 1 ESRS has been downgraded to "non-mandatory". Mandatory guidance is key to ensuring comparability and completeness of sustainability reporting. At a minimum, Non-mandatory Implementation Guidance (NMIG) should be included in the Delegated Act, and ideally called Mandatory Implementation Guidance. A major point of concern is that ID-177, which provided guidance that most S1 metrics should be reported if S1 Own Workforce is material, has now been downgraded into NMIG. Instead, EFRAG should preserve and promote the guidance that at the very least most S1 metrics shall be reported.			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	As a whole the reliefs go too far, overshooting the balance between cost/effort and transparency. There is a danger of enabling green/social washing. The relief for "undue cost or effort" is too vague thus leaving too much room for interpretation. The relief for direct data for value chain reporting is too extensive, as direct data is key for transparency. The relief for reporting on operations which are not "significant drivers of IROs" also opens up too much leeway for interpretation.			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	These combined reliefs overshoot the balance between transparency and cost/effort and risk enabling green/social washing. At a minimum, there should be a time limit introduced for these reliefs on value chain metrics. From our perspective this is an area where there are well-documented labour rights abuses faced by transport, logistics and warehouse workers linked to exploitative business models, both in value chains within European member states and in non-EU countries.			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ability to estimate financial effects is critical for the undertaking's ability to integrate sustainability into its business strategy considerations, planning and risk management. It is also key for the determination of financial materiality, including in terms of accurately reporting topics as financially material. Reporting on financial effects is crucial to achieving the objective of putting sustainability reporting on the same level as financial reporting and integrating both into decision-making at a senior level. There are too many historic examples where multinational corporations have externalised long-term environmental and social costs, leaving member states and ultimately EU citizens to pick up the bill. The European Union has recognised the value of a double materiality approach to corporate reporting which requires disclosure of both material environmental and social impacts, risks and opportunities as well financially material data. It is important to keep the requirement on businesses to analyse and understand the financial effects of their business model. This will ensure investors have access to credible data as well as providing the underpinning for future business planning and long-term success.			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	ESRS reliefs should not go beyond those set in IFRS. The principle of fair presentation needs to be protected to provide transparency on all material IROs. As noted in the response to question 15, it is also important to consider interoperability with GRI when considering changes to the ESRS, rather than only considering the ISSB's standards. The GRI is widely used by global companies and well-established in terms of impact disclosure. See for example, the response to Question 15 above in relation to "may" (voluntary) data points which are in many cases "shall" in GRI standards.			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				

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Survey	International Transport Workers' Federation	Trade union	United Kingdom	22.S1	Comments on deleted datapoints in ESRS S1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The reduction in the number of mandatory and voluntary datapoints goes far beyond striking an acceptable balance. As mentioned above, the voluntary datapoints should be maintained to provide alignment with GRI, which is currently in the process of strengthening its labor standards, as well as guidance and standardization for companies reporting more than just the mandatory datapoints. An explicit quantitative goal of 50%+ reductions was never set by the European Commission for EFRAG. A number of S1 datapoint metrics have been eliminated which should be reinstated: •S1-5 Employees: gender breakdown for zero-hour employees •S1-8 Diversity: age distribution; •S1-10 Social protection: reinstatement of retirement •S1-12: Training and development: gender breakdowns, •S1-13 Health and safety: fatalities from ill-health for non-employees and other workers on site; •S1-14 Work-life balance: employees that took family related leave;			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	22.S2	Comments on deleted datapoints in ESRS S2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	We are concerned about the lack of specific entity level metrics. It is noticeable that a lot of the points that were based on years of learning by companies and multistakeholder initiatives about useful disclosures which would help drive and demonstrate positive change in the value chain which were available to reporting entities in the previous version of ESRS S2 have been cut in this revised version.			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Adding a datapoint on training of the procurement team is needed to support the implementation of human rights in the supply chain. The addition of a datapoint on confirmed incidents of bribery is needed to improve transparency on the effectiveness of bribery/corruption policies and measures.			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Agree that the following mandatory datapoint should be added: ESRS 2 General disclosures – BP 1 the undertaking shall state that the general requirements of ESRS 1 have been applied for the preparation of its sustainability statement.			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	The "fair presentation" principle is essential to reduce the risk of green/social washing, as it emphasizes the full disclosure of all material impacts, risks and opportunities and their management. It is not understandable why this principle is under attack, as it is included as one of the general principles of the Accounting Directive.			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	It is essential that financial institutions disclose absolute targets to assess how their strategies align with the economy-wide transition to net zero. Absolute targets are relevant for users of sustainability statements and for understanding the real-world climate impact of financed activities. While intensity measures provide insights into efficiency, they can mask rising absolute emissions in growing portfolios or sectors. Granting an exemption would also undermine fairness in a sector-agnostic standard. Other industries could equally argue for exceptions based on their own difficulties, reducing comparability across sectors. Moreover, absolute financed emissions are already recognised in existing standards and regulations: the SBTi financial sector net-zero standard, the UNEP FI/NZBA recommendations, and EU SFDR all require or encourage absolute emissions disclosure. Exempting banks would risk misalignment and reduce the usefulness of reported data for stakeholders, including consumers and asset owners who depend on it for their own disclosures.			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The "top 10" threshold for reporting country-level data on employment, collective bargaining and social dialogue is a major improvement over the current 10% employment threshold. An analysis of the first sustainability statements from Wave 1 companies shows that the current 10% threshold results in country-level disclosures on as little as 21% of total employees. More country-level information is needed to understand the distribution of impacts across countries, as well as whether employment thresholds for specific labour rights have been exceeded. The new threshold does not require additional effort/cost by companies, since they must gather country-level data anyways to calculate the global figures. Furthermore, it does not result in extra datapoints, since the information currently is (and can be under the revised ESRS) reported as one table.			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	An analysis of the first year ESRS reports shows that most companies are simply reporting that they pay minimum wages, whereas the intention (as outlined in the ESRS Basis for Conclusions) is that companies should be enabled to disclose commitments to paying a wage "sufficient to support themselves and their families in dignity" as well as the extent to which they do this. This shows that the methodology for non-EU countries needs to be changed. Furthermore, the new ILO agreement on a methodology for living wages needs to be taken into account. The proposed new methodology takes a step forward in both regards but we would encourage EFRAG to engage further with the trade unions at European and global level on this important point.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	International Transport Workers' Federation	Trade union	United Kingdom	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	The new, simplified framework should make it easier for companies to report on these SFDR-related matters in a way that corresponds to how their policies are set. For users, this consolidation makes it easier to locate the relevant information. However, the SFDR datapoints are helpful and should only be selectively amended. In particular, we would be against any further changes to either the Amended ESRS or the SFDR PAI which would weaken the link between corporate respect for human rights, ESRS disclosures and the SFDR PAI.			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	The unadjusted gender pay gap should be kept as mandatory, since the methodology for calculating it is clear. The adjusted pay gap figure as voluntary. In practice many companies are reporting both figures, which is useful for improved transparency. However, since the methodology for calculating the adjusted figure is not standardized, the unadjusted pay gap figure should be kept mandatory.			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS 1: As detailed above, cumulative impact of the various reliefs is concerning.			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS 2: The improved language on DMA is welcomed, including on the engagement with workers' representatives.			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS S1: The proposed "top 10" threshold for the reporting of country-level information for employee headcount, collective bargaining and social dialogue is a significant improvement over the current 10% employment threshold. Country-level information needs to be reported in more detail, and on other metrics as well, in order to have more transparency on the distribution of impacts across countries. In the metrics, voluntary datapoints need to be reinstated as well as the datapoints on gender breakdowns, workforce age distribution, etc. detailed above need to be reinstated. The proposed new methodology for adequate wages outside of the EU also needs attention, and the transition language for EU member states needs to be reinstated, since the Adequate Minimum Wage Directive has not been implemented in some Member States. We would also like to reiterate our longstanding demand for including franchise workers in the S1 definition of own workers, as well as the need for sector-specific standards to supplement the Set 1 sector-agnostic standards.			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS S2: We are concerned that the loss of many specific datapoints related to workers in the value chain will mean that disclosures about material impacts, risks and opportunities become more generic and have less information about the specific stakeholder groups because specifications about the level of granularity have been deleted. Many of the points that are being deleted from ESRS S2 had originally been included because they reflected effective practice in relation to improving supply chain labour rights, for example, AR 6 awareness of the impacts on value chain workers from an undertaking's strategy or business model, AR 20 illustrating how the perspectives of value chain workers have informed specific decisions or activities of the undertaking and AR 25 which looks at retaliation and whether workers can use grievance mechanisms confidentially.			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS S1, S2, S3, S4: An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	International Transport Workers' Federation	Trade union	United Kingdom	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS S1, S2, S3, S4: An explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts.			
Survey	International Transport Workers' Federation	Trade union	United Kingdom	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The definition of own workforce should be expanded to include franchise workers. The term "non-employees" should be supplemented with the phrase "non-employee workers" or "non-employee workers in own workforce".			
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	positive : possibility to report on topics, possibility to update DMA instead of reassessed negative : the process for DMA is still heavy and subject to different interpretations due to more flexibility and less comparability between companies			
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	A positive point is that you consider this question and address it, because it was unclear in the previous version. But it remains complicated even with the information from Appendice C, in order to know clearly what to consider. It would be better to consider only the fact that an action plan is still needed or not, to keep the impact in the report (instead of considering reporting years/future years).			
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	No comment, we agree			
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We agree. Just a little point : in previous version (old) 80j , a comment on the result compared to the target is needed. It is deleted in the new version MDR-T, it does not seem relevant to us			
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	OK with point 1 Regarding point 2, some AR still include datapoints and some others include "may". AR should be "how to disclose" requirements instead of guidelines. Example : AR24b in ESRS E1 is a datapoint, not included in the DR above. OK with point 3, even it could be still improved for more simplicity in wordings.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We agree except for the point 1. "Undue cost or effort" is not clear and may be subject to interpretation (paragraph 89 ESRS 1)			
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	good to give flexibility but "undue cost or effort" is not clear enough and is subject to interpretation. In addition, it could be a good point to give a time limit to foster improvement in the quality of data.			
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	Option 2 is too limited with qualitative data with no commitments. Regarding option 1, it should be amended and simplified : c iii is not clear and should be deleted			
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	It is still complicated. We should only focus on the main points, example in 41 : only a) and g) should be kept			
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	Positive point : reduction of narrative datapoints (avoidance redundancy between MDR and topical ESRS) Some deleted qualitative datapoints were only redundant datapoints or datapoints derived from other ones by calculation. The figure -57% is not representative of the real decrease of reporting and should not be interpreted as -57% of work !			
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	It is subject to interpretation			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	it is clearer			
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	GIFAS welcomes the following simplifications to the DMA process: –the possibility of adopting a top-down approach in addition to a bottom-up one, –the shift in focus from the IRO level to the topic level –the clearer identification of internal/external sources to be used at the beginning of the section –the enhanced prominence given to the materiality of information, –the simplification of AR16. However, companies are concerned by the definition of impact materiality in paragraph 21 (b) of ESRS 1. In particular, the definition of 'general purpose' according to AR3 is too vague and could result in multiple requests from a variety of stakeholders. They call for a simplification of the update requirement by specifying that the DMA process and its conclusions shall be updated only in case of significant events or material changes in circumstances (§29). Furthermore, additional structural and editorial changes are still needed to ensure that the drafting consistently reflects the intended simplification: –The requirement to describe the DMA process in IRO 1 §26 are too detailed –The purpose of the top-down approach is sometimes weakened by elements carried over from Set 1, which do not make it sufficiently clear that an IRO-level assessment is not systematically required during the DMA –Some methodological or illustrative elements should be moved into the AR (severity-related factors (§31), criteria for assessing positive impacts (§32), details on risks and opportunities (§41), dependencies (§42)); –Nuance the requirement to use thresholds (§28 + AR5c): when ranking material issues, severity may be assessed through comparison without the need to score each sub-criterion separately or define strict thresholds. –Certain terms remain imprecise and risk creating contentious discussions with auditors, such as "relevant information" in §22 and "appropriate level of aggregation" in AR 23 of ESRS 2.			
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	Annex C is not clear and creates confusion because: –It is different from the principles. –It adds the theoretical case of information to be produced in the next reporting period (year N+1). In practice, when producing a sustainability report, companies are always focusing on the reported period. Impacts cannot be artificially divided into different periods. Therefore, GIFAS believes that Annex C introduces confusion and should be removed to avoid difficulties related to diverging interpretations. Moreover, in ESRS 1 (P28/34) QC 8 (addressing gross/net concepts) remains in revised ESRS, and creates a lot of confusion. It is the only occurence of gross vs net and must be removed.			

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Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	GIFAS is supportive of the changes (possibility to better organize the report in a meaningful way, to put some granular datapoints in appendix…) as we deem very important to have a concise report, focused on important subjects, enabling the reader to better understand their strategy, politic and actions.			
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	GIFAS and its members welcome the improved presentation of the Standards, including: –the reduction of the length of the text, the simplification of narrative paragraphs deemed overly technical or detailed; –the positioning of AR directly after the disclosure requirements, focusing only on essential methodological elements and key presentation points, which significantly improves readability and understanding of the standards. Nevertheless, the overall length of ESRS 1 could be further reduced, including by simplifying Chapter 3 on double materiality assessment (similar length as in Set 1 and simplified ESRS, 34 pages, 25 without annexes). Regarding the datapoints which are kept from the set 1, EFRAG should confirm that the wording changes brought to improve conciseness of the standards shouldn't lead to additional burden for the first application due to a "fresh interpretation" by the auditors or regulator.			
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The NMIG should remain outside of the standards. The first wave companies' experience shows that EFRAG Q&As and Implementation Guidance have been used by auditors as a binding reference, with preparers expected to comply. Despite being issued by EFRAG for illustrative purposes only, the NMIG could be considered by stakeholders as having the same authority than the reporting standards. It is therefore essential that the NMIG remains outside the delegated act adopting the ESRS and is drafted in a way that cannot, under any circumstances, be used as an audit reference. The NMIG should remain a document published by EFRAG only and not by the European Commission. Furthermore, the treatment of previous lengthy and numerous Q&A and non-authoritative implementation guidance issued by EFRAG on Set 1 needs to be clarified by EFRAG. Companies shouldn't be required to read layers and layers of text to draft their CSRD, a reduction of the number and length of documents to consider and an improvement of their readability being particularly crucial for wave 2 companies. The basis for conclusion are very useful and should integrate the precise list of clarifications brought on the existing datapoints without requiring a modification of the standards. Indeed, it would enable preparers and auditors to already take them into account for the 2025 reporting. Some disclosures currently proposed by EFRAG in the environmental field should be transferred to the NMIG as mentioned in Questions 24 and 30 (see also EXCEL file on ESRS ENV).			
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	GIFAS generally welcomes for its members the proposed reliefs which should lead to a more cost-effective reporting without compromising its quality: –the clarification that the starting point for reporting is the scope of consolidated financial statements; –the reduced emphasis on direct data collection from value chain partners, with possibility to use estimates; –the concept of "undue cost or effort" consistent with financial reporting practice; –the clarification that non-material activities may be excluded from the calculation of certain metrics. Even if some go beyond the ISSB provisions, being "optional," we do not believe this will hinder interoperability. However, clarifications are necessary regarding how these reliefs fit into the fair presentation framework if it is adopted. Concerning joint operations, ESRS §92 seems to increase the burden, implying that undertakings must include data from the joint operation over which they have operational control, whereas preparers interpretation of the current standards (E1 apart) was that only own operations were concerned (except in the specific case of entity-specific indicators if this scope was deemed relevant by the company). In any case, ESRS S1 should also be targeted as it may be very delicate to obtain data on the joint operations' workforce. We also wonder how this extension to operationally controlled joint operations fits in with the relief regarding data quality. For the setting of climate objectives (E1-8) : the relief mentioned in ESRS1 §91 on "undue costs and efforts" should also be applicable for setting scope 3 objectives. They are most of the time very hard to quantify as they address the actors across the whole value chain, without certainty for applying effectively the expected action plans. In any case, this relief should also apply to E1-8 on GHG emissions if estimates are subject to too much uncertainty.			
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	GIFAS is supportive of this proposal because it is often very difficult for companies, to obtain even estimates on assets operated by third-party companies, for example. Even if companies implement improvement processes, it is not always certain that reliable data can be obtained at a later date, particularly when third parties operate in jurisdictions that are not subject to ESRS. We also agree that no time limit should be imposed since as mentioned in the basis for conclusion, transparency about such limitation would provide sufficient incentive for the undertaking to improve the data quality and achieve a more complete scope in the calculation of the metrics.			

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Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	GIFAS members consider that information on anticipated financial effects is problematic because it can reveal confidential and strategic information and raise issues in terms of liability considering the uncertainties attached to any projections or forecasts. Although disclosure of sensitive information will be dealt with ongoing developments on level 1, companies consider that anticipated financial information deserves specific relief in the ESRS. Companies point out the risks of disclosing projections covering medium and long-term horizons based on assumptions that change rapidly and dramatically. Such disclosures would significantly increase companies' liability without providing useful information to users. Furthermore, it is impossible to provide quantitative information without disclosing highly sensitive financial information. In the field of financial reporting, companies are not required to disclose their financial planning. Companies understand the expectations of some stakeholders for forward-looking financial information but highlights that they are useful only when they are reliable without exposing confidential information. A high-quality qualitative information is thus preferable to forcing companies to present unreliable and sometimes misleading quantitative data. The reliefs included in Option 1 are not sufficient as many stakeholders see these exemptions as temporary.			
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Quantitative reporting on anticipated financial effects is still premature given the immaturity of methodologies. Mandatory qualitative disclosure should be the baseline, with quantitative elements allowed on a voluntary basis (see option 2 for relief ESRS2 §23 a). In §41, subparagraph f) on stranded assets should be suppressed as it leads to too much uncertainty.			
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	GIFAS members operate globally and have investors outside of the EU who may be asking for ISSB compliance or operating in jurisdictions planning to make ISSB standard compulsory. Any reporting duplication or discrepancy of principle should therefore be avoided. Nevertheless, in our view, the international standards shouldn't necessary be the absolute global baseline and some datapoints may remain specific to this framework without being always embedded in the ESRS. Indeed, to allow a real simplification of the ESRS without hampering the interoperability, any DP and DR which can be considered as less of a priority or too complex should be withdrawn from the standards and flagged in an appendix as necessary for the interoperability. It would enable any company needing to be interoperable an easy identification of what is needed without imposing an unnecessary burden on others.			
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	GIFAS supports EFRAG's proposal, as planned in the Commission's mandate, to reduce the number of DPs by deleting the voluntary DPs, reducing overlap and increasing the focus on quantitative DPs with a reduction of the numerous narratives. Beyond the quantitative diminution of the number of DPs, companies highlight the difficulty to evaluate the concrete effect of that reduction on the reporting burden. Indeed, the quantitative DPs represent an important burden for companies considering the data collection in all the subsidiaries based in different countries with different legislations. GIFAS members note that some alleviations listed in the French proposals for a simplification have not been considered by EFRAG - notably the deletion of some difficult DPs - which, cumulatively, could enable a more significant decrease in the reporting burden. Therefore we believe that further alleviation is feasible and necessary.			
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	E3: GIFAS members do not have water meters installed at each point. Moreover, most industrial companies calculate their water consumption through estimations and modelling rather than by using the water balance approach. Consequently, these new datapoints contradict the principle of simplification create greater complexity, and increase the audit costs. E4: The notion of "transition plan" is not yet clearly defined. Companies explore the best ways to develop action plans on this highly complex subject, whether through national or international initiatives, but no official certification of such analyses and plans exists to date. Making this datapoint mandatory would discourage companies from taking initiatives, as it would trigger compulsory verification by auditors without existing auditing standards. Such a compulsory publication should be removed from the standard. G1-2 : Percentage of functions most at risk in respect with corruption and bribery should be included in G1-4 (sub topics). G1-4 : GIFAS strongly rejects the number of confirmed incidents. –It is irrelevant : it is not a reliable indicator to assess the effectiveness of the anti-corruption policies (a low number could mean a good policy to prevent the risks, a high number could mean a trustful reporting mechanism). –It is dangerous for EU competitiveness as it contradicts the right not to incriminate oneself guaranteed by the European Convention on Human Rights. Third countries authorities, such as the US Department of Justice, would investigate against EU companies to the benefit of their major strategic non-EU competitors who are not subject to similar reporting obligations. Finally, the specific point on CS3D and CSRD made in the recent joint statement on a US/UE framework on an agreement on reciprocal, fair and balanced trade, will lead to alleviate US companies from the main constraints of CSRD and create an unlevel playing field.			

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Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	E2-4: It must be reminded that the definition of secondary microplastics is not officially established, and their impacts are not yet clearly addressed by science. Companies wish that are entitled to refer to the relief on uncertainty when they consider official information is incomplete on this issue. E5-4: At present, the notion of critical and strategic raw materials may evolve over time with the development of the Critical Raw Materials (CRM) Act, and as the delegated acts deriving from the Eco-design for Sustainable Products Regulation (ESPR) are not yet approved. Companies consider this information hard to access and publish, particularly since these materials are often mixed with others. In this evolving context, this datapoint shall be inserted in the NMIG.			
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	GIFAS members do not support introduction of "fair presentation" in the ESRS. EFRAG's rationale being to allow companies to focus on essential information and to avoid a compliance approach ; to enhance interoperability. Since the mandate given by the Commission is to reduce and streamline, new concept should not be introduced in the ESRS, especially when not clear. Fair presentation is a new concept not used in the Accounting Directive which only refers to "true and fair view" regarding financial statements. French and European stakeholders have diverging interpretations of potential impacts and consequences : for some key stakeholders, it means the addition of supplementary datapoints in the report and it increases liability for both preparers and auditors to reach completeness, thus not reducing the reporting burden. French auditors consider that they will have to perform more due diligences and that the audit burden will be increased. Regarding liability, companies highlights that consequences are different in a double materiality reporting framework than in a financial one given the number of affected stakeholders, the importance of narrative and forward-looking information required by the ESRS. EFRAG is trying to frame the double materiality assessment, stating that undertakings are not required to assess every possible IROs but this provision is not sufficient in case of litigation. As regards interoperability with the IFRS, the ISSB claims a level of interoperability of 95% regarding climate reporting. The remaining 5% are rather technical and clearly identified; they can be addressed directly without introducing fair presentation.			
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Financial institutions' GHG emissions typically stem from financing activities (Scope 3, Category 15), which means that their GHG emissions depend on companies and households that they finance. Therefore, too many hypotheses are needed to calculate targets in absolute value, and the results are neither reliable nor comparable, because they ultimately depend on clients. Moreover, absolute value targets are appropriate only for sectors where financing may be phased out due to lack of transition. While for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. Estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. For this reason, we strongly believe that financial institutions should be exempted from disclosing GHG emission reduction targets in absolute terms. Intensity targets alone should be sufficient.			
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	GIFAS members have analysed the new definition of the threshold above which it is necessary to break down indicators relating to the characteristics of company employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of the amended version of ESRS S1). They are not in favour of this change in the definition of significant company workforce because they consider that: –the information is difficult to gather, –it involves a significant burden in terms of preparing information for companies that sometimes have a small workforce in these countries –when a company employs a small number of employees, the information will not be relevant for assessing the social or HR policies implemented. A top10 desagregation would lead companies to disclose non-material information (less than 10% of the workforce) which contradicts the objective of simplification. They therefore wish to return to the previously proposed definition, both for DR S1-5 and S1-7, but also for the majority of DRs, in particular S1-9.			
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	GIFAS is satisfied with the amendment made to AR 22. Outside the EEE, we believe it is entirely appropriate to compare the lowest wages in the company with the statutory minimum wage established by legislation or collective bargaining; and where these do not exist, to use the benchmarks developed by the ILO – a tripartite international organisation – on living wage estimates rather than resorting to consultants or private organisations.			
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	Simplifications brought in the ESRS must trigger changes in other regulations of the sustainable finance framework to ensure consistency between the different pieces of legislation. In particular, the upcoming review of SFDR should lead to deleting some PAI that are not particularly relevant and introduce a materiality principle. PAI should be strictly based on the information required by the ESRS and not impose additional disclosure requirements to investee companies. Prudential obligations need to be reviewed accordingly.			
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	GIFAS members welcome the intention to provide guidance for companies in setting biodiversity targets, provided that the future application guidance remains voluntary and is integrated into the NMIG.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	With regard to remuneration, whether it be the pay gap or the ratio (S1-15), companies question the value of unadjusted indicators that do not provide any useful information and which, if reproduced without contextual explanation, may contribute to damaging their reputation. The adjusted pay gap is the only metric that directly measures compliance with the principle of "equal pay for equal work or work of equal value."			
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	GIFAS members are in favour of deleting paragraph 14, which poses a feasibility problem for companies with tens of thousands of direct suppliers. This disclosure requirement raises the question of how to identify SMEs around the world: what definition should be applied in non-EU jurisdictions ? It is therefore impossible to calculate and provides no useful information (payment terms can differ between economic sectors rather than based on the size of companies). Companies consider that paragraph 14 should be deleted. In addition, this requirement is not aligned with Directive 2011/7 of 16 February 2011 on combating late payments in commercial transactions which does not make any distinction based on the size of companies.			
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

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Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
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Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

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Survey	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		ESRS E1: –E1-1/E1-6: GIFAS members remind that the EC committed to define by end of 2025 the meaning of "compatibility between companies' target and 1.5°C targets". Until such a definition is published, no obligations are legitimate on this issue. Moreover the Paris Agreement also refers to "well below 2°C objective" which should be reinserted in the amended CSRD. –Companies consider, in the case where disclosing an absolute emissions target would provide to competitors key sensitive information (i.e.: production forecasts) which are very sensitive, that they should be entitled to publish only a target expressed in intensity,. In this regard, a clarification that the "relief" mentioned in ESRS 1 §98 is effectively applicable for section E1-6 appears essential. –E1-3: The notion of resilience used in this section is very much unclear (see glossary); if the concept refers to adaptation, then it should be replaced by climate adaptation (without any reference to transition) –E1-6/E1-8: The distinction between financial control and operational control remains insufficiently clear, and it is uncertain whether the current drafting produces a positive outcome for preparers. This lack of clarity risks confusion in the interpretation of scope 1 and 2 emissions –E1-5/E1-9 : some obligations have been added (§24 a ; §24c ; § 34) and should be suppressed. ESRS E2: Requiring undertakings to disclose information on substances of concern goes beyond the obligations set by REACH and creates a significant additional burden. The same remark applies to the 0.1% threshold mentioned for disclosures relating to the quantities of SVHC which are part of procured/sold components or articles. Indeed, REACH only requires companies to share the name of those substances. Therefore, reporting on substances of concern should be suppressed, as proposed by the French Accounting Standards Authority, and datapoints 20(a) and 20(b) amended accordingly.			
Survey	Związek Banków Polskich	Association of financial institutions	Poland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The proposed amendments have partially simplified the DMA process, although some areas still require further clarification. The expression "fair/faithful presentation" might be difficult to prove in front of auditors, The principle of disproportionate cost or effort applies to the collection of data for reporting purposes. I expect there will be a lot of discussions with the auditor if we say that we estimated something, because collecting data was too time-consuming/labour-intensive. It would be useful to clarify this principle._ The simplification of "anticipated financial effects "is not clear to me ". This may derive from situations that do not yet lead to the recognition of assets/liabilities, or income/expenses, in financial statements, in accordance with the accounting recognition criteria. It might lead to differences between financial reporting and sustainability reporting. We need to ensure there is a homogeneous definition of materiality assessment across EU legislation, and one that is as closely aligned as possible with ISSB (for financial materiality). Regarding the financial sector specifically, the definitive EBA Risk Management Guidelines claim further alignment with EFRAG guidance on financial materiality assessment, and say that "The materiality assessment of ESG risks should be consistent with other materiality assessments conducted by the institution, in particular those made for the purpose of disclosing material sustainability risks in accordance with Directive 2013/34/EU6 and Commission Delegated Regulation (EU) 2023/27727 , where applicable".			
Survey	Związek Banków Polskich	Association of financial institutions	Poland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Partially yes. In our opinion Appendix C is unclear and could create even more questions and doubts. This could even make DMA more complex than it is already. As we mentioned in the previous answer any new or current doubts only create the risk of different interpretation, which is extremely meaningful when it comes to the discussion with auditors. This could create a risk in the relations with auditors – they may give rise to different interpretations that could lead to endless debates and different approaches to the same issue.			
Survey	Związek Banków Polskich	Association of financial institutions	Poland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Partially we agree. In our opinion the direction of the simplification of the DMA is a positive step. The changes make reporting more streamlined and reduce the effort needed for preparation, especially since many of the removed data points were qualitative and did not contribute significantly to comparability.			
Survey	Związek Banków Polskich	Association of financial institutions	Poland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Partially yes, but the language of new ESRS is still not fully clear. There is a lot of legal expressions. There is needed using "simple language principles" in order to achieve bigger accessibility of the document and more smaller companies could use the reporting standard on non-mandatory terms. Shifting AR to the relevant DR was a good step.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Związek Banków Polskich	Association of financial institutions	Poland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We welcome the removal of voluntary data points from the NMIG. This allows for better flow and reduction of unnecessary text in the standards themselves. NMIG has many advantages, but it also can bring some risks: NMIG may be perceived as a "hidden obligation", especially by auditors and regulators. If NMIG is not liked to materiality mechanism, some companies may ignore it – while others will treat it like mandatory checklist, increasing complexity instead of simplifying. At a later stage, we would be grateful for support in the form of examples of pragmatic estimations taking into account the specificities of financial institutions, such as the lack of data from SMEs.			
Survey	Związek Banków Polskich	Association of financial institutions	Poland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Our main concerns are regarding the "undue cost or effort", there is lack of a clear objective definition for "disproportionality". What is a standard cost for a large multinational corporation may represent a significant burden for SME. The lack of specific criteria (e.g. financial thresholds, number of working hours) means that each company will have to assess independently whether a given cost is "proportional". This could lead to highly varied approaches to the same issue. This will cause problems for auditors and problems with comparability of reporting. It may also cause risk of abuses and "selective reporting" This principle provides companies with opportunity to omit certain, uncomfortable disclosures. In our opinion, a safe harbor for portfolio estimates (Scope 3.15) is needed. This can be achieved, for example, by establishing protection for 2-3 disclosure cycles by demonstrating "best effort" estimates, provided the bank discloses the method, sources, and improvement plan.			
Survey	Związek Banków Polskich	Association of financial institutions	Poland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	Partially yes. As it was mentioned above our main concerns are regarding the "undue cost or effort", there is lack of a clear objective definition for "disproportionality". What is a standard cost for a large multinational corporation may represent a significant burden for SME. The lack of specific criteria (e.g. financial thresholds, number of working hours) means that each company will have to assess independently whether a given cost is "proportional". This could lead to highly varied approaches to the same issue. This will cause problems for auditors and problems with comparability of reporting. It may also cause risk of abuses and "selective reporting" This principle provides companies with opportunity to omit certain, uncomfortable disclosures.			
Survey	Związek Banków Polskich	Association of financial institutions	Poland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	In general Option 1 in the long perspective would be more preferable. From the perspective of the banking sector the key is to harmonizing reporting with IFRS. Moreover, when it comes to the banking sector it is also important to asses the interaction between proposed solutions and sectoral regulations, such as Market Abuse Regulation. Option 2 has also advantages, therefore we do not have a strong opinion on preferable option 1.			
Survey	Związek Banków Polskich	Association of financial institutions	Poland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We support the financial consolidation approach as a basis for sustainability reporting. However, to ensure consistency and simplify implementation, ESRS should clearly state that GHG emissions on assets that are under banks' financial control, but not under banks' operational control, should be reported as Scope 3 disclosure. Auditors have very different approaches to this at the moment. Above all, the concept of "control" must be clearly defined. The key should be to maintain the elements necessary for Pillar 3/Taxonomy disclosures (e.g. GAR) so as not to compromise data consistency and comparability of disclosures.			
Survey	Związek Banków Polskich	Association of financial institutions	Poland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Związek Banków Polskich	Association of financial institutions	Poland	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	There is a need for continued monitoring of the practical effects of the reductions, particularly with regard to the risk of losing comparability of data between companies and sectors, ensuring that key information for EU goals (e.g. climate transformation, biodiversity, human rights) is not overly simplified.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Związek Banków Polskich	Association of financial institutions	Poland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We would like to highlight the importance of ensuring that the "fair presentation" rule is applied in a proportionate and practical way. Without clear guidance, there is a risk that auditors could interpret it as a de facto requirement to disclose information that was intentionally excluded based on DMA. Therefore it would be useful for EFRAG to provide further clarification and examples illustrating how the rule should interact with materiality filter.			
Survey	Związek Banków Polskich	Association of financial institutions	Poland	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	There should exist an indication how to calculate emission intensity for banks – in 2024 reporting each bank had its own method for calculating intensity and results were not comparable.			
Survey	Związek Banków Polskich	Association of financial institutions	Poland	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	While we strongly support efforts to strengthen appropriate remuneration disclosure, the current approach introduces ambiguity and complexity. Clear guidelines and flexibility are needed to ensure consistent, transparent, and decision-relevant reporting.			
Survey	Związek Banków Polskich	Association of financial institutions	Poland	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	The direction of SBTN compliance is positive. However, this field is changing rapidly. Enforcing a widely recognized industry standard would be more effective than introducing rigid, mandatory guidelines. In this context, it's also important to remember the principle of proportionality.			
Survey	Związek Banków Polskich	Association of financial institutions	Poland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	In some industries, where the disparities between the number of employed women and men (e.g. banking) cause the unadjusted GPG to be a completely unreliable indicator and only the adjusted indicator has informational value.			
Survey	Aquaculture Stewardship Council	NGO	Netherlands	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	Aquaculture Stewardship Council	NGO	Netherlands	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	Aquaculture Stewardship Council	NGO	Netherlands	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We are in favour of an 'executive summary' to allow more concise and relevant reporting.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Aquaculture Stewardship Council	NGO	Netherlands	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We partially disagree with the removal of the requirement to disclose whether the undertaking plans to implement a PAT for material topics, together with a timeline. While we acknowledge that undertakings will still need to indicate which material topics are not covered by a PAT, the absence of information on future plans and implementation timelines weakens accountability, comparability, and transparency of disclosures. Without this obligation, undertakings may simply state that no PAT is in place for a material topic, without clarifying whether they intend to address it. This gap could encourage greenwashing, as stakeholders would lack visibility on whether and when reparation or mitigation actions are planned. The disclosure would therefore provide an incomplete and potentially misleading picture of the undertaking's sustainability strategy.			
Survey	Aquaculture Stewardship Council	NGO	Netherlands	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E4	If EFRAG is reluctant to keep the reference to the ISEAL Code of Good Practice in the E4 on biodiversity, it should at least keep a reference in NMIG.			
Survey	Aquaculture Stewardship Council	NGO	Netherlands	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	Striking the balance between "a) stakeholders' demands for burden reliefs and (b) preserving the transparency" should however weigh favourably towards transparency; and for any disclosure/reporting claim to be credible, these disclosures should be based on quality & direct data/metrics. The amendments proposed favour too much/too many horizontal reliefs in our views.			
Survey	Aquaculture Stewardship Council	NGO	Netherlands	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	In order to provide comparability and meaningfulness, there should be an attempt to define "partial scope" as a precise % of the reporting company's double materiality "size"; e.g. expressed in a unit comparable across all sectors or all companies falling under CSRD scope (e.g. % of annual turnover/sales in €; % of production volume (per sector) in tonnes; % of workforce (in # of employees), or % of estimated emissions (in Co2t) etc.			
Survey	Aquaculture Stewardship Council	NGO	Netherlands	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	In our opinion, option 1 provides an appropriate solution if the goal is to find a balance between ensuring the disclosure of relevant information and the needs of those undertakings that face limitations when estimating long-term financial effects. As explained in the 'description of changes', option 1 is substantially aligned with the IFRS relief, while introducing a safeguard (i.e., the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information), which is consistent with the scope and expectations of the ESRS. There is substantial concern that option 2 would lead to a significant loss of useful information for investors and other stakeholders. By limiting disclosures to qualitative information only and making quantitative reporting fully voluntary, option 2 risks undermining the possibility to compare different undertakings and weakens the incentive to develop robust methodologies for the assessment of financial effects. Option 2 also reduces the alignment (and interoperability) with IFRS S1 and S2, creating unnecessary divergence in sustainability reporting standards. For these reasons, we recommend Option 1 as the more proportionate and effective approach.			
Survey	Aquaculture Stewardship Council	NGO	Netherlands	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Aquaculture Stewardship Council	NGO	Netherlands	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Aquaculture Stewardship Council	NGO	Netherlands	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	Aquaculture Stewardship Council	NGO	Netherlands	22.E4.	Comments on deleted datapoints in ESRS E4	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	We noticed that the proposal deletes the reference in AR 17 to the ISEAL Code of Good Practice: "When disclosing its policies, if referring to third-party standards of conduct, the undertaking may disclose whether the standard used: (e) conforms to the ISEAL Code of Good Practice." We understand that this reference has been deleted just for simplification purposes. We would retain this reference, as the ISEAL Code of Good Practice provides a reliable guarantee that the sustainability ecolabel used in B2C communication is transparent, credible, and based on a certification scheme with third-party verification. This is important because the ISEAL Code is widely acknowledged by NGOs, consumers, and sustainability stakeholders as a benchmark for reliability and integrity in ecolabels. Including this reference would reinforce the credibility of sustainability disclosures and promote higher standards of accountability in the market. This datapoint would only apply to undertakings that are already using an ecolabel aligned with the ISEAL Code of Good Practice. Therefore reporting it does not constitute an additional cost for the undertaking. While this might make the indicator appear redundant, explicitly mentioning the ISEAL Code in the ESRS could encourage other undertakings to adopt it. We also noted that the ISEAL reference is not mentioned in the NMIG. If it is not possible to retain this datapoint, it should at least be included in the NMIG to to ensure that the importance of such recognised sustainability standards is preserved.			
Survey	Aquaculture Stewardship Council	NGO	Netherlands	22.S2	Comments on deleted datapoints in ESRS S2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	On ESRS S2 – Workers in the value chain, we support retaining points 10, 11, 12, and 13, as they specifically address the protection of workers in the supply chain. While deleting these points would reduce the number of indicators and simplify reporting for undertakings, such simplification risks undermining the rights of value chain workers, who are often in the most vulnerable situations. Any reduction in datapoints should not come at the expense of core transparency and accountability. Preserving these disclosures is essential to ensure enforceability of value chain worker rights and alignment with international standards on business and human rights. Removing these datapoints would create significant risks: it could allow undertakings to omit information on serious negative impacts, reduce comparability across companies, and weaken incentives to develop mature due-diligence processes. NGOs have warned that the proposed amendments risk enabling companies to rely on phase-in exemptions or "undue cost or effort" arguments to avoid reporting on value chain workers' rights. This would undermine alignment with international standards such as the UN Guiding Principles on Business and Human Rights and ILO conventions, and reduce the usefulness of ESRS for investors, policymakers, and affected stakeholders.			
Survey	Aquaculture Stewardship Council	NGO	Netherlands	22.S3	Comments on deleted datapoints in ESRS S3	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	On ESRS S3 – Affected Communities, we believe it is essential to retain points 8, 9, 10 and 11 in order to ensure adequate protection of affected communities, including local and indigenous peoples. EFRAG's objective of simplifying reporting requirements for undertakings should not come at the expense of these communities. Removing these disclosures creates a risk that undertakings could avoid accountability and liability following a material impact.			
Survey	Aquaculture Stewardship Council	NGO	Netherlands	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	As for any amendments enhancing the credibility and the comprehensiveness/focus of the reporting (which also enable comparability of Reporting outcomes), we support the decision to change the datapoints on biodiversity from "may" to "shall".			
Survey	Aquaculture Stewardship Council	NGO	Netherlands	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We are in favor of the decision to move the datapoint on secondary microplastics from "may" to "shall", given their impact on human health and relevance to achieving SDG 14 (notably SDG 14.1).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Aquaculture Stewardship Council	NGO	Netherlands	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We agree insofar as the Amendments contribute to meaningfulness; we disagree when/if the Amendments increase the likelihood for a variability of interpretation of, and comparability across, corporate reporting.			
Survey	Aquaculture Stewardship Council	NGO	Netherlands	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We believe that financial institutions (insurance, banking, and asset management sectors) should not be exempted — even temporarily — from disclosing "climate absolute GHG emission values targets" when they have only set intensity targets. Weakening absolute targets undermines comparability and transparency. Investors need both intensity and absolute emissions disclosures to accurately assess progress and risks. Moreover, granting exceptions creates loopholes; allowing an exception for financial institutions alone undermines consistency across sectors. If other sectors are required to provide both types of targets, financial institutions should be held to the same standard. Stakeholders — including investors, regulators, and civil society — lose the ability to assess whether financial institutions are genuinely aligning with climate commitments. Intensity targets alone can mask increases in emissions if overall activities grow. While estimating absolute targets is challenging (due to portfolio composition, production capacity, market shares, etc.), these challenges exist in many sectors. The reasoning given — that estimating absolute targets would require multiple assumptions, making results unreliable and less meaningful — is not convincing. We believe that complexity is not a justification for omission when impacts are material. We agree with the counter-argument that complexity exists across all sectors and should not prevent disclosure. For these reasons, we do not support this exception.			
Survey	Aquaculture Stewardship Council	NGO	Netherlands	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I would like to skip this question and provide my feedback in Part 3				
Survey	Aquaculture Stewardship Council	NGO	Netherlands	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The revised language and hierarchy of benchmarks for adequate wages for non-EU members gives preference to statutory minimum wages and ILO minimum wage setting principles over living wage benchmarks that objectively measure how much workers need to earn to afford a decent standard of living for themselves and their family. This is wrong as minimum wages are set through political and economic compromise and in almost all countries fall below what is needed for workers and their families to live decently. Accepting minimum wage as a benchmark risks legitimising poverty wages and undermines the purpose of wage adequacy standards. Furthermore, since human rights are universal, there should be no distinction between EU and non-EU countries in how adequate wages are defined. ESRS should be grounded in an understanding that in many countries there remains a significant gap between current pay levels and adequate wages and there needs to be a gradual approach to closing this gap to ensure sustainable employment. ESRS should encourage payment of adequate wages while also allowing companies to demonstrate progress towards closing gaps to adequate wages over time. This is important to avoid ESRS requirements driving counterproductive strategies such as outsourcing of production and employment to companies outside the ESRS scope and with lower wage levels. To substantiate claims of wage adequacy, companies should provide robust evidence, including disclosure of the lowest wages paid in each country of operation. All individuals engaged in company operations must be included in scope, including subcontracted and self-employed workers working alongside directly employed workers, as these groups are often at greatest risk of excessively low wages. To support this, the EU should promote the establishment of a global living wage database, developed with technical experts, and require companies to report regularly on progress towards achieving living wages across all operations.			
Survey	Aquaculture Stewardship Council	NGO	Netherlands	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	Not in a capacity to answer this at time being			
Survey	Aquaculture Stewardship Council	NGO	Netherlands	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Aquaculture Stewardship Council	NGO	Netherlands	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	ASC strongly supports the goal of full equality in terms of wage. To reach full equal pay, transparency and granular reporting by employee category and by country in wages are essential. This granularity is necessary to understand pay inequalities and help undertakings to address this issue. The decision to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio, does not help to address gender-pay inequalities. It actually weakens the ability of the ESRS to drive meaningful change. Without adjusted and disaggregated data, undertakings can present a simplified picture that hides structural inequalities, creating a risk of greenwashing and reducing the usefulness of disclosures for investors, workers, and policymakers. Therefore, ASC believes that maintaining adjusted and disaggregated reporting is crucial for ensuring accountability, comparability, and effective action to address gender pay inequalities.			
Survey	Finance for Biodiversity Foundation	Association of financial institutions	Netherlands	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Important considerations should be incorporated to ensure all relevant sustainability issues are correctly identified and reporting practices are comparable and rigorous. As the DMA defines the entire reporting process, it must be completely clear what components count and what steps are key for undertakings to develop their reports. Existing studies expose the limited number of companies (under 40% in CSRD), as well as banks, reporting on biodiversity. This is misaligned with the European Central Bank's analysis highlighting the strong dependency of the EU economy and banks loans on ecosystem services, as well as the "evidence review on the financial effects of nature-related risks" by TNFD, University of Oxford and Global Canopy. FfB Foundation calls for ensuring that all relevant sustainability issues are reported on, including biodiversity. It could be useful to include a recommendation for undertakings to explicit that their DMA process is following a "science-based approach", is aligned with "internationally recognised standards" (including the UN Sustainable Development Goals), and/or has made use of "score cards". This would lead them to using references and justifying results based on a rationale external to their own organisation. The DMA process could include key steps to ensure further consistency and comparability between practices, notably from the TNFD'S LEAP Approach. Some of these steps could be: a sectoral screening, triggering further analysis of specific operations; a location screening, to understand where business interfaces with nature; and a stakeholders screening, to understand the perception of activities from a diversity of viewpoints. It would be useful to precise time horizons (defined in ESRS 1, paragraph 77), to improve comparability. Furthermore, the FfB Foundation recommends raising "dependencies" to the same level of importance as "impacts, risks and opportunities". Dependencies are a key entry point of analysis for undertakings, supporting understanding of business models' relationship with natural capital.			
Survey	Finance for Biodiversity Foundation	Association of financial institutions	Netherlands	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Any remaining lack of clarity constitutes a risk as it may result in varying negative impacts not being reported as material, and therefore irregular reporting that cannot be compared across assessments. Notably, comparability can be lost under the notion of "significant action", not being precisely defined and thus subject to diverse interpretation. Requiring disclosure of potential and actual impacts based solely on pre-mitigation assessment would discourage effective risk management by overlooking meaningful actions already taken. However, judgments about remediation and prevention can vary significantly without established baselines and guidelines. This can then affect the values and data reported. Negative and positive impacts should always be reported separately, as recommended by the Partnership on Biodiversity Accounting Financials (PBAF). Primary and secondary data should both be collected to improve the accuracy of reporting and include datapoints of location and attribution. When considering reporting on impacts over a financial year, remedial activities contributing to the reduction of actual impacts should be considered, along with long-term expected effects on potential impacts. Finally, the FfB Foundation supports reporting on both actual and potential impacts, as each category provides information that are decision-useful to businesses and investors.			
Survey	Finance for Biodiversity Foundation	Association of financial institutions	Netherlands	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	FfB partially agrees that these proposed amendments strike an appropriate balance between prescriptiveness and preparation effort, with the need for relevant and comparable information. It is welcome that undertakings will be able to report by topics, as this will enable building logical connections between pressures, resulting impacts as changes in the state-of-nature, towards targets, policies and action. Still, the interactions between the Topical Standards are not completely clear, with the pressures on one side (climate change, pollution, water use, waste), and their impacts on biodiversity on the other side. It is important to ensure that undertakings will not only report on their identified pressures but will effectively manage the impacts of these pressures on biodiversity. We need to ensure that the undertakings reporting builds a coherent narrative following the mitigation hierarchy. It is essential to first avoid and reduce environmental damages, before turning to restoration activities. For the finance sector, this is key to the alignment of financial flows with global biodiversity goals. Such a coherent narrative should be enabled by the development of biodiversity transition plans but also based on a clear vision for biodiversity targets that encompass pressure reductions, biodiversity protection, conservation, and restoration, and systems changes. It has been pointed out to FfB, notably based on the current proposal for biodiversity targets in this survey, that ESRS E4 seems more focused on land-use change than on biodiversity. In a future revision, we could have Topical Standards focusing on pressures, and an overarching category on monitoring biodiversity and state-of-nature changes. Furthermore, the FfB Foundation would recommend raising "dependencies" to the same level of importance than "impacts, risks and opportunities" across ESRS2 and Topical Standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Finance for Biodiversity Foundation	Association of financial institutions	Netherlands	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	FfB agrees with these exceptions to the general rule, notably in support of biodiversity transition plans. Transition plans are a key mechanism to achieve Goal D (alignment of financial flows and means of implementation) and Target 14 (mainstreaming) of the Global Biodiversity Framework. Mandating Nature Transition Plan is a key policy ask to governments made by the FfB Foundation's Public Policy Advocacy working group, to support the alignment of financial flows with global biodiversity goals. In the context of the ESRS, biodiversity transition plans can provide an efficient tool to build a coherent narrative between the Topical Standards, integrating the reduction of pressures with the management of their impacts on biodiversity. It is important that the analysis and disclosure of companies and financial institutions' risks, dependencies, and impacts on biodiversity are not seen as sufficient for the implementation of the GBF. The undertakings analysis and disclosure should provide the basis for informing, driving, and prioritising action for impact mitigation. Transition plans will prove decision-useful for both companies and investors, with companies demonstrating how they will mitigate their negative impacts on biodiversity and investors having increased information to make effective investment decisions. For FfB, the other indicators on water are also important, notably the two indicators enabling to understand the water balance, including both withdrawal and discharge.			
Survey	Finance for Biodiversity Foundation	Association of financial institutions	Netherlands	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	FfB agrees with these exceptions to the general rule and particularly welcomes the indicator on secondary microplastics. On the raw material indicator E5-4, FfB believes that the weight should be completed with visibility on the types of critical/strategic materials. Similarly, on the indicator for final destination of materials – the type of material is also important and should be incorporated into the indicator.			
Survey	Finance for Biodiversity Foundation	Association of financial institutions	Netherlands	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	FfB agrees that AR 26 should be reviewed in the amended ESRS E4. The current proposal seems limited to the impacts of land-use changes, with a focus on protection and restoration. Targets should make the link from the reduction of pressures to their resulting potential impacts on biodiversity. The narrative regarding managing impacts on biodiversity should be reinforced across the ESRS environmental standards and be highlighted in the biodiversity targets. The FfB Foundation confirms interest in a stronger alignment with the SBTN targets framework but believes biodiversity targets should not be limited to land-use. The FfB Foundation recommends some key elements to include in biodiversity targets, based on its understanding of the nature positive goal. Positive outcomes are achieved at site-level and are quantifiable in terms of state-of-nature metrics, relative to a baseline. Contributions to these outcomes can happen at nested levels, be measured through pressure-based indicators, and compared to "business-as-usual" information to seek additionality. Targets should be accompanied by a theory of change. Their ambition should align with the Global Biodiversity Framework. From its Nature Target Setting Framework, the FfB Foundation recommends different levels of targets: defining goals to implement responsibilities, oversights, and training capacities, based on the double materiality assessment results; establishing means of implementation such as operational and capital expenses, as well as research and development; then, delivering on action plans towards improving the state of nature. Targets should follow an approach tailored to the nature of each undertaking's activities, notably based on a sectoral analysis, to address the most material issues affecting biodiversity. They should include "phasing out" indicators, to avoid any principal adverse impacts on biodiversity.			
Survey	Finance for Biodiversity Foundation	Association of financial institutions	Netherlands	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Firstly, dependencies are considered a key topic for investors and an important entry point of analysis for undertakings, so FfB calls for their analysis at the same level of importance than impacts, risks, and dependencies. This would make the double materiality assessment clearer and more in line with other international standards. Secondly, "Freshwater ecosystem/habitats" are missing from E4 and should be included, as the "impacts on biodiversity and ecosystems related to the use of water are addressed in E4". Thirdly, in reference to question 14 (standards' architecture) and to question 30 of the survey (biodiversity targets), if the interaction with the other ESRS is presented clearly, the narrative that all ESRS are connected could be reinforced. The coherence between pressures and impacts on biodiversity needs to be correctly reported on in practice, notably through biodiversity transition plans and integrated biodiversity targets answering to the priorities of the mitigation hierarchy (avoiding and reducing prior to restoring).			
Survey	Finance for Biodiversity Foundation	Association of financial institutions	Netherlands	35.E4-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The alignment of the transition plan with the Global Biodiversity Framework (GBF)'s mission to "halt and reverse biodiversity loss" is most welcomed. However, it does not mention "by 2030", even though the timeline is an intrinsic part of the GBF mission and is particularly relevant in the context of a transition planning to allow for clear, time-bound targets, policies, and actions. Furthermore, it would be highly inspiring to call for an integration, or at least a coherence, between the climate and biodiversity transition plans. This would ensure the sound management of trade-offs and synergies along the climate-biodiversity nexus.	E4	Disclosure Requirement E4-1 - Transition plan for biodiversity and ecosystems	
Survey	Finance for Biodiversity Foundation	Association of financial institutions	Netherlands	35.E4-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The fFB Foundation recognises the current focus on "traceability of products" and "site in or near biodiversity sensitive area" as relevant priorities. The reference to scenario analysis could be called "forward-looking" scenario analysis, to avoid only using models based on past data but instead using assumptions including evolving environmental dynamics, such as tipping points.	E4	Disclosure Requirement E4-2 - Policies related to biodiversity and ecosystems	
Survey	Finance for Biodiversity Foundation	Association of financial institutions	Netherlands	35.E4-3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	In reference to question 14 (standards' architecture) and to question 30 of the survey (biodiversity targets), the actions and resources related to biodiversity and ecosystems should not be only about the conservation and restoration of nature, but also about the reduction of pressures that are the sources of impacts on biodiversity. Furthermore, considering that targets are not mandatory (ESRS 2, 44), we suggest for the free, prior, and informed consents of Indigenous People and Local Communities to also be mentioned in actions and resources.	E4	Disclosure Requirement E4-3 - Actions and resources related to biodiversity and ecosystems	

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Survey	Finance for Biodiversity Foundation	Association of financial institutions	Netherlands	35.E4-5.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The FfB Foundation is aligned with the categories of biodiversity metrics proposed in ESRS E4 (drivers, state of species, state and extent of ecosystems, state of ecosystem services), as we consider that it reflects the State-Pressure-Response framework of the OECD and the recommendations of the Nature Positive Initiative. The presence of pressure-based indicators reinforces our call to ensure a coherent narrative on biodiversity based on the mitigation hierarchy, as expressed in question 14 (standards' architecture) and question 30 (biodiversity targets). The list of all indicators in the ESRS Standard (ESRS 1, Appendix A), aligned with SFDR, is a good basis in our opinion. However, we deplore not finding an indicator on water quality. We hope that more examples of relevant indicators should remain accessible in the Voluntary Guidance, notably on land-use change. In addition, a reference could be included to the TNFD core global disclosure metrics. Finally, we would recommend making sure that all drivers of loss are mentioned in A9, in addition to "habitat change" and "invasive species". We see no reason for "overexploitation of species" not be mentioned. Regarding "climate change" and "pollution", if the impacts on biodiversity resulting from drivers of changes are in the scope of E4, then they should be mentioned here in addition to E1 (climate change), E2 (pollution), E3 (water) and E5 (waste). To note, freshwater habitats are also missing from AR 9.	E4	Disclosure Requirement E4-5 - Metrics related to biodiversity and ecosystems change	
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	The amendments provide more flexibility, allowing companies to choose the right approach. However, a quantity approach to identify material impacts should be preferred, such as the Environmental Footprint methods to measure and communicate the life cycle environmental performance of products and organisations.			
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Overall, the new paragraphs give more flexibility. However, a net approach should be preferable. In addition, the new requirement to include mitigation and prevention measures in the materiality assessment can produce more complexity. This can create an additional level of assurance and different interpretations between auditors and different companies.			
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We appreciate the readability and simplification of the standards, the new layout, including the application requirements under disclosure requirements. However, some language in the standards should still be further clarified. For instance, the addition of new qualifiers (critical, key) without clear definitions can increase uncertainty. Another example is the removal of "severe" from human rights assessment.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	While the NMIG can be helpful, it is important to define the legal status of these guidelines. The NMIG should not be included in the Commission Delegated Act as suggested by EFRAG. In addition, a clear statement of the non-binding nature of the NMIG must be provided.			
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	The amendments improved alignment with IFRS S1, but a clear definition is needed for "undue cost or effort".			
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	Disclosure requirements on anticipated financial effects can lead to speculative information and disclose speculative financial information, without bringing any added value. Therefore, we do not support the continued inclusion of anticipated financial effects in the ESRS and strongly urge their removal. Requiring companies to disclose speculative, future-facing information in regulated disclosures creates significant uncertainty, methodological inconsistency, and auditability challenges. Such forward-looking estimates risk misleading stakeholders and diverting attention from robust, verifiable information. We believe that financial implications are already appropriately addressed through existing risk disclosures, and that adding this requirement would undermine both comparability and the objective of simplification.			
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	We oppose the inclusion of anticipated financial effects in sustainability disclosures, whether quantitative or qualitative. Estimating the financial impacts of sustainability-related risks or opportunities inherently relies on assumptions that are highly uncertain and often subjective. This makes it extremely difficult to establish robust and consistent methodologies across companies. As a result, disclosures would lack comparability and could mislead stakeholders rather than support informed decision-making. Placing such speculative figures alongside actual, verifiable data for other sustainability topics risks creating confusion and diminishing the reliability of the overall report. While transparency on financial implications is important, requiring forward-looking financial estimates within the ESRS framework goes beyond what can reasonably be assured or audited. The level of uncertainty is too high to integrate these figures in the same way as factual disclosures. In addition, since some companies are listed, it might be problematic to provide financial information towards the future, especially if listed outside Europe.			
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	We appreciate the deletion and movement of certain requirements from mandatory to non-mandatory, particularly the improved layout and the placement of Application Requirements directly under the related Disclosure Requirements. This reduces the need for cross-referencing and makes the standards more user-friendly. Nevertheless, the simplification is primarily structural. It improves navigation but does not lessen the overall reporting burden, as the workload required for compliance remains unchanged.			
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	22.E1.	Comments on deleted datapoints in ESRS E1	I disagree	We appreciate the deletion and movement of certain requirements from mandatory to non-mandatory, particularly the improved layout and the placement of Application Requirements directly under the related Disclosure Requirements. This reduces the need for cross-referencing and makes the standards more user-friendly. Nevertheless, the simplification is primarily structural. It improves navigation but does not lessen the overall reporting burden, as the workload required for compliance remains unchanged.			
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	22.E2.	Comments on deleted datapoints in ESRS E2	I disagree	We appreciate the deletion and movement of certain requirements from mandatory to non-mandatory, particularly the improved layout and the placement of Application Requirements directly under the related Disclosure Requirements. This reduces the need for cross-referencing and makes the standards more user-friendly. Nevertheless, the simplification is primarily structural. It improves navigation but does not lessen the overall reporting burden, as the workload required for compliance remains unchanged.			
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	22.E3.	Comments on deleted datapoints in ESRS E3	I disagree	We appreciate the deletion and movement of certain requirements from mandatory to non-mandatory, particularly the improved layout and the placement of Application Requirements directly under the related Disclosure Requirements. This reduces the need for cross-referencing and makes the standards more user-friendly. Nevertheless, the simplification is primarily structural. It improves navigation but does not lessen the overall reporting burden, as the workload required for compliance remains unchanged.			
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	22.E4.	Comments on deleted datapoints in ESRS E4	I disagree	We appreciate the deletion and movement of certain requirements from mandatory to non-mandatory, particularly the improved layout and the placement of Application Requirements directly under the related Disclosure Requirements. This reduces the need for cross-referencing and makes the standards more user-friendly. Nevertheless, the simplification is primarily structural. It improves navigation but does not lessen the overall reporting burden, as the workload required for compliance remains unchanged.			
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	22.E5.	Comments on deleted datapoints in ESRS E5	I disagree	We appreciate the deletion and movement of certain requirements from mandatory to non-mandatory, particularly the improved layout and the placement of Application Requirements directly under the related Disclosure Requirements. This reduces the need for cross-referencing and makes the standards more user-friendly. Nevertheless, the simplification is primarily structural. It improves navigation but does not lessen the overall reporting burden, as the workload required for compliance remains unchanged.			
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	22.S1	Comments on deleted datapoints in ESRS S1	I disagree	We appreciate the deletion and movement of certain requirements from mandatory to non-mandatory, particularly the improved layout and the placement of Application Requirements directly under the related Disclosure Requirements. This reduces the need for cross-referencing and makes the standards more user-friendly. Nevertheless, the simplification is primarily structural. It improves navigation but does not lessen the overall reporting burden, as the workload required for compliance remains unchanged.			
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	22.S2	Comments on deleted datapoints in ESRS S2	I disagree	We appreciate the deletion and movement of certain requirements from mandatory to non-mandatory, particularly the improved layout and the placement of Application Requirements directly under the related Disclosure Requirements. This reduces the need for cross-referencing and makes the standards more user-friendly. Nevertheless, the simplification is primarily structural. It improves navigation but does not lessen the overall reporting burden, as the workload required for compliance remains unchanged.			
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	22.S3	Comments on deleted datapoints in ESRS S3	I disagree	We appreciate the deletion and movement of certain requirements from mandatory to non-mandatory, particularly the improved layout and the placement of Application Requirements directly under the related Disclosure Requirements. This reduces the need for cross-referencing and makes the standards more user-friendly. Nevertheless, the simplification is primarily structural. It improves navigation but does not lessen the overall reporting burden, as the workload required for compliance remains unchanged.			
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	22.S4	Comments on deleted datapoints in ESRS S4	I disagree	We appreciate the deletion and movement of certain requirements from mandatory to non-mandatory, particularly the improved layout and the placement of Application Requirements directly under the related Disclosure Requirements. This reduces the need for cross-referencing and makes the standards more user-friendly. Nevertheless, the simplification is primarily structural. It improves navigation but does not lessen the overall reporting burden, as the workload required for compliance remains unchanged.			
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	22.G1	Comments on deleted datapoints in ESRS G1	I disagree	We appreciate the deletion and movement of certain requirements from mandatory to non-mandatory, particularly the improved layout and the placement of Application Requirements directly under the related Disclosure Requirements. This reduces the need for cross-referencing and makes the standards more user-friendly. Nevertheless, the simplification is primarily structural. It improves navigation but does not lessen the overall reporting burden, as the workload required for compliance remains unchanged.			
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The methodologies for the calculation of water consumption need more flexibility. In addition, the change from may to shall for E4-12 (disclosures of key features of the biodiversity and ecosystems transition plan) reduces flexibility for companies.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Disclosure on secondary microplastics presents significant challenges. Unlike primary microplastics, which are intentionally produced and can be quantified at source, secondary microplastics result from the degradation of larger plastic products during their use or end-of-life. Their formation is highly diffuse, indirect, and outside the direct control of companies, making accurate measurement and attribution extremely difficult. Scientific methodologies for monitoring and quantifying secondary microplastics are still evolving and lack standardisation, which risks generating inconsistent and non-comparable disclosures across companies and sectors.			
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	However, we are afraid of what this would mean for the audit, as this includes a judgment. Nevertheless, we agree to align with IFRS reporting standards and give flexibility to have pragmatic disclosures.			
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Rules should apply in the same way. if an exception is possible, it should be the case for all companies/industries.			
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Disclosing the total weight of SoCs/SVHCs, especially in mixtures, is a complex and burdensome process that doesn't help demonstrate if a company sustainably uses these substances. In addition, reporting SoCs/SVHCs in hazard class can lead to double-counting. A more qualitative approach is desired. ESRS shall avoid double reporting and overlap/inconsistency with obligations stemming from existing environmental legislation, as requested by the EU Commission in their mandate for revised ESRS. To ensure coherence, the ESRS mustn't introduce costly pollutant reporting obligations that would conflict with or duplicate those under the Industrial Emissions Directive (IED). Companies in the scope of the IED shall directly refer to quantities of pollutants as reported under Regulation (EU) 2024/1244 (Industrial Emissions Portal Regulation). This would ensure legal consistency, avoid regulatory overlap and reduce the reporting burden. The IED and underlying BREF documents are the sector-specific legal framework governing pollutant emissions, including thresholds, frequency, and reporting validation. Data collected under the IED (e.g., pollutant releases to air, water, and land; off-site waste transfers) forms the basis for E-PRTR data reporting. The monitoring of all relevant sources of emissions, including measurement methodology, frequency, evaluation procedure and reporting, is defined in detail in the environmental permit of IED installations. There is no need for additional pollutants or requirements. In addition, an assumed direct link between SOCs/SVHCs and sustainable use is fundamentally flawed. In the case of metals and their compounds, for example, such substances are responsibly sourced and processed under permit within IED BREF requirements, safely used in the EU market as detailed in REACH dossiers, respecting restrictions and other risk-management options, and are sustainably recyclable at the end of life. On the contrary, contrast this with a non-hazardous substance, which may be a fossil-fuel-based chemical, with dispersive use and not recycled. Which is the more sustainable business model?			
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The glossary hasn't been updated to match the new requirements.			
Survey	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Additional comments are added in the specific sections in the Excel.			
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Nokia supports the reduction in duplicative and overlapping requirements and the efforts made to secure more alignment across the standards themselves and to improve readability. Ambition levels have broadly been maintained, which is welcomed by Nokia. As a matter of principle, all new disclosure requirements introduced through this revision should be deleted, as they contradict the simplification spirit of this exercise, with the exception those that have the purpose clarifying the existing mandatory disclosure requirement. Attention should also be paid to ensure that all disclosure requirements relying on removed voluntary datapoints are also removed.			
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Nokia supports the reduction in duplicative and overlapping requirements and the efforts made to secure more alignment across the standards themselves and to improve readability. Ambition levels have broadly been maintained, which is something that Nokia welcomes. We also welcome the improved connectivity between the disclosure of PAT and the description of IROs to which they relate and simplification of Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements"). As a matter of principle, all new disclosure requirements introduced through this revision to be deleted as they contradict the simplification spirit of this exercise, with the exception those that have the purpose clarifying the existing mandatory disclosure requirement. Attention should also be paid to ensure that all disclosure requirements relying on removed voluntary datapoints are also removed. Additionally, Application Requirements should not increase the Disclosure Requirements, rather merely provide clarifications as to what should be disclosed.			
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Nokia supports the reduction in duplicative and overlapping requirements and the efforts made to secure more alignment across the standards themselves and to improve readability. We also welcome the improved connectivity between the disclosure of PAT and the description of IROs to which they relate and simplification of Minimum Disclosure Requirements (renamed "General Disclosure Requirements"). It is our understanding that the NMIG is not mandatory. Therefore, the formulation of the question above is unclear, as commentators are asked to consider only the mandatory content of the Exposure drafts. We will submit that the legal status of the NMIG is important and should be clarified as soon as possible. The NMIG will likely serve as interpretative guidelines, so they are important. Ensuring alignment between the NIMG, the Disclosure Requirements and the Application Requirements is essential, even if their enforcement status is different.			
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The legal status of the NMIG is important and should be clarified as soon as possible. The NMIG will likely serve as interpretative guidelines, so they are important. Ensuring alignment between the NIMG, the Disclosure Requirements and the Application Requirements is essential, even if their enforcement status is different.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	A flexible and pragmatic approach to interoperability between the ESRS and the ISSB/IFRS S1 and S2 is called for, especially as the ISSB only focuses on the financial materiality. The required level of documentation should not be explicitly defined in the standards. The current proposal requires a detailed level of documentation, considering thatgiven that some of the DMA assessments are based on long-term, forward-looking estimations and assumptions. We propose to remove this requirement from the standards. Even if the intention is to reduce workload, defining and requiring such detailed level of documentation could actually result in an increased burden being imposed on companies by the assurance service providers due to the fact that when defining the reasonable/supportable evidence, it is impossible to take into account absolutely all situations, conditions, information available.			
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	Nokia welcomes the introduction of a relief mechanism, which "undue cost or effort" clearly is. We also welcome the focus on IFRS interoperability (ESRS 1, paragraph 60). We urge EFRAG and the European Commission to clarify the meaning of "undue cost or effort" and to align the interpretation of the supply chain assessment with the provisions of the revised CSDDD, describing how in depth such assessment should be. Nokia calls for the introduction of practical boundaries for this concept, consisting of guidelines for calculating and demonstrating that an acceptable level of efforts and costs has been met, in order for reporting companies to be able to benefit from this relief. Additionally, estimates should not be required when there is lack of sufficient information available to compute robust estimates. The reliefs introduced in paragraphs 90 and 91 of ESRS 1 are important and should be extended to full reliefs, instead of requiring partial estimations in the situations described in the standard.			
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	Any commercially sensitive information should not be required to be disclosed, and alignment with other financial reporting regulations should be ensured. When the sustainability and climate related financial effects are not separately identifiable or tracked from business activities, companies should have a possibility to omit the metric and provide other explanatory disclosures.			
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	When quantitative information is required or voluntarily disclosed, ESRS 2 AR 17 should be maintained and referred to, whenever referring to anticipated financial effects, notably on climate matters. Any commercially sensitive information should not be required and alignment with other financial reporting regulations should be ensured. When the climate related financial effects are not separately identifiable or tracked from business activities, companies should have a possibility to omit the metric and provide other explanatory disclosures.			
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Sustainability Statements are largely following financial reporting boundaries (in alignment with the IFRS), and hence, we are of the opinion that alignment between the financial consolidation approach and the GHG emissions boundary used for GHG emissions reporting should be ensured as well, to simplify reporting efforts on the part of organizations. Therefore, we support this approach as the primary methodology.			
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	Nokia supports the reduction in duplicative and overlapping requirements and the efforts made to secure more alignment across the standards themselves and to improve readability. Ambition levels have broadly been maintained, which Nokia welcomes. As a matter of principle, all new disclosure requirements introduced through this revision to be deleted as they contradict the simplification spirit of this exercise, with the exception of those that have the purpose clarifying the existing mandatory disclosure requirements. Attention should also be paid to ensuring that all disclosure requirements relying on removed voluntary datapoints are also removed.			
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Comments are provided for some of the respective datapoints, specifically ESRS G1.			
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	As a matter of principle, all new disclosure requirements introduced through this revision to be deleted as they contradict the simplification spirit of this exercise, with the exception those that have the purpose clarifying the existing mandatory disclosure requirement. Attention should also be paid to ensure that all disclosure requirements relying on removed voluntary datapoints are also removed. Especially, the new mandatory datapoints and more granular requirements introduced in the E5 Exposure Draft which will add extra complexity and effort without adding value, resulting in commercial disadvantage for Wave 1 companies that have already invested substantial time, efforts and money to comply with the existing standard and meet the current requirements. Nokia calls for the initial requirements to be kept and for proposed amendments to be deleted.			
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The text is simplified and more understandable but further clarifications and modifications are needed (see comments).			
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The text is simplified and more understandable but further clarifications and modifications are needed (see comments).			
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The text is simplified and more understandable but further clarifications and modifications are needed (see comments).			
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The E5 exposure draft introduces new metrics and more granular requirements which will add extra complexity and effort without adding value, resulting in commercial disadvantage for Wave 1 companies that have already invested substantial time, efforts and money to comply with the existing standard and meet the current requirements. Nokia calls for the initial requirements to be kept and for proposed amendments to be deleted.			
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The text is simplified and more understandable but further clarifications and modifications are needed (see comments).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The text is simplified and more understandable but further clarifications and modifications are needed (see comments).			
Survey	Nokia	Preparer (non-financial preparing a sustainability report)	Finland	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		At Nokia, we believe that sustainable growth and competitiveness go hand-in-hand. Smart sustainability reporting and due diligence processes support high ambition levels by providing a strategic driver for performance improvement, while pragmatic implementation enables businesses to ensure compliance and to meet their customers' expectations quickly and in a cost-effective manner. Nokia published its first CSRD-aligned Sustainability Statement in March 2025 as a Wave 1 company. The reviewed ESRS should not sanction the Wave 1 reporters by requiring significant additional efforts to implement new requirements. Any changes to existing DRs should remove specific requirements rather than add to, or substantially modify the existing requirements. The new ESRS should prioritize high-level requirements that leave room for companies to define which information and disclosures are material to them, rather than focus on many detailed requirements under each material topic. That is why Nokia: - Supports the reduction in duplicative and overlapping requirements and the efforts made to secure more alignment across the standards themselves and to improve readability. - Asks for all new disclosure requirements introduced through this revision to be deleted as they contradict the simplification spirit of this exercise, with the exception those that have the purpose clarifying the existing mandatory disclosure requirement. - Nokia opposes the proposed 4-year phase-in. Wave 1 companies have already been required to report against all disclosure requirements. Nokia supports already planned phase-in reliefs that will apply to all companies. The applicability date of the simplified ESRS – once adopted – should be clarified to ensure no negative impact on 2025 sustainability statement preparation efforts. This clarification should also include national implementation timelines to ensure level playing field among EU companies themselves, as well as between EU companies and non-EU ones. Alignment with the "stop the clock" law could be a pragmatic solution to that end.			
Survey	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	The simplification is appreciated and will make DMAs a much more practical tool for companies.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The Appendix C clarifies it well, but the text in § 34 to 36 is difficult to understand. Please review if it could be better aligned with Appendix C, or if the Appendix C could replace some of the information in § 34 to 36. Concerning Appendix C, it should be differentiated between assessing and reporting (especially for the middle column), as the reporting would be relevant only when the assessment points out that it's a material impact.			
Survey	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	This change supports the understanding and readability a lot.			
Survey	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We support EFRAG's recommendation that NMIG should not be included in the Delegated Act. They might be a good background document especially for next wave companies.			
Survey	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We are a bit worried about making cross-referencing to the financial statement optional, as well as the reliefs for acquisitions and disposals -> consistency with Financial statement should be the key issue here. In general, we strongly support the alignment with IFRS S1 and S2 - or at least to align as much as possible.			
Survey	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We support Option 1 because otherwise there would be a too big difference to IFRS. Additional reporting outside the ESRS scope for IFRS should be avoided. The relief for omitting commercially sensitive information should be added to ESRS, too.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Please note the answer for question 20 for point 3!			
Survey	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Please consider to move the additional mandatory requirement for information on secondary microplastics for E2-4 back to the NMIG list. Information on secondary microplastic in the downstream value chain will be based on assumptions and very unprecise. Especially for companies with a multi-tier downstream value chain this information is almost impossible to disclose in a somehow reliable way. It depends on parameters such as the final end-use or disposal options in different regions.			
Survey	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We think that a purpose of a new principle of fair presentation is to bring the presentation format and language closer to the financial side. But generally taken, there might be a lack of maturity related sustainability reporting and it might not be clear what is expected under "fair presentation". This addition could be left away in our opinion as it's questionable how it will be interpreted, understood and implemented. Of course, it at the same time supports the alignment with IFRS.			
Survey	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	The former requirement was clear and supported to report on the material countries. We don't see a need for change which can result in a higher reporting burden.			
Survey	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	The biodiversity reporting is evolving still and there is a variety of possible areas which can be more or less relevant for companies. Thus we don't see a need for review the target currently but rather give companies the space to develop the relevant targets.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	As the legitimate factors affecting pay in real life are not captured in the calculation methodology, the raw pay gap value is purely artificial and not a representation of real equal pay practices in the different countries of operation. Thus reporting on raw pay gap as only disclosure is misleading in our opinion. Background: The raw pay gap is calculated purely by dividing the difference of average gross hourly pay of all male and all female employees by the average gross hourly pay of all male employees. In contrast with the adjusted gender pay gap framework, this raw pay gap framework and calculation does not take into account, for example, the number and distribution of male and female employees in different countries and locations or the different types and levels of jobs performed by male and female employees, or the experience and performance of the employees and the varying labour market conditions, all of which are considered legitimate factors typically driving pay and pay development decisions. An adjusted pay gap framework takes these legitimate factors into account.			
Survey	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	The focus on SMEs might rather lead to an avoidance to work with SMEs as suppliers. When having a huge supplier base it is almost impossible to separate the SMEs from other suppliers as there is no general definition available. Thus, the objective of the CSRD to protect SMEs can not be achieved with quantitative disclosure requirements in our opinion. We would rather see the whole topic of payment practices to be better covered as qualitative disclosure within the new G1-2 § 10 a. This would also avoid the public disclosure of business-sensitive information such as standard payment terms for main supplier categories.			
Survey	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland	35.ESRS1_7.8.	Do you agree with the amendments of this chapter?	I disagree	Reasons for omissions are very limited based on this DR. There can be commercially-sensitive information which is neither covered by the §100 and its references to EU legislation for the definition of classified and sensitive information nor by §99 which only covers information about strategy and action plans. Organisations should not be forced to disclose commercially-sensitive information which can have an influence on their competitiveness. Please consider to amend this DR to widen the scope of §99 beyond information related to strategy and action plans.	ESRS1	7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	
Survey	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland	35.E2-4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Based on AR 2 and AR 3 we are not 100% sure that it is not anymore required to disclose the amounts of each pollutant above the threshold from Annex II of the Industrial Emissions Portal Regulation. This is due to different interpretation of "The pollutants TO BE CONSIDERED for reporting ..." in AR 2. Could you please clarify or re-formulate "to be considered" in the application requirement? Also AR 4 leaves room for interpretation in our opinion. Does it mean that the emissions to water are excluded from the reporting scope of E2-4 (which is defined as own operations in § 16 a) when the wastewater is not treated internally but send to an external treatment plant? Or should they nevertheless be reported even if they "qualify" as downstream pollution?	E2	Disclosure Requirement E2-4 - Pollution of air, water and soil	
Survey	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland	35.E5-4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	"Total weight" is added to this DR as a new term but not defined further. Is it meant to be the weight including or excluding water content or is it up to the organisation to define it? Please add clarification either to the glossary or to the application requirements.	E5	Disclosure Requirement E5-4 - Resource Inflows	
Survey	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland	35.E5-5.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	"Total weight" is added to this DR as a new term but not defined further. Is it meant to be the weight including or excluding water content or is it up to the organisation to define it? Please add clarification either to the glossary or to the application requirements.	E5	Disclosure Requirement E5-5 - Resource outflows	
Survey	Tata Consulting Services	Other - please specify (required)	India	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Tata Consulting Services	Other - please specify (required)	India	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Tata Consulting Services	Other - please specify (required)	India	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Drastic reduction of shall datapoints for PAT is welcome. However, we do not believe that removal of ESRS 2 11 (sources of estimation and outcome uncertainty) is beneficial to achieving relevant and comparable information. EFRAG has stated that there is overlap elsewhere--eg ESRS 2 5 (c). We do not find ESRS 2 5(c) is adequate. However, we believe that as the EU is backing off from the pathway to reasonable assurance, it is doubly important to be fully transparent about data quality, including estimations, approximations and judgements.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Tata Consulting Services	Other - please specify (required)	India	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Clarification of what is mandatory is welcome. Simplification of the language in the standard is also an improvement. However, as there are a lot of Wave 1 reporters that have already reported some of this non-mandatory information, removing it from the standard entirely seems drastic. Ideally, ESRS should be easy enough for beginning reporters to use but provide guideposts for global best practice. GRI has worked with this concept for a long time, offering different labels for different levels of reporting. EFRAG should consider how to flag compliance plus versions of ESRS (including those with some reasonable assurance), and should encourage reporting beyond compliance. (For instance, with sector specific KPIs. However, this should not be limited to financial materiality-only SASB sector standards.)			
Survey	Tata Consulting Services	Other - please specify (required)	India	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The NMIGs would be an excellent place for EFRAG to steer reporters toward best practice. Consider that the guidance could be both shorter and clearer if best practice reporting EXAMPLES were included. It may not be possible to do this by the current tight deadline of 30 Nov, but consider updating in future with concrete examples of best practice for clearer guidance. ESRS 2: What jumps out here is reference to 'ESRS 2 GOV-2: Integration of sustainability-related performance in incentive schemes.' ESRS 2 Gov 2 has been eliminated, so this reference is confusing. As sustainability links to incentive schemes are important signals for investors, guidance on reporting this can and should be clearer. ESRS E4 and ESRS E5: Biodiversity and circularity are two areas which are relatively new for most reporters. Reporting examples, rather than list of PAT attributes, would be most welcome in these sections. ESRS G1: The examples provided for non-mandatory reporting on training do not include investments in training. The amount invested in people is just as useful for decision making as the amount invested in R&D. While this disclosure should not be made mandatory, the tick box approach in your NMIG is too simplistic--does not reflect best practice.			
Survey	Tata Consulting Services	Other - please specify (required)	India	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	As TCS works with companies to improve their data, we appreciate and welcome the ability to report partial data and disclose actions to improve coverage. This provides a pathway--and incentive--to improve. The other reliefs and changes of scopes are also welcome. However, we believe that the reduction in discussion of resilience is a step back from the objectives of the EU Green Deal. Resilience should include business model related opportunities as well as risks.			
Survey	Tata Consulting Services	Other - please specify (required)	India	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	As TCS works with companies to improve data quality, traceability and auditability, we know how difficult it is to gather data for some IROs and to expand and improve datasets. We therefore welcome the introduction of phase in periods to expand data coverage. However, we agree with EFRAG SRB members that a time limit is necessary. Because expanding and improving datasets requires effort and investment, having no time limit means it may never happen. This would undermine the objectives of CSRD.			
Survey	Tata Consulting Services	Other - please specify (required)	India	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We believe that this is an area where alignment with IFRS is in the public interest.			
Survey	Tata Consulting Services	Other - please specify (required)	India	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Tata Consulting Services	Other - please specify (required)	India	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	As a company based in Mumbai, serving clients around the world, we are obligated to report using ESRS but IFRS is not of particular interest. Only a minority of countries are adopting IFRS at this point, larger markets such as the US and India are not. India has its own standard, BRSR. We believe that interoperability with 'global standards' should be looked at more broadly. SASB is not a global standard--and was designed solely for by use by investors. We believe the recommendation to use SASB should be replaced with a recommendation to use GRI sector standards.			
Survey	Tata Consulting Services	Other - please specify (required)	India	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Tata Consulting Services	Other - please specify (required)	India	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Tata Consulting Services	Other - please specify (required)	India	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Tata Consulting Services	Other - please specify (required)	India	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Tata Consulting Services	Other - please specify (required)	India	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Tata Consulting Services	Other - please specify (required)	India	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Tata Consulting Services	Other - please specify (required)	India	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	As the methodological landscape for biodiversity is immature, being less prescriptive is greatly preferred. SBTN can be referenced in NMIG.			
Survey	Tata Consulting Services	Other - please specify (required)	India	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	A number of countries in the EU have their own methodology for gender pay gap, in which case it seems that reporters should be able to use this. It might be best to provide some flexibility in what companies use. Using adjusted gender pay gap as voluntary also seems to align with greater flexibility.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Tata Consulting Services	Other - please specify (required)	India	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Tata Consulting Services	Other - please specify (required)	India	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Tata Consulting Services	Other - please specify (required)	India	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Tata Consulting Services	Other - please specify (required)	India	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Tata Consulting Services	Other - please specify (required)	India	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Tata Consulting Services	Other - please specify (required)	India	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Tata Consulting Services	Other - please specify (required)	India	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Tata Consulting Services	Other - please specify (required)	India	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Tata Consulting Services	Other - please specify (required)	India	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Tata Consulting Services	Other - please specify (required)	India	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Tata Consulting Services	Other - please specify (required)	India	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Tata Consulting Services	Other - please specify (required)	India	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Requirement to report on links between sustainability targets and remuneration should not be removed.			
Survey	Tata Consulting Services	Other - please specify (required)	India	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Tata Consulting Services	Other - please specify (required)	India	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		One consequence of the 'simplification' drive is that the pathway to reasonable assurance has ended. We applaud the superb job EFRAG has done in a very short time period to refine ESRS, and it is understandable that most of the focus has been on the datapoints--what is reported. However, we feel that there should also be consideration of the quality of what is reported. EFRAG is in a position to provide nudges toward better quality data--even if reasonable assurance will not be mandated by the EU in the foreseeable future. The history of GRI offers many examples of distinguishing between different levels of reporting completeness and assurance, and it would be great if EFRAG could use these for inspiration. For instance, at one point GRI gave reporters the options of declaring that their reporting was A, B or C level and that, for those with assurance, they could declare a report was A+ or B+. The journey to reasonable assurance is time consuming and expensive--but aligning the quality of sustainability data with financial data is a worthwhile investment for companies and for society. We believe that EFRAG should be offering companies a tangible way of acknowledging high quality data--with reasonable assurance. Of our client base, many wave 1 reporters have already made investments in this area. EFRAG should look to support the continuation of this work.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Contact Group	Auditor	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The shift towards simplification, with a focus on material information as a guiding principle, and the emphasis on reporting impacts, risks and opportunities (IROs) at the management level (if appropriately explained), is welcomed. This approach is likely to be supported by a greater reliance on a top-down methodology, with an expectation that topics which are clearly material or not material to the entity would not require in-depth evaluation while acknowledging that this distinction is subject to a significant level of judgement. The approach would benefit from more guidance to avoid 'overlooking' material IRO/(sub-)topics, i.e., when a bottom-up approach is necessary. While the clarification of the link between IROs and topics is helpful, we believe it could be articulated more clearly, particularly in ESRS 2, which outlines the disclosure requirements. We would welcome clarifications on the identification of the level where material IROs are managed within the business, and how it could encompass multiple IROs addressing several topics. We would also suggest removing Application Requirements 18 and 20. We also note that the proposed definition of material information, in particular who is the intended recipient (i.e., users of general purpose sustainability statements) of sustainability information under ESRS, needs clarification. We further suggest complementing ESRS 1.21 by the notion of decision usefulness. Without further guardrails (e.g. clarifying context of the information needs of the intended users of the sustainability statement), there is a risk this could be misconstrued as covering the information needs of any stakeholder. This would be furthered by more guidance on what the concept of 'general purpose sustainability statements' in ESRS 1.AR3 means. Furthermore, we believe the revised version of ESRS allows reporting non-material information, and this requires more guardrails to mitigate risks, e.g., greenwashing. We think this would be necessary to enable users to identify non-material information.			
Survey	European Contact Group	Auditor	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	We welcome ESRS 1.34-36 as helpful clarifying principles placed in the main body of ESRS (i.e. the delegated act) to ensure consistent application since we see the need of precise guidance on whether to consider mitigating actions when assessing IROs, and on the difference between positive impacts and actions mitigating negative impacts. While Appendix C contains some useful guidance it seems very detailed and prescriptive, and, hence at odds with clear guiding principles that should be established in the core part of ESRS 1. Appendix C would benefit from being more concise and clearer, and better aligned with the core principles in ESRS 1. There needs to be consistency with the main body of the standard. We note, inter alia, the following points for clarification: -The guidance creates tensions with ESRS 1.35 -More guidance is needed on what constitutes 'significant ongoing actions' -Connection between policies and ongoing actions in AR12 -It should be made clear in ESRS 1.34 that fully remediated actual impacts should be assessed on a net basis as implied by Appendix C, if that was EFRAG's intention? -We suggest EFRAG to update Appendix C prescribing that the potential impact and corresponding action should be reported gross, as long as it requires significant ongoing action to reduce the severity or likelihood -We propose similar principles should apply to risks and opportunities as the identification processes are not distinct We ask EFRAG to carefully consider any results from the (limited) field test which will provide additional input to increase the robustness of the guidance, which can, in its current state, be understood in different ways.			
Survey	European Contact Group	Auditor	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The introduction of additional flexibility is a positive development. In some situations, the four sections format does not effectively support the presentation of a cohesive and connected narrative about how an undertaking identifies, measures, and manages its material IROs. We recommend EFRAG consider options for further flexibility. In general, we are not opposed to the introduction of a voluntary executive summary at the beginning of the sustainability statement. We believe a dashboard highlighting the undertaking's key sustainability matters, as advised by ECG in earlier consultations, would be covered by this statement. However, we think more guidance is needed regarding the content of the executive summary to ensure consistency with the reporting in the main sustainability statement. In addition, we think some of the proposals are actually reducing connectivity, e.g. removal of reconciliations and cross-references to financial statements, which is something we disagree with.			
Survey	European Contact Group	Auditor	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We welcome the decision to move the Mandatory Disclosure Requirements (MDRs) to the General Disclosure Requirements, as this aligns with the intent to encourage reporting on IROs at the level at which they are managed, to discourage the inclusion of overly granular information and is in line with an overarching concept of materiality. However, it would be helpful to provide greater clarity on what is meant by reporting policies, actions and targets (PATs) on IROs at the level at which they are managed or for groups of IROs. Without such clarification, entities may find it difficult to understand what is expected of them in practice.			
Survey	European Contact Group	Auditor	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We welcome the enhancements made, particularly the principle that ARs are streamlined and do not introduce additional disclosure requirements. Instead, they primarily include "shall" requirements that are necessary to achieve the objectives of the disclosure requirements. Nevertheless, we recommend that EFRAG ensure that all ARs are appropriately included as "shall" requirements, and any "may" disclosures remaining in the ESRS standards (or the NMIG) are genuinely illustrative in nature and do not introduce additional disclosures that are not directly embedded within the Disclosure Requirement itself. As a general remark, we note that all relevant definitions and concepts should be in the 'core' standards including the glossary.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Contact Group	Auditor	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We generally welcome the approach of including fewer mandatory ARs within the main body of the standard and moving illustrative content to the NMIG. We acknowledge that while some ARs are not designated as "shall" requirements, it can be helpful to include certain "may" ARs to provide important application guidance for users. As a general comment, we suggest EFRAG revisits the NMIG to ensure it does not contain guidance that is not anchored in the DR/AR section (i.e., it does not go beyond what is required in the mandatory guidance). We also note that the guidance would benefit from further work to make it more concise and robust. We would suggest the NMIG is issued later than the technical advice to be handed over to the EC. We encourage EFRAG to establish a process for updating and improving the NMIG including a robust due process.			
Survey	European Contact Group	Auditor	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	Overall, we welcome the introduction of additional reliefs, particularly the use of proportionality mechanisms drawn from the ISSB Standards, such as the concept of "undue cost or effort." This approach emphasises that an entity is still required to use relevant and appropriate information and implies that the greater the usefulness of information about a sustainability-related impact, risk or opportunity for users, the greater the effort expected of an undertaking to obtain that information. When incorporating these mechanisms, we recommend that the wording and accompanying guidance be adopted verbatim and in their entirety, including the guidance provided in the ISSB appendices. We note that some of the reliefs in the proposals seem to be permanent practical expedients by design compared to others that seem to be more of a temporary nature helping companies with the transition to ESRS in certain areas. There is an expectation that sustainability reporting will mature and that the overall concept of undue cost or effort and impracticability might be sufficient concepts in the future. For some of the temporary and partial reliefs it should be clear that undertaking should explain how they intend to progress towards full compliance. It is important to reiterate that decision usefulness should be carefully balanced against the cost aspects when EFRAG reconsiders the reliefs. We also note that the standards should establish a 'measurement hierarchy' (akin to the scope 3 emissions hierarchy in IFRS Standards) so it is clear when to use primary data in calculations vis-à-vis estimates. In particular for value chain disclosures, it could be misinterpreted that an undertaking could directly use estimates. Lastly, where the application of reliefs in ESRS lead to a disconnect with financial reporting this should be clearly disclosed in the spirit of connectivity (see also response to Q18).			
Survey	European Contact Group	Auditor	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We propose to include an impracticability exception for specific data points in limited situations when a company is not able to provide a metric after making reasonable effort. Such exception could be limited in time (like the existing ESRS 1 relief for the 'value chain' data points) or permanent. We suggest replacing the current text with a wording aligned with the definition in IFRS S1 which states that "applying a requirement is impracticable when the entity cannot apply it after making every reasonable effort to do so". We suggest that EFRAG reflects on this – also in light of maturity of companies and methodologies – as part of a future post-implementation review of ESRS.			
Survey	European Contact Group	Auditor	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We agree with option 1. Information about anticipated financial effects provides relevant information to users of sustainability statements, in particular for quantitative information which then establishes the link to policies, actions and targets. We appreciate the complexities around this relatively young area of corporate reporting, but believe practice, including methodologies and best practices, will evolve over the years. To ease the burden in the first years, we suggest EFRAG leverages the reliefs in IFRS Standards, also in the spirit of interoperability. If the guidance on skills and capabilities is added, we ask for adding the relevant paragraphs of the Basis for Conclusions from IFRS Standards to ensure the guidance is fully understood. We also suggest EFRAG to consider the educational guidance issued by the ISSB on anticipated financial effects that might inform re-deliberations.			
Survey	European Contact Group	Auditor	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We welcome that the amendments introduced enhancements to interoperability and referencing of IFRS industry guidance, including SASB Standards. We ask EFRAG to collaborate with the ISSB when finalising to improve interoperability with IFRS Standards to the maximum. However, it is unclear on what basis EFRAG determined it has "considered all opportunities to align the provisions and avoid unnecessary differences between the ESRS and the ISSB Standards." There continue to be differences, many of which do not appear to have justifiable reasons. In addition, some of the proposals indeed increase the differences. As ISSB Standards have been designed to provide a global baseline and are in the process of being implemented in numerous jurisdictions, it will be important that efforts to streamline ESRS continue to integrate this baseline. This is supported by the clear call for interoperability in Commissioner Albuquerque's letter to EFRAG. We agree with EFRAG's assessment that there is room for further alignment. Given the importance for users of global consistency and comparability of GHG emissions measurement and disclosure, we also recommend that ESRS E1 clearly indicates that GHG Protocol (GHGP) is the general starting point for measurement of emissions. Although the approach chosen is a step towards the provisions in the GHGP, it still does not fully comply with it. We acknowledge some differences would remain such as EU ETS related provisions or transition plan targets that cannot include carbon offsets, however ESRS GHG emissions reporting boundaries should require applying GHGP which would further align with IFRS S2. Furthermore, the GHG Protocol is expected to be subject to significant revisions in the next years which hopefully will address some of the issues that lead to deviations in ESRS. We encourage EFRAG to contribute to this process and to leverage potential for further alignment and potential for removing deviations.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Contact Group	Auditor	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	European Contact Group	Auditor	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	Please refer to our comments on questions 15 and 16.			
Survey	European Contact Group	Auditor	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We welcome EFRAG providing clarity around the question of ESRS being a fair presentation versus a compliance framework. It is of utmost importance that all qualitative characteristics of a fair presentation framework are included in the final revised ESRS, ideally fully aligned with the guidance in the IFRS Standards to ensure interoperability, including linking to entity-specific information (which now has more prominence given the reduction in mandatory datapoints and the ceased mandate for EFRAG to develop sector standards). This would also include a statement on the basis for preparation that the sustainability statement is prepared on a fair presentation basis. This would also make clear the roles and responsibilities of those involved in the reporting process, reduces diversity and, hence, avoid frustration in the corporate reporting ecosystem. We also believe that the commonalities and differences between the two concepts are sometimes not well understood in practice and might lead to misconceptions, particularly the idea that fair presentation is 'less than compliance'. Hence, we suggest adding some educational language in the NMIG or Basis for Conclusions to inform stakeholders or complement the main body of ESRS 1 if needed. While outside EFRAG's mandate, we note that the foundation for fair presentation should be clearly established in the CSRD as the legislative basis for ESRS.			
Survey	European Contact Group	Auditor	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We suggest clarifying in the standards whether the lease exception provided in ESRS 1 applies to GHG emissions as per E1. In addition, while appreciating that EFRAG worked under an externally imposed timeline, we want to remind EFRAG that high-quality standards and their credibility rely on a robust, transparent and diligent due process. We note the significant number of closed meetings of the Sustainability Reporting Board and Technical Experts Group and the short comment period for stakeholder feedback. We urge EFRAG to stay within its own established due process as much as possible when finalising the advice to improve acceptance, increase clarity and avoid further changes in the near future. In addition, this should not create a difference with the IFRS Standards. We ask EFRAG to collaborate with the EC towards the development of a holistic approach towards the finalisation of the omnibus initiative, considering jointly, amongst others, the revisions of the ESRS, the SFDR and the EU Taxonomy to leverage interdependencies. The significant simplifications achieved should also inform the debate about the number of companies being subject to the reporting requirements under the CSRD in line with the objectives of the EU Green Deal.			
Survey	Dutch Accounting Standards Board	(National) standard setter	Netherlands	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The inclusion of the information materiality filter is an important concept that has been elaborated on. This will support companies in a clearer division between relevant and irrelevant information based on the materiality of sustainability topics. However, examples and additional guidance on the application of the information materiality filter is necessary to avoid a lack of uniformity in the application of the information materiality filter. The risk of misuse of this filter by avoiding to report on salient negative impacts should be mitigated as much as possible. Guidance would help to mitigate that risk. Furthermore, an additional disclosure requirement that lets companies explain how the materiality filter has been applied might help users to understand the DMA outcome better. The distinction in paragraph 3 of ESRS 1 of primary users of a general purpose financial report and other users of general purpose sustainability statements may lead to placing an unfair emphasis on the user needs of primary users of financial reporting as opposed to the user needs of other users of sustainability statements. This perception might lead to an overemphasis on financial materiality and an understatement of impact materiality. Both types of users should be identified as primary users of general purpose sustainability statements. DASB has included a text suggestion in part 3. ESRS 3.1 paragraph 21 links materiality to the information needs of users. While this is understandable, in order to apply these information needs, we suggest to include more application requirements for the understanding of general purpose sustainability statements and the information needs of users. A text suggestion is included in our input on part 3. This text is in analogy with the IFRS Conceptual Framework of Financial Reporting and gives the preparer a better understanding of the application of the materiality filter.			
Survey	Dutch Accounting Standards Board	(National) standard setter	Netherlands	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	DASB members have differing views on the suggested gross versus net approach leaning towards the adoption of the gross approach. The gross approach demonstrates the impacts that the company manages on a gross basis, thus providing relevant information on the undertaking's efforts to prevent, mitigate and remediate those impacts. This gives additional information on the actions taken by the company to prevent and mitigate impacts. It also provides companies with an opportunity to report on measures taken to lower its impacts proactively. The net approach focuses on the actual impacts that occur after the preventive and mitigating actions have been taking into account. While this provides less information on the company's efforts, it does provide information on the net impacts that remain and are managed by the company. Ultimately, the key priniciple should be whether reporting about an IRO results in material information, where it might be reasonable to consider certain preventive and mitigation actions. The discussions identified a need for clear examples on the consideration of potential impacts 1) in the area of Health and Safety; and 2) on the cut-off moment for ongoing action (when does an action actually qualify as ongoing and when is it significant?). DASB suggest to add an application requirement to clarify this more and to add illustrative examples to the non-mandatory illustrative guidelines.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Dutch Accounting Standards Board	(National) standard setter	Netherlands	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	DASB partially agrees with the proposed amendments to provide flexibility. By adding the possibility to include an executive summary in the director's report outside of the sustainability statements (although incorporated by reference), companies are given the opportunity to provide their own narrative regarding their sustainability performance and put it in broader (strategic) context. DASB emphasises that this summary should meet the qualitative characteristics of information in order to avoid misleading the users of the director's report, as is stated in paragraph 109. DASB is questioning the possible harm to connectivity that might arise from the removal of the mandatory cross-references to the financial statements and would therefore suggest to make ESRS 1 paragraph 114 mandatory.			
Survey	Dutch Accounting Standards Board	(National) standard setter	Netherlands	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	DASB mainly agrees with the implemented changes as summarised in the question. DASB has one remark concerning the amendments made under point 5 which states: "They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed'. DASB agrees with the changes made, however doubts whether this means that companies report on a higher aggregation level. Our understanding is that companies report on the same aggregation level, however are able to cluster the information provided and link it to several topics in accordance with the clustering of topics within the company's strategic and internal structuring. This may be further explained under the application requirements. DASB suggests to keep the requirements for companies to disclose whether the undertaking plans to implement a PAT for material topics and the expected timeline mandatory. This requirement contains useful information for several users groups.			
Survey	Dutch Accounting Standards Board	(National) standard setter	Netherlands	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	DASB agrees that the understandability, clarity and accessibility of the Standards is improved. Specifically the removal of voluntary (may) disclosure requirements helps to avoid misunderstandings on the need to disclose this voluntary information. However, disclosure requirements that have been deleted might provide direction for entity-specific disclosures necessary to achieve a fair presentation of material IRO's. Furthermore, the DASB suggests to provide further clarity on when a company is required to report entity specific disclosures or metrics. E.g. as add-on to pre-defined metrics. Or in case no metrics are defined: (when) is a company required to report entity specific metrics; and whether such requirement would also apply when they which are are not already used within the entity. When is a company required to "develop" metrics? And when sector or other guidance needs to be applied. And how do entity specific disclosures relate to targets? This results primarily from the wording in ESRS1.10-11 and particularly AR 1 related to par 11, which is ambiguous when to report entity-specific metrics for a topic/IRO not sufficiently addressed by a topical standard. Adding these disclosure requirements as a possible menu for additional voluntary disclosures in the non-mandatory guidelines will help preparers in providing a transparent sustainability report. This should by no means be interpreted as mandatory requirements.			
Survey	Dutch Accounting Standards Board	(National) standard setter	Netherlands	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The implementation guidance that EFRAG issued on ESRS set 1 has led to different interpretations by preparers, auditors and supervisory authorities. While this implementation guidance was not legally binding, certain parties treated this guidance as if this was legally binding. For instance, ESMA has issued a public statement that it strongly encouraged preparers to consult the support material (paragraph 13) (ESMA public statement 5 july 2024, https://www.esma.europa.eu/sites/default/files/2024-07/ESMA32-992851010-1597_-_ESRS_Statement.pdf). This has led parties to regard the implementation guidance as de facto soft law. Therefore the DASB urges EFRAG and the European Commission to be very clear on the legal status of the 'Non-Mandatory Illustrative Guidance'. It is important that the legislator emphasises that use of the non-mandatory illustrative guidance is voluntary. However, there is also a clear need for practical implementation guidance, and this will also be necessary for the application of ESRS set 2. Currently, the NMIG is not readable on a standalone basis. DASB suggests to update the NMIG so that it is readable on a standalone basis and more in line with the current implementation guidance. This will increase the practical value of the NMIG and aid its (voluntary) application. Adding more examples will also increase the usefulness of the NMIG. Furthermore the DASB suggests to provide clarity on the status and future of the FAQs. Finally, the NMIG currently contains all the voluntary disclosure requirements of ESRS set 1 that have been deleted from the proposed ESRS set 2. This is useful information as inspiration for frontrunners on sustainability reporting that want to provide more in-depth reporting and for entity-specific disclosures. However, possible additional voluntary disclosures should be separated from the implementation guidance. DASB therefore advises to split implementation guidance from possible voluntary additional disclosures by creating clear chapters within the NMIG.			
Survey	Dutch Accounting Standards Board	(National) standard setter	Netherlands	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Proposed amendment 7 (relief for acquisitions or disposals) results in challenges e.g. on data availability, such as the inclusion of a business' carbon emissions from Jan - Sept if this business is sold in October. We suggest adding practical examples. We suggest to make the relief included for acquisitions conditional on the undue cost or effort; based on facts and circumstances such relief could be applied for the acquisition as a whole or for certain specific information depending on the undue-cost-and-effort-principle. The relief provided for disposals might lead to important information not being reported on even when that information is available. DASB suggests that material IROs and data related to disposed activities during the reporting period shall not be excluded from material IROs of the group in that reporting year and only to exclude them based on the principle of undue cost or effort. Some impacts/risks might still be relevant to report beyond the date of disposal. E.g. in case of potential liabilities related to soil pollution this might lead to significant anticipated financial effects for the undertaking itself. We welcome additional NMIG guidance hereon. We suggest transparency on disposed activities by separating the presentation of data/metrics related to material "disposed activities" and the data relating to continuing operations. We refer to current principles in IFRS 5 for financial statements as inspiration for this approach. Disclosures are required for major transactions or significant events occurring between acquisition or disposal date and the end/beginning of the reporting period. This doesn't seem to include the IROs at acquisition date related to the subsidiary. When acquiring a new subsidiary with other material IROs than the group, additional transparency might be needed to ensure a fair presentation of IROs. EFRAG could include DRs similar to the DRs in BP-2 for undertakings that use phase-ins.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Dutch Accounting Standards Board	(National) standard setter	Netherlands	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	The proposed relief is sufficient to provide flexibility but not to avoid undue loss of information. More flexibility in itself means less (comparable) information reported. The following inconsistencies need to be solved: ESRS 1 paragraph 92 only relates to joint operations over which the undertaking does not have operational control. In case of joint operations a company will have (full) control over its (part of the) assets and liabilities, etc. and will recognise these in its (consolidated) financial statements. Therefore it is unlikely that this paragraph can be used in practice. Clarification or examples on the specific application of this paragraph are welcome. The partial scope relief available for metrics is not available for E1-6 GHG Emissions. However, the broad use of undue cost and effort is applicable for all metrics and not excepted for E1-6 GHG Emissions. Could this perhaps still result in reporting on a partial scope when estimating the GHG Emissions would require undue cost or effort? It is good to add an explanatory application requirement in order to be very clear on the application of undue cost or effort for this specific disclosure requirement. The DASB suggests to include a time-limit for the use of the undue cost or effort relief to provide an incentive to improve data quality.			
Survey	Dutch Accounting Standards Board	(National) standard setter	Netherlands	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	DASB prefers Option 1. However, some preparers within the DASB-working-group would prefer Option 2, because the complexity of providing anticipated financial effects is high and prone to subjective estimates. This leads to more subjective information that may also differ significantly between different companies within the same sector. Option 1 is more in alignment with ISSB and provides important quantitative information on anticipated financial effects. If the reporting on quantitative information is too hard to achieve at the beginning, this falls under the undue-cost-or-effort-relief, thus giving companies a possibility for transition when the information isn't easily available. A possible phase-in approach for the quantitative effects will also aid companies to build the appropriate way to report on this type of information. DASB suggests to include a time limit on the relief options provided (both in option 1 and 2) for anticipated financial effects after which companies should shift from qualitative information to providing quantitative disclosures. The lack of a time limit might not provide companies with sufficient incentives to improve their anticipated-financial-effects-disclosures. Further guidance and examples illustrating how to quantify anticipated financial effects; more work on conceptually distinguishing anticipated financial effects from IROs from general expectations of financial outcomes of business activities; field tests and workshops, may represent a helpful complement to Option 1, reducing (perceived) complexity and allowing undertakings to better understand how to meet this requirement. We are concerned that the long-term anticipated financial effects for non-financial undertakings (i.e. upto 2050) are prone to a high-level estimation uncertainty and also with limited relevance/understandibility as companies do not provide forecasting information for such a long period. A compromise between option 1 and 2 may be to provide further relief for such quantitative AFE. We suggest collaboration with the IFRS Foundation as they face the same challenges.			
Survey	Dutch Accounting Standards Board	(National) standard setter	Netherlands	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	The DASB is of the opinion that securing interoperability is a major point of attention, especially for undertakings also active outside the EU. The DASB is of the opinion that interoperability in the proposed amended ESRS has increased. According to the DASB interoperability indicates that the ESRS facilitate the possibility to simultaneously apply IFRS-SDS. Consequently, standards and concepts must be clearly defined. According to the DASB, ESRS and IFRS-SDS should strive for consensus wherever possible, and where any difference exists, it must be clarified what the difference is and what is additionally required to meet the requirements of both frameworks. Suggestion for improvement: The DASB believes that interoperability should be enhanced by including, in ESRS 2 par 23, the IFRS relief that a preparer can omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information. Additionally, such relief may further reduce the reporting burden under ESRS and may reduce a barrier for smaller companies to voluntary apply ESRS.			
Survey	Dutch Accounting Standards Board	(National) standard setter	Netherlands	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Dutch Accounting Standards Board	(National) standard setter	Netherlands	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	The DASB is of the opinion that reduction for the sake of having fewer DRs should be avoided. The objectives of the EU Green Deal should be leading in reduction in the number of mandatory and voluntary datapoints. DASB is also not able to conclude on the balance between burden reduction and the information preserved to meet the EU Green Deal objectives. The objective of the green deal, in short 'striving to be the first climate-neutral continent', is in essence an objective that reporting as such cannot achieve on its own. Furthermore, sustainability reporting is still in its early stages and it will take some time before the sustainability reporting practice will reach its full potential. The alignment of the ESRS with other EU sustainability legislation necessitates a broader perspective to fully assess the relevance and impact of the ESRS on reporting practice. Notably, the Omnibus proposals are expected to have a significant impact on the development of EU sustainability legislation, including the CSRD, SFDR, EU-Taxonomy and the Corporate Sustainability Due Diligence Directive (CSDDD). In light of the above the DASB did not answer this question.			
Survey	Dutch Accounting Standards Board	(National) standard setter	Netherlands	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	The DASB agrees that these exceptions are appropriate and justified.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Dutch Accounting Standards Board	(National) standard setter	Netherlands	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	The DASB agrees that these exceptions to the general rule are appropriate and justified			
Survey	Dutch Accounting Standards Board	(National) standard setter	Netherlands	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	The DASB welcomes the explicit objective of ESRS to fairly present the material IROs. The DASB is concerned that the fair presentation concept and expected need to use more entity specific disclosures, including the judgments required in this respect, might not reduce the current reporting burden. The reduction of voluntary disclosure requirements might even complicate reporting due to the loss of guidance. Suggestion to -further clarify the fair presentation concept. -provide more guidance on how the fair presentation concept interacts with the requirement to provide additional entity-specific disclosures if a topic is not covered, or not covered with sufficient granularity by the ESRS. We believe clarification will avoid possible interpretation differences which could increase reporting burden and risks for undertakings and assurance providers, resulting in inconsistencies undesirable for the users of sustainability reporting. Most fair presentation reporting frameworks also include a derogation clause. This clause is added in case following the ESRS standards might lead to misleading reporting. Under that rare circumstance a company is obliged to deviate from the reporting standards in order to achieve fair presentation. This should be accompanied by an explanation on the deviations made. DASB suggests adding such a clause to tackle discussions on the fair presentation principle. E.g. in line with article 4.4 of the EU-Accounting Directive 2013/34/EU. And ESRS 1.11 should be clarified that the requirement for additional information is subject to the fair-presentation-requirement (including the derogation clause) The effective functioning of the fair-presentation-requirement could be increased by clarification of information needs of users to support preparers/auditors in their assessement of those needs are met. Also necessary to understand at which users the information is aimed, and what should be fairly presented. See for example the IFRS Conceptual Framework of Financial Reporting. Our text suggestions are included in section 3.			
Survey	Dutch Accounting Standards Board	(National) standard setter	Netherlands	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	The DASB notes that in several requirements the headcount is required and cannot be replaced by FTE. Generally, the DASB is of the opinion that FTE is more relevant than headcount. The DASB does not fully grasp the rationale of the amendment to the ten (10) largest countries by headcount. The DASB is of the opinion that lowering the threshold – for example to 5% – while simultaneously adding a cap on the total share of employees (50%? 75%?) would be preferable.			
Survey	Dutch Accounting Standards Board	(National) standard setter	Netherlands	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	The DASB is of the opinion that the amendment can be further improved. The DASB feels the proposed changes could result in burdensome data collection and maintenance of data for companies active in many jurisdictions and assurance providers requiring evidence demonstrating the non-availability of either a statutory wage or a mandated wage estimate. The DASB suggests investigating the possibilities of authoritative reporting databases at EU level on living wages as a basis for standardized assumptions. And since, even within the EU, it may occur that the minimum wage is not an adequate wage, such a database should also include an assessment whether the statutory minimum wage is indeed an "adequate" or "living" wage.			
Survey	Dutch Accounting Standards Board	(National) standard setter	Netherlands	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	ESRS should be as compliant as possible with SFDR. However, SFDR will also be revised. DASB cannot, at this moment, evaluate the changes made within the ESRS as it is fully possible the requirements will become obsolete following the SFDR revision. DASB suggest to incorporate a mechanism to change the related ESRS after the SFDR revision is completed, and to hold a separate public consultation on the SFDR revision changes made in ESRS.			
Survey	Dutch Accounting Standards Board	(National) standard setter	Netherlands	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We think in the question AR 5 is mentioned. We believe a clear reference to the TNFD Leap approach and its guidances will help undertakings to a good quality assessment of (D)IROs and further implementation into strategy, policies, actions, targets and metrics. The references in E4 to TNFD LEAP as mentioned in ESRS 2 ESRS 2 AR 22 for para 26, are not clear and can be improved in several elements of E4, including the target disclosure requirements. This will also improve interoperability between TNFD and CSRD.			
Survey	Dutch Accounting Standards Board	(National) standard setter	Netherlands	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	Alignment of the ESRS with other EU legislation, especially the requirements from the SFDR is essential for the DASB. The SFDR includes an unadjusted indicator. However, the SFDR will be revised. Also, the transposition of the EU Pay Transparency Directive (Directive (EU) 2023/970) provides a base for transparency. The DASB suggests to align the ESRS accordingly. Alignment could be enhanced by incorporating references to the comparable disclosure requirement in the relevant EU legislation. For the users of sustainability information the datapoint on the adjusted gender pay gap provide relevant information – perhaps even more than the unadjusted gender pay gap - on the topic of diversity and inclusion and the effectiveness of the company's equal pay policy. DASB proposes to keep the adjusted gender pay gap as a voluntary data point. If EFRAG comes to the conclusion that this voluntary datapoint should be deleted from the ESRS, the DASB suggests to incorporate the datapoint on the adjusted gender pay gap in the NMIG. Furthermore, the DASB notes that no explanation or application requirement is added on the regular pay ratio, and proposes to add one with the methodology that a company uses to calculate the gender pay gap.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Dutch Accounting Standards Board	(National) standard setter	Netherlands	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	The DASB questions whethter the intended purpose of the DR (in short protection of SMEs) will be achieved in practice. We expect that late payments in practice result in legal proceedings which might have the late payment as base, but mostly result in discussions on the absence of full delivery of the product. Is the annual report and transperancy (given the historic character) the most appropriate place and resource to stimulate fair payment practices for SMEs? Shouldn't the information on payments be easily accessible for SMEs e.g. on the website as part of the generals terms and conditions? However, the DR could be used as a tool for auditors to, for example, share sector information with undertakings on payment practices. We believe the current replacement formulation is sufficient.			
Survey	Dutch Accounting Standards Board	(National) standard setter	Netherlands	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The amendments resulted in various changes across the cross cutting and topical ESRS. The DASB feels not all ESRS are in balance, for example ESRS S3 seems to focus very much on indigenous people while we would assume the scope of ESRS S3 is broader; also ESRS G1 mentions animal welfare as objective while this isn't part of the disclosure requirements. In ESRS S1 the DASB feels that is unclear which requirements apply to "own work force" as a whole and which to "employees" and/or "non-employees" only. The DASB notes an inconsistency between ESRS E3-10 which refers to oceans and seas – while ESRS E2-7 seems to suggest that marine waters only include oceans (and not seas). Suggest to also include seas in ESRS E2-7 In the wording of the ESRS inconsistencies are noted e.g. the reference to amended not consistently used, also inconsistent/interchangeable use of "adverse impact" and "negative impact" across the standards			
Survey	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	AFME broadly supports the changes introduced by EFRAG as set out in ESRS 1 – Chapter 3.1 and the new Chapter 3.5, which strike an acceptable balance in simplifying the DMA while still providing a robust framework for entities to work with when conducting their assessments. These changes are expected to improve the process of the DMA and the subsequent reporting. However, there are a few areas where EFRAG can go further to meaningfully simplify the DMA, for example by clarifying that credit institutions may refer to existing methodologies in describing their DMA process and, in ESRS 1, removing the requirements to aggregate disclosures of low-probability, high-impact outcomes. Please see our response to Part 3 for more details.			
Survey	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	We do not agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA. We agree with the EFRAG SRB members that consider the added guidelines excessively complex and overly prescriptive which can limit undertakings from implementing a DMA process to account for entity nuances. We also agree with the view of some EFRAG SRB members that the "gross" approach to reporting could result in excessive reporting and that the complexity of the guidelines risks inconsistent application. This guidance is likely to increase a compliance-driven approach and increase burdens for preparers. We recommend removal of the new guidelines. Instead of this framework, EFRAG should consider a more flexible approach that focuses on whether impacts, after considering management's response, remain material to stakeholder decision-making. Management must have the flexibility to use reasonable judgement in determining whether a gross, net or hybrid approach is most appropriate. This would better align with the fundamental materiality principle while reducing implementation complexity and avoiding perverse incentives for effective risk management. A more flexible approach would also better align with the ISSB standards. IFRS S1 does not prescribe how entities should take mitigation activities into account when determining materiality and allows management to apply judgment regarding current and planned mitigation and remediation actions. In our view, any future guidance on the gross vs. net issue is better placed in the NMIG. It could be helpful to develop guidance on this topic in the NMIG at a later date with further contributions from credit institutions. [Our response to this question is continued in part 3 as comments on ESRS 1 -34]			
Survey	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	AFME supports the changes made to improve the readability, conciseness and connectivity of the sustainability statements. •We support the changes that introduce greater flexibility in organising the disclosures. In particular, we support the changes in ESRS 1 - 8.3, which provide the option of having an 'executive summary' at the beginning of the sustainability statement and including granular information, such as EU Taxonomy-related information, in detailed sections/appendices. These changes provide the flexibility for reporters to highlight key messages in their sustainability statement, improve the readability of the sustainability statement, and encourage alignment with ISSB requirements. •We support the changes made to emphasise that items should be disclosed once. There are, however, additional changes that would further improve readability, conciseness and connectivity of the sustainability statements. The ESRS should provide additional flexibility by allowing cross-referencing via links, and incorporation by reference of other relevant entity or subsidiary reports within the sustainability statement. ESRS 1, paragraph 117 should be amended to ensure that risk management information contained in the company's annual report can be incorporated by reference in relation to CSRD risk disclosures. ESRS 1 already permits incorporation by reference and explicitly mentions Pillar 3. We recommend that ESRS 1 Chapter 3 and the Application Requirements (ARs) make explicit that financial institutions may refer to Pillar 3 disclosures or omit information relevant only to supervisory authorities. This is particularly important for banks that report against Pillar 3 ESG requirements. These institutions already explain impacts, risks and opportunities (IROs) and anticipated financial effects in Pillar 3 ESG reporting. These changes would also be impactful for firms in scope of the CSRD that have subsidiaries in scope of the CSRD, as it would reduce duplicative content across parent firms' consolidated sustainability reports and subsidiaries' sustainability reports.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	AFME supports the changes made by EFRAG in this respect. The revised structure of the standards is more readable and removes overlaps. For #4, above, we support the clarification that undertakings do not have a requirement to disclose a timeline for the creation and implementation of PATs. For #5, above, we support the changes improving the ability to disclose information at a higher aggregation level than the material IROs. We have the following further suggestions to improve the architecture of the standards: •Conduct further checks of the drafting as there are still many instances of repetition. •Clarify the hierarchy of topics, sub-topics and datapoints and ensure that every "shall disclose" requirement sits under the relevant topic/sub-topic. This would make it more intuitive to progress from DMA conclusions to the applicable disclosures. •Provide a navigable HTML edition of the final standards in which every reference to another section or paragraph in the standards is a live link to the referenced paragraph/AR. This would materially improve accessibility and ease the implementation of the standards. •We would also welcome the reinstatement and revision of relevant decision trees in ESRS 1, noting that these sorts of visual aids are a useful way of communicating key requirements to the wide and varied range of stakeholders within organisations who are involved in the CSRD process.			
Survey	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	AFME supports the changes made by EFRAG in this respect because they make it easier to read the standards and identify required disclosures. We welcome the inclusion of the ARs in the body of the ESRS and consider that this will make it easier for the broad range of stakeholders involved in the ESRS process to fully understand the nature of the disclosure requirement. We recommend the following additional improvements to enhance the clarity and accessibility of the standards. The 'may' datapoints which remain within ARs should only be presentational suggestions (providing a choice between presentation options) and not additional datapoints. With this in mind, we are concerned that some of the remaining ARs do not seem to be 'how to disclose' guidelines (e.g., methodological guidance or presentation options). Overall, we would suggest that a review of usage of the words "useful", "material", "fair" and "faithful" should be performed to ensure internal consistency. Among Disclosure Requirements, Application Requirements and the Glossary, there are several definitions of incidents and confirmed/substantiated incidents. We suggest the best approach would be having specific definitions for each case (e.g. human rights incidents, incidents of corruption and bribery, etc.) and presenting them under the related application requirements. In our view, the best path to support simplification would be to focus on incidents that have been confirmed through a final decision issued by a court of law or relevant authorities. To improve clarity and accessibility of the standards, we also recommend avoiding clustering multiple datapoints within each paragraph. This will assist with identifying the required datapoints more easily. Additionally, we recommend publishing a revised IG 3 list of updated mandatory datapoints for preparers. We would also welcome the inclusion of decision trees for key disclosure requirements, especially where new provisions/reliefs have been introduced, e.g., disclosure of metrics.			
Survey	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	NMIG should be included in EFRAG's guidance rather than the Delegated Act to clarify that it is for voluntary reference and good practice only. This would also provide greater flexibility to update the guidance in a timely manner. An explicit statement should be added to clarify that the NMIG cannot be used for audit purposes. We also consider that the NMIG could be used to develop additional guidance to support financial undertakings in applying disclosure requirements designed for real economy companies. The NMIG could provide indications of methodologies to be used in preparing disclosures (complementing the existing ARs) and identifying datapoints which are by nature not applicable for financial undertakings. This guidance could include practical guidance on the limitation of the downstream value chain for financial undertakings and the application of the "undue cost or effort" relief in this context. We welcome EFRAG's efforts to incorporate the key themes from the Q&A platform into the new NMIG – we would welcome further work on this and clarity regarding the status of the FAQ. Additionally, some parts of the draft ESRS could be moved to the NMIG. For example, ESRS 1 – AR 6 could be moved as the examples do not really add a new perspective to the disclosure requirements. Finally, we are concerned that the draft NMIG has been used as a "collection basin" for voluntary disclosures, with many "may" ARs having been moved there. The NMIG should maintain its status as optional guidance. We would also welcome work on revising and streamlining the existing guidance (e.g. IG 1 and IG2) with a focus on producing more streamlined/shorter guidance.			
Survey	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	AFME supports the horizontal reliefs proposed in the revised ESRS, including the IFRS 'undue cost or effort' relief (#1). From our members' experience with this relief in the context of financial reporting, this is still a high bar to meet in the context of the audit which could lead to multiple interpretations in the context of impact materiality. EFRAG should clarify that management has sufficient flexibility to determine "undue cost and effort" with respect to each entity in scope, and the meaning of this relief should also be informed by the value chain cap. EFRAG should clarify that companies subject to the CSRD have no obligation to collect non-publicly available data from companies not subject to the CSRD or have no obligation to estimate this information to close data gaps. We also support #3 which allows the use of proxies/estimates where appropriate. Reporting entities, especially financial institutions, face ongoing challenges in accessing high-quality Scope 3 emissions data. For global financial institutions, much of this data comes from counterparties in jurisdictions without sustainability reporting mandates, leading to inconsistent, incomplete, or delayed data—often lagging by 12 to 18 months. However, members highlight that proxies are not an automatic solution to data delays and data gaps. Proxies and estimates must still come from reputable third-party providers and be based upon a standardised methodology to provide the required level of transparency.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	AFME supports the relief proposed in amended ESRS 1 paragraphs 87-89 and 90-92. This relief is critical for financial institutions which are reliant upon the reporting of their counterparties. If, for example, a counterparty reports using transitional reliefs under the ESRS, the burden reliefs provided here would allow corresponding relief for financial institutions' value chain reporting. These horizontal burden reliefs also address reporters' limited access to primary data through the operation of the value chain cap. We support extending the relief for lack of data quality on metrics to E1-6 GHG emissions (at least to scope 3 emissions). There are cases where data on certain types of GHG emissions or certain categories of scope 3 emissions is not available with sufficient coverage or adequate quality. Publication of such data is not consistent with the ESRS (e.g., ESRS 1 paragraph 18 on the qualitative characteristics of information). The revision of the data hierarchy which allows use of proxies/estimates could supplement data gaps where only low-quality emissions data is available.			
Survey	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	It is essential to provide effective relief to address challenges with disclosing anticipated financial effects. At a minimum, EFRAG should go beyond Option 1 and align the relief for anticipated financial effects with the reliefs provided in the ISSB standards. The Basis for Conclusions notes that Option 1 is substantively the same as the ISSB relief, but Option 1 introduces new language which is not aligned with the corresponding ISSB standard. The language allowing relief "when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects" is highly likely to increase costs and confusion with assurance providers. The process of "proving" to auditors that this threshold is met is anticipated to be highly burdensome. While all members support going beyond Option 1, at a minimum fully aligning the relief with ISSB, members have differing views on the benefits of moving to Option 2. Some members have noted that reporting qualitative financial effects only in perpetuity would provide less decision-useful information to the market since there would be less consistency and comparability in disclosures. However, a number of members support Option 2, which offers greater flexibility in cases where the underlying data may be confidential or subject to significant uncertainty. Option 2 would allow preparers to omit disclosure of anticipated financial effects which are based on projections/assumptions that would potentially render them unverifiable, irrelevant or incomparable (and thus in violation of the Qualitative Characteristics of Information requirements of the ESRS). Option 2 would allow room for preparers to continually improve quantification mechanisms and risk management, improving the quality of disclosure over time: this approach would reflect the challenges in data collection and unreliable estimates and could still provide meaningful information to investors and stakeholders.			
Survey	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	EFRAG should re-think disclosure requirements on anticipated financial effects throughout the ESRS and align these with ISSB, Pillar 3 and banks' internal risk management processes. ESRS disclosures on quantitative financial effects go beyond the corresponding ISSB requirements, do not align with Pillar 3 disclosures and raise significant concerns about the accuracy and verifiability of forward-looking disclosures. Rather than maintaining datapoints in E1 for the sake of Pillar 3, EFRAG should coordinate with the EBA to holistically consider which datapoints are necessary for users and streamline the reporting requirements horizontally across legislation. We recommend to significantly simplify E1 anticipated financial effects and align them with ISSB. For example, the ESRS DRs for anticipated financial effects include disaggregation, specific time horizons which do not align with ISSB (see e.g. FN 3-4, ESRS/ISSB standards interoperability guidance) and impacted revenue which are very complex to report and do not provide precise information for users. The disclosures in E1-11, paragraphs 41-42 should be made optional to relieve burdens on reporters. Greater alignment should also be provided between the disclosures in E1-11 paragraph 40 and Pillar 3, including aligning the methodology for E1 with the revised Pillar 3 ESG disclosures (e.g. in Pillar 3, the bank's own assets are not considered). While Pillar 3 requires disclosure of the exposure value of assets at material physical and transition risk, the revised draft E1 still goes beyond Pillar 3 requirements and asks for quantification of anticipated financial effects, which are not required. The EDs note that revised Appendix A of ESRS 2 does not consider changes to Pillar 3 potentially arising from the ongoing Pillar 3 revision. We strongly urge EFRAG and the EBA to ensure alignment between the disclosures on anticipated financial effects in ESRS E1 and the disclosures required by financial institutions for Pillar 3 reporting.			
Survey	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	AFME strongly supports maximising alignment of ESRS with global standards; interoperability and common datapoints must be maintained as the ESRS are streamlined. The focus should move from interoperability with ISSB to comparability, as investors can best use disclosures if they can consistently read across ESRS sustainability statements and ISSB reports. We therefore support EFRAG's amendments to increase interoperability with ISSB, but there are areas to improve. It is also essential that EFRAG works with the ISSB and takes the opportunity of the ESRS Review to improve interoperability. AFME supports changes 1, 5 and 6 above. Aligning the wording of disclosure requirements where possible and allowing reporters to refer to IFRS guidance are welcome changes. EFRAG should clarify that IFRS industry-based guidance and SASB standards are not mandatory, to avoid additional audit complexity, and make entity-specific disclosures voluntary. We also welcome the introduction of the "undue cost or effort" relief and the option to include an "executive summary". For further information, see our responses to Q11, Q13, Q17 and Q25. However, we strongly urge EFRAG to go further with ISSB alignment, in line with the Commission's letter to EFRAG on 5 May 2025. We have provided examples of such opportunities throughout this response. In Q19 and Q20, we explain how the ESRS should align disclosures and reliefs for anticipated financial effects with ISSB. In Q26, we explain how the disclosure of absolute emissions reduction targets, translated from financial institutions' intensity targets, does not provide useful information. We also strongly encourage EFRAG to align with the ISSB on reliefs for commercial sensitivity, value chain guidance and metrics preparation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	General Feedback on all of the ESRS Standards: While AFME supports the overall reduction of mandatory datapoints to reduce the reporting burden, further consideration is needed to ensure that all remaining datapoints are decision useful. In our responses to Q19, Q20 and Q32, we set out specific suggestions for datapoints which could be removed to simplify the ESRS without compromising on transparency. In AFME's response to EFRAG's Call for Evidence on the revision of the ESRS, we suggested key areas where the ESRS could better consider financial undertakings' business models by providing flexibility on reporting metrics which are by their nature relevant for financial undertakings. We note that this is not the approach taken in the revised ESRS, although there could be an opportunity to provide some of this flexibility within the NMIG (see our response to Q16 above). AFME notes that the removal of datapoints which are directly derived from other datapoints, while removing duplication, does not constitute a true burden reduction. We agree with the points raised in EFRAG outreach events that reduction of datapoints does not necessarily translate into a lighter reporting burden for undertakings. The real benefit lies instead in streamlining disclosure requirements, ensuring consistency, and avoiding unnecessary repetition of information across different standards or even within the same standard. For this reason, the elimination of datapoints should not be seen as directly proportional to a reduction in the effort required to prepare disclosures.			
Survey	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	Please see our response to Part 3 for AFME's comments on these datapoints.			
Survey	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	The majority of AFME members support the emphasis on the ESRS being a "fair presentation" system, as this should create a principles-based disclosure environment which is more aligned with ISSB and improve the relevance of disclosures. "Fair presentation" should allow entities to move away from checklist-style compliance towards a more coherent and meaningful disclosure framework. However, in the absence of limited assurance standards for CSRD reporting, a few members have concerns over potential divergence in assurance practices under a "fair presentation" framework, due to a different and more cumbersome definition in IAASB sustainability auditing standard ISSA 5000. EFRAG should clearly establish in ESRS 1 what "fair presentation" means to ensure that it achieves its intended simplification objective and avoids creating (i) extensive burdens for preparers in proving that the report presents a "true and fair view" for users of general-purpose sustainability statements, and (ii) different auditing approaches across geographies. It is also crucial to ensure that the application of "fair presentation" as a concept does not impact preparers' ability to use the horizontal reliefs proposed as part of the ESRS simplification. See response to Q17. ESRS 1 should explicitly state that the "fair presentation" concept does not preclude the use of the horizontal reliefs and of the materiality of information filter set out in ESRS 1.			
Survey	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We strongly support the inclusion of a relief for banks not to disclose emissions reduction targets in absolute terms when they have only set intensity-based targets. The greatest need for transition financing is in the most emissions-intensive sectors, which means absolute targets may be deceptive and discourage investment in such sectors. Financed (Scope 3 Category 15) emissions make up the bulk of a financial institution's GHG inventory, and given the ties to client activity, targets are typically set at the sectoral level for this category. For certain sectors, intensity targets are used as they take production values into account (e.g., mt CO2e/mt cement produced). It does not make sense to develop absolute targets for sectors for which there are already nearer-term, interim intensity targets. Because financed emissions footprints are an aggregate of corporate emissions footprints, the translation of a portfolio intensity target to an absolute target requires significant assumptions. Banks would have to make hypotheses on portfolio composition, clients' future production/sales mix and volumes, future enterprise value etc. The outcome of such calculations would not meet the qualitative requirements of ESRS disclosures and would not be comparable. Under the ESRS disclosure requirements, banks will in any event need to disclose absolute financed emissions; therefore, stakeholders will have transparency on the scale of a financial institution's absolute emissions. Given the unique role of banks in the value chain, and that the disclosure of their absolute financed emissions is already a requirement, a bespoke approach for banks' target disclosure is essential. We note that for financial institutions, the EBA recognises the relevance of intensity-based targets in both its Pillar 3 ITS and its ESG Risk Management Guidelines.			
Survey	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	AFME does not support the new thresholds proposed for reporting metrics disaggregated at country level in S1-5 and S1-7 (S1 -23(a), S1- 27(b) and S1–28(a)). The new thresholds add reporting burdens and dilute the principle of only reporting material information by removing the 10% materiality threshold, thereby contradicting the simplification objectives of this exercise. We recommend maintaining the current thresholds as set out in the existing ESRS. The updated definition expands the data gathering efforts for the disclosure, with minimal value added: countries with low headcount above 50 employees were formerly excluded because they were low percentages of the total workforce of the undertaking. However, countries above 50 but with a low relative number of employees will now need to be disclosed (having relatively little impact to the undertaking). This change in threshold should be indicated in the list of new mandatory datapoints in Q24 as it will result in new reporting requirements which were not in the previous ESRS. The new thresholds applied to collective bargaining agreements also increase the risks of disclosing legally and commercially sensitive information when disclosed at country level.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	AFME considers that the creation of a distinction between EU and non-EU countries creates additional complexity and would like to understand the reasons for this. If retained, it would be necessary to clarify how to apply the ILO principles and provide examples of benchmarks which would qualify, such as those provided by the Fair Wage Network. An exception in AR 22 for companies already using a relevant homogenous benchmark for all countries could also be added to reduce complexity.			
Survey	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	AFME supports EFRAG's approach to maintaining the information pipeline for reporting under the SFDR and other financial services legislation, but the inclusion of datapoints in ESRS should not be driven by the existence of PAIs in the SFDR. The relevance and decision-usefulness of PAIs should inform the concurrent revision of the SFDR and ESRS. The ESRS' current approach to include mandatory DPs that correspond to both mandatory and voluntary SFDR PAIs creates unnecessary burdens for all reporting entities, especially given that voluntary PAIs tend to be sector specific. For this reason, we recommend making datapoints corresponding to voluntary PAIs voluntary. Voluntary PAIs are not widely used in the market beyond their mandatory inclusion in SFDR entity-level disclosures. The PAI entity-level disclosure requirements under Articles 3-5 of the SFDR should ultimately be removed through the SFDR Review in light of the revised ESRS. If entity-level disclosure requirements are retained, they should be aligned with the revised ESRS, not the other way around. We acknowledge that due to the timing of the Omnibus I proposal, the revised ESRS are likely to be adopted before the completion of the Level 1 review of SFDR. However, it is our view that the review of SFDR should be conducted in conjunction with the review of the ESRS. If not done at the same time, the ESRS will need to be further revised after the completion of the SFDR review to further align the data required from investees for the revised PAIs, increasing uncertainty and undermining the simplification objectives of the Omnibus. Nevertheless, our proposed change to make voluntary PAIs voluntary under the ESRS should be implemented as an immediate measure.			
Survey	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	No, EFRAG should not review AR26 for the Amended ESRS E4. The existing ESRS 2 GDR-T provides comprehensive guidance for target-setting disclosures, and additional prescriptive application requirements would create implementation complexity without proportional benefits.			
Survey	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	The adjusted gender pay gap can be included as part of the NMIG as some preparers may wish to report this metric on a voluntary basis.			
Survey	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	AFME supports the deletion of these datapoints and replacement with PAT provisions. Financial institutions are subject to strict rules as to how payments to clients and financial market intermediaries are governed. To calculate specific "payment practices" metrics defined under the ESRS (construed for real-economy companies), many assumptions are required. These include the systematic categorisation of financial market intermediaries vs. traditional suppliers and the consideration of whether contracting and payments are performed by other group entities to ultimately present information which is of low value for regulated financial institutions. However, members have raised concerns that the new G1-6 12(a) does not represent a true simplification. G1-6 12(a) represents an additional quantitative datapoint which should be noted in the list of new mandatory datapoints. Amending a narrative disclosure about payment practices (former G1-6 paragraph 31) with respect to SMEs to a quantitative disclosure about payment practices for SME suppliers (current G1-6 paragraph 12(a)) does not represent a simplification and is unlikely to result in meaningful or comparable information. The disclosure of standard payment terms does not bring much added value for the users of the statement and the distinction between SMEs and non-SMEs does not have significant relevance. If an undertaking applies specific conditions to SMEs, it should be described in the PAT sections. Where EFRAG considers it critical to define a metric related to the management of suppliers, we suggest focusing only on the overall percentage of payments aligned with contractual terms. We suggest including any optional methodological guidance on G1-6 in the NMIG.			
Survey	WWF EPO	NGO	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The overall clarification of the Materiality Assessment process is welcomed. The revised definition of materiality in Section 3.1—specifically, the shift from using "significance" to focusing on the "understandability" of impacts—offers more precise guidance and is better aligned with the CSRD and international sustainability due diligence frameworks. Section 3.5 is especially useful in helping to manage and reduce unnecessary complexity during the materiality assessment process. However, there are still some pitfalls. We believe that a requirement for site-level analysis disclosure when conducting materiality assessment is key to ensure the meaningfulness and completeness of information and should be introduced. Currently, a disclosure requirement is provided for site-level analysis in ESRS 2, which in our view lacks detail (see corresponding section below). In parallel, a requirement for companies to disclose site-level analysis as part of their impact materiality assessment process in ESRS 1 would ensure meaningfulness of information and streamline the exercise for companies. Notably, it should be considered that the purpose of financial material assessment is also to determine material risks and opportunities, which is lacking in chapter 3.3.2.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	WWF EPO	NGO	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	It is extremely relevant that actual impacts are considered and reported as they occur during the reporting period, and that their ex-post remediation is not considered for this effect. We welcome and underscore the importance of the clarification that potential impacts requiring significant and sustained prevention or mitigation efforts should be assessed on a gross basis. Without this clarification, it would be practically unfeasible for companies to accurately report on how they address such issues.			
Survey	WWF EPO	NGO	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The proposed changes are meaningful and welcomed as a whole. However, we would like to highlight that Taxonomy-related information should be visible and easily available in the reporting. This information is far too important to be given reduced visibility —particularly given its critical role in securing capital and financing, enhancing corporate valuation, and demonstrating effective risk management and strategic planning, and while analytical reports are gradually evidencing that the EU taxonomy framework is useful for financing the sustainable transition of EU companies. For example, mortgages and other loans linked to Taxonomy-eligible activities account for, on average, more than 50% of large EU banks' assets, based on first-year reporting data. In our experience, major users of sustainability information—especially financial institutions—actively seek out this data as a priority. Placing it in an appendix risks reducing its visibility, leading to fragmentation and hindering the usability and comparability of disclosures. Moreover, it's worth noting that more than 50 countries globally have already established their own taxonomy frameworks, and capital flows into Taxonomy-aligned activities in the EU witnessed a grow last year—even amid a broader political push for regulatory simplification. This demonstrates the enduring economic and strategic relevance of clear, accessible Taxonomy reporting. Relevant Sources: https://finance.ec.europa.eu/document/download/08dd5091-6df7-45ed-8dc1-2583007594c4_en?filename=240605-sustainable-finance-taxonomy-factsheet_en.pdf			
Survey	WWF EPO	NGO	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We welcome the removal of duplications between the cross-cutting and topical standards. We also support the reinforced focus on general disclosure requirements, and value the retention of the fundamental structures within the environmental and social standards. The environmental standards continue to offer a coherent structure, including specific metrics under each of the E1 to E5 standards. Nevetherless, the newest application requirement to ESRS 2 IRO-1 that replaces the original DR in environmental standards concerning screening of sites in materiality assessment is considerably weakened. Notably, the original version of the ESRS required site-level analysis and disclosure of certain site-specific policies, actions, targets and metrics linked to pollution, water use or biodiversity within topical standards. The requirements have now disappeared altogether from the standards on pollution and water and have been weakened under the biodiversity standard. This new AR under ESRS2 has significantly less ambition and detail, and no obligation to report when companies do not perform or report on site-level impacts. This is likely to reduce the quality of site-level analysis and disclosure by companies, which is essential to understand their impacts on nature and people as they tend to be highly dependent on local context. The disclosure requirements on site-level impacts should require that companies at least provide the number of sites in which they conduct activities that have material impacts ESRS topics, the nature of activities at these sites, the impacts linked to these activities, and the ecosystems impacted. Disclosures should be aggregated at the scale of each ecosystem impacted by the company's sites.			
Survey	WWF EPO	NGO	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We agree that removing "may" disclosures provides a clearer understanding of what is mandatory for companies to report under the ESRS framework. However, the unilateral removal of some "may" disclosures with no replacements deletes a significant amount of relevant content which supports companies under different topical standards (for example, all biodiversity metrics and biodiversity transition plan elements under E4). This will impact the quality and comparability of information going forward, as the required information and underlying methodologies are not standardized. Where "may" metrics represent the bulk of information required under ESRS Set 1, it is relevant to rationalize the number of metrics, but some key sector-agnostic metrics that provide a common basis for reporting and data analysis - namely biodiversity metrics and biodiversity transition plans under E4 should be retained.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	WWF EPO	NGO	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	The reliefs proposed are very excessive, only partially defined, and not time-bound. When assessed cumulatively these reliefs strongly risk undermining the availability of meaningful and reliable data, as they offer companies excessive ways to justify not reporting information without. We are deeply concerned that these changes do not support the goal of avoiding information loss and strategic relevance of the ESRS in a balanced way. The three following exemptions are particularly susceptible to abuse: - Undue cost and effort (section 7.3): The interpretation of "undue costs and efforts" is therefore left to the discretion of companies, which creates leeway to avoid reporting indefinitely. We recommend either removing this relief or, at a minimum, clearly defining the limits of what constitutes "undue cost" and "undue effort", as well as providing a time cap for the use of this relief. Such clarification is essential to prevent abuse and ensure the continued improvement of information systems and long term comparability of information. -Value chain (section 5.2 AR 28): this relief allows companies to exclude all value chain data from their published metrics, with the exception of Scope 3 GHG emissions data. This compromises the ability to report on the real impact of companies' activities, as a significant part of this impact occurs upstream or downstream of their operations. We recommend its removal. -Data quality (7.4): this is not limited in time. Companies could justify not publishing data based in part on estimates, even though such data may be relevant for understanding the risks and impacts associated with their activities. We recommend removing this provision or, at the very least, introducing a time cap to ensure the continuous improvement of information systems. In general, other exemptions- such as joint operations, business secrecy- suffer from lack of definitions and lack of time limits.			
Survey	WWF EPO	NGO	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	This new relief provides excessive leeway for companies not to report on highly relevant data. As mentioned above, the minimum protection to minimize risks would be the introduction of a time limit to this relief, so as to encourage the continued improvement of reporting practices. Notably, the use of estimates does not necessarily lead to poor quality data. As previously mentioned, what constitutes a "reliable" source for data calculation is open to the interpretation of companies. This can lead to abuse of the relief, although the use of estimates can be essential to provide a full picture of the scale of the impacts generated by a business's activities.			
Survey	WWF EPO	NGO	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ability to estimate financial effects is essential for an undertaking to integrate sustainability into its business strategy, planning, and risk management. Without a clear view of the financial effects of sustainability risks and impacts, such information can be treated merely as negative externalities by companies and financial institutions, instead of the strategic data it should be. This data is also key for regulators and supervisors, who must possess a clear picture of the anticipated financial effects of sustainability risks and impacts to ensure the long-term stability of the financial system. It is therefore crucial that companies move forward on quantifying the financial effects associated with sustainability impacts, risks and opportunities. Abandoning this ambition in favor of purely qualitative reporting would undermine the objective of achieving true integration between sustainability and financial reporting. EFRAG should therefore retain Option 1 for the disclosure of anticipated financial effects. This option still provides significant flexibility for companies to report qualitatively on anticipated financial effects while requiring a clear explanation as to why quantitative figures are not available. Notably, the assertion included in the consultation that "different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources." is only one interpretation of the relief, as this is not clearly stated as such in the Option 1 paragraph of the draft – thereby opening the door to abuse. Specifically, the relief introduced for "undue costs & efforts" could realistically be mobilized to justify not reporting this data. Therefore, even with Option 1, companies have significant leeway to delay reporting quantitative figures; however, this option ensures that there is a basis for the quantification of anticipated financial effects going forward.			
Survey	WWF EPO	NGO	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	WWF EPO	NGO	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Reliefs should not extend beyond those provided under the IFRS framework. Doing so undermines the goal of establishing a global baseline for ESG reporting—an essential step towards ensuring a level playing field for EU companies in the international market. Notably, there are already raising concerns over a lack of alignment and interoperability between the two frameworks. Notably, WWF EU insists on the importance of not providing a relief that would allow companies to omit Scope 3 GHG emissions. Scope 3 emissions often represent the majority of a company's carbon footprint and are key in providing a full picture of climate-related risks and opportunities across the value chain. Having this information is not only critical for more informed decision making in companies committed to playing a meaningful role in the green transition but is also essential for informed public decision making. It is also worth noting that Scope 3 emissions reporting is a standardized practice notably for large companies, who have been reporting on these emissions most often under the NFRD framework. There is no methodological justification for providing a relief on this topic, as broadly accepted and consensual frameworks already exist to calculate and report Scope 3 emissions. This is the case both for businesses and financial institutions.			
Survey	WWF EPO	NGO	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	WWF EPO	NGO	Belgium	22.E2.	Comments on deleted datapoints in ESRS E2	I partially agree and partially disagree	As an organization mostly focused on nature, biodiversity and climate related issues, the deletion of several datapoints and wording under E2, E3 and E4 is of very high concern to us. This was already highlighted in the question related to "may" statements. Specific issues will be developed in the relevant sections of this questionnaire.			
Survey	WWF EPO	NGO	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We are in full agreement with the changes and see them as suitable. They do not add any overload for the reasons rightfully mentioned. In particular, we welcome the changes on water-related issues, where moving datapoints which companies were already calculating on makes the process more explicit and clearer. Notably, we recommend clarifying that where a biodiversity transition plan is disclosed, it should integrate and reference the connections to the material topics covered by the other environmental standards. Biodiversity loss and recovery are also driven by local issues such as pollution (E2), water use and marine resource exploitation (E3), and resource extraction (E5), while circular economy approaches often form part of the solution space. Making this systemic relationship explicit would not introduce new reporting requirements, but would likely enhance coherence, support a more holistic understanding of impacts and responses, and prevent a siloed or overly narrow interpretation of the scope of a biodiversity transition plan.			
Survey	WWF EPO	NGO	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We are in full agreement with the changes and see them as suitable. Introducing datapoints that serve to delete a number of other data points (eg. ESRS 2 BP1) should be counted as a reduction, not an addition. Indeed, it is logical that to offset the information loss stemming from the simplification, some counter-proposals must be made. Other tweaks either help to align the ESRS framework with existing regulation, which is an amelioration in terms of interoperability, or to provide detail on existing datapoints. Notably, E2-4 is not a new datapoint, but simply an additional precision to an existing datapoint, as suggested in the rationale above.			
Survey	WWF EPO	NGO	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	The simplified version of the ESRS introduces numerous reliefs allowing companies to omit data requested by the CSRD. In this context, maintaining the fair presentation requirement is a top priority, as it allows auditors to verify that sustainability reports contain sufficient information to provide a representative and faithful picture of the company's business model and the impacts, risks, and opportunities associated with its activities. This means that auditors are given the power to verify that the exemptions provided for in the ESRS are not being abused by companies. The relevance of the fair presentation requirement is also reinforced by the heavy reliance on entity-specific disclosures in the simplified ESRS. Indeed, this will allow auditors to ensure that sufficient information is provided through entity specific disclosures to account for the company's material impacts, risks and opportunities when standardized metrics are not provided.			
Survey	WWF EPO	NGO	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We strongly disagree that financial institutions should be exempted from disclosing climate absolute GHG emissions. Despite realizing the complexity of calculating emissions based on absolute values, we recognize the incremental need for a shift in such practice. Improvements can be made to calculation methodologies for financed/facilitated/insured emissions, but this concerns FI's GHG accounting. On targets, regardless of the methodology used, FIs will have to decrease their absolute emissions. Financial institutions often voice concerns over two elements: that emissions may temporarily rise to enable the development of low-carbon alternatives to existing production, and that investment needs to be made in highly emissive sectors to decarbonize their production. Regarding low carbon alternative financing, the ESRS are a reporting standard and do not place a "hard" obligation on FIs to reduce GHG emissions. If emissions rise in the short term, it should be contextualized. Regarding the capitalization of highly emissive sectors, this should be dependent on the delivery of tangible results in line with global decarbonization needs. Otherwise, it makes sense for FIs to divest companies not in line with their climate goals. Finally, intensity targets alone do not reflect potential rise of GHG emissions due to growth in financing and investment volumes. Disclosing emissions in terms of absolute targets is the only way to support real economy decarbonization. Absolute targets are clear, transparent, and measurable. They make it easier to track progress and hold institutions accountable for their climate commitment. This is also true from the perspective of market supervisors/regulators. Finally, granting an exemption would also undermine fairness in a sector-agnostic standard. Moreover, absolute financed emissions are already recognised in existing standards and regulations: the SBTi, UNEP FI/NZBA recommendations, and EU SFDR all require or encourage absolute emissions disclosure.			
Survey	WWF EPO	NGO	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	WWF EPO	NGO	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The proposed methodology is discriminatory and creates unnecessary complexity for companies. It requires different wage standards for employees inside and outside the EU, allowing companies to compare wages to generally lower legal minimum wages outside the EU. This undermines the goal of ensuring all workers earn an adequate wage and creates inconsistencies in reporting. It also places an unrealistic burden on companies to assess whether legal wages or benchmarks in different countries align with ILO principles—something most companies are not equipped to do—leading to inconsistent interpretations and reporting across jurisdictions. To address this, the methodology should be revised to apply a consistent standard: actual wages should be compared to a living wage benchmark for all employees, regardless of location. Legal minimum wages should only be used when they are demonstrably aligned with ILO principles for estimating living wages. Companies should not be required to make these determinations themselves; instead, they should be allowed to rely on public evidence from credible authorities or organizations that confirm wages alignment with ILO's principles for estimating living wages. These changes would promote fairness, comparability, and reduce the reporting burden.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	WWF EPO	NGO	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	WWF EPO	NGO	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	We agree that AR 26 should be reviewed to ensure alignment with leading global frameworks on biodiversity and ecosystem-related target setting. The current wording does not provide sufficient clarity or specificity regarding how companies should define, measure, and disclose biodiversity-related targets. Strengthening the guidance in AR 26 would support greater consistency and comparability in disclosures, while anchoring the standard in established, science-based methodologies. The following frameworks should be considered : -The Science Based Targets Network (SBTN), particularly Step 3 – 'Measure, Set & Disclose Targets' of the SBTN corporate guidance; -The Taskforce on Nature-related Financial Disclosures (TNFD), including components P1 and P2 of the LEAP approach, Annex 5 on target-setting; -Resources from the World Economic Forum on Nature-Positive Transitions, which provide sector-specific pathways and metrics to support nature-positive business strategies -WWF report on Nature Transition Plans			
Survey	WWF EPO	NGO	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	As developed in previous responses, we are highly concerned about the disproportional and concurrent effects of the different reliefs added, notably the relief due to (lack of) data quality for entity specific disclosures; the overall supply chain relief and the relief on undue costs and efforts.			
Survey	WWF EPO	NGO	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We disagree with the downgrading of the transparency on site/assets/activities screening. Ideally, this provision should be included in ESRS 1 and complemented by a specific disclosure on ESRS E, integrating the following elements: -Locations in which the company operates its sites (ecosystem, basin, etc.); -Number of sites in these locations; -Nature of activities at these locations; -Impacts generated by these activities on the identified locations; -Other specific datapoints for E4 - notably unconditional BSA disclosure			
Survey	WWF EPO	NGO	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	1- The 1.5°C alignment shall remain the central and non-negotiable reference for corporate climate targets. Allowing companies to refer alternatively to the EU Climate Law risks undermining scientific robustness and integrity, as it could open the door to selective interpretations and policy developments. 2- The Application Requirements for removals should not be restricted to CRCF credits. Given the current weaknesses in CRCF methodologies, such a limitation risks lowering quality and integrity. The requirements should instead be certification-agnostic but referencing, allowing for the application of more robust and higher-quality (voluntary) standards. 3- Corporations should continue to set five-year targets beyond 2030 to ensure transparency and accountability in their transition pathways, as well as consistent performance measurement and alignment with recognized voluntary standards, such as the SBTi.			
Survey	WWF EPO	NGO	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	We are highly concerned over the deletion of the reference to value chain disclosures in AR4 for Par.16. The weakening of site level analysis requirement, as referred to in our comment to ESRS 2, also results in less meaningful disclosures under this standard.			
Survey	WWF EPO	NGO	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We are particularly concerned over the deletion of the Application requirement specific to water risk areas/high water stress areas. Further, there is very little reference to marine resources, only specified in the objectives and "interactions with other ESRS".			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	WWF EPO	NGO	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	We are very concerned over the absence of specific metrics on this issue.It would be helpful to at leas include more guidance on how to set metrics and how to utilise the other reporting frameworks and standards such as the TNFD. The standard should also clearly require the disclosure of sites in/near biodiversity sensitive areas, rather than limiting it to those determined to be connected to material impacts only. Further, reference to Value Chain reporting was removed from the metrics section, which again fully compromises the meaningfulness and completeness of information.			
Survey	WWF EPO	NGO	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	WWF EPO	NGO	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	WWF EPO	NGO	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	WWF EPO	NGO	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	WWF EPO	NGO	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	WWF EPO	NGO	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	WWF EPO	NGO	Belgium	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	WWF EPO	NGO	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		WWF welcomes the effort to amend the definition of area of high-water stress in Annex II – Acronyms and glossary Terms. The updated ESRS definition aligns with the guidance from GRI 303 Water and Effluents Standards on tools and indicators to use for assessing water stress (page 12 on Guidance for Disclosure 303-3-b). However, we have concerns about the limitations of this outdated GRI guidance , namely, the narrow definition of water stress focused only on qater quantity indicators. As such, we recomend EFRAG to adopt an inclusive, well-recognised definition of water stress and acknowledge the limitations of the two water quantity specific indicators · Adopt the definitions from CEO Water Mandate or the European Environment Agency, recognising water stress as a multidimensional challenge (availability, quality, and accessibility). If ESRS wants to limit the reporting to only include water quantity specific indicators, WWF recommends changing the terminology from "water stress" to "water scarcity", in line with international definitions. Furthermore, WWF would recommend to emphasize that other relevant indicators on water quantity may also be used in addition to the two specific indicators: Baseline Water Stress and Water Depletion.			
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The Group Caisse des Dépôts support the effort to clarify and simplify requirements for DMA. However, we fear that: (i)in practice the effectiveness of the simplification will strongly depend on the level of documentation required by third parties auditors (ii)The flexibility provided to companies may in some cases result in the omission of key elements for users of the report and notably investors; (iii)Guidance provided remains too high level for less advanced companies, leading to the production of incomplete assessments where key impacts or financial risks are missing; (iv)The continuous improvement approach is too limited, notably as undertakings are not incentivized to take into account remarks from sustainability statement users. To mitigate these risks, further clarifications would be welcome: -On climate change, we strongly suggest maintaining the current ESRS requirement that any company deeming climate change not to be material should provide a detailed explanation of how the materiality assessment led to this conclusion– and to extend this requirement to own workforce, and business conduct. Requirements included in previous ESRS 1 §32 should be reinstated. -Provide guidance or materiality matrixes tailored to sectoral specificities. EFRAG could use the work has done in the past on sectoral standards for sectoral guidance and add it to ESRS Appendix -Provide a list of external resources for company's assessment: United Nations Environment Programme Finance Initiative impact tool, guidance on responsible business conduct by OECD, guidance from the German Federal Office for Economic Affairs on the identification, weighting and prioritization of risks, Sustainability Accounting Standards Board (IFRS) (…)			
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	The DMA is the cornerstone of CSRD reporting. The foreseen shift from gross to net analysis for the impact materiality has direct structural consequences on the topics reported by companies. This change 1/ would require a complete overhaul of the analysis and rating process, as well as a complete review of the processes for maintaining and updating the DMA and 2/could significantly change the results and the scope of topics reported by companies. The revised section seems to require that the severity of the negative impacts should be evaluated considering the outcomes of any mitigation or prevention measures implemented before the impact occurred, but without accounting the remediation actions taken during the reporting period to address actual negative impacts. As currently drafted, this net analysis of impacts under certain conditions is complex and will inevitably generate interpretations (Appendix C seems overly complex) this seems contrary to the initial objective of the readability of the standards and the comparability of the sustainability statements. In addition, another identified risk is that issues that are material to a company but for which it has made every effort to prevent and remediate their negative impacts will disappear from the DMA even though they are of major importance for the activity. This would reduce transparency on the mitigation policy, action and measure and would limit sectoral comparability. For these reasons, Caisse des Dépôts Group if of the view that material impacts should always be reported on a gross basis for the DMA, net can be useful to show effectiveness of the policies and action plan.			
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Overall the amended ESRS provides a slight level of flexibility on the presentation of the report. The simplification of the MDR will contribute to improving the conciseness of the report without reducing the ambition of the reporting. However, the reduction of the number of datapoints has sometimes been achieved artificially by regrouping different former datapoints (Example ESRS 2 GOV1). This complexifies readability and usability since a datapoint in the amended ESRS may now comprise of different metrics /information, reducing machine readability. Overall, different metrics /information should be in different datapoints. In addition, sometimes key standardized template for the presentation of metrics (in particular GHG emissions) have been made optional. This proposition weakens the comparability and usability of the reporting for third parties. Maintaining the standardized format for the publication of metrics would help third parties without added further burden for the preparers.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The revised standard presents less redundancy between ESRS 2 and the topical standards. Centralizing information formerly dispatched in ESRS S1, S2, S3 and S4 within the ESRS 2 might be slightly helpful in avoiding unnecessary duplication of information but might also lead to information published to be less specific, reducing the added value of the information to stakeholders In addition, centralized datapoints positioned in ESRS 2 remain unclear in their application by topics. For some of these datapoints, it appears that a single response can be made within ESRS 2 for all topics. For other datapoints (for example the GDR), the response should be provided for each material topic concerned. This distinction should be further clarified. In this regard, EFRAG could provide further guidance on where to present information published in accordance with ESRS 2 in the structure impose by ESRS 1 § 105 (general information, environmental information, social information and governance information). The Caisse des Dépôts Group make the following suggestions: -GOV 1, 2, 3 and 4 : Companies may include the disclosures in the section "general information" or in section "governance" - SMB 1 and 2 : General information -SBM-3 : If the high-level approach is common to all topics, undertakings may present it in section "general information". If there is specificities depending on the nature of the topic (E, S and G), companies may provide the information in introductory parts of topical sections. Anticipated financial effects may be provided at topical or sub-topical level depending on the disaggregation approach of the company. -IRO 1 : General information -§35 relating to international standards : undertaking may present it in an introductory part of section "Social Information".			
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Streamlining the drafting of the ESRS and more clearly distinguishing voluntary and mandatory datapoint by removing the former in a separated document strongly improves the clarity of the standards. However, the presence of AR in tables separated for the mandatory datapoints under the disclosure requirement they complement is confusing. It would have been clearer to integrate the AR directly within the datapoint (when the element relates to mandatory requirements) or to integrates is the NMIG when the element relates to a presentation option.			
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	This new non-binding document includes guidelines and illustrative examples which clarifies that they do not represent additional requirements but are meant to reduce implementation questions. This document is both useful and the clearer separation with the mandatory datapoint represents a progress.			
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The reduction of the number of datapoints has sometimes been achieved artificially by regrouping different former datapoints. This complexifies readability and usability since a datapoint in the amended ESRS may now comprise different metrics /information, reducing machine readability. Overall, different metrics /information should be in different datapoints. Certain language modifications could also negatively impact the amount of work required to meet specific data point requirements. In some cases, it may be harmful to the initial objectives and usability of the information by third parties such as investors. In particular: -For climate disclosures, do not allow to use the relief except for scope 3 GHG emissions. -As for relief for lack of data quality, require undertakings to disclose whether and how the undertaking will try to collect the data in future period A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 2, Paragraph 5(k)) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. To enhance clarity, we would recommend to -Regarding the relief on "undue cost or effort", move the clarifications provided in §47 to chapter 7.4 or make a reference to this paragraph -In ESRS 2 DGR-M (General Disclosure for Metrics), make reference to ESRS 1 chapter 7.4 (rules for using reliefs relating to "undue cost or effort" and "lack of data quality") To enhance transparency and ease the understanding from users, undertakings using the reliefs relating to "undue cost or effort" or "joint operations" (ESRS 1 §92) should disclose it in the information disclosed in accordance with ESRS 2 § 5 (BP-1).			
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	The notion of « reasonable and supportable information available without undue cost or effort » is a progress. However, there should be clear documentation by the preparer on the level of quality and the perimeter covered (qualitative), with the clear aim to cover the whole perimeter to achieve the most faithful representation.			
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Quantitative anticipated financial effects are one of the core pieces of information for investors and are essential for financial materiality. In the developments of the ESRS, it has been a priority to provide investors with this data, which is a fundamental requirement for managing the risks in their portfolios. While we acknowledge that there can be challenges connected to producing this information, the effort is worth the benefit for a company, its investors and the wider economy. Understanding these often existential risks is necessary for resilience both at the level of the enterprise, and the economy as a whole. Option 1 would be a workable compromise and the only solution (as opposed to option 2) to maintain the credibility of the ESRS – clearly establishing the expectation to provide quantitative data to users, while granting adequate reliefs for reporting companies when they encounter legitimate challenges to do so.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	The aim should be that companies reporting under the ESRS could automatically meet the requirements for the ISSB's standards. The reverse should not be a target, for it would mean undue simplification on key principles of the European standard (double materiality, 1.5°C alignment, …).			
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	22.ESRS2	Comments on deleted datapoints in ESRS 2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Overall, the simplification is targeting redundant datapoints or datapoints that do not impact the overall ambition. However, some deleted content should be maintained, in particular: -ESRS 2: The normalized revenue breakdown by sectors -ESRS 2: the share of climate criteria in the incentive's schemes (in a simplified manner embedded in the existing ESG criteria to reduce the actual complexity but provide a key information for investors on climate governance). -ESRS 2: Number of executive members -ESRS E1: The suppression of the template for Gross GHG emissions and the standardized presentation of the Ghg reduction target reduces comparability for stakeholders using the sustainability statements and should not be maintained. The datapoints that should be maintained correspond to the need of interoperability with international frameworks and investors' needs. Moreover, the Caisse des Dépôts Group believes that EFRAG's proposal corresponds to the maximum data-reduction achievable, below which the objective of the original CSRD would be endangered. In particular, the transparency of the compatibility of the transition plan with 1.5°C ambition should be maintained.			
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	22.E1.	Comments on deleted datapoints in ESRS E1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Overall, the simplification is targeting redundant datapoints or datapoints that do not impact the overall ambition. However, some deleted content should be maintained, in particular: -ESRS 2: The normalized revenue breakdown by sectors -ESRS 2: the share of climate criteria in the incentive's schemes (in a simplified manner embedded in the existing ESG criteria to reduce the actual complexity but provide a key information for investors on climate governance). -ESRS 2: Number of executive members -ESRS E1: The suppression of the template for Gross GHG emissions and the standardized presentation of the Ghg reduction target reduces comparability for stakeholders using the sustainability statements and should not be maintained. The datapoints that should be maintained correspond to the need of interoperability with international frameworks and investors' needs. Moreover, the Caisse des Dépôts Group believes that EFRAG's proposal corresponds to the maximum data-reduction achievable, below which the objective of the original CSRD would be endangered. In particular, the transparency of the compatibility of the transition plan with 1.5°C ambition should be maintained.			
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Data relating to water withdrawal and discharge is of primary importance for understanding the efficiency of water resource use within a company and for benchmarking against peers. Water resources are getting increasingly critic in the context of global warming and higher frequence of droughts Publication of biodiversity transition plans should become become a standard element in corporate disclosures to demonstrate the strategy for impact reduction and mitigation of biodiversity-related risks which macro analysis prove to be systemic. Such plans should be based on standardized processes, notably with a dependency and impact assessment via thematic tools, helping corporates in recognizing the main risks they are facing. In that context, a strategy with clear objectives to reduce those risks should be implemented, with measurable KPIs to monitor progress over years. Current EFRAG proposal should in our view allow to reach this goal. Refer to question 30 for suggestions.			
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	3 of them correspond to necessaries datapoints that replace in a more simplified manner datapoints that have been deleted. As regards E2-4, we acknowledge that undertakings may have difficulties in the short term to measure the amount of secondary microplastics produced. However, this is a major source of pollution that needs to be properly addressed. Incentivizing companies to measure their production is a necessary first step for treating this serious issue. As regards E5-4 Percentage of total weight that are critical and strategic raw material, we acknowledge the importance of the topic and its usefulness to help support decision making for investors.			
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	Fair representation is a key principles for usability by third parties, but it may lead to interpretation issues in practice.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	As a key starting point, financial institutions should be required to disclose both metrics on their portfolio (intensity and absolute emissions). Regarding the disclosure of targets, intensity metrics (aka ratio per K€ invested) allow to monitor decarbonisation progress independently of portfolio size changes. We understand that the ability to provide an associated indicative absolute value to intensity-based GHG emissions reduction targets is highly variable depending on the nature of the financial player (bank or investment), its balance sheet and the chosen intensity methodology, the prospective growth of the portfolio and the type of assets financed. However, information on absolute values is key and should be reported to third parties for calculating financed emissions and portfolio-level climate risk assessment. Given the limitations previously mentioned we could support the exemption in time with a review clause or requiring a "best effort" translation of intensity targets in absolute values from day 1 but in form of ranges to account for the uncertain nature of the information for some players and some methodologies.			
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I would like to skip this question and provide my feedback in Part 3				
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The definition of an adequate wage should be aligned with the ILO methodology for estimating a decent wage—namely, a weekly remuneration sufficient to meet the needs of the worker and their family, including food, water, housing, and education. The definition proposed by EFRAG risks creating confusion between the concepts of minimum wage and adequate wage, which are fundamentally distinct. Minimum wages generally do not represent the threshold for a decent wage. Furthermore, the ESRS should require disclosure of gaps between actual pay, decent wage, and minimum wage—at least at the country level of operation.			
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	We support the overall efforts to simplify the standards while maintaining datapoints investors need to calculate SFDR Principal Adverse Impact (PAI) indicators. Ensuring this alignment between revised ESRS and future SFDR should be key.			
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	In order to deepen comparability and meaningfulness of information, we would suggest the following adjustments: -To ensure reliability and comparability, it seems to us essential to refer to Kunming Montreal GBF and specially the alignment to the Goal A. Moreover, corporates should align with recognized frameworks for the assessment and analysis part (like the TNFD), and science-based targets compatible with Global Biodiversity Framework (like the SBTN) whereas we think that it might be not relevant to mention IBAT which is not a free too (so not accessible to every actor). We eventually recommend defining metrics for assessing and managing negatives and positive impacts on biodiversity and ecosystems not forgetting freshwater ecosystems. -It is also important to keep on asking undertaking to report on policy, action, targets and metrics referred to its own operation in or near biodiversity sensitive areas (but also on its value chain's operation in or near biodiversity sensitive areas) as well as to report on its sites or assets which are within these areas. The DR E4-5 must remain. Location-specific considerations are indeed particularly important in relation to biodiversity and ecosystem as well as to other issues (such as climate, pollution and resources but also affected communities). Once again, it's important to keep a DR on the value chain's impacts on biodiversity and ecosystems. -As for climate transition plan: orequire companies to disclose whether the target set are science-based (e.g. SBTn) olf material, plans could include details on restauration or renaturation strategies on protected areas, disclosing methodologies of reference and progress updates oif any biodiversity offsets in action plans, to not make it a major contributor of corporates transition plan.			
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	Provided that preparers still have the option to publish this ratio, we agree with the datapoint deletion. Nevertheless, we believe it would still be beneficial to encourage preparers to publish both the unadjusted and adjusted gender pay gaps. This is particularly relevant as French national law already requires the publication/sharing of the adjusted pay gap with worker representatives, although the publication of the unadjusted gender pay gap is not mandatory.			
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	We agree with the deletion of the DR regarding the average time to pay an invoice. We believe preparers should be encouraged to calculate the ratio of payments aligned with these standard terms (33b) based on the number of invoices rather than the financial amount, as previously suggested in AR 17. Referring to the financial amount of invoices rather than the number of invoices could lead to the marginalization of small suppliers, who are much more likely to suffer from any delayed payment practices.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS E2: •The suppression of the disclosure on "the policies in place to manage material IROs related to pollution" (the proposition to refer to the NMIG) is not appropriate considering a) the impacts of the widespread pollution and its consequences on human health as well as on biodiversity and ecosystems; b) reputational and transition risks; c) opportunities on clean up or decontamination activities. •To allow users to provide comments and therefore help undertakings to improve their future sustainability statements, EFRAG could add a provision in ESRS 2 SBM-2 (interest and views of stakeholders) requiring undertakings to disclose "whether and how the administrative, management and supervisory bodies are informed about remarks from users relating to pervious sustainability statements"			
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The significant mandatory content deletions for actions and targets are regrettable and require clarifying the scope of the NMI. The specific requirements of the E3 should be covered by the ESRS 2, particularly regarding the resilience of the SBM, information on affected communities, the importance of localizing issues (LEAP/TNFD), and reference to ecological thresholds, but will they be well considered as such by the actors subject to the regulation? We need to be sure that this issue will be properly reported and managed according to the spirit and the letter of the CSRD. We also recommend moving some ARs to NMIG rather than outright deleting them, especially since some definitions remain important (AR24-26), and references to methodological frameworks are also relevant (SBTN AR22, AWS/AR19).			
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Refer to question 30			
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We suggest keeping on considering how the undertaking affects resource use, including resource efficiency besides circular economy and waste management.			
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Group Caisse des Dépôts	Asset manager/Investor	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The reduction of the scope of the CSRD and the proposed "value chain cap" will substantially reduce the availability and quality of ESG data that are necessary for both larger companies and investors in their own policies. It is paramount to ensure that: 1/ the cap described in the revised standard is restricted to the sole use of data for CSRD reporting and does not hinder the needs of information for decision making for investors and purchasers. 2/ for CSRD purposes, proxies can be used when needed. Comparability with preceding reporting periods: undertakings should be required to make available, on a dedicated section of their website, all the sustainability statements their prepared in application of the CSRD. Assessing climate risk: -Further standardize the use of climate scenarios for risks analysis. ESRS could defined "baseline" scenarios that reporting companies should consider, with the possibility to use alternative scenarios if the companies has objective elements proving that the alternative scenario is more accurate. This is notably to avoid references to undisclosed /black box internal scenarios. oFor transition risks, IPCC SSP 1, also known as "sustainability" scenario. oFor physical risks : IPCC SSP5 also known as « fossil-fueled development ». For physical risks, ESRS could require companies to report against a second scenario base of the current trend to limit the risk that reporting companies do not feel concerned as the scenario used is "extreme". Therefore, IPCC SSP2 "middle of the road" could be used Climate transition plan: Regarding the Information on fossil-fuel Capex, we fear that the current flexibility provided to companies may lead to incomplete information. Indeed, the current proposal states that disclosure is required only if Capex are "significant". Interpretation of "significant" could lead to diverging approaches. We suggest requiring reporting any fossil-fuel related Capex.			
Survey	COLEAD	NGO	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Most non-EU operators are not, and likely will not be, directly impacted by the CSRD obligations. However, they might be indirectly affected by the need to provide specific information about their operations to allow larger companies meet their reporting requirements. Moreover, given that the costs of compliance and certification (evidencing) are passed up the value chain, these additional reporting requirements will add to the increased costs already faced by SMEs in LMICs. It is essential that the challenges faced by operators in LMICs, particularly producers and exporters of horticultural products from Africa, the Caribbean, and Pacific (ACP) countries, are adequately considered. In particular: (i)SMEs have expressed concern over unrealistic and disproportionate information requests from business partners (ii)(More time is needed for these operators to prepare for compliance with CSRD-related (trickle-down) requirements. (iii)Most critically, the revised ESRS must take into consideration the operational realities of the agri-food sector. They must be aligned and compatible with the social and environmental requirements that suppliers to EU-based retailers and the food industry are already subject to through company-level or industry-wide private standards and third-party certification. This is essential to avoid adding further compliance and cost burdens, especially as these disproportionately affect smaller and more vulnerable non-EU suppliers.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	COLEAD	NGO	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	Suppliers to reporting companies are increasingly required to provide detailed information to their business partners. However, many SMEs - particularly those based outside the EU - have limited capacity to absorb these information sharing demands, especially in terms of data collection and reporting. This should not lead to unfairly disadvantaging operators from these countries. It is essential that suppliers in LMICs are able to enter and sustain trade relationships with large companies that fall under the scope of the CSRD. Many of these suppliers are SMEs operating in the agri-food sector that provide many (direct and indirect) employment opportunities to vulnerable communities, often in rural areas. The revised ESRS should take these challenges into account. We welcome the introduction of the 'undue cost or effort' relief. However, we require that this relief be made available over multiple reporting periods, recognising that the structural barriers to data provision faced by SMEs in LMICs are likely to persist in the medium and long term.			
Survey	COLEAD	NGO	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	Living wages are essential to ensure that workers and their families can afford a decent standard of living. However, the average costs of sustainable production is not factored into the concept of living wage, exposing producers - particularly in agri-food supply chains - to systematic economic losses. To ensure that producers operate in an economic and financially sustainable way, it is essential that: (i) Agricultural products must not be purchased below the cost of sustainable production, and (ii) Products must not be sold below their purchase price. The phrasing of the revised ESRS should go beyond "non-EU adequate wages" to include provisions that guarantee fair minimum prices are paid for goods produced outside the EU, alongside the payment of living wages to non-EU workers. This broader approach is essential to achieving fair and sustainable global supply chains.			
Survey	COLEAD	NGO	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	With regard to ESRS E1(GHG DR E1-9) and the Mandatory Application Requirements (ARs) 28 for para. 67 on the calculation by the undertaking of its greenhouse gas ('GHG') Scope 3 emissions, we highlight the importance of using an appropriate method to estimate the GHG emissions in the fresh produce sector in low- and middle-income countries (LMICs). There is a need to consider climate justice and ethics in relation to the most vulnerable countries. This is especially relevant for airfreighted fresh horticultural products from developing countries. GHG emissions calculations and estimations must not result in unintended negative consequences for fresh produce suppliers in LMICs—many of whom operate within vulnerable rural communities. Thus, using standard methodologies developed primarily for companies in OECD countries, or relying on proxies that disadvantage LMIC suppliers, should be avoided. The EU has recommended the Product Environmental Footprint (PEF) as a harmonised methodology for assessing GHG emissions. However, few African countries have been involved in its development. The Fresh Produce Product Environmental Footprint Category Rules (PEFCR) has been developed in parallel, offering tailored guidance for Life Cycle Assessments (LCA) of fruit and vegetables, greater harmonisation and comparability within the sector. The PEFCR is used for scope emissions calculations (as it supports companies in making informed decisions that improve sustainability). Yet, the current PEFCR rely heavily on data from Europe and the Americas, and LCA databases primarily reflect OECD processes. To ensure fairer, more accurate accounting for global supply chains, further adaptation is needed. A tiered approach is essential to avoid disadvantaging companies and populations in LMICs with limited data. As the ESRS revision introduces the concept of the 'undue cost or effort' relief, we require that this relief be made also available for GHG emission data when requested from operators especially SMEs, in LMICs.			
Survey	FPS Health, Food Chain Safety & Environment (SPF-SPSCAE-DGEM)	Other - please specify (required)	Belgium	35.E1-6.	Do you agree with the amendments of this chapter?	I agree	DG environment of the Federal Public Services Health, Food Chain Safety & Environment is not in favor of the exemption for banks on absolute targets settings for the reasons outlined below: Absolute emissions targets are a critical component of credible climate strategies, including within the banking sector. Their relevance is underscored by several key factors: •They demand real emissions reductions, regardless of business growth or changes in operational scale. •They offer clarity and measurability, enabling straightforward tracking of progress: a decrease in emissions is immediately visible. •They align with climate science, particularly with the objectives of the Paris Agreement, such as limiting global warming to 1.5°C. In contrast, relying solely on emissions intensity (e.g., emissions per euro invested or per unit of revenue) can be misleading. Intensity may improve while total emissions continue to rise, especially in cases of portfolio or business growth. Therefore, both absolute and intensity-based metrics are necessary to fully understand the implications of a bank's climate strategy. However, absolute targets are especially relevant when a bank adopts a divestment approach, as they directly reflect the reduction in exposure to high-emission sectors	E1	Disclosure Requirement E1-6 - Targets related to climate change	
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Overall, we are supportive of the direction EFRAG has taken with the amendments to the double materiality assessment (DMA) process. The simplification of allowing entities to apply a so-called 'top-down' approach is one that we expect to see widely applied. We welcome the added emphasis on material information. It will allow for a clearer understanding of the requirements and for a more proportionate application by reporting entities. We believe that some additional clarification is required for the application of the top-down approach. We think that it should be emphasised in the Standard that although the DMA process can start by identifying higher level matters or topics, by the end of the assessment, entities are still required to identify material impacts, risks and opportunities (IROs). It is important to highlight that we do not expect the outcome of which IROs identified as being material to change under either approach. Additionally, EFRAG may consider using different terminology to describe the top-down approach to the DMA, as the term top-down has been previously used in the context of group-reporting. We believe this would avoid confusion over its meaning. In our view, the additional guidance on material information will aid reporting entities in being able to comply with the fair presentation objective that has now been made explicit in the standard. However, we believe it would be useful to provide some additional guidance on exactly how entities should consider and apply the concept of 'decision-useful information for users' in practice. In our view, decision usefulness is a vital precondition for information being considered material, so we recommend that this is explicitly included in the definition of material information. In addition, we would like to see a clearer definition of 'users of general-purpose sustainability statements' in the glossary.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The additional clarification on how to consider remediation, mitigation and prevention actions while performing the DMA is a positive step, and we agree the amendments provide a clearer picture of what is required from reporting entities. However, we believe while Appendix C contains useful guidance, the prescriptive approach taken may not be aligned with the principles of ESRS 1 requiring fair presentation and is more aligned to a compliance approach. Appendix C would benefit from being more concise and principles based. We also recommend that those same principles are applied when identifying risks and opportunities, as well as impacts. We have concerns about the complexity of applying the new requirements. The concept of "significant ongoing mitigation/prevention actions" is clear in theory but could be applied very differently in practice. Without further clarification or guidance on how this concept should be applied there is a risk reports will vary widely when making disclosures about very similar situations, and this will result in a reduction in comparability. We have some concerns with the statement "the undertaking's positive impacts shall be assessed in their own right and shall not be netted off against its negative impacts", and the wording in ESRS 1.36 regarding mitigation and remediation of negative impacts of another party. This wording could imply that remediating negative impacts should always be considered as having a positive impact. This interpretation goes against previous guidance, so should be clarified or reworded if that was not the intention. We also recommend that EFRAG clarifies in the Glossary the definition of "another party", "mitigating action, and "prevention action" as these terms will be crucial in identifying positive impacts. There is support in our network for including practical examples to illustrate some of the intended applications of the new guidance to help drive consistency in reporting.			
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We agree that these amendments are a significant improvement on the original requirements and will give greater flexibility for reporters to present their sustainability statements in a more readable way. In our view, the definitions are clearer, the direct linkage of Application Requirements (ARs) to the relevant Disclosure Requirements (DRs) is a very useful change, and the option to include an executive summary will be valuable in providing an overview of the most important outcomes of the sustainability statement. We do however have some concerns that removing the requirement to cross-reference to financial statements may harm the connectivity of the sustainability statements. This is a trade-off, and we acknowledge that making cross-referencing optional may improve the readability of sustainability statements. However, given that users of general-purpose financial reporting are used to cross-references when reading annual financial reports, we recommend leaving in place the former "shall" requirement to cross-refer to financial statements. We are not opposed to including an executive summary at the start of sustainability reports. Additional guidance on how the fair presentation requirement should be applied when including an executive summary would be very useful, as summarising information carries additional risk that the information required to give a fair presentation could be obscured or overlooked.			
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	In general, we agree that the overlap between ESRS 2 'General Disclosures' and the Topical Standards has been reduced and that this will improve clarity and reduce duplication in reporting, making reports more user-friendly. However, more clarity is needed on the level at which policies, actions and targets (PATs) need to be reported and managed. In our view, the requirement for entities to disclose whether they have a plan to implement PATs for material topics should be retained, as we believe this could constitute material information for the reporting entity if it relates to an identified IRO. Finally, some additional guidance would be useful to ensure that the mandatory disclosure requirements (MDRs) now in ESRS 2 do not unintentionally create additional complexity in cases where sustainability measures cut across multiple topics.			
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We agree with the amendments to improve understandability and clarity of the requirements. The revised drafting has enhanced readability and accessibility by simplifying language, ensuring consistent terminology, and consolidating all mandatory "shall" datapoints in the main body of the Standards rather than in the ARs, and that all ARs are appropriately included as "shall" requirements. EFRAG should also ensure that any remaining "may" disclosures are only illustrative in nature, and do not introduce any additional requirements above what is embedded in the relevant DR itself. We believe that the requirements for scenario analysis in ESRS E1-2 needs to be further clarified. Although the Basis for Conclusions states that it should be clear that scenario analysis is not required for all undertakings, we believe that the wording of paragraph 19 is less clear on this issue and could be interpreted as a requirement for all entities to perform scenario analysis. We recommend that this be clarified in the main body of the standard, and more guidance provided about when undertakings are and are not required to perform scenario analysis.			
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Generally, we believe the NMIG is useful to provide assistance in implementing the requirements of ESRS, particularly when requirements are complex or flexible. It is also very useful to have all of the guidance consolidated in one place for easy access by preparers. In our view the NMIG should remain illustrative and therefore not be included in the legislative materials or delegated acts. Given this, we believe that the NMIG should be released after the revised ESRS, so it is clear that it is not part of the main Standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We are supportive of the introduction of new reliefs, especially aligning with the International Sustainability Standards Board's (ISSB) concept of using reasonable information that is available without undue cost or effort. This is also a concept familiar from financial reporting, and our expectation is that it is already well understood. However, we believe the ESRS should also contain a specific statement to say this relief is expected to be strictly applied, and should not be considered as a blanket option to avoid reporting requirements without strong evidence of undue cost or effort. We also recommend the 'undue cost or effort' relief is extended throughout other requirements and not limited to only information about an entity's value chain. However, we do not agree with the relief being extended to acquisitions and disposals. By allowing preparers to not include information about acquisitions or disposals during the period, in our view it will increase divergence with both ISSB sustainability reporting and financial reporting. We recommend aligning the relief on this matter with the ISSB approach to further enhance interoperability. We believe the Standards should establish a 'measurement hierarchy' so it is clear when it is appropriate to use estimates as opposed to primary data calculations. For example, our concern for value chain disclosures, is that there could be a misunderstanding that estimates can be used.			
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We agree that for cases where an entity does not have operational control over joint operations the relief seems reasonable, however it does still carry the risk of overlooking significant impacts. We note that the partial scope relief is not explicitly available for E1-6 GHG emissions requirements, however the broad application of the undue cost and effort relief to all metrics can cover this. We do have some concerns in our network that by using the IFRS SDS wording and concept of undue cost or effort, but extending it further to all metrics, could result in dropping below the ISSB global baseline. EFRAG should consider whether closer alignment to the ISSB approach is appropriate. In addition, the absence of a time limit for the use of the relief may reduce the incentive to improve data quality over time. While transparency about future improvement actions is required, a lack of clear expectations or deadlines could lead to prolonged use of partial disclosures without substantial progress. We believe it may be useful to include a time horizon for this relief.			
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We support option 1, with the aim to strengthen interoperability with ISSB Standards. We recognise the importance of anticipated financial effects for users of the sustainability reports, however quantification remains challenging in the first years of reporting. Therefore, a phased-in relief is appropriate and should avoid unreliable figures being reported. We consider that option 2 would drop below the ISSB global baseline requirements and therefore we would not support this option.			
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	We are generally supportive of the relief provided by the amendments and acknowledge that quantifying anticipated financial effects is very challenging, especially at an early stage of reporting maturity. However, in our view entities should be required to provide transparent qualitative disclosures where the phase-in relief is applied, clearly describing assumptions made and demonstrating progress towards quantification in order to avoid prolonged reliance on qualitative-only reporting. We note that this will also be closely related to the interpretation described in question 19 above, and as such we would emphasise our support for view 1, and concern that option 2 would drop below the ISSB global baseline.			
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We are supportive of efforts by EFRAG to enhance interoperability between ESRS and ISSB Standards. Alignment of language to the greatest extent possible is very helpful and has improved the understandability and clarity of the ESRS. However, we have some areas where we are concerned that there is a lack of alignment, or that amendments may drop below the ISSB global baseline. As mentioned previously, there is inconsistency regarding the treatment of acquisition and disposal effects, and when reporting on anticipated financial effects. These are two areas where we could see easy alignment being achieved by adopting the ISSB requirements. The requirements in ESRS E1 for the treatment of joint operations when assessing GHG reporting boundaries do not cover joint ventures that are accounted for using the equity method. This will create another difference compared to both ISSB and the GHG Protocol. We recommend aligning the GHG emissions reporting boundaries within the GHG Protocol which will create further alignment with ISSB Standards. In our view, the approach of setting qualitative and quantitative thresholds for identifying risks and opportunities is fundamentally not aligned with the ISSB approach of identifying material information. This will lead to another area where work will have to be replicated using a different assessment when dual reporting. We also see the expanded proportionality relief as an area that may cause divergence. The language has been taken from ISSB, however the scope of the relief has been expanded to cover all metrics. This may allow for much more information to be excluded in ESRS reports compared to ISSB, and could result in a shortfall of the ISSB global baseline.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	On an overall level, we see the reduction in the number of data points as helpful and an initiative that clarifies the reporting structure and focuses on what is most essential. We generally do not see that the reduction in the number of mandatory data points results in a lower quality of the "content" of the reporting, ie no significant area has been removed but rather has been simply reformulated and clarified. Please note that there may be minor exceptions at the data point level where we believe that something essential has been removed from a standard. Overall, however, this means that we do not see any contradiction between the reduction in mandatory data points and the ability to meet the objectives of the EU Green Deal.			
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We are supportive of EFRAG making an explicit statement in the ESRS that there is a requirement for fair presentation. Alongside the emphasis on the materiality of information, this should allow entities to prepare more useful sustainability reports that more clearly communicate the important sustainability matters that are impacting their business. However, we do still see some tension in the way that the Standards have been drafted. Although the overarching requirement is to provide fair presentation, a lot of the disclosure requirements (DRs) are still written in a very prescriptive way which is more in line with a compliance framework. We recommend including more detailed guidance about what exactly fair presentation entails, and how entities are supposed to consider it when reporting on DRs that still seem to draw 'bright lines' in the way they are written. A detailed definition of fair presentation should focus on providing a balanced, unbiased and complete view of an entity's material IROs, and a requirement to consider positive and negative impacts. We frequently see entities focusing on positive impacts in their reporting, while underestimating risks and negative impacts, so a clear reference to ensure their reporting is balanced, would be beneficial in encouraging higher quality reporting. We also believe that EFRAG should follow the ISSB approach to fair presentation, which means that it should be explicitly stated that for fair presentation, additional information beyond the requirements of the standards may need to be disclosed if necessary. Assuming this is the intent for ESRS then further consideration of material such as the NMIG may be needed, to ensure this does not effectively become mandatory.			
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We disagree that financial institutions should be exempt from disclosing absolute GHG emissions values. We believe the point is not to introduce new absolute targets, but rather to complement the intensity target with information about its equivalence in absolute terms. In our view, reporting only intensity targets and values can disguise actual increases in emissions, which contradicts the objective of ESRS E1. Combining intensity targets with absolute emissions values allows for a more complete picture of an entity's GHG emissions and their target for reductions.			
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	We disagree with how this requirement is drafted considering the requirement for fair presentation. Given the fair presentation requirement, we are concerned that this DR is too prescriptive and more in line with compliance-based standard setting. If entities are required to comply strictly with these thresholds, it will limit their ability to assess the most material and relevant information that should be disclosed on this matter. We would recommend that this DR be redrafted to allow entities to assess themselves which countries would constitute material information to require disaggregation. If this cannot be done, we would at least like EFRAG to consider revising the level at which the threshold is set. Assessing countries with at least 50 employees makes sense in relation to the 250-employee threshold which was the previous scope of the CSRD for ESRS reporting. However, the employee threshold is set to rise, potentially to 1,000 employees, and 50 employees would no longer be representative of the global headcount (only 5%).			
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	Although we agree that the disclosure of adequate wages is important, we have some concerns about how this calculation has been formulated. While a hierarchy approach is appropriate, we believe that the definitions of each level for non-EU countries is too vague as they are currently written. In particular the definition of an "institution mandated by the public" could be interpreted very broadly without further clarification. EFRAG could consider including examples of such institutions as part of the NMIG. We also disagree with the ESRS definition of what constitutes adequate wages, and believe that the current methodology could create unequal treatment between EU and non-EU workers. Outside the EU, statutory minimum wage may not be an appropriate benchmark, and we are also concerned that collective bargaining may also not give the best information about whether the wage is adequate.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	We agree with the consolidation of SFDR datapoints into ESRS 2 and believe it improves consistency and avoids duplication. We do have some concerns around the treatment of human rights-related datapoints. We recommend having a clearer differentiation between "human rights" and "severe human rights" issues, which currently seem ambiguous. We also believe EFRAG should reconsider the merging of some datapoints such as "non-respect for UNGPs" and "human rights incidents", as we believe this may lead to reduced clarity in disclosures and create room for inconsistent interpretation. We also highlight that SFDR will be subject to revision in the future, and therefore the ESRS should incorporate a mechanism to capture any future changes to keep these Standards aligned.			
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	In our view, reviewing AR 26 as described would be useful to ensure that biodiversity target setting by reporting entities moves with the latest insights from science-based frameworks such as Science Based Targets Network (SBTN). In fact, to ensure the development of such frameworks and the quality of target setting we recommend including in the Standards a list of such frameworks that reporting entities should work with. For example, a clear reference to the TNFD LEAP approach and its guidance will help reporting entities to perform good quality assessments of IROs and will have further benefit for setting strategy, policies, actions, targets and metrics. In addition, the references in E4 to TNFD LEAP as mentioned in ESRS 2 AR 22 for paragraph 26, are not included in E4. We suggest making the reference in E4 as well, including the target disclosure requirements. This will also improve interoperability between TNFD and ESRS.			
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	In general, we agree with the approach to remove voluntary datapoints to simplify and streamline disclosures. However, in this case 'adjusted gender pay gap' could be considered material information for any organisations that are reporting on gender pay gap. We also note that this is an area that should align with the EU Pay Transparency Directive. The data should already be available for reporting entities in scope so it is not clear why they should not disclose it. Additionally, we suggest emphasising that the methodology for calculating the adjusted gender pay gap should be aligned with the implementation guidance published (or will be published in the future) in the context of the EU Pay Transparency Directive.			
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	We support the simplification of these requirements and note that SMEs are specifically mentioned as a supplier category to be considered when making disclosures. However, we have some concerns that an SME is not clearly defined, and that standard payment terms can be a very broad concept. Wider/narrower interpretations of these terms could lead to limited comparability in reporting and less transparency on interactions with SMEs specifically.			
Survey	Grant Thornton International Ltd	Auditor	United Kingdom	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		As a general comment on the amendment process, we would like to emphasise the importance of a robust, transparent and diligent due process in creating high-quality standards. While we appreciate that EFRAG has been working under a tight timeline imposed by the European Commission (EC) on this project, we are aligned with the rest of the European Contact Group in noting the significant number of closed meetings of the Sustainability Reporting Board and Technical Experts Group and the short comment period for stakeholder feedback. We urge EFRAG to follow its usual due process as far as possible in the final stages of this project to ensure that the advice provided to the EC is of the highest standard, and to increase clarity of the amendments to avoid the need for further changes in the near future.			
Survey	Climate & Company – The Berlin Institute for Climate Training and Research gGmbH	NGO	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We welcome EFRAG's effort to simplify the double materiality assessment (DMA) and to clarify the wording of Chapter 3 in ESRS 1. The language is easier to follow, and several passages (e.g. 3.2, 3.5) are now more precise and less vague than before. This is a positive outcome for preparers and auditors alike. Still, important points remain unclear: • Topical vs. IRO-level reporting (Par. 22 / 3.2): While flexibility is useful, allowing undertakings to report at either the topical or IRO level risks inconsistent application and reduces comparability. This may raise legal and auditability concerns if no further guidance is provided. If companies decide to report at IRO level, identifying the relevant DRs to disclose remains a challenge. • Top-down vs. bottom-up approaches (Par. 48 + AR 17 vs. AR 5): Companies are told they may start their assessment at the topical level, but elsewhere they are advised to begin with IROs. The notion of "top-down" should be explicitly explained and reconciled with the "bottom-up" approach. •Value chain scoping (Par. 45 / 3.5): Focusing on areas where impacts, risks, and opportunities are likely to arise is practical and reduces unnecessary effort. However, the implications for value chain responsibility should be stated more clearly. • Appendix C: The instruction to "assess and report the impact before the remediation action; and report action taken" should clarify whether planned actions are to be considered. The guidance overall can be improved more practical or sector-specific support would have been welcome. • Sector specific guidance: carries great potential for reducing the complexity of the DMA, and should be considered for future developments.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Climate & Company – The Berlin Institute for Climate Training and Research gGmbH	NGO	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	• We welcome the new guidance in ESRS 1 on remediation, mitigation, and prevention actions, as it brings greater clarity to a complex issue. However, we remain concerned about the current distinction between potential negative impacts mitigated by completed actions (assessed on a net basis) and those under ongoing management (assessed on a gross basis) (Par 35). •It is not evident why completed actions or investments should automatically be considered more effective than ongoing measures. In practice, ongoing management (e.g., supplier audits, monitoring systems, continuous risk controls) is often the decisive factor in preventing or reducing negative impacts. Treating these differently introduces inconsistency and may incentivize "one-off" actions rather than continuous improvements. • We therefore recommend a gross-for-all approach combined with disclosure of remediation actions. This would preserve comparability, reduce complexity, and avoid the unrealistic expectation that companies can quantify net impacts consistently. Many sustainability impacts (particularly social and biodiversity-related) are qualitative by nature, and calculating them on a net basis risks bias and subjectivity. • Moreover, Appendix C, while clearer than before, could benefit from additional visual support. A simple schematic or flowchart would help preparers, auditors, and users better distinguish between potential vs. actual impacts, and between prevention, mitigation, and remediation. In sum, a gross-plus-remediation model, supported by clearer visual guidance, would enhance both the credibility and practicality of the DMA. • Additionally, readability of the Standard would be improved if it is made clearer that Par 34 is about actual negative impacts, Par 35 is about potential negative impacts and Par 36 is about positive impact.			
Survey	Climate & Company – The Berlin Institute for Climate Training and Research gGmbH	NGO	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Executive Summary: We do not consider it necessary to introduce a formal requirement or option for an "executive summary" within the sustainability statement. Companies already have the flexibility to provide introductory material to their reporting, and many do so in the context of their financial reports. The proposed addition would therefore not add substantive value, while creating risks in terms of comparability, auditability and integrity of the reporting framework executive summary, if left unstructured or unaudited, could facilitate selective framing and undermine trust in sustainability reporting. Readers may rely on such a summary rather than on the actual ESRS disclosures, which risks distorting the purpose of the standards. From a transparency perspective, it is essential that any communication provided under the ESRS framework is directly traceable to the underlying disclosures. If EFRAG maintains the option, it is crucial to establish clear safeguards: the executive summary must not contain information beyond the ESRS content, must be explicitly linked back to the corresponding disclosures, and must fall within the scope of assurance. Without these safeguards, the introduction of an executive summary risks weakening the credibility and comparability of sustainability reporting. Appendices: We could envision a role for appendices as a structured place to store detailed metrics, EU Taxonomy disclosures, and potentially also voluntary information on non-material issues. This could improve readability for some users by keeping the main report more concise, while still ensuring full transparency. At the same time, care is needed: separating information across main reports and appendices may complicate auditability, reduce comparability, and risk frustrating professional users who need complete data in one place. If pursued, the approach should be tested carefully to ensure it enhances usability without creating repetition or undermining the integrity of the core disclosures.			
Survey	Climate & Company – The Berlin Institute for Climate Training and Research gGmbH	NGO	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We welcome the reformulated structure and objectives of ESRS 2 and support efforts to align the standards more closely with IFRS. Alignment should serve the goal of simplification and interoperability, but it must not lead to a lowering of ambition. This process must not become a race to the bottom. The ESRS should remain the leading framework on sustainability reporting, setting the benchmark for other global initiatives such as the ISSB rather than adjusting downwards to them. We particularly welcome the clarification now included in ESRS E1 that "shall" means "subject to materiality." This is a positive step, as it removes previous uncertainty about whether requirements were unconditional or materiality-based and makes the framework easier to apply in practice. We would encourage EFRAG to ensure this formulation is applied consistently across all standards. We also appreciate the clarification brought by the definition of the term "shall" more generally, which improves transparency on the level of obligation attached to requirements. To avoid ambiguity, we recommend moving this definition further up in ESRS 1. The replacement of "minimum" disclosure requirements with "general" disclosure requirements is also a step forward, as it better reflects the principle of materiality underpinning the standards. However, we would encourage further clarification on the rationale for simultaneously reducing some "shall" datapoints and introducing new ones. It should be clear whether the issue lies in the number of datapoints or in the conceptual use of "shall." Finally, while we acknowledge the improved connectivity between PAT and the description of IROs, we are concerned that the removal of requirements to disclose plans and timelines for PATs may weaken the forward-looking value of sustainability reporting. We therefore recommend maintaining at least a minimum requirement for companies to explain where PATs are not planned and why, thereby preserving accountability and comparability.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Climate & Company – The Berlin Institute for Climate Training and Research gGmbH	NGO	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The package of changes reflects a strong push towards simplification and burden reduction. While this can support wider uptake and feasibility of reporting, we see a risk that the credibility, comparability, and forward-looking value of the ESRS framework could be undermined if simplification goes too far. The standards are also not clear on how the various reliefs are meant to interact, and applying them independently opens the door to omission of material information and significant divergence in practice. The relief for lack of data quality, allowing partial scope reporting, can be useful in practice, but should always be linked to clear action plans and timelines for improvement. Similarly, the removal of the preference for direct data should not lead to overreliance on estimates, which risks undermining comparability unless methodologies are transparently disclosed. Allowing unconditional exclusions, for example of joint operations, further exacerbates this issue. If such operations are material drivers of impacts, the standards should require their progressive inclusion. We are also concerned by the narrowing of resilience disclosures to qualitative risks only, which reduces one of the most forward-looking and transformative elements of sustainability reporting. Likewise, limiting disclosures on financial effects to already announced plans reduces the usefulness of reports for assessing transition readiness. At the same time, we positively note pragmatic changes, such as the relief for acquisitions and disposals, which align reporting more closely with financial practice and reduce disproportionate burdens. We also welcome the clarification of "shall" in ESRS E1, which now explicitly means "subject to materiality." This strengthens clarity and supports international alignment			
Survey	Climate & Company – The Berlin Institute for Climate Training and Research gGmbH	NGO	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We recommend deleting paragraphs 87(d) and 89. While we support alignment with ISSB and recognize the importance of proportionality, allowing undue cost or effort relief for the preparation of metrics (par. 87(d)) risks undermining the reliability and comparability of reported data. Key metrics are central to decision-usefulness and should not be subject to such exemptions. Similarly, paragraph 89 introduces a subjective cost–benefit balancing test that can create inconsistent application across undertakings. Instead, a clearer and more proportionate framing would be to apply the principle "with reasonable costs and efforts,".			
Survey	Climate & Company – The Berlin Institute for Climate Training and Research gGmbH	NGO	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	We welcome the streamlining and the shift of detail into ARs, which improves readability and usability. On transition plans (TPs), we can follow the rational that disclosure is intended to apply only if a plan already exists and is public; but this is not a requirement to have a plan. We understand that EFRAG is following the conditionality approach, i.e., disclosure applies only if such a plan is in place, and that this is aligned with the simplification mandate. However, we are concerned that the current wording ("mandatory" / "shall") could be perceived as jeopardizing the substantial simplification achieved, although this is not the case. To avoid this misunderstanding, we propose the following clearer wording: "Undertakings shall disclose their position on biodiversity and ecosystems transition plans. If a publicly released plan exists, it shall be reported under ESRS E4. If no plan exists, the undertaking shall state whether it intends to develop one and, if so, indicate the envisaged timeframe." This makes explicit that disclosure is conditional on a plan being in place and prevents misinterpretation that companies are being required to create such plans.			
Survey	Climate & Company – The Berlin Institute for Climate Training and Research gGmbH	NGO	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	To us, ESRS has always operated under the logic of fair presentation. We welcome the clarification that it is now made explicit and aligned with IFRS S1 and S2. This international alignment contributes to simplification by reducing divergence across frameworks, but it should not be interpreted as positioning IFRS as the global baseline. ESRS remains firmly anchored in the CSRD and the principle of double materiality, which extend beyond the scope of IFRS. Stating fair presentation explicitly reinforces that companies are expected to apply judgment when preparing their statements and ensure that the information disclosed provides a balanced and accurate picture. This supports the functioning of the materiality filter and helps move away from a purely checklist-based compliance approach. At the same time, it is important to underline that this is not introducing new requirements: ESRS has already incorporated fair presentation principles through its structure and objectives, and the clarification simply makes this more transparent. We also emphasise that a checklist-style approach is not always negative. In some sectors, certain datapoints are intrinsically material (e.g., GHG Scope 1 emissions, land-use, water), and maintaining such baseline disclosures is crucial for comparability across companies. In summary, making the fair presentation principle explicit can enhance the effectiveness of the materiality filter and reduce unnecessary reporting, while preserving comparability and highlighting ESRS's distinct grounding in double materiality.			
Survey	Climate & Company – The Berlin Institute for Climate Training and Research gGmbH	NGO	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	The connection between SFDR and ESRS is crucial, as the flow of reliable, comparable, and decision-useful information from companies to financial market participants forms the backbone of SFDR implementation. Alignment between the two frameworks should therefore be as streamlined as possible. This is especially important given that SFDR may evolve into a categorisation tool, where clarity and consistency of underlying datapoints are essential. We welcome that, despite the reduction in datapoints, coverage of SFDR PAIs has only been marginally reduced and in some cases strengthened through consolidation, ensuring ESRS remains fit for purpose in supporting SFDR.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Climate & Company – The Berlin Institute for Climate Training and Research gGmbH	NGO	Germany	35.E1-1.	Do you agree with the amendments of this chapter?	I agree	Transition plans are essential for assessing whether companies are truly on a 1.5°C pathway. The current ESRS amendments simplify too far and risk leaving investors without trustworthy, comparable data. First, independent validation of targets (e.g. SBTi) is only optional. Without mandatory checks, credibility and comparability of plans will remain weak. Second, key financial elements such as time-bound CapEx and OpEx, especially taxonomy-aligned CapEx, should be disclosed directly in the plan itself, not spread across different sections. Third, the proposed "locked-in emissions" disclosure is only qualitative, but companies in capital-intensive sectors need to provide at least a headline quantitative figure to allow investors to judge the feasibility of transition. In addition, the standard should make clear guardrails: no expansion of assets inconsistent with 1.5°C (e.g. new coal power), clear exit timelines for high-emitting activities, and just transition measures. Companies without a plan should also be required to state when they will publish one, and all plans should be tracked through simple progress tables each year, showing resources deployed, actions taken, and emission reductions achieved. These additions keep disclosures focused and practical while ensuring that transition plans provide the decision-useful information investors need. They also create a strong basis for SFDR alignment, including the development of a credible "transition" product category.	E1	Disclosure Requirement E1-1 - Transition plan for climate change mitigation	
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	Although some "practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported" have been introduced, it is not clear how these considerations can be applied, given that the entire chapter relating to double materiality retains the current complex and burdensome process. Therefore, it is difficult to evaluate the proposed simplification exercise. A possible solution would be to clarify more precisely the circumstances under which the simplifications can be applied.			
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	It is necessary to define within the standards a single approach to be applied (gross or net). The new wording (in particular that of Appendix C) risks creating unnecessary complexity and confusion. The same single approach should also be applied and specified for risks, in order to ensure that disclosures are supported by methodological consistency			
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	13.	Improved readability, conciseness and connectivity of ESRS SustainabilityStatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The development of separate documents for each standard called "non-mandatory explanatory guidelines" risks creating confusion and interpretation difficulties compared with the provisions in the ESRS (as has been the case in the past for the guidelines on the value chain and materiality assessment). The conversion of previous DRs from "shall" to "non-mandatory guidelines" risks nullifying the simplification exercise because, given the fair presentation principle, this could effectively require mandatory reporting on these items.			
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	EFRAG has included in the new version of ESRS 1 a provision that allows deferring the inclusion of a subsidiary or business in the materiality assessment and in the sustainability statement to the subsequent reporting period (paragraph 72 of ESRS 1). However, from a simplification perspective, the requirement to disclose, for major acquisitions or disposals and based on available information, significant events affecting the acquired or disposed subsidiary or business occurring between the date of acquisition and the end of the reporting period (or between the start of the reporting period and the date of disposal) should be removed when such events could affect the subsidiary's or business's exposure to material impacts, risks and opportunities (paragraph 73 of ESRS 1). Furthermore, it is necessary to clarify what constitutes a "significant" acquisition or disposal.			
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	The topic is highly sensitive and burdensome for companies. Companies have expressed serious concerns about the limited measurability and reliability of forward-looking information, the potential lack of reliability for users, and the sensitivity of commercially relevant data. Therefore, we consider that Option 2 in ESRS 2 represents a more proportionate approach to reporting such effects. Only with regard to climate change should the qualitative approach be complemented—given the announced continued importance of EU climate objectives—by a limited set of quantitative disclosure requirements that would enable a more accurate assessment of the effects, accompanied by specific guidelines on quantification methodologies.			
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	The topic is highly sensitive and burdensome for companies. Companies have expressed serious concerns about the limited measurability and reliability of forward-looking information, the potential lack of reliability for users, and the sensitivity of commercially relevant data. Only with regard to climate change should the qualitative approach be complemented—given the announced continued importance of EU climate objectives—by a limited set of quantitative disclosure requirements that would enable a more accurate assessment of the effects, accompanied by specific guidelines on quantification methodologies.			
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	This revision not only makes the transition difficult for current preparers but also undermines the objective of simplifying the ESRS. Therefore, we suggest maintaining those datapoints on a voluntary basis or deleting them. The main changes are the following: ESRS E3 paragraph 17 "The undertaking shall disclose for its own operations Total water withdrawals in m3." ESRS E3 paragraph 17 "The undertaking shall disclose for its own operations Total water discharges in m3." ESRS E4-1 paragraph 12 "If the undertaking has in place and has made public a biodiversity and ecosystems transition plan to transform its business model and strategy so it is aligned with the global goal of halting and reversing biodiversity loss as stated in the Kunming-Montreal Global Biodiversity Framework, it shall disclose its key features." ESRS G1-2 paragraph 10c "training activities within the undertaking on business conduct, including the target audience, frequency and depth of coverage. This shall include the percentage of functions and/or roles most at risk within the undertaking in respect of corruption and bribery, as well as members of the administrative, management and supervisory board. It shall also disclose whether the procurement team is involved in training related to its engagement with suppliers for the improvement of their sustainability performance". ESRS G1-4 paragraph 14 "The undertaking shall disclose the number and nature of the confirmed incidents of corruption or bribery that occurred during the reporting period".			
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We disagree with the inclusion of new disclosure requirements in the Standards, especially regarding topical standards. These requirements make the transition difficult for preparers and undermine the objective of simplifying the ESRS. Therefore, we suggest deleting them. The main additions are the following: ESRS 1, paragraph AR 28 "Metrics in topical ESRS do not require inclusion of upstream and downstream value chain data, with the exception of GHG emissions Scope 3. For the following items, the standardised metric in ESRS is limited to own operations, however the disclosure is able to inform about aspects of the value chain: removals of GHG (Amended ESRS E1-9), secondary microplastic (Amended ESRS E2-4), substances of very high concern in procured components and articles Amended ESRS E2-5), and waste (Amended ESRS E5-5). When necessary, in accordance with paragraph 10 the undertaking shall on an entity-specific basis, include upstream and downstream value chain data when disclosing on metrics." ESRS E1, paragraph 29, extended the requirement on the disaggregation of "total energy consumption from fossil sources" to all undertakings. The actual Set 1 limits this information to "undertakings with operations in high climate impact sectors". ESRS E2 AR4 "Transfers of water pollutants to external treatment plants qualify as pollution in downstream value chain." ESRS E2/E3/E4 "Location-specific considerations are particularly important in relation to pollution/water/biodiversity and ecosystems. When material impacts, risks or opportunities arise at local level, it is important to consider appropriate disaggregation or aggregation of the reported information, e.g. by key site, asset, location, affected area at water risk/affected local ecosystem or other appropriate level in accordance with Amended ESRS 1 paragraph 53". Location disclosures should be limited to few examples and key sites, while granular disclosures should be avoided as we are in the context of an annual report.			
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	We disagree with the introduction of this principle given: the different level of maturity of sustainability reporting compared with financial reporting. The concept of fair presentation is well-established in financial reporting, but not in the context of sustainability reporting—especially considering the double materiality principle, which requires considering a multi-stakeholder approach as opposed to the single/financial materiality perspective. This creates a significant grey area in which the onus is placed on the company to determine what constitutes a fair presentation. the risks associated with this principle in terms of a significant increase in the liabilities of Board members on the one hand and of auditors on the other, who must ensure that the overall set of information provided meets the needs of all categories of users. Under such a regime, companies would not only be required to apply the standards and ensure the consistency of disclosures, but also to demonstrate that the information is fairly presented to all stakeholders. If the fair-presentation requirement were broadly applied to all relevant stakeholders, the scope of information to be disclosed in the sustainability statement could become virtually unlimited, leading in particular to a potentially unchecked expansion of "entity-specific" information (i.e. information not sufficiently covered by the standards). the concept, which is clearly stated in the Accounting Directive, is not equally reflected in the CSRD, which requires a compliance-based disclosure framework with regard to the auditing and assurance of sustainability reporting (see, in particular, Article 34(1)(aa)). It would be appropriate to remove all references to fair presentation introduced by EFRAG in ESRS 1 (paragraphs 16, 17, 18), as well as in the other standards, if any, and to clarify that the objective of sustainability reporting is to ensure compliance with the provisions of the CSRD and the ESRS.			
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	ESRS S1 DR S1-5 Characteristics of the company's employees (paragraph 23) requires to disclose the total number of employees by head count and breakdowns by gender and by country for the countries where the undertaking has 50 or more employees and that are the ten largest countries in terms of employee numbers for the undertaking. This new information on the "ten largest countries" should be removed (the actual delegated act is "per country for countries in which the undertaking has 50 or more employees representing at least 10% of its total number of employees") because it adds specific granularity that may not be relevant.			
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		-			
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	35.ESRS1_1.1.	Do you agree with the amendments of this chapter?	I disagree	The obligation to provide entity-specific information in the sustainability report is retained when the matter is material for the company but is not addressed or is not sufficiently addressed in the standards (paragraphs 10-11 and AR1-2 of ESRS 1). Entity-specific disclosures do not support comparability unless reported with reference to existing sector-specific standards. From a simplification perspective, it would be appropriate to require such information only on a voluntary basis (removing references to fair presentation and materiality). Furthermore, considering the regulatory decision to abolish sector-specific ESRS for simplification purposes, we believe it is appropriate to clarify that companies should take into account already existing sector-specific standards when disclosing entity-specific information.	ESRS1	1.1 ESRS standards, reporting areas and entity-specific disclosures	
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	35.ESRS1_5.	Do you agree with the amendments of this chapter?	I disagree	The value chain is a vague concept and is difficult to apply in practice. Due to the difficulties of data collection, we believe it is appropriate to limit the requests for quantitative indicators in the ESRS as much as possible (e.g. GHG Scope 3).	ESRS1	5. Reporting undertaking and upstream and	
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	35.ESRS1_5.2.	Do you agree with the amendments of this chapter?	I disagree	The value chain is a vague concept and is difficult to apply in practice. Due to the difficulties of data collection, we believe it is appropriate to limit the requests for quantitative indicators in the ESRS as much as possible (e.g. GHG Scope 3).	ESRS1	5.2 Inclusion of value chain information	
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	35.ESRS1_5.3.	Do you agree with the amendments of this chapter?	I disagree	The value chain is a vague concept and is difficult to apply in practice. Due to the difficulties of data collection, we believe it is appropriate to limit the requests for quantitative indicators in the ESRS as much as possible (e.g. GHG Scope 3).	ESRS1	5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	35.ESRS1_7.1.	Do you agree with the amendments of this chapter?	I disagree	The requirement, when illustrating progress made against a target, to revise the base year and comparative information in the event of a significant acquisition or divestment should be removed, as acquisitions or divestments may form part of a strategy to achieve the set targets.	ESRS1	7.1 Presenting comparative information	
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	35.ESRS2_GDR-M.	Do you agree with the amendments of this chapter?	I disagree	For each environmental metric, the company is required to disclose the specific environmental conditions and characteristics of the area where the impact occurs. For reasons of consistency with the impact materiality assessment, simplification of reporting, and reduction of the level of granularity of information, this requirement should be removed.	ESRS2	General Disclosure Requirement for metrics - GDR-M	
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	35.E1-6.	Do you agree with the amendments of this chapter?	I disagree	•ESRS E1 DR E1-6 Emission reduction target (paragraph 26a): the disclosure requires that the target be presented in absolute terms. It is necessary to reinstate the previous formulation, which allowed the target to be expressed either in absolute terms or in intensity terms, without requiring, in the latter case, the disclosure of absolute values for the target year and interim years.	E1	Disclosure Requirement E1-6 - Targets related to climate change	
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	35.E1-11.	Do you agree with the amendments of this chapter?	I disagree	•ESRS E1 DR E1-11 Anticipated financial effects (paragraphs 39-42): the level of granularity of the quantitative information required remains very high. Even when adopting Option 2 (qualitative information), the analyses underlying the qualitative disclosure still require reliable information, which is particularly sensitive. Furthermore, with regard to this disclosure requirement, it is necessary to adopt a single, consistent approach for presenting assessments on a gross or net basis.	E1	Disclosure Requirement E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	35.E2-4.	Do you agree with the amendments of this chapter?	I disagree	•ESRS E2 DR E2-4 Air, water and soil pollution (paragraph 16c) requires the disclosure of the quantities of primary microplastics manufactured or used in products and, separately, those directly released into the environment (Section 3, Amended ESRS Exposure Draft 2025 Public Survey). Due to the lack of a specific methodology for calculating microplastics, it is suggested that these metrics be deleted.	E2	Disclosure Requirement E2-4 - Pollution of air, water and soil	
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	35.E4-2.	Do you agree with the amendments of this chapter?	I disagree	•ESRS E4 DR E4-2 Policies related to biodiversity and ecosystems (paragraph 14b): requires a description of the content of biodiversity and ecosystem-related policies concerning the company's operational sites located within or near a biodiversity-sensitive area (Section 3, Amended ESRS Exposure Draft 2025 Public Survey). It is proposed to eliminate the requirement to refer to sites altogether, as it is excessively burdensome.	E4	Disclosure Requirement E4-2 - Policies related to biodiversity and ecosystems	

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Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	35.E4-5.	Do you agree with the amendments of this chapter?	I disagree	•ESRS E4 DR E4-5 Biodiversity and Ecosystem Change Metrics: biodiversity metrics are still too granular. For example, DR E4-5 requires " locations in its own operations to which the material impact, risks or opportunities relate " (see section 3 of the EFRAG Amended ESRS Exposure Draft 2025 Public Survey). In a spirit of simplification, it could be appropriate to focus only on material sites and on most relevant actual impacts. •E4-5 AR 8: the application requirement related to paragraph 20 states that "if the company's site is located in a biodiversity-sensitive area, it is highly likely that its activities negatively affect the area. If a site located outside a biodiversity-sensitive area is in proximity to such an area, this must be determined based on: the potential of the site's activities to adversely impact species and ecosystems in the biodiversity-sensitive area; a buffer zone specific to the type of activity and to the species and ecosystems present in the area. Buffer zones may be determined by following industry best practices and science-based recommendations, such as the Integrated Biodiversity Assessment Tool (IBAT), or on the basis of site-level survey results." Considering that the concept of "near" is being expanded in terms of distance radius, this requirement proves excessively granular and burdensome, particularly for companies operating across a large number of sites. This requirement should therefore be removed.	E4	Disclosure Requirement E4-5 - Metrics related to biodiversity and ecosystems change	
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	35.S1-1.	Do you agree with the amendments of this chapter?	I disagree	In the spirit of simplification, it would be useful to reduce the number and granularity of quantitative metrics concerning non-employees.	S1	Disclosure Requirement S1-1 - Policies related to Own workforce	
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	35.S1-13.	Do you agree with the amendments of this chapter?	I disagree	•ESRS S1 DR S1-13 Health and safety metrics (paragraph 40): requires information on the percentage of people in the workforce covered by the company's occupational health and safety management systems, the number of work-related fatalities among the company's workforce and among other workers operating at the company's sites, etc. (see Section 3 of the 2025 Amended ESRS Exposure Draft Public Survey by EFRAG). The information required under this DR is overly granular and should be simplified.	S1	Disclosure Requirement S1-13 - Health and Safety metrics	
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	35.S1-16.	Do you agree with the amendments of this chapter?	I disagree	•ESRS S1 DR S1-16 Incidents of discrimination and other human rights incidents (paragraph 46b) requires disclosure of the number of human rights incidents. The term "severe" has been removed from the concept of "human rights incident," extending the reporting obligation to any human rights incident and risking the need to carry out very thorough investigations across the value chain, since this term has also been removed from ESRS S2. It would be preferable to reintroduce the concept of "severe" and define it more clearly.	S1	Disclosure Requirement S1-16 - Incidents of discrimination and other human rights incidents	
Survey	UTILITALIA	Business association (other than association of financial institution)	Italy	35.G1-5.	Do you agree with the amendments of this chapter?	I disagree	The concept of lobbying activities should be better defined.	G1	Disclosure Requirement G1-5 - Metrics related to political influence and lobbying activities	
Survey	VBO-FEB	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We see as positive simplifications in the DMA and the IRO (impact, risk and opportunities) the fact that: The companies can limit themselves to information that is available without undue cost or effort, thereby allowing for a pragmatic approach The introduction of a materiality aspect for the scoring/quantification of IROs: activities may be excluded from metric calculations if, due to their nature, they are not expected to be a significant driver of the impacts, risks and opportunities However, we believe that the whole process of DMA (including the IROs) could be even further simplified, for example by simplifying the engagement with all stakeholders, e.g., by allowing to take into consideration the opinions of stakeholders indirectly (e.g., through publicly available information about their strategy, annual reports, press releases, position papers, etc) to facilitate the process.			
Survey	VBO-FEB	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We acknowledge and appreciate that much of the feedback from companies has been reflected in the latest draft. This demonstrates a genuine effort to improve the framework. The simplification and consolidation of requirements have made the standards more logical and easier to navigate. However, we believe that the communication regarding a "50%+ reduction in reporting burden" could be more nuanced. While the framework is now more user-friendly and logically organized, the actual reduction in workload does not fully align with this figure. Our position remains clear—we advocate for a level playing field via simplified and streamlined reporting.			
Survey	VBO-FEB	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We have concerns regarding the addition or removal of certain terms throughout the editing process. The introduction of subjective terms such as "key" and "relevant" may create ambiguity and potential tension between companies and auditors. Of particular concern is the removal of the word "severe" in the context of human rights violations, which weakens the clarity and seriousness; and diffuses the focus of reporting on most impactful cases. We strongly advocate to limit reporting focussed on severe case only. We also reiterate our ongoing feedback regarding the undue cost and efforts related to reporting requirements "substances of concern" and "very high concern," for companies operating in an international context given differences in EU versus non-EU local legislations.			
Survey	VBO-FEB	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We support the simplification and flexibility offered by the framework, including the freedom to include non-mandatory data points on a needs basis. However, there is a lack of clarity regarding whether non-mandatory data points can be included in the audit report. We request explicit guidance confirming that issuers may request the audit of non-mandatory data, as this verification is crucial for the credibility and value of ESG labels. Without the ability to disclose that such data has been audited, its relevance in ESG assessments is diminished and could have a negative impact on scores.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	VBO-FEB	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	While we support the goal of simplification, we observe that some of the proposed changes have introduced greater uncertainty and room for interpretation. However, we believe that some of the proposed solutions do not fully deliver on the promise of harmonisation, which is essential for aligning ESG reporting with broader EU compliance requirements. From a reporter's perspective, the CSRD should enable and facilitate the consolidation of ESG-related compliance across EU regulations. If the reporting requirements are not clearly connected to existing EU regulations, it becomes difficult for companies to demonstrate compliance effectively. We seek clarity on whether separate reporting obligations are being introduced and how they relate to existing regulatory frameworks.			
Survey	VBO-FEB	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	We would actually rather favour making disclosure of anticipated financial effects optional. As a matter of fact, these are typically sensitive information, and speculative by definition. As a second choice, if we had to choose between the 2 options described, we would favour option 2, and then limit the qualitative anticipated financial effect to a qualitative description of the factors (key considerations) that could have future financial effects, without going into details on sensitive, usually confidential information on the actual quantification of these effects. Moreover, the quantification is often a tricky exercise, and would likely be difficult to compare across companies given there are no common methodologies for such quantifications.			
Survey	VBO-FEB	Business association (other than association of financial institution)	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	VBO-FEB	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We have observed inconsistencies between definitions in the latest version of the ESRS and those in the glossary. Auditors frequently rely on the glossary as a reference in the absence of dedicated audit guidelines. It is essential that any changes or amendments to definitions in the ESRS are mirrored in the glossary to avoid confusion and ensure consistency. Furthermore, it is of critical importance that clear and comprehensive audit guidelines are made publicly available in time for the 2027 audit cycle. The ESRS standards must be fully aligned and unambiguous to support effective implementation and ensure confidence in the audit process.			
Survey	VBO-FEB	Business association (other than association of financial institution)	Belgium	35.S2-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	(point 10) represents a considerable administrative burden and is somewhat unnecessary in sectors with severe labour shortages, such as construction.	S2	Disclosure Requirement S2-1 - Policies related to value chain workers	
Survey	German Investment Funds Association BVI	Association of financial institutions	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	We support the use of ESRS as a fair presentation framework in line with the international IFRS standard S1 and a stronger emphasis on materiality as a guiding filter. This can reduce checklist-style reporting and promote decision-useful disclosures for investors. In the same vein, we welcome a stronger promotion of the top-down approach to the double materiality assessment (DMA) which helps focusing on the company's strategy and sectoral impacts while easing the burden of exhaustive bottom-up scoring. In order to make the approach more effective, we suggest further: - clarifying that the top-down assessment should be the default approach to DMA, taking precedence over the bottom-up scrutiny, to avoid potentially lengthy discussions with auditors, - obliging companies to document their DMA process, in particular the reasons for concluding why certain topics have been considered as obviously immaterial. By way of accompanying measures, we would support development of sector-specific application guidelines that should be non-binding in nature. Such guidelines could provide orientation for a top-down analysis of material IROs typical in specific sectors and resolve other practical application challenges. For the financial sector, they would enable EFRAG to analyse in-depth different financial services and their implications for the sustainability reporting value chain. We also recommend that the value chain amendments should systematically link reporting with the underlying due diligence. Companies should disclose the rationale for chosen value-chain boundaries and the coverage of value chain information per material topic. Where actions do not extend to the value chain, it is important to disclose the related constraints, potential planned measures and timelines in order to enable meaningful stakeholder engagement.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	German Investment Funds Association BVI	Association of financial institutions	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We support the adoption of the "net impact approach", reflecting the actual situation in terms of adverse impacts after accounting for mitigation measures. In this regard, we strongly recommend taking one consistent approach to "netting" in terms of actual and potential impacts to reduce complexity in reporting. The underlying message should be that only mitigation measures that have been undertaken or are fully prepared and underway can be considered as relevant for a given reporting period.			
Survey	German Investment Funds Association BVI	Association of financial institutions	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We fully support the proposed amendments aiming at introducing additional flexibility and avoiding duplications in sustainability-related disclosures. As users of sustainability information, we acknowledge the need to improve the readability and conciseness of sustainability reports and to enhance their connectivity with financial reporting.			
Survey	German Investment Funds Association BVI	Association of financial institutions	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	In general, we welcome the proposed simplifications, especially in terms of streamlining the relationship between ESRS 2 and topical standards, and greater flexibility for PAT disclosures. However, we are against eliminating the requirement for disclosing whether and in which timeline an undertaking intends to adopt PAT for identified material impacts and risks. In the absence of such disclosures, investors will not be able to distinguish inactive companies from those that intend to take responsibility and/or strengthen their resilience through specific measures. We would favour the introduction of an "explain if not" approach where undertakings should explain why PAT have not been developed for risks and/or impacts identified as material. This would ensure accountability without excessive prescription and ensure that the absence of PAT reflects a deliberate strategic choice rather than an oversight.			
Survey	German Investment Funds Association BVI	Association of financial institutions	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We agree with the proposed amendments and see significant benefits in terms of understandability and clarity of the ESRS. To further enhance the usability in practice, we recommend two supplementary changes: 1.Clarify that application requirements (AR) are relevant for assurance purposes. This could be accomplished by including a sentence in ESRS 1 stating that AR are part of the mandatory standards and within the assurance scope. This would help ensuring consistent interpretation of the ESRS by preparers, auditors and users. 2.Introduce stable IDs for every mandatory datapoint and AR; assign durable identifiers (for example, E.1-6 M1 for a datapoint and E.1-6 AR1 for the corresponding application requirement). Stable IDs will make the standards easier to navigate also in case of subsequent changes, reduce the risk of mis-tagging and facilitate high-quality digital reporting. These adaptations would reinforce EFRAG's efforts for improving clarity and usability of the standards. The quality of a standard as mandatory or non-mandatory content would be clear at the first glance, interpreted consistently by companies and assurers and straightforward to implement in systems and tags.			
Survey	German Investment Funds Association BVI	Association of financial institutions	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The Non-Mandatory Illustrative Guidance (NMIG) can support companies by providing further explanations to the reporting standards and practical examples in terms of reporting. This can enhance consistency and ultimately improve the quality of the reported information. In order to reflect its non-binding status and to allow for easy adaptations in case of new practical experiences, we agree with EFRAG that NMIG should not be part of the Delegated Act implementing the ESRS.			
Survey	German Investment Funds Association BVI	Association of financial institutions	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The introduction of a horizontal „undue cost or effort" relief seems pragmatic. From investors' perspective, however, the risk that companies will widely invoke this claim, especially in value-chain metrics, in order to reduce the reporting burden, should be reasonably contained. Invoking the relief should be subject to clear safeguards, including a disclosure of why the relief applies, a disclosure of the scope left out, and material gaps. Without such safeguards, decision usefulness of the reported data and portfolio level aggregation might suffer. Similarly, the relief on the use of estimates must be accompanies by the requirement for robust methodologies and improvement plans. There should also be consistent reporting on the uncertainty ranges/sensitivities and data coverage. This will help preserve decision-usefulness and comparability for investment decisions. Ultimately, full coherence with the IFRS S1 should be aimed for when assessing the acceptability of any relief considered.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	German Investment Funds Association BVI	Association of financial institutions	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	While agreeing in principle with the proposed relief for lack of data quality implying partial disclosures, we are concerned about the lack of any time limit. Companies should be incentivised to improve their data coverage and reporting quality over time. Unlimited possibility of reporting based on narrow scopes would undermine such "learning curve" in sustainability reporting. In any case, invoking the relief should be accompanied by clear guardrails, such as explicit rationale and the decision criteria applied as well as time-bound improvement plans. Ultimately, full coherence with the IFRS S1 should be aimed for when assessing the acceptability of any relief considered.			
Survey	German Investment Funds Association BVI	Association of financial institutions	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We strongly support Option 1 that is broadly aligned with the IFRS standards. Disclosure of anticipated financial effects is the most critical element in sustainability reporting. Investors need quantitative information on the anticipated financial effects of material sustainability risks and opportunities in order to account for such effects in their investment process. Without proper quantification, systematic assessment of the upside potential of companies or risks to their cashflows will not be possible and effective capital allocation to support sustainable transition will be impaired. Option 1 also does not represent a disproportionate burden for companies, since it accounts for the possibility to omit quantitative disclosures in cases where there is no reasonable supportive information or the level of uncertainty is otherwise too high. As a rule, however, we would expect that companies should be able to provide quantitative estimates on the effect of sustainability topics that according to their internal analyses have been identified as material sources of financial risks (or opportunities). In order to safeguard proportional and sufficient disclosures, we suggest reintroducing phasing-in provisions matching those of the original ESRS, ensuring that companies could report qualitative information in the first three years of applications and afterwards would need to report quantitative data, subject to the relief referenced above. Option 2, on the other hand, would result in undue loss of information and fail to provide the correct incentive to build more mature methodologies and reporting practices. Companies would be deprived of the learning curve on proper assessment of sustainability-related financial risks that is by far not only relevant for reporting purposes. Lastly, option 2 falls behind the IFRS standards meaning that investors would receive less information on anticipated financial effects from EU companies than from their non-EU competitors. This might have negative effects on channeling investments to EU transitioning companies.			
Survey	German Investment Funds Association BVI	Association of financial institutions	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	To ensure that disclosures on anticipated financial effects are both feasible and effective, we advocate for the consistent application of the "comply or explain" principle. This approach should require undertakings to report quantitative information by default. If they are unable to do so (due to unavailability of reasonable data or high uncertainties in anticipation results), undertakings should be required to provide a clear and substantiated explanation. From investors' perspective, such explanation would already provide valuable information, offering insights into a company's risk management maturity and data infrastructure. We expect that the application of the "comply or explain" principle will increase adoption rates while simultaneously fostering greater transparency. As collecting and reporting methodologies mature, the ambition of achieving full quantitative disclosure would be maintained, safeguarding that the ESRS remain both deliverable for preparers and decision-useful for investors.			
Survey	German Investment Funds Association BVI	Association of financial institutions	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Investors need comparable and consistent sustainability-related data from all their investee companies, inside and outside the EU. Thus, we support full interoperability between ESRS and IFRS without diluting double materiality and acknowledge EFRAG's efforts made in this regard. We particularly welcome EFRAG's suggestion to include a permanent reference to the IFRS industry-based guidance, including SASB standards, for reporting of entity-specific sectorial information. Nonetheless, the simplification efforts and the proposed reduction of data points have created new discrepancies, resulting in a situation where the EU reporting standards might lag behind the IFRS requirements. This is particularly evident in the E1 standard, where many detailed disclosures supporting investors' analyses have been deleted. The ESRS will thus not live up to the global baseline meaning that investors will likely receive less information from EU companies than from their non-EU competitors. Ultimately, this loss of transparency might have negative effects on channeling investments to EU transitioning companies. In order to ensure future-safe interoperability and reduce burden for firms reporting in line with both standards, we strongly suggest introducing a new optionality in the ESRS to report either according to ESRS or IFRS standards for sustainability topics where international standards exist (currently only climate E1-S2, but potentially extending to other topics like human resources or biodiversity in future). This choice should pertain only to the standards for reporting material risks and opportunities, with disclosure of potential impacts being always required in line with the applicable ESRS. This new optionality would allow for providing appropriate relief under the revised ESRS while offering the possibility to live up to the expectations of (international) investors. It would also provide a mechanism that accounts for future evolvement of the international standards and ensures structural interoperability with the ESRS in a pragmatic manner.			
Survey	German Investment Funds Association BVI	Association of financial institutions	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	German Investment Funds Association BVI	Association of financial institutions	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	We acknowledge and appreciate EFRAG's intention to reduce the reporting burden by streamlining mandatory datapoints and eliminating all voluntary ones. The 57% reduction in "shall disclose" datapoints can support greater proportionality and usability for preparers, particularly during first-time application. However, from the perspective of investors, deletion of certain datapoints may compromise the consistency, comparability, and usability of reported sustainability information. This pertains in particular to datapoints covered by the ISSB standards S1 and S2, but removed from the EFRAG EDs. Moreover, we are concerned that the systematic removal of detailed narrative datapoints within Policies, Actions, and Targets (PAT) sections may weaken the forward-looking and strategic dimension of disclosures, which is essential for assessing credibility of a company's transition plans, its governance quality, and capability to manage climate/nature-related financial risks. We urge EFRAG to reconsider the general concept of PAT disclosures and potentially to maintain a minimum core set of strategic and forward-looking PAT datapoints, especially if they align with international frameworks.			
Survey	German Investment Funds Association BVI	Association of financial institutions	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We acknowledge the reasoning behind EFRAG's suggestion to exceptionally move these disclosures from "may" to "shall", provided they remain subject to the double materiality assessment. In particular, improved disclosures of transition plans for biodiversity and ecosystems are definitely decision-useful. In this regard, we would welcome abandoning previous publication of the transition plan as a precondition for reporting. What matters in terms of avoiding additional burden on companies is that the transition plan has been internally adopted and approved. We also see added value in reporting on confirmed incidents of corruption and bribery under the G1 standard, in case the topic has been identified as material by the reporting entity.			
Survey	German Investment Funds Association BVI	Association of financial institutions	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	In general, we support a stronger emphasis on fair presentation as the underlying principle of the ESRS. Fair presentation is consistent with the framework used for financial reporting and aligned with the IFRS standards, thus promoting interoperability. Moreover, enhancing consistency between financial and non-financial reporting promotes connectivity, which is key in terms of making sustainability-related disclosures decision-useful for investors. Notwithstanding these benefits, we note certain concerns that the introduction of "fair presentation" could be interpreted by auditors as "true and fair view", which is only applicable under reasonable assurance. In order to provide effective relief, it should be made sufficiently clear that it is the reporting company's role to assess materiality, while the remit of assurance providers is confined to a review of the process.			
Survey	German Investment Funds Association BVI	Association of financial institutions	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We agree with the arguments that financial institutions should be exempted from disclosing climate-related absolute targets in terms of GHG emissions when they have only set intensity targets. Given that absolute GHG emissions depend on the transition progress of investee companies and in view of the large amount of variables to be considered, including in terms of portfolio composition, we are not convinced that requiring disclosures of absolute targets would result in meaningful added-value information for investors.			
Survey	German Investment Funds Association BVI	Association of financial institutions	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	For investors to determine whether companies pay their employees adequate wages, it is essential to provide information on the methodology used. In the absence of this information, investors cannot assess the robustness of figures or compare them across peers and time. In the same vein, we support clarifications of the assessment methodology that will lead to simpler and more consistent application by companies. We expect that this should be the case by referring to the principles of the bi-partisan ILO agreement.			
Survey	German Investment Funds Association BVI	Association of financial institutions	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, S3-S5; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	We greatly appreciate EFRAG's commitment to ensure adequate coverage of PAI-sensitive data in the ESRS and subscribe to the view that it can still be sourced from the ESRS despite significant reduction in the number of data points. The upcoming SFDR review will also put the PAI indicators included in Annex I of SFDR Delegated Regulation under close scrutiny. While discussions could arise about the decision-usefulness and added value of the voluntary PAI indicators in Tables 2 and 3, we expect that the 14 mandatory indicators on PAIs for companies will remain broadly relevant, since they have been integrated in the investment process by (large) UCITS and AIF managers and used as the basis for the "do no significant harm" assessment for sustainable investments. A recent survey among BVI members has confirmed that PAI indicators on GHG emissions, violations of UNGC/UNGP and OECD Guidelines for multinational undertakings as well as investments in banned weapons are generally considered both, decision-useful and relevant for investors. These indicators should thus be maintained under the future SFDR and must remain fully available under the revised ESRS.			
Survey	German Investment Funds Association BVI	Association of financial institutions	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	We support the revision of AR 26 in the amended ESRS E4, given that the ESRS GDR still require companies to publish information on the methodology, baseline value, scope of the target etc. However, given that measuring and reporting on biodiversity IROs are not fully mature, further revision would be helpful to account for the market experience with the TNFD framework. The potential international standards currently under discussion by ISSB should prompt a broader review of ESRS E4 in due time.			
Survey	German Investment Funds Association BVI	Association of financial institutions	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	We agree that the datapoint on adjusted gender pay gap by employee ratio is not absolutely necessary and that it is preferable to maintain the unadjusted gender pay gap since it matches a mandatory PAI indicator under SFDR. With the national implementation of the EU Pay Transparency Directive, the information on unadjusted gender pay gap should become more broadly available. On the other hand, the transposition of the EU Pay Transparency Directive is crucial to close the data gap, since the indicator on unadjusted gender pay gap is currently one of the SFDR PAI indicators with the poorest data coverage. We suggest that EFRAG highlights this interdependency when submitting its recommendations for ESRS revision.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	German Investment Funds Association BVI	Association of financial institutions	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We deem it very unfortunate that EFRAG does not attempt to clarify the value chain boundaries for asset managers and other financial institutions, apparently due to the assertion that this is a topic discussed at Level 1. However, since we have not heard of any relevant discussions as part of the Omnibus I negotiations, it must be feared that no further clarification will be obtained and the financial sector will be left with the same uncertainties in terms of ESRS application that prevail today. Value chain of financial services must be interpreted against the background of the relevant business model while aiming for equivalent treatment across sectors. The case of asset managers who take investment decisions on behalf of their clients when managing third-party assets and in line with the instructions given by the client must be distinguished from investment decisions by banks and insurance companies who take the risk on their own books. In any case, should the sector-agnostic nature of the ESRS inhibit due clarifications, we would support development of sector-specific application guidelines that should be non-binding in nature. Such guidelines would allow for an in-depth, differentiated response to the value chain issue for financial institutions, but could also resolve many other application challenges, e.g. related to a top-down analysis of material IROs in specific sectors. Moreover, we would see value in adding further clarifications as regards the "compatibility with 1.5 degrees" for the transition plan disclosures, in particular regarding the base year as a reference point for measuring the GHG emissions and setting reduction targets, in order to ensure meaningful and decision-useful information.			
Survey	ChemSec	NGO	Sweden	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	Quantative information on financial effects is most important for investors to understand the financial risks. Loosing this limits transparency and how these factors impact company performance and risk.			
Survey	ChemSec	NGO	Sweden	35.E2-1.	Do you agree with the amendments of this chapter?	I disagree	Do not switch from mandatory to non-mandatory reporting - the pollution topic is underevaluated and companies can choose already, if it is material to them or not.	E2	Disclosure Requirement E2-1 - Policies related to pollution	
Survey	ChemSec	NGO	Sweden	35.E2-2.	Do you agree with the amendments of this chapter?	I disagree	Do not switch from mandatory to non-mandatory reporting - the pollution topic is underevaluated and companies can choose already, if it is material to them or not.	E2	Disclosure Requirement E2-2 - Actions and resources related to pollution	
Survey	ChemSec	NGO	Sweden	35.E2-3.	Do you agree with the amendments of this chapter?	I disagree	Do not switch from mandatory to non-mandatory reporting - the pollution topic is underevaluated and companies can choose already, if it is material to them or not.	E2	Disclosure Requirement E2-3 - Targets related to pollution	
Survey	ChemSec	NGO	Sweden	35.E2-4.	Do you agree with the amendments of this chapter?	I disagree	Please set the mass units - otherwise reports are not comparable	E2	Disclosure Requirement E2-4 - Pollution of air, water and soil	
Survey	ChemSec	NGO	Sweden	35.E2-5.	Do you agree with the amendments of this chapter?	I disagree	Do not switch from mandatory to non-mandatory reporting - the pollution topic is underevaluated and companies can choose already, if it is material to them or not. Please set one mass unit, so that data is comparable. Please use H-phrases as hazard class definition.	E2	Disclosure Requirement E2-5 - Substances of concern and substances of very high concern	
Survey	Medtronic	Preparer (non-financial preparing a sustainability report)	United States	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	To support practical application within the DMA and enable interoperability, we respectfully request EFRAG align its financial materiality definition with existing definitions. Specifically, we'd encourage EFRAG to broadly align with the IFRS/ISSB's definition of financial materiality, while providing entities the option to apply the definition that best aligns with their reporting structure and the respective financial reporting framework in the jurisdiction in which they will be filing their CSRD report.			
Survey	Medtronic	Preparer (non-financial preparing a sustainability report)	United States	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Medtronic	Preparer (non-financial preparing a sustainability report)	United States	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Medtronic	Preparer (non-financial preparing a sustainability report)	United States	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Medtronic	Preparer (non-financial preparing a sustainability report)	United States	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1	As a preparer, I am supportive of EFRAG's recommendation that the Commission not include the Non-Mandatory Illustrative Guidance (NMIG) in the Delegated Act. I think the placement of the NMIG is important – as it should serve as a helpful reference, not as a regulatory requirement. Excluding it from the Delegated Act makes clear to assurance providers that the NMIG is not a mandatory compliance checklist. This distinction helps ensure the NMIG remains useful and flexible for preparers without creating unintended obligations.			
Survey	Medtronic	Preparer (non-financial preparing a sustainability report)	United States	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	As a preparer, I am strongly supportive of Option 2 which limits disclosure requirements to qualitative information, with voluntary quantitative reporting. I believe qualitative disclosures in this area are more decision-useful for users, primarily for the following reasons: 1)Speculative Nature of Forward-Looking Data: Unlike historical financial data, which is grounded in actual events, disclosures of anticipated financial effects rely heavily on forward-looking assumptions about future climate scenarios, technological advancements, and regulatory changes. 2)Lack of Comparability for Users: Mandating quantitative disclosures may also undermine comparability across companies.			
Survey	Medtronic	Preparer (non-financial preparing a sustainability report)	United States	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Medtronic	Preparer (non-financial preparing a sustainability report)	United States	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	Suggest keeping these as voluntary disclosures only			
Survey	Medtronic	Preparer (non-financial preparing a sustainability report)	United States	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Recommendation 1 - Member companies across industries observed differences in auditor views on impact materiality assessments – particularly regarding how preparers should consider remediation, mitigation and prevention policies (1)EFRAG should consider combining actual and potential impacts. Members believe that maintaining separate assessments for actual and potential impacts creates unnecessary complexity and hinders efficiency in identifying and evaluating material impacts. Alignment would offer preparers a clearer, more practical framework for making assessments, while also giving users and assurance providers greater transparency into how those assessments are performed. Recommendation 2 - with respect to the disclosure of emissions (Paragraph 32), we are concerned that the Application Requirements (ARs) on defining the organizational boundary are overly prescriptive and not aligned with current practice. Many members currently apply the operational control method, while the amended ARs prescribe the financial control method (unless it fails to provide fair presentation). The ARs, as currently written, may require companies to shift away from how they manage and monitor targets internally – which we believe to be counterintuitive and not supportive of user understanding of an entity's efforts related to GHG emissions. We respectfully recommend EFRAG consider modifying ARs related to Amended E1-8 to align with ISSB S2 and California (SB 253) reporting requirements, both of which reference the GHG Protocol as the basis for defining the emissions boundary. Alignment with the GHG Protocol would improve interoperability, as many companies already have processes and controls in place to comply with its requirements when preparing ISSB and California filings. Further, users and investors are already familiar with a company's emissions reporting per the GHG Protocol. As such, we believe requiring companies to change their emissions boundary approach would reduce comparability across filings and may create confusion for investors			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ETSA	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	ETSA members view the simplifications and additional guidance concerning the Double Materiality Assessment (DMA) as a pragmatic and welcome development. A specific positive change ETSA members value is the introduction of upfront scoping and a top down approach to materiality, enabling organizations to quickly identify evidently material or immaterial topics based on their business model. This allows to reinvest efforts in analysing areas of uncertainty. The confirmation of ESRS as a fair presentation framework is appreciated. ETSA members believe CSRD should be about presenting decision-useful information to market participants – and not about a compliance approach.			
Survey	ETSA	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	EFRAG introduces more granularity in when and how to adopt the 'net vs. gross' approach. ETSA members believe that this introduces extra complexity and subjective judgement on the side of preparers, needing to 1) classify actions into prevention, mitigation and remediation actions, 2) being able to assess the influence of such actions on impacts. ETSA members express a preference for a gross approach, based on the following considerations.			
Survey	ETSA	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	ETSA	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Many of the structural simplifications within ESRS 2 are welcomed. ETSA members stress the relevance of a clearer and more user-friendly structure for IRO reporting, as well as being able to aggregate the reporting of policies, actions, targets (PATs) for groups of IROs or even topics. This will avoid excessive reporting.			
Survey	ETSA	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	The association values the ongoing efforts by EFRAG to amend, clarify and simplify the first set of European Sustainability Reporting Standards (ESRS). ETSA's advocates constructively for a framework that remains both practical and effective, facilitating the disclosure of meaningful and decision-useful sustainability information. ETSA members welcome the consolidation of voluntary datapoints into non-mandatory illustrative guidance (NMIG), bringing more clarity for preparers on what to report. At the same time, we would like to point out: •That assurance providers should not include NMIG into assurance requirements, unless specifically asked for by the preparer.			
Survey	ETSA	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Next to interoperability with other reporting standards (see next section), also stability of reporting requirements is essential for preparers (eg. NMIG datapoints should not be moved into the body of the standard). ETSA members agree with EFRAG on the position to keep NMIG out of the delegated act.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ETSA	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Regarding the relief for undue costs or efforts related to data quality, members stress that such provisions should not compromise the comparability of reported information. Any time limits placed on this relief should be carefully considered to balance the need to reduce reporting burden with the imperative for robust, comparable data over time. ETSA stresses that a public reporting duty should not distort market competition or compromise the protection of know-how and intellectual property, eg. on anticipated financial effects related to opportunities (see section on anticipated financial effects). A relief (in line with IFRS) on omitting commercially sensitive information would be welcomed, provided that it does not require undue efforts in proving the sensitive nature of information to assurance providers.			
Survey	ETSA	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	Regarding the relief for undue costs or efforts related to data quality, members stress that such provisions should not compromise the comparability of reported information. Any time limits placed on this relief should be carefully considered to balance the need to reduce reporting burden with the imperative for robust, comparable data over time.			
Survey	ETSA	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The provisions for reporting anticipated financial effects have prompted significant discussion. ETSA members support option 1 "quantitative first", with multiple provisions: •The focus should be on the quantification of what is material. •Preference to limit quantification to material risks, and to allow for estimations of anticipated effects in ranges as (probably) used in the double materiality assessment. Opportunities are harder to quantify and quantification is more likely to contain commercially sensitive information. •Preference to limit quantitative disclosures to material physical risks. ETSA members recommend providing relief for material transition risk quantifications by allowing companies to rely on qualitative disclosures.			
Survey	ETSA	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	- Preference to limit quantitative disclosures to material physical risks. ETSA members recommend providing relief for material transition risk estimations by allowing companies to rely on qualitative disclosures. - It is not clear whether this also includes monetary amounts related to material transition opportunities, which are hard to estimate or might contain sensitive information			
Survey	ETSA	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	ETSA acknowledges the importance of interoperability, particularly with IFRS standards, while recognizing that achieving full interoperability remains a nuanced and ongoing task.			
Survey	ETSA	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ETSA	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Biodiversity transition planning: crafting this kind of transition plan is not common knowledge amongst preparers. ETSA members advocate for clear scientific methodologies and sufficient guidance from standard setting bodies on how to develop targets and transition plans for biodiversity impacts. EFRAG can bring the NMIG on biodiversity transition planning to the level of climate transition planning, most especially on how to apply scenario analysis and how to set biodiversity-related targets according to the latest trends. This approach should remain pragmatic and proportionate especially in terms of cost and resource requirements, even for NMIG. •ETSA members question the usefulness of the mandatory nature of disclosing a transition plan in the sustainability statement, conditional to being already public (E4-1:12).			
Survey	ETSA	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	E2-4: •EFRAG proposes, and ETSA members approve, to clearly distinguish between primary and secondary microplastics for reporting purposes. ETSA follows the advice of EFRAG SRB, SR TEG sub-group and the outreach analysis to qualify the calculation and reporting of secondary microplastics as qualitative – due to the lack of mature methodologies. To stimulate the development of knowledge on this topic, EFRAG could allow preparers to voluntary report secondary microplastics if the information is (publicly) available. oETSA members note that reporting on the generation of secondary microplastics does not equal (sole) responsibility on the generation of secondary microplastics (textile manufacturing). On this topic, ETSA members advise the European Commission to take the value-chain wide accountability into account when developing legislation related to secondary microplastics. E5 -4: •When disclosing metrics on resource inflows, EFRAG coins the definition of 'key materials'. Evaluating the definition of key materials in the glossary, ETSA members find it hard to define a threshold on when to define a material as key. This is especially important as all other resource inflow metrics are derived from this assessment. •The introduction of the metric related to the percentage of "critical and strategic materials" is also a concern. Members question its practical impact on the ETSA value chain and the feasibility for downstream users to reliably obtain and report such granular data. ETSA members advise to only mandate this metrics for preparers that are found upstream the value chain, that have primary access to this data. •Reporting on relevant resource-related metrics is very sector-specific. As EFRAG postponed the release of sector-specific reporting standards indefinitely, NMIG might suggest sector-specific metric frameworks to be used by preparers (eg. Circular Transition Indicators (CTI), ISO 59000 or others).			
Survey	ETSA	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	The confirmation of ESRS as a fair presentation framework is appreciated. ETSA members believe CSRD should be about presenting decision-useful information to market participants – and not about a compliance approach.			
Survey	ETSA	Business association (other than association of financial institution)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	ETSA	Business association (other than association of financial institution)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	ETSA members advocate for clear scientific methodologies and sufficient guidance from standard setting bodies on how to develop targets and transition plans for biodiversity impacts. EFRAG can bring the NMIG on how to set biodiversity-related targets according to the latest trends			
Survey	ETSA	Business association (other than association of financial institution)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	EFRAG retains the disclosures on a gender pay gap. ETSA members stress the need to align definitions and reporting on pay gaps with 1) other relevant EU legislation (like the Pay Transparency Directive (EU) 2023/970 and 2) national legislations that require reporting of pay gaps.			
Survey	Lithuania Green Finance Institute @ ILTE	Other - please specify (required)	Lithuania	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	We support the efforts to clarify the requirements related to the DMA. Based on the first-year experience with the preparation and audit of sustainability statements in Lithuania, we have observed significant challenges faced by companies and auditors. Many companies expressed concerns about the lack of clarity regarding the level of documentation required to make the audit process feasible. At the same time, auditors questioned the robustness of the DMA in great detail, which created additional pressure on reporting entities. Another issue was the strict interpretation that no immaterial information could be included in sustainability statements, leaving companies with very limited flexibility to use their sustainability reports not only as accountability tool but also as instrument of communication. Against this background, we support clearer regulatory guidance on how to apply the DMA in practice, what level of documentation is expected, and how materiality should be applied in order to strike the right balance between ensuring auditability and allowing companies to provide meaningful sustainability information to their stakeholders.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Lithuania Green Finance Institute @ ILTE	Other - please specify (required)	Lithuania	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Lithuania Green Finance Institute @ ILTE	Other - please specify (required)	Lithuania	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The Green Finance Institute in Lithuania act as a national centre of knowledge and expertise on sustainable finance, coordinating discussions among public sector and financial institutions, businesses, and other stakeholders. In these discussions, we have identified a concern regarding the definition of the value chain for the financial sector. Initially, it was expected that this issue would be resolved through the sector-specific ESRS for financial institutions. As the decision has been taken by the Council and the Commission to discontinue sector-specific standards, the originally foreseen solution is no longer feasible. Based on our expertise and stakeholder dialogue, we believe that the CSRD text is not the most suitable place to introduce a specific definition of value chain for financial institutions. We strongly recommend that such a definition is integrated directly into the revised ESRS, which is the appropriate framework for providing clarity to reporting entities and ensuring consistency of application across different sectors, including financial sector. Providing a clear and operational definition of the value chain for financial institutions within the ESRS would significantly enhance legal certainty, improve the quality of sustainability reporting, and support comparability across the EU.			
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	We acknowledge that the process has been simplified and flows better. As the fundamentals have not been amended, the revised process will, however, not lead to a substantially different conclusion on IRO-assessment. We believe the standards must ensure a reporting focused on the principal (most severe) impacts and the most significant risks and opportunities To achieve this, a revised materiality threshold must be adopted (ESRS 1.28), requiring disclosures only on impacts with significant effects and of risks and opportunities of strategic importance to the business model of the preparer. Only entity-specific sub-topics to ESRS topics shall be included, not new topics. Furthermore, we need guidance emphasising focus on the business model for Investment Holding Companies and financial institutions. In addition, the materiality of information (ESRS 1, section 3.1) should only require information that is indispensable for the understanding of the entity's IROs and clearly necessary for users' decision-making. Therefore, the link to decision making (decision-usefulness) needs to be strengthened and the needs of primary user groups´ should be better explained. The user group for impact materiality (ESRS 1-4b) remains overly broad and should be limited to those (potentially) having a financial or social engagement with the undertaking, i.e. to primary user groups. Addressing the above-mentioned changes are important to avoid an extensive and unfocused sustainability reporting, essentially obscuring the reporting for the primary user groups. The section on materiality of information should also clarify how the "shall requirements" work together with decision-usefulness and understandability and allow for assessment of DR's in the light of the entirety of information provided for a given IRO, emphasizing relevance and a faithful representation without cluttering the reporting. Finally, the requirements on entity-specific reporting (both the DMA-level and metric level (ESRS1-10)) needs to be limited to avoid a de-facto reintroduction of the removed DRs			
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	The proposed rules are complicated to comprehend, quite abstract and thus potentially challenging to apply in practice. Furthermore, the calculations and assessments of gross/net will be overly complex or even impossible for many undertakings. We are specifically uncertain about how to assess the severity and likelihood of potential negative impacts, especially those where mitigating actions are ongoing. It is difficult to assess and report on an impact/situation before mitigation actions are taken, when the actions are implemented, crucial for the operation and part of business as usual. Preparers would essentially have to assess a hypothetical situation. The description of gross/net should be amended, making it clear that the outset of the materiality assessment of actual impacts should always be based on the business as established and as it is operating throughout its normal operating businesses (e.g. including environmental approvals/rights to produce, H&S measures and other procedures and controls in places). Similarly, potential impacts, risks and opportunities should be assessed taking preventive and remediating actions into consideration when such are established and the entity has the ability and intention to activate those if/when relevant (for instance an internal fire brigade or a well-established system to quickly deal with minor oil-spills). Where mitigation has successfully taken place there is no real risk and thus, nothing to report on. Against this backdrop, we suggest deleting the proposed detailed rules on when mitigation activities can and cannot be taken into account. The preparers should be able to use the most meaningful and relevant assessment methodology provided it is explained in the sustainability reporting. In this regard, we note that ISSB leaves it to the preparers' judgment as to whether and how to consider risk mitigation activities.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We partially agree. The provided flexibility is appreciated and important to provide relevant and easily accessible information to the primary user groups. We have identified the following measures to further enhance the flexibility and the relevance: Structure of the reporting: We suggest providing flexibility in the order of the E, S and G-sections (ESRS.1-105) as this would allow preparers to present the information more logically based on its business model and provide enhanced readability and accessible information for the primary users. This is particularly important when the social aspects are the most important to the reporting entity. We support the introduction of appendices (ESRS1-105+110), but suggest, further flexibility in location of appendices and extensive tables, e.g., allowing for a part 2 of the sustainability report located after the financial section (provided this is allowed under national legislation) as this provides clarity in the reporting. Incorporation by reference: We believe the requirements on "incorporation by reference" (ESRS1-9.3) should be less granular for ESRS 2, allowing for DR-references to the relevant (sub)section in the management review, e.g., "ESRS2-GOV1 is incorporated in section xxx of the management report". The practical solution on identifying sections with different levels of assurance should be left to the preparers and auditors. This would support better integration of, e.g. strategy, business model and the governance-information with the counterparts in the management report. Non-material information: We support the possibility to provide non-material information (ESRS.1-108) to meet the needs of specific stakeholders, when clearly labelled as non-material information. However, we believe the requirement for non-material information to provide a faithful representation (ESRS.1-108(b)) should be deleted as this goes beyond relevant criteria for such information, and that the requirement (108(a)) on non-obscuring is sufficient.			
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We Partially Disagree We acknowledge the simplifications achieved by removing requirements on GOV, SBM and IRO, and certain details relating to PAT from the topical standards, but have noticed that the majority of requirements are maintained – some merely combined under one DR. Although the amendments provide a better structure and simplification, there is a need for further significant reductions and enhanced focus on key aspects relevant for the year reported on. Particularly, the requirements on SBM and GOV focuses on "everything-included-report" rather than on significant/important changes in the year. We suggest reducing/focusing the IROs to those most significant and amending the materiality of information with strong focus on the key aspect of each IRO. EFRAG should describe the objective and purpose of each DR, while ensuring it's not becoming a separate datapoint. As the standards still require somewhat "generic"/boilerplate information regarding policies and targets, we believe the sustainability reports will only be slightly reduced and the efforts on preparation are not considered to be reduced. In our opinion, the reporting should focus on the actions and targets, i.e. what the entity is doing to address the IROs and how it tracks progress as these are the key interests of most users. Furthermore, we highlight that extensive descriptions of policies are not generally considered to support the need for relevant and comparable information. To facilitate better and more focused reporting, we suggest focusing on AT or ATM and seperating reporting Policies from the more specific actions, metrics and targets, thereby providing a more overarching approach to policies. In addition, we suggest that it's clearly stated that materiality on information apply to all DR, including the description of policies. Finally, we believe there are some overlaps between GDR-T (ESRS2-43) and the requirements on GDR-M, and BP / description of accounting principles.			
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We Partially Agree We support that all "may"-disclosures have been eliminated, and the new structure where all the "shall-disclosures" are included in the main body of the standards as well as the intention that ARs should not include any mandatory requirements. However, the AR's still provide a mix of mandatory requirements, examples and guidance. We suggest all ARs are reviewed and that any mandatory requirements moved to DR's, and examples and guidelines to the NMIG. Some datapoints have been merged to improve the readability and understanding of the requirements although still requesting the same information. We support this but suggest that the objective of a disclosure requirement is clearly described to support a more principles-based approach and to ensure it is evident how it supports the fair presentation and fulfil the decision-usefulness of users. Overall, the language of the standards has improved, with some new terms being introduced. We suggest ensuring that all new terms are defined in the standard or explained in the Basis for Conclusion to reduce any interpretation challenges. The term "shall consider" should be clearly defined, both in relation to the difference to the term "shall disclose" and in relation to the need for documentation of the consideration, hence how can "consideration" be measured or assured. Furthermore, "is expected to" should be defined, including a clarification that the term does not impose additional documentation requirements. To reduce the transition costs, we strongly encourage EFRAG to publish a new Excel sheet of datapoints as soon as possible, with a correlation table linking the previous and updated datapoints. We believe further clarification is needed on how the value chain cap and the scope of VSME (ESRS2-63) affect the requirements for entity-specific disclosures. Furthermore, we suggest a systematic review of ESRS1-5.1+5.2 as outlined in part 3 of this questionnaire.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We agree with EFRAG that the NMIG should not be part of the delegated act. We believe a NMIG-document can provide valuable and helpful information and implementation support, but it needs to be re-written to include other guidance issued by EFRAG (FAQ's, IG1-3). At the same time, the old versions of these documents (FAQ's+IG's) need to be removed as they should be incorporated into the revised ESRS and/or revised illustrative guidance document if still relevant. The NMIG in the current form is not ready for publication -The current version of the NMIG is a collection of the left-overs of set 1 as indicated in the introduction to the question. -The NMIG needs to be stripped from "EFRAG SRB intentions" as these should be part of the "Basis for conclusions" -To the extend the NMIG tries to explain the intention of a definition, clarification of the definition itself may be more relevant. -The illustrative guidance should include more diverse examples (and always minimum 2), to the extent possible based on best practice sustainability statements, illustrating – where relevant – more than one approach to ensure that the intention is conveyed, but without limiting options for the actual reporting. This will strengthen the "non-binding nature of the document". We encourage EFRAG to make use of for instance 10 "standard-companies" representing different industries and/or complexities in the analysis to ensure a structured variation in the examples and to better tease out the diversity in reporting challenges. This will also alleviate part of the pressure on sector guidance and allow for ongoing additions to the examples, which should be thought into the design. EFRAG should work on the NMIG after handing in the revised ESRS			
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	We disagree as we do not find the overall burdens reliefs to be sufficient. Most importantly, we emphasize a strong need further improvements ensuring that reporting according to ESRS provides a complete set of decision-useful information for the primary user-groups. While we recognize the efforts made to reduce burden, and agree to principles of undue costs and efforts, we find that further burden reductions are possible while maintaining transparency in support of the EU green Deal. To ensure that the envisaged burden reductions are realized in practice, we would like to highlight our fundamental concerns iterated in Q11, 12 and 25 (including the application of materiality and the concerns regarding the scope of entity-specific information) as they also impact the elements highlighted here. We support the introduction of the "undue cost or effort" relief, as it will set a limit to the spending to prepare sustainability statements. The introduction of the "undue cost or effort"-relief is therefore extremely relevant and necessary to achieve the needed simplifications. It is therefore important that the principle is applicable and consistent throughout the standards, also covering E1-6 (as also mentioned in Q18).We believe the "use of estimates" constitutes an important element (to be seen on equal footing as a source of reliable data) and should also be included by the undue cost and effort principle. We note that there seems to be some inconsistencies – or at least different nuances – due to the term being used slightly different in different parts of the standards. Finally, we would like to note that while we agree with the statement in ESRS1-89 that the assessment can change over time – and often will – there are instances where data is unlikely to become available in a foreseeable future. For comments regarding ESRS1-91, please refer to Q18.			
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We understand that this question addresses section 7.4 and ESRS1-91 in particular We support the relief proposed in ESRS1-91 and see no need for a time limit. Estimates shall meet the qualitative criteria of faithful representation, and QC9 clearly states that information can be accurate without being perfectly precise in all respects. For this reason, we suggest extending the relief to cover GHG emissions as well. The E1-6 exclusion is not justified and should be deleted. The incorporation of this relief is clearly positive, but it should be acknowledged that some data may be permanently unavailable, especially given the expected significantly reduced CSRD scope due to the omnibus, and that this is beyond the company's control. Therefore, there should not be a time limit to the relief. Furthermore, we believe this evaluation is not needed yearly, depending on the specific metrics and the nature/reasoning for data either not being available or for the use of estimates. We believe the principle in ESRS1-89 grasps this as it indicates that the assessment can change over time as circumstances change and hence the formulation of the last sentence in ESRS1-91 needs to be adjusted accordingly. Finally, the standards clearly state that they do not impose behavioral - or conduct requirements, only disclosure requirements. Hence, there is no requirement to cease cooperation if the counterparty cannot or will not provide data. The relief for missing data should be applied consistently regardless of the disclosure type.			
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	The Danish business community is deeply concerned about the requirement to disclose anticipated financial effects. Such information is highly dependent on estimates and a large variety of possible developments and outcome, which cannot be reliably projected and for this reason subject to significant uncertainty. Anticipated financial effects would therefore not provide reliable insights for investors or other users, due to their potential variability. Disclosing premature information on matters that are not yet actively incorporated in the entity's financial planning may involve a measurement uncertainty and thus lead to unprecise or even unreliable information that may not only mislead stakeholders but also expose companies to reputational and legal risks associated with misinterpretation. Furthermore, the Market Abuse Regulation (MAR) would require that the issuer continuously and upon any change to the disclosed financial effects communicates these to the market, leading to excessive and disproportionate burdens. We appeal for a thorough investigation and debate about what the requirement on anticipated financial effects in reality entails, involving not only the Commission but also ESMA, EBA and other relevant bodies. If the requirement to disclose anticipated financial effects remains, then Option 2 (qualitative information) is highly recommended.			
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	We disagree with most of the detailed disclosures on anticipated financial effects in the E1 standard. We generally believe, subject to our answer in Q19, that option 2 should also apply for climate-related anticipated financial risks and opportunities. Furthermore, we disagree with a significant amount of the detailed requirements and refer to our detailed answer on -ESRS E1 paragraph 40a, c and d; -ESRS E1 paragraph 40a, b, c, d and f; -ESRS E1 paragraph 42			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We partially agree We believe that undertakings should be able to comply with both ESRS and ISSB global standards without major obstacles, if they wish to. Users should be able to compare ESRS Sustainability Statements with ISSB sustainability statements without understanding difficult technical differences. We therefore support aligning basic concepts and overlapping disclosure requirements. It is, however, important to take into consideration that ESRS applies to both listed and unlisted undertakings, where ISSB generally shows consideration to listed entities. We find that ESRS should provide minimum requirements to ensure it's appropriate and proportionate for the smallest entities within CSRD. In addition, the ESRS requirements should be within (a subset) of the IFRS-S requirements, and we suggest EFRAG provides guidance on additional (voluntary) information to be provided to gain full interoperability with ISSB standards. For this reason, we support option 2 for anticipated financial effects. The consolidation-requirements in ESRS differ from those in IFRS that may be difficult for users to understand. Ideally, such general concepts should be aligned. Even though we find it important to ensure an alignment between ESRS and ISSB Standards on how to understand fair presentation and "undue cost or effort", we believe the primary alignment of the ESRS-standards should be with other EU-legislation (which applies to all companies in scope) and secondary with ISSB. The EU-alignment is especially important for the topical standards and governance sections which is significantly governed within EU. EFRAG should provide guidance on the alignment when language in the standards is not identical. The "may"-reference in paragraph 11 referring to the IFRS industry-based guidance and GRI sector standards should be moved from the standards to the "basis for conclusions" as this is a voluntary ""may". Keeping the reference in the standards will de facto endorse these standards through the back door.			
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	We disagree. While we support the total reduction of disclosures by 68%, we see a need to stress that there is no 1:1 correlation between these numbers and the actual burden reductions for reporting entities. Based on our analysis and discussions with several of the largest Danish entities, their analysis and initial assessment of applying the amended standards, it is our conclusion that the draft standards will only result in very limited administrative burden reductions for reporting entities – only around 5-10 pct. The reduction in data points must also materialize in actual burden reductions, to ensure the Omnibus ambitions are met. We find that further burden reduction is possible while maintaining transparency in support of the EU green Deal and without impairing the needed data infrastructure to requirements for the financial sector in SFDR, CRR, Pillar 3 etc. We suggest considering further reduction in the mandatory datapoints for instance by removing granularity, in particular in S1. Furthermore, we suggest adding additional guidance to the assessment of materiality of information described in ESRS 1, section 3.1 or 3.6, making it easier for the preparer to deem information non-material taking the characteristics of the IRO into consideration, e.g. considering whether it is actual or potential, or material due to scale or scope being most important. This would be particularly relevant for the IROs that "only just" met the threshold set in accordance with ESRS 1, para. 28, and would – besides reducing the reporting burden – provide a more focused and decision-useful report. This also links to our comments relating to policies in Q14 that illustrate this point.			
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We are of the opinion that the amended ESRSs should not introduce new "shall"-requirements and support the deletion of the "may" disclosures. We cannot support the six datapoints added as they would impose significant additional reporting burden in particular on E3 Water requiring a full water-balance calculation independently of the structure of the group and reason for water being material. Although, E4 Ecosystems and Biodiversity only require information on transition plans when such a plan is in place, we believe that it is too early to add such requirement to the standard as global frameworks and models to measure biodiversity and ecosystems are still being developed. Therefore, most entities would be able to make a reliable estimate of the baseline whereby defining a transition plan would be impossible. Lastly, we note, that datapoints added to the governance standard add complexity and might impose risk of self-incrimination or other legal risk. As described in our answer to question 22, we suggest adding additional guidance to the assessment of materiality of information described in ESRS 1, section 3.1 or 3.6, making it easier for the preparer to deem information non-material taking the characteristics of the IRO into consideration, e.g. considering whether it is actual or potential, or material due on scale or scope being most important. We believe, it's important to facilitate a better use of materiality on information; and in particular with the addition of new "shall" requirements its important the preparers have the ability to deem these (as well as other) information non-material when that is the case.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	Firstly, we want to highlight, that the imposed granularity in ESRS E5 in relation to detailed datapoints on inflow and outflow goes way beyond the elements mentioned in the question. We are of the opinion that the amended ESRSs should not introduce new "shall"-requirements and cannot support the datapoints added as they would impose significant additional reporting burden in particular on granularity of key resources/products in the inflow and outflow information required in ESRS E5. The datapoints required would be almost impossible to gather as the inflow/outflow does not only take place for each individual resource/products, but are complex components, e.g. when a resource inflow is embedded in semi-finished goods or a mix of several products. In relation to the two datapoints suggested to be added to E5-4 and E5-5, please note our comments provided in part 3 to this questionnaire on consistency between the definitions and terminology in ESRS E5 and the EU waste regulation. As described in our answer to question 22, we suggest adding additional guidance to the assessment of materiality of information described in ESRS 1, section 3.1 or 3.6, making it easier for the preparer to deem information non-material taking the characteristics of the IRO into consideration, e.g. considering whether it is actual or potential, or material due on scale or scope being most important. We believe, it's important to facilitate a better use of materiality on information; and in particular with the addition of new "shall" requirements its important the preparers have the ability to deem these (as well as other) information non-material when that is the case.			
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	25.	Emphasis on ESRS being a “fair presentation” reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We Partially Agree. We support the purpose of introducing the fair presentation concept, which should make it easier to leave out information that is not material and/or unreliable. The purpose, however, is not directly reflected in the incorporated rules nor clearly defined. Overall, in its current version, the concept seems to create an additional burden rather than simplification. The description and definition of fair presentation need to be amended to define a fair presentation of the sustainability report in its entirety for the topics covered by the CSRD, rather than a focus on a fair presentation of each individual IRO and its related disclosure requirements. This would require changes to ESRS 1, paragraph 16 and 18, and consequential changes to the definition of faithful representation in Appendix B. It must be made absolutely clear that fair presentation is used as an overall assessment to see if additional information is needed and to more easily leave out information which is found not-material and/or unreliable by the reporting undertaking in the assessment of materiality of information as defined in ESRS 1, section 3.1. We do not find this sufficiently clear in the current description and therefore recommend that EFRAG states this more clearly in the standards. We find that the current draft standards simply impose requirements on companies to ensure that their sustainability reporting meets a range of qualitative criteria. Thus, the interpretation of the "fair presentation" concept and the impact on the assurance process is unclear. The concept has to be elaborated preferably with reference to a revised materiality threshold focusing on strategically important matters ensuring that that sustainability report as a whole fairly present decision-useful information on the material sustainability matters to the users of the sustainability report. Please see our response to question 11 regarding user-groups.			
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 (“when only setting intensity targets”), to disclose also the associated absolute values” (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking’s progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We agree that financial institutions should be exempted from disclosing absolute GHG reduction targets. The reason is that financial institutions do not emit GHG to any significant extent. Therefore, financial institutions' targets aim at reducing emissions pr. invested/financed unit. Especially for insurers the estimation of absolute climate reduction targets would require extensive assumptions and be very complex, and provide a result with very limited value for users. Exempting banks from disclosing GHG emission reduction targets in absolute terms is needed. Over 90% of banks' GHG emissions typically stem from financing activities (Scope 3, Category 15), which means that their GHG emissions depend on companies and households that banks finance. Therefore, too many hypotheses are needed to calculate targets in absolute value, and the results are neither reliable nor comparable, because they ultimately depend on clients. Furthermore, the figures would reflect not only double counting but multiple counting of the same impacts and have no information value. For this reason, we strongly believe that banks should be exempted from disclosing GHG emission reduction targets in absolute terms. Intensity targets alone should be sufficient.			
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking’s employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	We believe that the requirement to disaggregate the metrics for characteristics of the undertaking's employees as now suggested to be for the top 10 largest countries with more than 50 employees is too detailed and removes the focus on material and substantial countries. Such a requirement would increase the reporting requirements compared with ESRS Set-1 and thereby contradict the purpose of the Omnibus. Furthermore, it will lead to additional reporting on more details than necessary for a fair presentation, undermining overall relevance. We suggest that the threshold of 10% is reintroduced or, alternatively, that the minimum number of employees is increased to match the threshold of the entities required to report under the CSRD. We also note that fair presentation would normally drive reporting at more aggregated levels, for instance regional, to provide more relevant information for the primary user groups and better align with the management approach that should also prevail in S1.			
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	We Partially Agree. Adequate wages is mainly a political subject. Therefore, disclosures on wages and wage-setting processes always needs to be seen in a national framework and in context of the national social dialogue. This is vital to ensure that local realities related to the cost of living and economic prospects are fully integrated, therefore the guidance and principles of ILO wage setting processes and principles on estimating a living wage are crucial. However, we believe that EFRAG and/or the EU-Commission needs to find practical solutions involving for instance databases that the reporting undertakings can rely on to promote comparability and consistency. We note that the OECD in 2023 published a policy insight "Living wages in practice" and would encourage EFRAG to invite OECD to provide their advice for a reporting basis that can lead to reliable and comparable principles			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	We would like to stress the importance and need for the data infrastructure being maintained and we find it positive that suggested changes etc. is communicated clearly to the EU-Commission to ensure consistency when the SFDR, CRR and other relevant regulations is to be updated to ensure the ongoing consistency in the infrastructure. To ensure the infrastructure is maintained in the future, we suggest incorporating a dynamic link between SFDR, CRR, Pillar 3 etc. and ESRS. This is especially relevant with the upcoming review of SFDR.			
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We Partially Disagree. We disagree with the proposal especially due to the maturity of measurement principles and the fact that these are still developing and expected to change and be further refined in the future. Instead, we suggest that EFRAG issue non-mandatory illustrative guidance which can be updated more frequently, adapting future developments in this area.			
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	We Partially Agree. Any disclosure on remuneration metrics on possible pay disparities should be fully aligned with the EU Pay Transparency Directive for the part of the company operating in EU. Therefore, companies should be able to use directly the information country by country they have supplied according to the directive as required in the national legislation implementing the directive. Furthermore, it is not feasible to try to spread an EU Directive globally and a disclosure of global unadjusted pay differences does not seem meaningful due to national differences across borders as wages and levels need to be seen in a national framework and in context of the national social dialogue. Having said this, we do not believe the number provides meaningful nor relevant information – and hence conflicts with the fundamental qualitative characteristics like relevance. Furthermore, as the number is already reported under the EU Directive to the public authorities, the reporting requirement essentially duplicates other reporting and should be deleted. If reporting on gender pay gap is retained, we suggest to revert to a more meaningful disclosure, like the adjusted pay gap			
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	We agree with the amendments suggested, and that setting up a specific metric, uniformly applicable without undue costs and efforts (including the challenges for identifying the relevant datapoints in the global ERP-systems) was not proportionate. We agree with the PAT-approach that ensures that the topic – if material – is addressed and that the reporting undertaking can set the relevant targets			
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	In our opinion it's crucial that the revised ESRS provide a significant burden-reduction. Based on discussions with several of the largest Danish entities, their analysis and initial assessment of applying the amended standards, it's our conclusion that the draft standards will only result in very limited administrative burden reductions for the reporting entities – and likely only around 5-10 pct. The amendments must materialize in actual burden reductions and ensure a report providing information that is indispensable for the understanding of the entity's IROs and clearly necessary for users' decision-making. To ensure this, the standards must ensure reporting focused on the principal (most severe) impacts and the most significant risks and opportunities. Therefore, a revised materiality threshold must be adopted, requiring disclosures only on impacts with significant effects and of risks and opportunities of strategic importance to the business model of the preparer. As indicated in the above responses, starting in Q11, the revised DMA process has not amended the fundamentals. Furthermore, clear criteria for the needs of primary user groups for decision-making and understanding shall be elaborated in order to determine whether those needs can be considered met. This includes limiting the primary user-groups to those, potentially, having a financial or social engagement with the undertaking. These improvements are crucial to achieving burden-reduction, ensuring decision-useful information as well as avoiding cluttering the reports with non-material information. We refer to the detailed comments in the other questions. Furthermore, we highlight the importance of resolving the issues for Investment Holding Companies. If no solution is provided at level 1, there is as a minimum a need for a general provision in ESRS 1 specifying that Investment Holding Companies must report based on their business model, i.e. not having operational control over the investees, thereby focusing the reporting on the investment decisions.			
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Partially agree The definition seems to be too narrow, as it only relates on the legal proceeding and complaints. The use of the term would generally be broader than this and include things that has happened "un-planned" or even as accidents. This also seems to be thinking behind the use of the term in, e.g., ESRS E2 paragraph 16(a). We suggest broadening the definition.			

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Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Structure of ESRS 1: We have noted that ESRS 1, section 2, describes fair presentation and qualitative characteristics of information, while the materiality of (sub-section 3.1), determining the information to be reported (sub-section 3.6) and level of aggregation/dis-aggregation (sub-section 3.7) is included in section 3 on the double materiality. We suggest moving sub-sections 3.1, 3.6 and 3.7 to section 2 for clarity as all of these sections are inter-related and describe the requirements for the presentation of the sustainability report and elements to be included. Reference to EU regulations: We have noted that amended ESRS E2, AR2+3, refers to (EU) 2024/1244 (Industrial Emissions Portal Regulation), whereas the current ESRS 2 references (EC) No 166/2006. Regulation (EU) 2024/1244 apply from 1 January 2028 at which date it repeals (EC) No 166/2006. This possibly leaves entities with an amended E2-standard applicable from 1 January 2027 which references an EU-regulation applicable on a future date. We recommend that EFRAG considers how the standards respect current and future regulations, including any possible early adoption, and considers how this is effectively incorporated into the standards. EFRAG should include general guidance on this for entities to be able to plan for any future changes in the EU regulation. Furthermore, we observed that the draft amendments remove references to existing EU legislation and frameworks that previously provided some context for preparers. While we understand that the intention may be to simplify the standards, this poses a need for more guidance to alignment with existing EU frameworks. Greater consistency in definitions and scope - particularly in relation to current and upcoming EU initiatives - would support more coherent, comparable, and decision-useful reporting, while also helping to reduce the compliance burden for companies navigating multiple regulatory obligations. We suggest keeping reference in the ARs or in the NMIG.			
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	35.ESRS1_5.1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Partially disagree Sub-chapter 5.1 attempts in short to explain concepts from financial reporting on consolidation, including exemptions, and which assets, liabilities, income and expenses are usually considered as part of own operations. These paragraphs are neither accurate nor sufficient as accounting legislation on consolidation is complex. We encourage EFRAG to ensure consistency with legal provisions for financial reporting and provide more elaborate guidance on how to present consolidated sustainability statements within the remit of level 1 regulation. In addition, we encourage EFRAG to consider the description of consolidation in light of the issues for Investment Holding Companies, which – if not solved in Level 1 regulation – should be handled within ESRS. Furthermore, we highlight the importance of resolving the issues for Investment Holding Companies. If no solution is provided at level 1, there is as a minimum a need for a general provision in ESRS 1 specifying that Investment Holding Companies must report based on their business model, i.e. not having operational control over the investees, thereby focusing the reporting on the investment decisions. Finally, the standards should, as an exemption, allow entities to apply the requirements on operational control in the GHG reporting to provide consistency with the GHG-protocol.	ESRS1	5.1 Reporting undertaking and own operations	
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	35.ESRS1_5.2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Partially disagree Sub-chapter 5.2 needs to be reworked in its entirety, by removing things covered elsewhere, e.g. undue cost or effort, use of estimates, examples of data sources, and separating paragraphs clearly being AR, e.g. ESRS 1 paragraph 63- 65.	ESRS1	5.2 Inclusion of value chain information	
Survey	Danish Industri	Business association (other than association of financial institution)	Denmark	35.ESRS1_7.3.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	Partially agree Paragraphs are widespread on sources of information expected used, e.g. ESRS 1, paragraph-27, 47, and 62, and various paragraphs mentioning the undue cost or effort relief, e.g. ESRS 1, paragraph-47, 60, and 87-89. A gathering of these paragraphs in sub-chapter 7.3 may avoid different interpretations as to what applies when, e.g. whether data available in-house shall be used in ESRS 1, paragraph 65	ESRS1	7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	
Survey	Plastics Europe	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The mandate given to EFRAG by the EU Commission to simplify sustainability reporting standards, including an aim to substantially reduce mandatory datapoints, is welcomed. However, the text "connected to the undertakings downstream value chain, information on secondary microplastics resulting from the breakdown of larger plastic items from the products of the undertaking" introduces a new datapoint which extends the scope into the downstream value chain. Our concern is that this represents an increase in complexity rather than a simplification and that the introduced requirement is unclear, difficult to implement, and not in line with the Commission mandate. This proposal does not enhance the reliability and auditability of sustainability reporting: materiality assessments require traceability and measurability. Polymers are used in a wide variety of applications with highly variable lifespans, designs, and disposal routes. It is nearly impossible to predict what the secondary microplastic generation of plastic articles would be a priori, as it depends on context-specific degradation mechanisms beyond the control or visibility of the reporting entity. Moreover, no existing framework allows undertakings to evaluate how their activities, or actors in a company's value chain, may contribute to environmental emissions of secondary microplastics from larger plastic items. Because of the absence of robust and harmonised calculation methodologies for estimating secondary microplastic emissions, as acknowledged by EFRAG, the proposed disclosure is qualitative and narrative-based. This imposes disproportionate effort and complexity without generating reliable or actionable insights, whilst requiring undue cost and effort, in contrast with the ESRS principles on downstream value chain information sharing. We therefore recommend removing the proposed disclosure requirement on secondary microplastics in paragraph 16(d) of the amended ESRS E2-4. The elimination of this provision would support consistency, proportionality, and meaningful reporting across the plastics value chain.			
Survey	European Committee of Central Balance Sheet Data Offices, ECCBSO (secretariat at Deutsche Bundesbank)	User (analyst, data provider, rating agency, etc.)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	When reviewing the ESRS revision documents, it appears that changes made for "readability" purposes primarily serves to the needs of companies in structuring the report. However, the concerns of the report's users, typically being the "readers" seem to be addressed only to a small degree. Phrases on important datapoints such as "users can still derive" or "similar information is already disclosed in financial statements" and the choice to present numerical data in text rather than in tabular format, rather contrast with the readability of sustainability report which stands on its own. Thus, EFRAG might also evaluate these readability aspects when preparing the final standards. Further, EFRAG could monitor future sustainability reports to see if readability varies across EU member states, as a uniform European approach would be beneficial for the comparability of these reports.			

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Survey	European Committee of Central Balance Sheet Data Offices, ECCBSO (secretariat at Deutsche Bundesbank)	User (analyst, data provider, rating agency, etc.)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Despite the higher level of uncertainty associated with the evaluation of anticipated financial effects, such quantitative information from material physical and transition risks are important for credit assessment systems and other sustainability analysis for understanding how climate risks and opportunities may impact a company's future performance. The permissible exclusion of such quantitative information under specific conditions should suffice. To reduce the burden on entities, the financial impacts stemming from "opportunities" may only optional be disclosed.			
Survey	European Committee of Central Balance Sheet Data Offices, ECCBSO (secretariat at Deutsche Bundesbank)	User (analyst, data provider, rating agency, etc.)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	European Committee of Central Balance Sheet Data Offices, ECCBSO (secretariat at Deutsche Bundesbank)	User (analyst, data provider, rating agency, etc.)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	The elimination of presenting revenues by ESRS sectors has also led to the removal of total revenue disclosure (SBM-1). This is detrimental for users of sustainability reports. Several aspects speak in favor of a mandatory disclosure although this datapoint can be found in the profit-and-loss-account of traditional financial statements: - Total revenues (or turnover) are crucial for evaluating a company's size, being a fundamental financial indicator providing essential context for interpreting sustainability performance. - The management report and the sustainability report are distinct legal documents (the latter being a specific component of the former). This distinction supports the necessity of mandating the disclosure in ESRS. - Revenue is used in multiple EU-frameworks, including SFDR and EU-Taxonomy. Removing disclosure would reduce interoperability and risks inconsistencies across EU sustainability regimes. -Removal of this datapoint would significantly affect future ESEF tagging; many companies will lack a specific tagged element since the respective financial statement requirements apply only to entities with securities on an EU-regulated market. - The additional effort required for companies to report this data is expected to be minimal, especially since it is included in conventional management reports and financial statements. - Some stakeholders being readers of sustainability reports and not necessarily of financial statements, might not be aware of this information being elsewhere in a connected report. Consequently, users have to apply extra efforts. - Turnover is addressed in the Delegated Act of the VSME (B1.(e).iv). The revised ESRS should align with this standard, which sets accepted minimum requirements for SMEs by the EU Commission. - As stated in another question, this datapoint is essential for calculating GHG-emission-intensity. In summary, omitting total revenues in sustainability reports limits the ability to assess a company's size, potentially leading to suboptimal or inappropriate decisions. Therefore, considering their re-inclusion in ESRS2-SBM-1 should be assessed.			
Survey	European Committee of Central Balance Sheet Data Offices, ECCBSO (secretariat at Deutsche Bundesbank)	User (analyst, data provider, rating agency, etc.)	Germany	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	GHG emission intensity is crucial for credit assessments in banks, as highlighted e.g. by the German Association of Private Banks (see https://bankenverband.de/en/nachhaltigkeit/esg-regulation-banks-and-insurers-offer-guidance-data-requirements). It is a key metric for evaluating transition risks and scaling emissions with business activity, helping stakeholders gauge efficiency improvements beyond mere emission reductions. EFRAG itself declares that this removal affects users' ability to understand an undertaking's carbon-risk exposure. Although users can theoretically compute GHG-intensity by dividing emissions by turnover, this process requires additional effort. The respective extent varies, automated systems may handle this efficiently, but for smaller institutions this might not be given. For traditional "readers", it depends on personal capability and time resources. This concern particularly applies if turnover is not available as denominator as anticipated in revised-ESRS2, forcing users to seek information elsewhere, increasing search costs on top. It is important to note that omitting turnover in ESRS2 would result in non-availability in tagged ESEF-format for a significant number of CSRD-companies. Instant calculation of intensity would not be possible. As rationale EFRAG mentions challenges in using revenue-based metrics, yet these are vital for performance comparison and widely used in financial analysis. It should be highlighted that if a company deems revenues as an inadequate denominator, disclosing this would provide valuable insights to users and improve decisions. GHG-intensity is also part of the VSME standard (B3.31). Revised ESRSs should align with this standard setting minimum requirements for SMEs. Finally for cost-benefit-analysis, the additional effort required for companies to report GHG-intensity is rather small. From an aggregate perspective, it cannot be ruled out that this imposes a greater burden on users than on the companies themselves. Therefore, given the significance on informed decision-making, the inclusion of GHG-intensity in revised ESRSs should be evaluated together with mandating the disclosure of total revenues (refer also to response in Q22/ESRS2).			

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Survey	European Committee of Central Balance Sheet Data Offices, ECCBSO (secretariat at Deutsche Bundesbank)	User (analyst, data provider, rating agency, etc.)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	We share EFRAG's observation that the current ESRS threshold, which mandates country disclosures in current DR S1-6 only for countries with over 10% of employees, leads to limited reporting and excludes a significant portion of the workforce from mandatory disclosure. The ESRS and the resulting sustainability reports generally implement a consolidated, transnational or cross-border approach. Further, despite the EU's significant efforts towards sustainable policy, many policy measures are still executed at the national level. Hence, country-specific evaluations by public authorities are essential, and corporate reports are a crucial source of information. Having data on employee numbers by country would be extremely supportive for assessing the national significance of different European groups, independent where the main office is located. Furthermore, for individual stakeholders, access to information on the number of employees per country is also critical for understanding the impact of the reporting entity in each country, irrespective of its registration location. Without such data, performing meaningful country-specific analyses becomes difficult. These points support EFRAG's proposed new threshold in the revised ESRS S1-5 (para. 23 (a)), which establishes the criteria at the ten largest countries with 50 or more employees. The additional effort required for companies to report this data is expected to be minimal, since this information is generally necessary for setting up consolidated reports. Evaluating whether to apply the new threshold to DR S1-7 (para 27 (b)) or to maintain the old threshold could be based on the effort on entities regarding this specific information.			
Survey	European Committee of Central Balance Sheet Data Offices, ECCBSO (secretariat at Deutsche Bundesbank)	User (analyst, data provider, rating agency, etc.)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	From the initial application of the ESRS in 2024, it is apparent that reporting significantly improved under the CSRD/ESRS regime compared to the NFRD framework, particularly in clarity of definitions and presentation of quantitative datapoints, including setting units like tCO2eq, m^3. This enhancement notably increased comparability across entities. Comparability benefits greatly from standardized presentation. E.g. for IFRS financial statements, IAS 1 mandates presentation formats to ensure comparability both with an entity's previous reports and those of other entities. Generally, presenting quantitative data in tabular formats is preferred over textual descriptions as it enhances comparability and simplifies data aggregation. However, ESRSs currently lack a presentation standard or a unified approach to numerical datapoints, likely due to the nature, complexity and novelty of this information compared to financial statements. Presentation and comparability issues are partially addressed in ESRS1, as enhanced characteristics (para 19(b)), and in sections 7.1, 8, QC10-12. Chapter 7.1 focuses on comparability to prior periods without addressing cross-entity comparisons. Specific requirements for presenting quantitative datapoints are merely included in topical ESRSs. The new draft ESRSs raise concerns about the potential compromise in comparability of numerical datapoints. This poses risks that some companies apply amendments or presenting multiple datapoints under a single variable, both would undermine comparability. The absence of clear presentation guidelines also impacts digital reporting (machine-readability, ESEF). Flexibility in "adjusting" metrics would complicate tagging rules, lead to block-tagging or customized tags, which is detrimental to users. Consequently, companies might argue that ESEF is overly complex, potentially leading to delays, partial, or complete non-ESEF-adoption. Therefore, maintaining mandatory tabular formats for numerical information already required in ESRS would enhance the comparability of ESRS datapoints. Further developing tabular formats for numerical datapoints where such formats are not yet available would enhance comparability (see also our comments in Q33 on E1).			
Survey	European Committee of Central Balance Sheet Data Offices, ECCBSO (secretariat at Deutsche Bundesbank)	User (analyst, data provider, rating agency, etc.)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Presenting GHG emissions in a table as mandated in current E1-AR48 is crucial for data extraction. GHG emissions are among the most critical information requested by users in our institutions, e.g. within the Eurosystem's task to assess the impact of climate change and nature degradation on both price and financial stability as well as on the value and the risk profile of the assets held on the Eurosystem's balance sheet (see: An overview of the ECB's monetary policy strategy – 2025: https://www.ecb.europa.eu/mopo/strategy/strategy-review/ecb.strategyreview202506_strategy_overview.en.html#toc12). Prior to ESRS, disclosures for values of the reporting year included a mix of text, graphs, tables, with varying dimensions. The mandated table in ESRS E1 has notably enhanced 2024 reporting. However, the revised E1 modifies this by changing the mandatory table format to optional in AR 27. EFRAG attributes this to feedback regarding challenges associated with tabular presentations of milestones and targets. From our observations, such concerns are understandable for milestones and targets resulting in many blanks in the table. However, this rationale is not convincing for actual values of the reporting year. Eliminating the complete table requirement risks losing the main benefits of this format and in consequence might lead to data gaps influencing negatively decisions. Therefore, maintaining the mandatory table format for GHG emissions would clearly enhance the data quality of these important metrics. This would imply shifting the table in draft AR27 as "Shall" to the priority paragraphs of the revised E1. An alternative could be to include the words "in tabular format" in revised E1 para 32 after "shall disclose" in order to maintain the improved ESRS reporting of fiscal year 2024.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	Chapter 3 is clearer and better organised. However, Chapter 3 frequently conflates 'topics' with 'impacts, risks and opportunities' ('IROs'). Para 22 is confusing when it says that information may be presented "either at the topical level or at [IRO] level". Such a dichotomy is confusing and incorrect. While topics refer to broad thematic areas, IROs are entity specific. The CSRD, as well as IFRS, TCFD, and TNFD consistently focus on the latter. Overemphasising 'topics' risks leading to generic, boilerplate disclosures that lack relevance and specificity. Chapter 3 would be clearer if it keeps the focus on IROs and plainly explain that depending on their nature and context such IROs may be defined at a general level - often corresponding to topics - and/or that information on their management may be similarly aggregated. This should be clarified also in provisions on entity-specific disclosures in paragraph 23 (and in paragraph 10 in Chapter 1) In Chapter 3.3.2, para 37 fails to mention that the purpose of financial material assessment is to not just to identify materiality information but also determine the material risks and opportunities, as required by the CSRD. In this regard, the risks and opportunities are only mentioned in the middle of para 38, making the text incoherent.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	It is useful that Chapter 3 addresses the question of how prevention, mitigation and remedy of impacts shall be considered in materiality assessment, but the rules could be expressed in a more simple and understandable way. Para 34 uses a very complicated language to express a simple idea that actual impacts shall be considered as they occurred during the reporting period, and that their ex-post remediation is not relevant. We welcome and stress the importance of the clarification that the potential impacts which require significant ongoing preventative or mitigation efforts shall be considered gross. Without such clarification, it would be in theory impossible for companies to report on how they manage such issues. In this regard, it would be helpful to refer to the materiality of information filters to provide companies with further guidance on how to distinguish such significant efforts from common practice and compliance measures. The table provided in Appendix C provides more detailed information, which it would be helpful to integrate directly into the main body to ensure clarity and consistency.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The proposed changes are meaningful. We would like to bring the attention to para 113, which we find hard to understand: "113. If the description of the material impacts, risks and opportunities prepared in accordance with [Draft] Amended ESRS 2 IRO-2 is not presented alongside the respective policies, actions and targets, the undertaking shall make explicit which policies, actions and targets relate to which material impacts, risks, or opportunities, in accordance with paragraph 22." It is not clear to us what the reference to para 22 is meant to imply. Para 22 addresses the issue of appropriate aggregation or disaggregation of information on material impacts, risks and opportunities and their management. But it doesn't set any rules regarding the location of such disclosures depending (or not) on the level of aggregation.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We welcome the removal of the duplications between the cross-cutting and topical standards. We support the emphasis on general disclosure requirements. Likewise, many PAT provisions in the topical standards had a character of examples or guidances rather than datapoints. However, we have two critical concerns. First, the original DR in environmental standards concerning screening of sites in materiality assessment were replaced by an application requirement to ESRS 2 IRO-1. This in effect makes transparency on this aspect optional. Consideration of local context is a key element of an appropriate materiality assessment. This should be both recognised in Chapter 3 of ESRS 1, and in ESRS 2 IRO-1, which should include an explicit datapoint on how the undertaking screened its locations and value chains. We welcome that E standards provide a clearer reference on the importance of disaggregation of disclosures, but this can only be done well if locations are properly screened. Second, we strongly recommend adding an explicit reference to the disclosure of relevant, entity-specific metrics directly in S standards. The fact that S2, S3 and S4 do not include any metrics and the anticipated sectoral standards which would have provided such metrics will not be adopted, shift the expectations for disclosure of metrics for S topics to entity-specific disclosures. As highlighted by the Danish Institute for Human Rights, a leading National Human Rights Institute on business and human rights and reporting, adding the reference to metrics to disclosure requirements SX-4 on targets would improve consistency between the topical and the cross-cutting standards and acknowledge the common use and disclosure by companies of metrics relevant to their social sustainability impact management and progress. This addition would ensure that preparers better understand the ESRS expectations in this regard, whilst not adding any new obligations or datapoints.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We support the proposed changes. We agree with the removal of 'may disclose' elements, because their status has been causing confusion. However, they do not need to be all removed to NMIG. Where they provide useful examples of disclosures, they could be included directly in the standards as "examples". This is particularly the case for the topics for which the reporting practice is evolving, such as Biodiversity and ecosystems. This would make it easier for first-time preparers to understand what kind of information is likely to be relevant and provide a basis for the standardization of metrics. Having to consult another document, such as NMIG, is adding an unnecessary hurdle. The language and therefore understandability of the standards have been considerably improved, however in ESRS 1 especially there is still much to be done in this regard.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The standards are not clear in terms of what the combined effect of the reliefs is and how the reliefs are meant to interact. Interpreting and applying these reliefs independently of each other open doors to abuse and omitting material information, significant differences in reporting practice. Reporting of metrics is subject to a combination of undue cost and effort and lack of data quality reliefs. But the standards do not put these two reliefs in proper context and do not include any explicit requirement and timeframe for companies to improve the coverage and quality of data. This is exacerbated by the relief which unconditionally allows exclusion of joint operations. If the environmental metrics concerning such operations are material, then the standards should incentivise their eventual disclosure. The undue cost and effort and lack of data quality reliefs already provide sufficient flexibility in this regard. Similarly, there is a lack of coherence among the directions of the reliefs related to financial effects, i.e., information which is essential for understanding of the risks and company's ability to overcome them. The limitation related to the announced investment plans focuses the disclosures on effects which are easier to assess and therefore quantify, yet the standards also propose reliefs that enable omitting quantitative disclosures. We broadly agree with the relief provided in ESRS 1, para 90, which allows for calculation of metrics exclusion of activities that are not significant drivers of the IROs. However, the application of this option must be clarified for specific environmental and social metrics which are standardised in the ESRS. For instance, the GHG Protocol's completeness principle explicitly warns against misapplication of materiality criteria in this regard. Similarly, for S1 workforce metrics, such as characteristics of the employees and non-employees, such exclusions are not appropriate.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	These combined reliefs should clearly require the undertaking to improve the coverage and quality of the data needed to meet ESRS requirements. Being formulated in rather generic terms, those reliefs could be abused and lead to omission of material data disclosures. For the metrics concerning own operations and/or metrics standardised directly in the ESRS, this should be subject to clear time limitation. For other metrics, improvements over the years should be also explicitly required, subject to undue cost and effort relief.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ability to estimate financial effects is critical for the undertaking's ability to integrate sustainability into its business strategy considerations, planning and risk management. It is also key for the determination of financial materiality, including in terms of overreporting topics as financially material. Resigning on this ambition is at odds with the objective of putting sustainability reporting on the same level as financial reporting, the integration of both, and ultimately overcoming the tragedy of horizons. We find Option 1 unnecessarily extensive, and lacking time limitation, but broadly acceptable. We disagree with the assertion made in the question that it "[d]ifferent from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources ". In this regard, the new proposed ESRS include the undue cost and effort relief which seems to account for such a situation. With respect to Option 2, we don't find it justifiable to go beyond the IFRS relief. One of the most strongly voiced arguments from stakeholders who called for simplification of ESRS was that, as a matter of principle, ESRS must be aligned with the IFRS except where CSRD or other EU legislation require otherwise. Abandonment of this principle seriously undermines prospects of building a global baseline which both the EU and the ISSB support, and which is an important part of building a level playing field for the EU companies.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Reliefs should not go beyond those set in IFRS. Going further would undermine the objective of setting a global baseline for ESG reporting, which is important for achieving a level playing field for EU companies in a global context. The undue cost and effort relief outlined in ESRS 1, para 87-89, is a powerful relief, which addresses virtually all situations where the undertaking may encounter practical obstacles. Explicit emphasis on fair presentation, combined with the strengthened focus on the use of materiality of information filter, provide companies with an increased flexibility in determining meaningful content of their sustainability statements. It marks a further move away from compliance-based to principle-based approach. However, such changes imply increased responsibility for the undertaking. Implementing further reliefs would undermine this responsibility and open the doors to abuse.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	ESRS are generally more concise and less demanding. Introducing further reductions (while keeping the coverage of all ESG factors as required by the CSRD) would create serious quality gaps between the ESRS disclosures and those based on the standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	22.E1.	Comments on deleted datapoints in ESRS E1	I agree	ESRS are generally more concise and less demanding. Introducing further reductions (while keeping the coverage of all ESG factors as required by the CSRD) would create serious quality gaps between the ESRS disclosures and those based on the standards.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	22.E2.	Comments on deleted datapoints in ESRS E2	I agree	ESRS are generally more concise and less demanding. Introducing further reductions (while keeping the coverage of all ESG factors as required by the CSRD) would create serious quality gaps between the ESRS disclosures and those based on the standards.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	22.E3.	Comments on deleted datapoints in ESRS E3	I agree	ESRS are generally more concise and less demanding. Introducing further reductions (while keeping the coverage of all ESG factors as required by the CSRD) would create serious quality gaps between the ESRS disclosures and those based on the standards.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	22.E4.	Comments on deleted datapoints in ESRS E4	I agree	ESRS are generally more concise and less demanding. Introducing further reductions (while keeping the coverage of all ESG factors as required by the CSRD) would create serious quality gaps between the ESRS disclosures and those based on the standards.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	22.E5.	Comments on deleted datapoints in ESRS E5	I agree	ESRS are generally more concise and less demanding. Introducing further reductions (while keeping the coverage of all ESG factors as required by the CSRD) would create serious quality gaps between the ESRS disclosures and those based on the standards.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	22.S1	Comments on deleted datapoints in ESRS S1	I agree	ESRS are generally more concise and less demanding. Introducing further reductions (while keeping the coverage of all ESG factors as required by the CSRD) would create serious quality gaps between the ESRS disclosures and those based on the standards.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	22.S2	Comments on deleted datapoints in ESRS S2	I agree	ESRS are generally more concise and less demanding. Introducing further reductions (while keeping the coverage of all ESG factors as required by the CSRD) would create serious quality gaps between the ESRS disclosures and those based on the standards.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	22.S3	Comments on deleted datapoints in ESRS S3	I agree	ESRS are generally more concise and less demanding. Introducing further reductions (while keeping the coverage of all ESG factors as required by the CSRD) would create serious quality gaps between the ESRS disclosures and those based on the standards.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	22.S4	Comments on deleted datapoints in ESRS S4	I agree	ESRS are generally more concise and less demanding. Introducing further reductions (while keeping the coverage of all ESG factors as required by the CSRD) would create serious quality gaps between the ESRS disclosures and those based on the standards.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	22.G1	Comments on deleted datapoints in ESRS G1	I agree	ESRS are generally more concise and less demanding. Introducing further reductions (while keeping the coverage of all ESG factors as required by the CSRD) would create serious quality gaps between the ESRS disclosures and those based on the standards.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree with these changes, noting that the suggested changes do not add a new burden. This is particularly the case for the water-related metrics. In order to disclose the water consumption, the undertaking already has to calculate withdrawals and discharges, and such calculation and therefore the underlying data is subject to the assurance. Moving these implicit datapoints to the forefront as explicit data points makes the disclosure requirement clearer, compared to the previous ESRS where some of these datapoints were framed as "may disclosures". Whether or not these individual datapoints are to be disclosed is correctly subject to materiality of the information filter applied by the undertaking.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree with these changes, noting that the suggested changes do not add a new burden. E2-4 on secondary microplastics is not a new datapoint, as correctly pointed out in the Rationale above. We do not understand why it is included in this question, as such.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	ESRS, being based on the materiality principle, the CSRD requirement to disclose impacts, risks and opportunities and their management, and the general principles of the Accounting Directive, has already been subject to a fair presentation regime. Making it explicit helps to clarify it. It provides companies with clarity on the discretion and judgement, as well as related safeguard, they are expected to exercise when applying the standards.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We recognise the complexity of recalculating absolute values and acknowledge that financial institutions often manage GHG performance using intensity-based approaches. However, the global carbon budget is defined in absolute terms. For this reason, it remains essential that even financial institutions disclose absolute targets to assess how their strategies align with the economy-wide transition to net zero. Absolute targets are relevant for users of sustainability statements and for understanding the real-world climate impact of financed activities. While intensity measures provide insights into efficiency, they can mask rising absolute emissions in growing portfolios or sectors. Absolute values, by contrast, give a clear signal of whether institutions are contributing to the necessary 90–95% global reduction in emissions by 2050, with steep cuts by 2030. Both approaches rely on similar underlying data, and estimation challenges are not unique to the financial sector. Granting an exemption would also undermine fairness in a sector-agnostic standard. Other industries could equally argue for exceptions based on their own difficulties, reducing comparability across sectors. Moreover, absolute financed emissions are already recognised in existing standards and regulations: the SBTi financial sector net-zero standard, the UNEP FI/NZBA recommendations, and EU SFDR all require or encourage absolute emissions disclosure. Exempting banks would risk misalignment and reduce the usefulness of reported data for stakeholders, including asset owners who depend on it for their own disclosures.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The new threshold is simpler and clearer, and therefore easier to apply. It also sets a clear cap. Any potential increase of breakdowns of the disclosed information is negligent in terms of added burden.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree				
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	We welcome the fact that multiplication of datapoints was removed. The new, simplified framework makes it easier for companies to report on these SFDR-related matters in a way that corresponds to how their policies are set. For users, this consolidation makes it easier to locate the relevant information.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Measurable targets related to biodiversity and ecosystems shall be set and disclosed according to the guidance and examples given by relevant global frameworks, such as SBTN (Step 3 - Measure, Set & Disclose Targets), TNFD (component P1 and P2 & Annex 5, sector guidance and guidance on Target Setting) & resources by World Economic Forum Nature-Positive Transitions.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	Our proposal is to not include such datapoint, but instead provide a paragraph in the application requirements, explaining that the adjusted pay gap is an important entity-specific information, which is often necessary to contextualise and enable understanding of the information provided by the unadjusted pay gap. Further this AR could remind the undertakings that the unadjusted pay gap needs to be appropriately disaggregated. Unadjusted and adjusted perspectives on pay gap have different purposes. The unadjusted pay gap - appropriately broken down by countries or areas of operations in line with ESRS 1 - provides general context and the information on how the undertaking is affected by systemic drivers of gender inequality. The adjusted pay gap is primarily an entity-specific disclosure. It is particularly relevant for complex companies to better understand where and how the pay gap manifests, and what are the specific drivers of it. There is no one 'standardizable' way to adjust the pay gap calculation. Such adjustments must consider the undertaking's specific context and circumstances and avoid 'overadjusting'. If the calculation controls for every source of difference between males and females in the workforce, then it would obscure the pay gap and its causes. Therefore, including a datapoint - whether mandatory or voluntary - on adjusted pay gap in the standards is problematic, because it is impossible to provide a standardised methodology. On the other hand, for many companies' information on adjusted pay gap is likely to be material, and therefore such information should be provided.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	The removal of paragraph 14 can be easily compensated by adding a reference to SMEs in the description of the topics in ESRS 1, Appendix A, and in ESRS G1, paragraph 4. The removal of datapoint originally located in para 33(a) concerning average days it takes to pay an invoice, does not seem to be necessary for the reduction of burden. The undertaking would still need to collect this data to be able to meet the other requirements, in particular the calculation of the % of its payment aligned with its standard payment terms (in para 20(a)).			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS 1: We are concerned about the concurrent effect of various reliefs. We are also concerned about the unintended confusion caused by a rather confusing explanation of the relationship between impacts, risks and opportunities on one hand, and sustainability topics on the other.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We disagree with the downgrading of the transparency on site/assets/activities screening from the level of datapoints in the E standards to an Application Requirement in ESRS 2.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We do not think that the streamlining of the E1-1 Transition Plan for Climate Change Mitigation added value. If anything, more rather than less details and clarifications are needed. The glossary could retain the definition of net zero targets and related criteria, as use and reporting of such targets is a common practice.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We welcome the changes made, including the clarification and minor additions to the datapoints in the metrics section. They provide for greater clarity and do not add further reporting burden.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We welcome the changes made, including the clarification and minor additions to the datapoints in the metrics section. They provide for greater clarity and do not add further reporting burden.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Given the current state of art in this area, it would be helpful to include more guidance on how to set metrics and how to utilise the other reporting frameworks and standards such as the TNCFD. The standard should also clearly require the disclosure of sites in/near biodiversity sensitive areas, rather than limiting it to those determined to be connected to material impacts only.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We welcome the changes made, including the clarification and minor additions to the datapoints in the metrics section. They provide for greater clarity and do not add further reporting burden.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We would recommend adding an explicit reference to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, that is the standards that lack any metrics. In S1, we have strong reservations about the newly suggested methodology for adequate wages outside of the EEA. It would lead to misleading disclosures and add burden for companies.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We would recommend adding an explicit reference to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, that is the standards that lack any metrics. In S1, we have strong reservations about the newly suggested methodology for adequate wages outside of the EEA. It would lead to misleading disclosures and add burden for companies.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We would recommend adding an explicit reference to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, that is the standards that lack any metrics. In S1, we have strong reservations about the newly suggested methodology for adequate wages outside of the EEA. It would lead to misleading disclosures and add burden for companies.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We would recommend adding an explicit reference to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, that is the standards that lack any metrics. In S1, we have strong reservations about the newly suggested methodology for adequate wages outside of the EEA. It would lead to misleading disclosures and add burden for companies.			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We particularly welcome the streamlining and alignment of the structure of this standard with the remainder of the standards			
Survey	Stowarzyszenie Pracownia na rzecz Wszystkich Istot	NGO	Poland	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	VEOLIA	Preparer (non-financial preparing a sustainability report)	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Generally speaking, Veolia is satisfied with the current approach that we consider controlled and reproducible We welcome the following simplifications to the double materiality assessment process and especially : the possibility of adopting a top-down approach in addition to a bottom-up one, the shift in focus from the IRO level to the topic level, the clearer identification of internal and external sources to be used at the beginning of the section, the enhanced prominence given to the materiality of information, the simplification of AR 16. However, we are concerned by the definition of impact materiality laid down in paragraph 21 (b) of ESRS 1. In particular, the definition of 'general purpose' according to AR3 is too vague and could result in multiple requests from a variety of stakeholders. The new wording in §26 of what shall be disclosed regarding the process to identify and assess IROs goes in the wrong direction : it is more complex and detailed than the original text in §53 of 2023 ESRS 2.			
Survey	VEOLIA	Preparer (non-financial preparing a sustainability report)	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	No DMA process : The ESRS 1 Appendix C about assessing actual and potential negative impacts for materiality introduces confusion: It is not fully consistent with the text body, which is giving clear and detailed enough explanations to companies. In our view, appendix C should be removed from the final publication.			
Survey	VEOLIA	Preparer (non-financial preparing a sustainability report)	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	Yes Companies are supportive of the changes (possibility to better organize the report in a meaningful way, to put some granular datapoints in appendix...) as they deem very important to have a concise report, focused on important subjects, enabling the reader to better understand their strategy, politic and actions.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	VEOLIA	Preparer (non-financial preparing a sustainability report)	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree					
Survey	VEOLIA	Preparer (non-financial preparing a sustainability report)	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Yes We welcome the improved presentation of the Standards, including: the reduction of the length of the text, the simplification of narrative paragraphs deemed overly technical or detailed; the positioning of AR directly after the disclosure requirements, focusing only on essential methodological elements and key presentation points, which significantly improves readability and understanding of the standards. Nevertheless, the overall length of ESRS 1 could be further reduced, including by simplifying Chapter 3 on double materiality assessment (similar length as in Set 1 and simplified ESRS, 34 pages, 25 without annexes). Regarding the datapoints which are kept from the set 1, EFRAG should confirm that the wording changes brought to improve conciseness of the standards shouldn't lead to additional burden for the first application due to a "fresh interpretation" by the auditors or regulator.			
Survey	VEOLIA	Preparer (non-financial preparing a sustainability report)	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The NMIG should remain outside of the standards. The first wave companies' experience shows that EFRAG Q&As and Implementation Guidance have been used by auditors as a binding reference, with preparers expected to comply. Despite being issued by EFRAG for illustrative purposes only, the NMIG could be considered by stakeholders as having the same authority than the reporting standards. It is therefore essential that the NMIG remains outside the delegated act adopting the ESRS and is drafted in a way that cannot, under any circumstances, be used as an audit reference. The NMIG should remain a document published by EFRAG only and not by the European Commission. Furthermore, the treatment of previous lengthy and numerous Q&A and non-authoritative implementation guidance issued by EFRAG on Set 1 needs to be clarified by EFRAG. Companies shouldn't be required to read layers and layers of text to draft their CSRD, a reduction of the number and length of documents to consider and an improvement of their readability being particularly crucial for wave 2 companies. The basis for conclusion are very useful and should integrate the precise list of clarifications brought on the existing datapoints without requiring a modification of the standards. Indeed, it would enable preparers and auditors to already take them into account for the 2025 reporting.			
Survey	VEOLIA	Preparer (non-financial preparing a sustainability report)	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Regarding the reporting boundary mentioned in ESRS2 §4.a, Veolia is strongly supportive of the possibility to have a different boundary compared to the consolidated financial statements. For a large worldwide company like Veolia, it is particularly complex to assess environmental and social contributions of subsidiaries acquired or divested during the reporting year : the divested entities are no more within the group when the time comes to report the extension of the reporting processes to newly acquired entities is not yet completed. Therefore, Veolia wishes to report reliable and available information concerning its perimeter present during the whole reporting year.			
Survey	VEOLIA	Preparer (non-financial preparing a sustainability report)	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	Yes We are very supportive of this proposal because it is often very difficult to obtain even estimates on assets operated by third-party companies, for example. Even if companies implement improvement processes, it is not always certain that reliable data can be obtained at a later date, particularly when third parties operate in jurisdictions that are not subject to ESRS. We also agree that no time limit should be imposed since as mentioned in the basis for conclusion, transparency about such limitation would provide sufficient incentive for the undertaking to improve the data quality and achieve a more complete scope in the calculation of the metrics.			
Survey	VEOLIA	Preparer (non-financial preparing a sustainability report)	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Companies consider that information on anticipated financial effects is problematic because it can reveal confidential and strategic information and raise issues in terms of liability considering the uncertainties attached to any projections or forecasts. Although disclosure of sensitive information will be dealt with ongoing developments on level 1, companies consider that anticipated financial information deserves specific relief in the ESRS. Companies point out the risks of disclosing projections covering medium and long-term horizons based on assumptions that change rapidly and dramatically. Such disclosures would significantly increase companies' liability without providing useful information to users. Furthermore, it is impossible to provide quantitative information without disclosing highly sensitive financial information. In the field of financial reporting, companies are not required to disclose their financial planning.			

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Survey	VEOLIA	Preparer (non-financial preparing a sustainability report)	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Quantitative reporting on anticipated financial effects is still premature given the immaturity of methodologies. Mandatory qualitative disclosure should be the baseline, with quantitative elements allowed on a voluntary basis (see option 2 for relief ESRS2 §23 a). In §41, subparagraph f) on stranded assets should be suppressed as it leads to too much uncertainty.			
Survey	VEOLIA	Preparer (non-financial preparing a sustainability report)	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	E2-4: It must be reminded that the definition of secondary microplastics is not officially established, and their impacts are not yet clearly addressed by science. Companies wish that are entitled to refer to the relief on uncertainty when they consider official information is incomplete on this issue For a more general comment on microplastics, please see our answer to question 34 below			
Survey	VEOLIA	Preparer (non-financial preparing a sustainability report)	France	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	Regarding Payment practices, Veolia has a huge number of worldwide suppliers of all sizes and with a large array of contractual payment terms. Firstly, the notion of "category of suppliers" doesn't have a universal definition. Additionally many countries do not require companies to publish size related information, the information is then not accessible. Therefore, we suggest to suppress "...by main category of suppliers, including SME's", in the wording of §20.a. Secondly, payment terms are not standard, due to local and supplier related specificities. It would be more feasible and would make sense to describe sets of payment terms grouped by consistent number of days (0-30days, 31-45 days...), and the percentage of its payment aligned with these terms.			
Survey	VEOLIA	Preparer (non-financial preparing a sustainability report)	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Introduction of a more restrictive definition of recovery (E5 and Annex 2) One of the main topics covered by ESRS E5 is waste recovery. The definition of "recovery" is given by the new "ANNEX II_Aggregated acronyms and glossary of terms _Set1Revision (clean)" in its page 27, which excludes explicitly energy recovered from waste and focuses exclusively on material loops (reuse, repair and recycle). This definition is detrimental to the development of local sources of recovered energy, which: contributes to Europe's energetic resilience and completes the benefits of the material loops, since the Energy Recovery facilities focus mainly on extracting all possible value from the non-recyclable fraction of municipal waste, in line with circular economy principles. In addition, this definition lacks consistency with the waste hierarchy principles, which clearly ranks energy recovery at a higher priority level than waste elimination. Regarding microplastics, the mandatory disclosure defined by ESRS E2 §16.b and AR1 is not at all feasible for Veolia. Let's take for example the activity of wastewater treatment, which is a significant one for the company in different parts of the world : Neither the definition and the measurement methodology are officially established to date And if the above conditions were fulfilled, the measurement of rapidly varying flows of microplastics in the wastewater received for treatment and released after treatment would not be feasible in practice, both for technical and economical reasons, given the fact that no entity in the current framework is in charge of the continuous monitoring of this newly identified pollution, in a highly competitive wastewater treatment market.			
Survey	SAIM GmbH	Consultant (including software vendor)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	SAIM GmbH	Consultant (including software vendor)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	SAIM GmbH	Consultant (including software vendor)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	SAIM GmbH	Consultant (including software vendor)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	SAIM GmbH	Consultant (including software vendor)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We agree with moving the AR to below each relevant disclosure point and the removal of required tables and "may disclosures". However, some terms used are not fully defined, e.g. the definition of "net zero" has been removed.			
Survey	SAIM GmbH	Consultant (including software vendor)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We generally agree with this proposal but we think there should be a clearly defined criterion for "undue cost and effort", to avoid offering an "easy out" from reporting requirements.			
Survey	SAIM GmbH	Consultant (including software vendor)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We agree with the relief but disagree with the lack of time limit. We think it should be encouraged that data quality is improved over time. A single year may be unrealistic, but within e.g. five years (depending on the metric), data should be adequately aligned with the requirements.			
Survey	SAIM GmbH	Consultant (including software vendor)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Option 2, in our opinion, lacks the proper encouragement to provide real data and doesn't support data quality improvement over time.			
Survey	SAIM GmbH	Consultant (including software vendor)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	SAIM GmbH	Consultant (including software vendor)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	SAIM GmbH	Consultant (including software vendor)	Germany	22.S1	Comments on deleted datapoints in ESRS S1	I partially agree and partially disagree	We generally agree, but some of the removals in S1 undermine efforts made to improve awareness/transparency around gender equality and diversity (please refer to Excel).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	SAIM GmbH	Consultant (including software vendor)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	SAIM GmbH	Consultant (including software vendor)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	SAIM GmbH	Consultant (including software vendor)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Yes, this is aligned with SBTi guidance.			
Survey	SAIM GmbH	Consultant (including software vendor)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I would like to skip this question and provide my feedback in Part 3				
Survey	SAIM GmbH	Consultant (including software vendor)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	SAIM GmbH	Consultant (including software vendor)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	It would be preferable for the standard to reflect latest trends in the evolving methodological landscape, especially the results of the EU working group on this. Preemptively setting a (vague) standard could undermine this work.			
Survey	SAIM GmbH	Consultant (including software vendor)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	We understand the unadjusted gender pay gap as the raw average pay difference between men and women, while the adjusted gap controls for role, seniority, hours, and other relevant factors to compare like-for-like work. Focusing on the adjusted gap is crucial because it reveals inequities that persist after legitimate drivers are accounted for, enabling targeted and fair-pay actions.			
Survey	SAIM GmbH	Consultant (including software vendor)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	We think the policies (14) should be included/kept.			
Survey	SAIM GmbH	Consultant (including software vendor)	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Since the standards can be downloaded individually, it would be useful to duplicate the glossary for the relevant terms into each standard to minimize risk of mis-interpretation.			
Survey	Deloitte	Auditor	Spain	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We agree with the focus on material information as an overarching principle and the emphasis on reporting IROs at the level at which they are managed. This is supported by EFRAG's greater emphasis on a top-down approach and guidance that topics clearly material/not material to the undertaking do not need to be assessed in depth. However, the proposed simplified DMA process will continue to require considerable effort for undertakings, in particular for first-time application and in the assessment of impacts which involves consideration of their severity and significance from the perspective of affected stakeholders. Further non-binding guidance on how to identify affected stakeholders and assess impacts would be helpful. We support the principle of including a definition of material information for stakeholders more broadly than investors. It should be clarified that the assessment is to be considered in the context of the information needs of the 'intended users' of the sustainability statement, rather than the information needs of any stakeholder. Better explanation is needed of the concept of 'general purpose sustainability statements' in ESRS 1:AR3. The clarification of the connection between IROs and topics is helpful, but the overall organising architecture of the standards should be clearer. The standards consistently should allow an undertaking to disclose material information about material IROs aggregated at the level at which they are managed in the business. Once the undertaking has identified its material IROs, it should apply the topical standards to identify material information. However, the language in ESRS 1 and ESRS 2 is not sufficiently clear in this regard (e.g., ESRS2:2 references disclosing on IROs and disclosing on topics). Further non-mandatory guidance on how to apply 'reporting at the level IROs are managed' or 'groups of IROs' in practice would be helpful. See also Q33.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Deloitte	Auditor	Spain	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	We do not agree with the inclusion of overly prescriptive detail that could have unintended consequences for undertakings when identifying material IROs. Instead, we support clear principles in DRs/ARs. We therefore agree with ESRS 1.34-36 as helpful clarifying principles and they should be extended to assessment of risks and opportunities. A qualifier 'generally' should be added to the requirements in these paragraphs (i.e., that the impacts/IROs are 'generally assessed…') to allow for consideration of an individual undertaking's facts and circumstances and for interoperability with the ISSB Standards, including the approach set out in the Transition Implementation Group paper on this matter. A major part of Appendix C, which in our view is too prescriptive and detailed, should be repurposed as NMIG, with any essential points from the appendix being moved to the related ARs. The appendix should therefore be removed from the standard.			
Survey	Deloitte	Auditor	Spain	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I disagree	While we acknowledge the proposed additional flexibility, we disagree with the prescriptive format of four mandatory sections which does not support sufficiently the ability of an undertaking to disclose IROs at the level at which they are managed, notably for undertakings which are conglomerates. The template approach encourages more granular 'topic-by-topic' reporting (even when allowing for the enhanced guidance on avoiding duplication and on cross-referencing) rather than a connected story about how the undertaking measures and manages its material IROs. Greater flexibility should be allowed in the structure of sustainability statement to allow entities to report in a connected and authentic way, e.g., by material IROs. We support the additional clarifications on the use of appendices to the sustainability statement, including for EU Taxonomy disclosures. The option to include an executive summary is useful and could support companies in better 'telling their story'. However, the standard should state clearly that the executive summary should be subject to considerations of materiality and qualitative characteristics of information and should be unbiased and supportable in the context of the sustainability statement as a whole. Furthermore, an executive summary may become superfluous if more flexibility is given on presentation of IROs as suggested above.			
Survey	Deloitte	Auditor	Spain	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I disagree	We consider that the proposals do not focus sufficiently on disclosure of material information or go far enough in achieving interoperability. The introduction of GDR is consistent with the intent to encourage reporting on IROs at the level at which they are managed and to discourage too granular information. However, further revisions are needed to help undertakings to 'tell their story' and to support interoperability, by: -further clarifying what is intended by reporting PATs on IROs at the level they are managed or for groups of IROs – without this, it would not be clear to an undertaking what is expected. -following the relabelling of the MDR concept, structuring the general disclosures in the same four content areas used by the ISSB in IFRS S1 and S2 (based on the widely accepted TCFD structure). This could be achieved by moving policies and actions into the Strategy area, which would reinforce the principle of reporting about policies at the strategic rather than tactical level. The disclosure requirements could be placed alongside SBM 3 (in ESRS 2:22), which already requires disclosure about the effects of IROs on an undertaking's strategy and how its strategy addresses or plans to address them. -using the same words in IFRS S1 for ESRS 2 GDRs as far as possible. Furthermore, with the reduction and simplification of datapoints in the topical standards (some of which now only include 1-2 pages of disclosure requirements), it may be more difficult for undertakings to identify relevant disclosures, leading to greater reliance on entity-specific disclosures (e.g., on metrics as mandated by ESRS 2). IFRS S1 includes sources of guidance to help an undertaking identify material information in the absence of related requirements in topical standards. Introducing the approach used by the ISSB would give helpful guidance to preparers.			
Survey	Deloitte	Auditor	Spain	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I disagree	Extensive changes have been made to the overall structure, disclosure requirements and related guidance in a very short timeframe. While clarity and accessibility have been improved, there is insufficient time to consider the implications of the revisions across 12 standards. Furthermore, the revisions could lead to new unforeseen implementation issues, especially where new language has been introduced that is not clearly derived from existing standards and frameworks (such as the ISSB Standards). We support the objective that ARs are streamlined, do not introduce additional disclosure requirements, and only include requirements needed to fulfil the objective of the disclosure requirements. The work to determine what should remain in ARs as 'shall' and what should be moved to non-mandatory implementation guidance (NMIG) was done in a very short timeframe. We therefore recommend EFRAG validate that the following 'hierarchy' is consistently adopted across the standards: ARs should be included as 'shall' requirements that clearly support the related DR, and non-mandatory guidance in NMIG should be genuinely illustrative and not introduce additional disclosure requirements that are not directly included in the DR itself (see Q16). To support a cost-effective system for preparers, enhance interoperability and support globally consistent and comparable disclosures, we recommend the ISSB's disclosure requirements are included as mandatory requirements in ESRS as far as possible.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Deloitte	Auditor	Spain	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We support the approach of including mandatory ARs in the body of the standard with illustrative content in NMIG. However, some of the NMIG content represents extensions to DRs or ARs rather than illustrations. It is essential that NMIG does not introduce additional requirements or options that should be part of DRs/ARs themselves (either explicitly or by implication), especially for measurement of metrics. Such ambiguity would lead to implementation challenges, requiring further guidance and interpretation by preparers, regulators and assurance providers. We believe more time is needed to for EFRAG to validate and refine the NMIG, including drafting quality, than is available in the current timeline. We therefore recommend that EFRAG take the time to do so and finalise the NMIG later than the technical advice on the core ESRS to be submitted to the EC. NMIG should remain a living document that can be updated to reflect practical implementation considerations as undertakings apply the revised ESRS, while maintaining appropriate due process. An appropriate due process should therefore be put in place for proposed future changes to NMIG which should set out to what extent proposals would be consulted on through a public consultation process and requirements for considering that feedback when finalising content. This due process should be published to give stakeholders certainty as to how updates to the NMIG will be made.			
Survey	Deloitte	Auditor	Spain	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	In our view, the proposed reliefs do not strike the right balance. We recognise the need for relief for specific circumstances (such as impracticability of obtaining data, or challenges arising from new IROs or business transactions) and support the inclusion of the 'undue cost or effort' proportionality mechanism (see Q18). However, we do not support how the proposed new reliefs on reporting 'partial scope' or excluding data on activities that do not significantly drive IROs have been introduced: we are concerned that these reliefs as drafted could undermine the usefulness of information to users and encourage selective reporting. In particular, such reliefs should not be included as permanent provisions as we expect that over time there should be less need to apply them as reporting becomes more widespread and practice matures. Instead, we recommend a general relief, independent of the 'undue cost or effort' relief based on a 'comply or explain' principle under which the undertaking explains which required information it was not able to provide in specified circumstances such as temporary impracticability of obtaining data, together with an explanation as to when the undertaking expects to be able to comply in full. As an example, the 'comply or explain' relief would be suitable for acquisitions and disposals, allowing the consideration of facts and circumstances. For example, affected stakeholders might expect disclosure to be made of material impacts related to an undertaking prior to its disposal; or where an acquisition occurred late in the reporting period disclosure at a more general level could be provided on IROs, strategy, performance and targets (e.g., adapting ESRS 2:17). If the proposed reliefs are kept as drafted, clear parameters are needed setting out the circumstances when the reliefs can be applied and for how long.			
Survey	Deloitte	Auditor	Spain	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We welcome the inclusion of the 'undue cost or effort' proportionality mechanisms, incorporated from the ISSB Standards, as helpful ongoing relief for preparers, available to use in appropriate circumstances. We note that the 'undue cost or effort' mechanism is not conditional on timing and specific events or circumstances. We strongly recommend the exact words and the accompanying guidance, as well as scope of application, are incorporated in full from the ISSB Standards (including guidance in appendices). Regarding the proposed relief on 'partial scope' reporting, we disagree and refer to our response to Q17.			
Survey	Deloitte	Auditor	Spain	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We agree with Option 1. Information on anticipated financial effects is valuable to investors. We recognise that this is a complex and difficult area for preparers, and that practice is largely nascent. However, we support the requirement to provide quantitative information in keeping with the aim of providing consistent and comparable information. By continuing to require this information, we would expect practice to evolve and mature over the years. Recognising the inherent challenges of measuring financial effects in this area (including the lack of globally recognised measurement methodologies and skills/experience), we welcome the inclusion of a range of reliefs to enable proportionate application of the requirements, based on the ISSB provisions. We note that EFRAG has only partially included the proportionality mechanisms that the ISSB included in its standards that would be helpful when disclosing information about anticipated financial effects and recommend that EFRAG incorporates all the ISSB's guidance (including in the appendices to IFRS S1). We also note the existing transitional relief for the first years of application in ESRS 1 and believe this continues to be important for preparers. Further guidance on appropriate methodologies and application will be helpful for the future.			
Survey	Deloitte	Auditor	Spain	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	We disagree with the proposal as it does not strike an appropriate balance between simplification and users' needs, in our view. Our comment here is made as an overarching point rather than on each individual paragraph. ESRS E1:40-42 includes additional mandatory DRs on anticipated financial effects that are not included in the ISSB requirements. These paragraphs could be moved to NMIG as non-mandatory illustrations to help support application of the requirement to provide quantitative information on anticipated financial effects, along with further guidance that would be needed on areas such as measurement and aggregation of the information. More generally, we believe it is essential that EFRAG uses the ISSB's approach on anticipated financial effects in its entirety, including the disclosure requirements and the relief/proportionality mechanisms (see Q19).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Deloitte	Auditor	Spain	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	We believe full alignment of language between ISSB Standards and ESRS is necessary to achieve true simplification (i.e. using the same language as far as possible), which should be possible given the high degree of interoperability already achieved. It is not clear on what basis EFRAG has concluded it has 'considered all opportunities to align the provisions and avoid unnecessary differences [...].' We agree with the amendments made to enhance interoperability, including on fair presentation and IFRS industry guidance, including SASB Standards. However, there remain many differences in language for no obvious reasons and a significant lack of alignment in many areas - with the ED introducing additional differences in some cases. Some disclosure requirements and reliefs/proportionality mechanisms have only been partially adopted, or included without the complete accompanying application guidance. The repositioning of MDR would allow for aligning the content areas fully with the ISSB's approach and introducing content on sources of guidance that could be used when the topical standards do not address material IROs sufficiently (see Q14). We strongly recommend that EFRAG should align the wording of ESRS E1 and IFRS S2 as far as possible on a topic that leads to material IROs for most undertakings, adding requirements only where it is necessary to meet the objectives of the EU Green Deal (see Q33). Not achieving the greatest possible alignment of the exact wording of the standards would be contradictory to the overall objective of burden reduction. Many EU and non-EU undertakings will be required to apply ISSB Standards in addition to ESRS and will face significant complexity and costs when applying both sets together if the requirements are not fully aligned; this may also hinder the ability of undertakings applying only ESRS to obtain exemptions for subsidiaries in jurisdictions with mandatory ISSB disclosure requirements.			
Survey	Deloitte	Auditor	Spain	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	Deloitte	Auditor	Spain	22.ESRS2	Comments on deleted datapoints in ESRS 2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	We recommend EFRAG validates that the architectural 'hierarchy' is consistently adopted across the standards, including that ARs are appropriately included as 'shall' requirements that clearly support the related DR, and that any non-mandatory guidance remaining in NMIG is genuinely illustrative and does not introduce additional disclosure requirements that are not directly included in the DR itself (see Q16). It is essential that the NMIG does not introduce additional requirements or options that should be part of DRs/ARs themselves (either explicitly or by implication), especially for measurement of metrics. Such ambiguity would lead to implementation challenges, requiring further guidance or interpretation by preparers and assurance providers. We note that some disclosures that were previously included to support interoperability with the ISSB Standards have been removed – for example, disclosure of whether the process to assess and manage material sustainability IROs is integrated into the undertaking's overall risk management process; whether and how climate-related considerations are factored into executive remuneration and the percentage of executive management remuneration that is linked to climate-related considerations (as summarised in the Basis for Conclusions paragraph 100). Such information is likely to be important to users, particularly investors. See also responses to Qs 15, 16 and 21 and further detail in the accompanying spreadsheet.			
Survey	Deloitte	Auditor	Spain	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The rationale for moving these 'may' to 'shall' data points is that 'they do not add new obligations, as they refer to an already existing disclosure objective'. While we do not disagree, this approach does not seem to have been applied consistently to all DRs. The rationale for mandating disclosure of these additional data points seems to be that the disclosures are needed to support the DR objective. On the other hand, for other DRs the opposite approach of removing data points seems to have been taken. We think that consistency in the approach taken by EFRAG (deletion vs moving to 'shall' vs moving to NMIG) is key. For example, the following voluntary datapoints in S1-15 'Remuneration metrics' have been removed and not moved to 'shall' even though it could be considered that they are relevant to the existing disclosure objective: 'The undertaking may disclose a breakdown of the gender pay gap as defined in paragraph 97(a) by employee category and/or by country/segment. The undertaking may also disclose the gender pay gap between employees by categories of employees broken down by ordinary basic salary and complementary or variable components'. We set out similar general concerns in our answer to Q24. On the specific proposal to require mandatory disclosure of a transition plan for biodiversity and ecosystems if such a plan exists, we are concerned by the difficulties in assessing whether an undertaking's plan would be considered a transition plan (as opposed to an extension of strategic policies, actions and targets). If mandating disclosure, it would be important that the standards include characteristics necessary to determine what constitutes a biodiversity transition plan for the purposes of disclosure.			
Survey	Deloitte	Auditor	Spain	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	In our view, the proposed additional disclosure requirement on a statement of compliance in BP 1 is essential in the context of a fair presentation framework. As stated in the EFRAG accompanying FAQs, the rationale for addition of the other new data points is to 'make explicit a separate element of required information' with the aim to 'clarify the reporting requirements' to meet 'the disclosure objective'. Whilst we do not disagree, this approach does not seem to have been applied consistently to all DRs. The approach taken for these additional DPs seems to be that because the disclosures are needed to support the DR objectives, disclosure should be mandated. On the other hand, for other DRs a different approach seems to have been taken, simplifying the disclosure requirements without making a corresponding amendment to the objective itself, leading to an inconsistency between the objective and the related DRs. We think that clarity on this matter and consistency in the approach taken by EFRAG (additions vs deletions vs moving to NMIG) is key.			

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Survey	Deloitte	Auditor	Spain	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	We welcome the clarification that ESRS is a fair presentation framework, which should support a more effective application of materiality and more relevant, concise reporting. Fair presentation, along with qualitative characteristics of information, is at the heart of the IASB's financial reporting standards and has been adopted by the ISSB for sustainability reporting. Clarity that ESRS is a fair presentation framework brings certainty on a concept that is widely used and understood by preparers and users (e.g., for financial reporting), and is therefore familiar in application. However, while clearly derived from the IASB and the ISSB Standards, the words and their order in ESRS 1 are different. It is essential that ESRS use the same words as the IASB/ISSB subject to deviations only when absolutely necessary such as reference to 'material IROs'. In particular the content on fair presentation does not include a direct reference to entity-specific information (included at ESRS 1:10-11), which is an integral part of fair presentation as included in the IASB and ISSB Standards. Including requirements on entity-specific information separately from the fair presentation requirement potentially undermines the concept of fair presentation. (Such a disconnect would be even more prominent given the significant proposed reduction in mandatory datapoints that will likely lead undertakings to rely more on entity-specific information.) While fair presentation is well understood when supported by the characteristic of financial materiality, guidance should be provided on how to achieve fair presentation when supported by the characteristic of impact materiality. For example, impact materiality assessment requires consideration of the entire value chain, considering impacts on all stakeholders, hence further guidance is needed to explain how to narrow this down to a 'complete depiction of an impact' that includes 'all material information necessary for the users'.			
Survey	Deloitte	Auditor	Spain	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The disclosures associated with adequate wages are highly judgemental and there is a general lack of consensus about what might be considered 'adequate'. Instead of prescribing an approach, EFRAG should require undertakings to provide transparent disclosures about the judgements and methodologies applied. We recommend that EFRAG works with undertakings and other stakeholders to identify and make available sources of information on levels of adequate wages around the world that would be needed to achieve the disclosure objective. We note that there is an inconsistency between the disclosure objective 'to enable an understanding of whether or not the undertaking's employees are paid an adequate wage' and the DRs relating to employees outside the EU that focus primarily on minimum wage and living wage.			
Survey	Deloitte	Auditor	Spain	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	We agree with the principle of not retaining voluntary data points in ESRS unless there is a specific reason. If an undertaking uses an adjusted metric in its management, it would be possible to disclose this as entity-specific information, if material.			
Survey	Deloitte	Auditor	Spain	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Further to our comments in Q11, we recommend that ESRS 1:AR17 explicitly permits an undertaking to start its assessment at the level of the IROs it already addresses when applying the top-down approach. In respect of the proposal to permit the inclusion of non-material information, we think the focus of the sustainability statement should be on disclosure of material information. If an undertaking wishes to disclose non-material information, this could be made outside the sustainability statement. If retaining this provision, we recommend undertakings are required to ensure that the information is not unduly prominent and the rationale for its inclusion is disclosed. Investors emphasise the importance of connections with financial information. While we agree with the simplification of the requirements on connectivity with financial statements, including the removal of detailed requirements such as cross-references to specific line items or notes in the financial statements, we disagree with the proposal to make this entirely optional (ESRS1:114). We believe a high-level requirement to explain connections between sustainability information and the related financial statements should be retained (IFRS S1:21 uses a principles-based approach). We are not clear how ESRS 1:53 and AR24 are meant to interact - it is not clear how 'materiality at group level' and 'material at the subsidiary level but not the group' is meant to be applied in practice, and more importantly where to draw the line. This is inconsistent with the approach in financial reporting where group materiality is assessed at group level. If this is intended as a trade-off for subsidiaries to use an exemption from reporting, it should be made clear (and presumably then should only apply to subsidiaries that otherwise would be in scope of CSRD).			
Survey	Deloitte	Auditor	Spain	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	In addition to our response to Q21, we do not agree with the revised approach proposed for measurement and disclosure of GHG emissions in ESRS E1. It introduces additional complexities and, as the BC acknowledges, the proposals would lead to differences with disclosure of GHG emissions under the ISSB Standards and the GHGP– e.g., with respect to the control approaches and the treatment of leases and joint ventures. As we stated in our earlier feedback to EFRAG, global consistency and comparability of GHG emissions measurement and disclosure is of particular importance to users. We note that GRI would now accept GHG emissions disclosure under the ISSB Standards as equivalent to the requirements under its new climate standard. There should therefore be no need for a difference between a 'risk and opportunity' or an 'impact' perspective on GHG emissions disclosure. We strongly recommend that EFRAG incorporates the ISSB requirements in full as far as possible (allowing for addition of EU-specific disclosures on, for example EU ETS and not permitting carbon offset in setting targets). We note that the GHGP is going to be revised significantly in the near future. This will likely resolve some of the issues that lead to the need for differences between ESRS and GHGP. We encourage EFRAG to contribute to this process in its capacity as an observing entity of the Independent Standards Board of the GHGP, and to leverage the potential for further alignment with the aim to remove deviations. We further note the recent announcement by the GHGP and ISO to harmonise their standards, which should serve further to align global practices in measurement of GHG emissions and allow EFRAG to reference global approaches without unnecessary deviations. Further consideration will be needed in the future on sources of guidance for measurement of financed emissions.			

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Survey	Deloitte	Auditor	Spain	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The use of both 'pay' and 'remuneration' in the proposals have different definitions but in practice seem to cover the same item. We recommend that EFRAG adopts uniform terminology in this regard.			
Survey	Deloitte	Auditor	Spain	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Acknowledging the reduction in datapoints, we caution this will not lead to a corresponding percentage reduction in the cost or effort required to prepare disclosures. While EFRAG has responded to address feedback provided by stakeholders following its earlier call for input, there has been little time for the SRB to think through all aspects of the structure and drafting, and the rationale for mandatory v. voluntary datapoints moved to NMIG. Without more time to follow due process in full, we are concerned that the revisions could lead to lack of clarity in some instances and unintended consequences (e.g., application of new requirements and reliefs), which in turn could lead to implementation challenges when undertakings start to apply the revised standards. There is very short time available to consider and provide feedback on extensive proposed revisions to 12 standards – significantly more time would normally be given under due process for smaller revisions, let alone an entire set of standards. It is therefore not possible for us to conclude whether the revised standards are capable of practical application in a consistent and comparable way by undertakings. This also applies to the excel template for providing comments on specific paragraphs of the EDs, which is not an exhaustive list, and where we have set all responses to partially agree/disagree, pending time for a more comprehensive assessment. Separately, it is important that ESRS can be revised to reflect the outcome of the expected SFDR review to ensure alignment between EU legislation, including allowing the potential for removing any data points no longer included in SFDR considered not necessary to meet disclosure objectives under CSRD/ESRS; and aligning any changes to metrics or disclosures in revised SFDR.			
Survey	FEAD	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	We believe that the proposed changes have not achieved the goal of simplifying the Double Materiality Assessment process. In particular, the new guidance on the approach described in Appendix C for impact assessment introduces further complexity by differentiating between current and potential impacts, reporting periods, and the timing of remediation, mitigation, and prevention actions. It would be preferable to adopt a uniform principle of assessment on a gross basis of the actions taken. This approach would ensure greater clarity, reduce the risk of divergent interpretations, and enhance comparability between companies, while still allowing for the disclosure of measures taken in the dedicated sections of the standards.			
Survey	FEAD	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We believe that an additional step is needed to differentiate the information contained in the document, to include only the strictly necessary information in the EC Delegated Act. The "clarification" information of the now mandatory DPs present in the draft Standards must be well-defined and clear and included within the Delegated Act; voluntary DPs, on the other hand, should not be included in the Delegated Act, in order to respect the goal of simplification.			
Survey	FEAD	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	In general, we welcome the introduced simplifications and understand the reasons behind the various reliefs provided, which help reduce the reporting burden. However, we believe it is essential that these measures do not result in a decline in the quality and completeness of the reported information. It is crucial to maintain an adequate level of standardization and rigidity of the standards to ensure transparency, comparability, and reliability of the data.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FEAD	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We express our preference for Option 1. In our view, disclosure of financial effects related to climate risks should not be left on a purely voluntary basis. These risks are already frequently embedded in corporate risk assessment processes and are of increasing significance from a financial perspective. We therefore consider it appropriate that the omission of quantitative data be restricted to limited and well-defined circumstances, as foreseen in the proposed amendment.			
Survey	FEAD	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	We believe that all Application Requirements related to the quantification methodology should be retained within the text of the Disclosure Requirement. These guidelines are essential to provide a clear and consistent methodological reference for all companies, ensuring comparability and operational support in preparing anticipated financial information. Their inclusion helps balance the need for simplification with users' requirements for reliable and comparable information.			
Survey	FEAD	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	The CSRD is not strictly a "compliance-based framework" but a real support that allows highlighting the company's sustainability performance while also linking to financial reporting. We therefore support the introduction of the concept of "fair representation," with the suggestion that clear guidelines be introduced for both preparers and auditors. Otherwise, there is a risk of producing reports with a very large number of entity-specific indicators.			
Survey	FEAD	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We believe that the proposed change to the definition of the term "Recovery" in the new Standards could have a significant impact. Currently, in indicator E5-5, waste-to-energy is classified under "other recovery operations" within recovery waste. According to the new version, it would be reclassified under "other disposal operations" under disposal. This change could encourage companies to favor disposal instead of considering energy recovery of waste as a virtuous practice. We do not agree with this change and believe it is appropriate to maintain the current definition of recovery to properly value waste recovery activities, in line with the waste hierarchy established in the EU Waste Framework Directive (Directive 2008/98/EC).			
Survey	FEAD	Business association (other than association of financial institution)	Belgium	35.E1-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	We believe it is important that, within the E1-1 Transition Plan disclosure requirement, the trajectory well below 2°C, in addition to the 1.5°C trajectory provided for by the Paris Agreement and the European Climate Law, be explicitly considered. This would allow companies to more accurately represent their transition plans in relation to different decarbonization scenarios that are still consistent with international and European objectives We believe that all references to the EU Taxonomy should be maintained as mandatory requirements and not included in the NMIG. The interconnection with the data provided by Taxonomy is essential to ensure full connectivity between sustainability and financial information. Only a mandatory approach can ensure consistency, comparability, and reliability of the information provided to stakeholders.	E1	Disclosure Requirement E1-1 - Transition plan for climate change mitigation	
Survey	FEAD	Business association (other than association of financial institution)	Belgium	35.E5-5.	Do you agree with the amendments of this chapter?	I disagree	We believe that the proposed change to the definition of the term "Recovery" in the new Standards could have a significant impact. Currently, in indicator E5-5, waste-to-energy is classified under "other recovery operations" within recovery waste. According to the new version, it would be reclassified under "other disposal operations" under disposal. This change could encourage companies to favor disposal instead of considering energy recovery of waste as a virtuous practice. We do not agree with this change and believe it is appropriate to maintain the current definition of recovery to properly value waste recovery activities, in line with the waste hierarchy established in the EU Waste Framework Directive (Directive 2008/98/EC).	E5	Disclosure Requirement E5-5 - Resource outflows	
Survey	DRSC	(National) standard setter	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	Please, refer to our cover letter as well as to the Excel-Template provided by EFRAG for our detailed comments. As for Appendix A of ED ESRS 1 (which we could not address in the Excel-Template) we would like to point out that we welcome the proposal to reduce the granularity level in the ESRS to topics and sub-topics. However, Appendix A now seems to introduce a "mixed approach", i.e. not listing sub-sub-topics but at the same time introducing an "additional layer of topics" in brackets for some sub-topics. This does not simplify the structure but rather raise additional questions for the application of the ESRS. For example, questions about the status / the binding nature of these additional aspects mentioned on brackets (which include former sub-sub-topics). In other words, the additions in brackets could be interpreted as binding, which would mean that the removal of the sub-sub-topics would be meaningless. It would also be questionable whether undertakings would have to analyse a sub-topic on the level of (each of) the "additional layer" in the brackets to document non-materiality.			

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Survey	DRSC	(National) standard setter	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	Please, refer to the Excel-Template provided by EFRAG for our detailed comments on ESRS 1 par. 34-36 as well as on Appendix C.			
Survey	DRSC	(National) standard setter	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	-Support for executive summary -Not necessary to prescribe the order of ESG in sustainability statements (does not reflect intention to consider management view), par. 105 -On connection of information (ch. 9.2), Par. 116: undertakings should not be asked to "explain the level of consistency", but consistency should be assumed to be the rule (therefore, need to explain where differences remain in the data and assumptions			
Survey	DRSC	(National) standard setter	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The DRSC welcomes the changes made in ESRS 2. They contribute significantly to the simplified structure of the ESRS. However, any inconsistencies and (unintended) changes in the requirements that stem from restructuring the requirements need to be addressed and editorial changes are still necessary to align throughout the ESRS. Please, see the excel-template that EFRAG provided for more details. For example, understanding of policies and actions (the differentiation is blurred through changes in GDR from MDR) or the new reference to "key actions" (in ED ESRS) instead of "action plans" (in DA) which should not be understood to address another level of detail.			
Survey	DRSC	(National) standard setter	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	DRSC welcomes the changes made and that the ED ESRS focusses on shall-datapoints and explanatory ARs. However, at times, the AR seems to go beyond explanations, go beyond the content of the DR or are not considered to further contribute to the understanding. Therefore, further adjustments are needed. Examples are: -ESRS 2.AR 36 provides examples for "non-monetary resources", however, par. 38 does not refer to non-monetary resources. -ESRS 2.AR 11, which merely refer to the glossary. -ESRS 2.AR 28 repeats underlying principles from ESRS 1 or ESRS 1.AR 2 which refers to qualitative characteristics applying to all ESRS (not specifically needed in this context). - ED ESRS E4.AR 8 suggests that if the site of an undertaking is in a biodiversity sensitive area it "is highly likely that its activities will negatively affect the area". This assumption is pre-empting the result of the DMA of the reporting undertaking. -ED ESRS E1.AR 19: This AR extents the DR in par. 32 (specified in AR 18) for the specific case of financial control not conveying fair presentation of the GHG emissions. -ED ESRD E5.AR 2: This para requires an undertaking to designate certain materials in order to identify the material's characteristic, which constitutes an addition to the requirement in para 15(a) of ESRS E5.			
Survey	DRSC	(National) standard setter	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	DRSC concluded that NMIG should not be published at all. While NMIG are intended (and explicitly labeled) as non-mandatory guidance in practice they will inevitably be referred to as further sources for understanding the requirements laid out in ESRS. It would be crucial that NMIG do not raise further questions or even contradict the ESRS. However, currently there is the risk of NMIG stipulating further discussions rather than providing clarifications only. Therefore, DRSC is in favour of not publishing an NMIG at this point in time. Despite these considerations it will be necessary to reevaluate the NMIG in the light of information that need to be part of the ESRS. For example, the flowchart for determining disclosures under the ESRS (p. 13) have to remain part of the ESRS. In case the NMIG will be retained, they need to be completely aligned with ESRS. For example: -NMIG on ESRS E1, NMIG 4 for para. 24: "Additions made to both tangible and intangible assets" are the definition for CapEx but not for OpEx, see chapters 1.1.2. and 1.1.3. of the DA. OpEx are "non-capitalised costs that relate to research and development", and "non-capitalised" means they are not recognised on the balance sheet, i.e. there are no "additions" recorded. -NMIG on the structure of the ESRS Sustainability Statement: while ESRS 1.ch. 8, par 105 seems to require a specific order in the presentation of the topics the "Example of structure" in the NMIG seems to imply that a specific order is not required, but only an example. -Inconsistencies in NMIG 3 for ESRS S1.11: While "communication channels" were removed from MDR-P, they are reinserted in this NMIG. They should, however, either be deleted or integrated into ESRS 2 to ensure consistent application in relation to policies.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DRSC	(National) standard setter	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Please, refer to our cover letter for the issue of AFE as well as the Excel-Template provided by EFRAG for our detailed comments on ESRS 2 par. 23.			
Survey	DRSC	(National) standard setter	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	E1-11 does not constitute a simplification for anticipated financial effects as, for example, it still refers to "monetary amount and percentage of assets", "monetary amount and percentage of revenue". As we strongly support Option 2 as mentioned in draft ESRS 2, we propose to design this DR as a "may" disclosure. An example for the wording could be: "If the undertaking discloses quantified anticipated financial effects it may include (a) the monetary amount and percentage of assets at material physical risk ..." Requirement on "location of key assets at material physical risks" results in unnecessarily detailed reporting, as depending on the sector, this could involve a large number of locations in all regions of the world. As an example, logistic sector undertakings have much more sites than heavy industry.			
Survey	DRSC	(National) standard setter	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	For the constituents of the DRSC interoperability with IFRS SDS is crucial. We therefore welcome the efforts made in the ED ESRS to enhance interoperability with IFRS SDS as much as possible. We further strongly recommend EFRAG seeking enhanced cooperation with the ISSB on the area of interoperability in short term.			
Survey	DRSC	(National) standard setter	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	DRSC	(National) standard setter	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	Many proposals are welcomed as helpful to reduce the burden reduction (e.g. DMA proposals, reliefs). However, as pointed out by many constituents the reduction of data points is not completely correlated to the burden reduction for the undertakings. For example, many undertakings of wave 1 have reported about increasing implementation burden for the amended ESRS (as proposed in the ED) due to the introduction of new concepts and terminologies, due to new reporting requirements or the introduction of a new level of required detail in the reporting. It will be crucial to address these concerns in order to achieve the objective of the ESRS simplification exercise.			
Survey	DRSC	(National) standard setter	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	On ED ESRS E4-1: We do not support this additional reporting requirement. On ED ESRS E3-4: We note that this is not intended to impose an additional burden (as mentioned in paragraph 127 of the BfC), but the change to "shall" does in fact impose an additional burden, regardless of EFRAG's intention to the contrary.			
Survey	DRSC	(National) standard setter	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	On ED ESRS E4.24: "Information on secondary microplastics connected to the undertaking's downstream value chain" is a requirement that does not exist in the delegated act. Although the Basis for conclusion (BC130) states this disclosure "was already required to be reported in ESRS E2 through AR 20, which addressed both primary and secondary microplastics", it should be noted that AR20 of ESRS E2 (delegated act) clearly addresses metrics related to own operations, but not the Value chain. In other words: The delegated act contains a requirement that may be understood to capture microplastics; however, the requirement does not address the downstream value chain, whereas the ED ESRS E2 (para 16(b)(ii) does. This new data point expands the information on secondary microplastics to include the value chain. This information cannot currently be estimated with a high degree of accuracy and would significantly increase the amount of work involved. On ED EDRD E5.18(e): As this new para seems to help undertakings in preparing the reports, the addition is regarded helpful.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DRSC	(National) standard setter	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	Please, refer to our cover letter as well as the Excel-Template provided by EFRAG for our detailed comments on ESRS 1 par 16 et seq.			
Survey	DRSC	(National) standard setter	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	EFRAG changed the threshold for the requirement to disaggregate the metrics for characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7). Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. This change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. Moreover, changes in the definitions/thresholds for the metrics regarding characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in S1-5 and S1-7 lead to additional effort as it triggers changes in methodology and additional disclosure requirements. In particular, with respect to S1-5 and S1-7, this additional effort to collect the relevant data is considerable, because it may be necessary to report on more countries than before, as the calculation has been changed. Moreover, the revised threshold for significant employment leads to inconsistencies over the years and may lead to strong discrepancies and additional reporting burden for undertakings depending on their distribution over countries.			
Survey	DRSC	(National) standard setter	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	Calculating a (country-specific) living wage involves a great deal of effort in terms of data collection, also regarding verifiability of the information for the auditor of the sustainability report. If a country outside the EU does not have a wage level established through collective bargaining or a statutory minimum wage (that considers the ILO wage setting principles), it should not be necessary to calculate a living wage. Instead, the wages established through collective bargaining or minimum wages of neighbouring countries or comparable countries in the region could be used, which would make things much easier than calculating the living wage. Morover, the new requirements for ILO compliance of all wage levels used outside the EU and queries to local authorities cannot be met by companies with many activities in many different countries. These requirements represent a new reporting burden, which we reject. Additionally, the two years-cycle should not be mandatory. The proposed amendments lead to considerable additional effort as the requirements regarding which sources can be used (e.g. for living wage estimates in countries outside the EU) have been changed requiring a review whether previously used sources can still be used. Moreover, estimates regarding living wages are complex to collect and, in practice, difficult to carry out without external service providers. The EU Commission or EFRAG should issue a list of applicable adequate wages worldwide so that individual undertakings do not have to prepare such an overview themselves. If such a list is not provided, only a) the wage level established through collective bargaining or b) the statutory minimum wage established by legislation or collective bargaining agreement should be used as a reference instead of living wages.			
Survey	DRSC	(National) standard setter	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	It is crucial that the information required by the SFDR are provided by the reporting companies. ESRS need to allow gathering the SFDR information. However, alignment is important. For example, ESRS S1 - 46. (b), ESRS S2.36, ESRS S3 - 19. and ESRS S4 - 15. Previously (ESRS S1.104, ESRS S2.36, ESRS S3.36, ESRS S4.35), the focus was only on "severe human rights incidents". Indicator No. 14 in table III of annex I to Delegated Regulation (EU) 2022/12888 also refers to "severe human rights issues and incidents". In order to ensure consistency between the SFDR and the ESRS, the word "severe" should be reinserted. With regard to the determination of "severe" human rights impacts, the definition of the United Nations Guiding Principles on Business and Human Rights should be adopted.			
Survey	DRSC	(National) standard setter	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	This voluntary datapoint regarding the adjusted gender pay gap is requested by some users of the sustainability report. It is therefore important for some undertakings to report on this data point. DRSC is therefore in favour of retaining this voluntary datapoint in ESRS S1 in this specific case.			
Survey	DRSC	(National) standard setter	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	G1-6 is not able to address payment practices in the context of SME suppliers as laid out in the CSRD. For one, reporting undertakings usually do not categorise their suppliers by size (categorisation rather by risk, region etc.). Secondly, usually there are no "standard payment terms", i.e. for SME suppliers, that the reporting undertaking could disclose. Overall, this requirement does not seem suitable to address the SME specific context of payment practices.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	On DMA analysis: Michelin acknowledges the clarification and simplification provided by EFRAG for the DMA analysis. The approach relying on a reduction of granular information, allowing a top-down DMA analysis and being strategy-driven rather a compliance-oriented checklist, is more than welcome. The simplification of AR16 is an important progress. It is, however, regretted that the strategic nature of the DMA analysis is not explicitly recognized in the draft. A DMA analysis should have a recommended "duration" in the ESRS. In our view, it should not require updating more frequently than after 3 reporting exercises (§29), unless a major event impacts upon the business model, strategy or consolidation perimeter. Materiality of information : The principle of materiality should indeed be applied not only to the DMA, but to sustainability reporting as a whole. This principle, when applied, ensures not only relevance in the information reported, but also helps ensure the right level of granularity and, in fine, comparability.			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	No objection to DMA analysis being carried out in consideration of « brut » impacts. Concerns about the complexity of an analysis in « net », and how this analysis would be audited.			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The modifications proposed by EFRAG are welcome and should result in better readability and usability for all stakeholders (preparers, users and other stakeholders). It provides greater flexibility to undertakings to highlight the more relevant information, in particular by means of a useful executive summary.			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We support the changes proposed since they provide more clarity on the reporting obligations relating to Policies, Actions and Targets (PATs).			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	Yes, the amendments proposed are more than welcome as they will greatly facilitate the preparation of the report and useability of the standards by preparers (the confusion between "may" and "shall" in the first version of the ESRS made their application extremely complex). Restricting the obligatory datapoints to the main body of the standard only is good legislative drafting practice. More generally, an effort has clearly been made in simplifying language that was often overburdensome and sometimes not at all easy to understand .			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We support moving all voluntary and non-mandatory data points into a separate document to improve the clarity of the reporting obligations. The question of the legal status of this document is important (could it have the same legal status as a Commission FAQ?), and should be treated as soon as possible, as it could also have a direct impact on the scope of the audit (assurance providers/auditors need to know that NMIG content is not a "lesser" form of mandatory reporting obligations). The reality is that the impact of this simplification will be limited for "wave 1" companies who have already (and sometimes with much difficulty) , applied the first version ESRS. It is expected that the largest reporting burden relief here will be felt by successive waves of reporting companies.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	All reliefs proposed are welcome and provide greater alignment with other international frameworks (ISSB, GRI), although a relief on commercially sensitive information is missing. It is regrettable that the "undue cost or effort" provision did not exist in the first version ESRS. This would have simplified the preparation of the 2024 report. In our view, it is disproportionate to expect metrics relating to an acquired entity to be consolidated into the preparer's report in the year following the acquisition – a more adapted timeline is required (up to 3 years). It is not to be underestimated the time and effort required to identify, capture, homogenize, collect, control, consolidate and audit data obtained from an entity entirely foreign to the preparer of the sustainability statement. However, further clarification is expected as regards the impact of an acquisition on the consolidated sustainability statement. The principle of materiality is to be considered not to impose the same rule for all acquisitions. On this point, we would recommend mirroring the taxonomy regulation provision of materiality of an activity or not (< 10%), bearing in mind that the taxonomy is part of the sustainability report, and the same principle of materiality should apply. The exclusion of activities that are not a significant driver of IROs is welcome and wholly pragmatic (and reflects the materiality principle).			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We support the relief measures for using reasonable and supportable information available without undue cost or effort, and believe this provision should remain permanent and to allow companies to decide when to take action. In some cases, the access to information is not in the remit of the company (for example, when lacking of standardisation between EU and non Eu regulations). It is our view is that there is no need to impose a time limit on the use of the relief, for 2 reasons : data quality should naturally improve over time (a natural consequence of the transparent reporting of ESG progress) and some indicators are complex and, for many reasons, may take time to prepare and consolidate (one size does not fit all). The allowance for excluding joint operations from environmental metric calculations is relevant and avoids duplicate reporting. Additionally, enabling partial scope metrics while requiring disclosure of data limitations and future improvement plans encourages both transparency and realistic sustainability reporting.			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	We agree with Option 2, due to the inherent difficulty in the exercise (what methodology?), the robustness of any such calculations (based on what scenarios?) and the consequent usefulness for investors (what weight can be attached to such predictions)? We question the usefulness for investors of such metrics that are expected to cover all time horizons (up to and even beyond 10 years). The longer the horizon, the less relevant it will be for investors due to uncertainty and lack of quality (a parallel needs to be drawn with financial reporting on the question of anticipated reporting over long time horizons). It is therefore our opinion that a maximum 5 year time horizon should be applied to the disclosure of any anticipated financial effects.			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Please refer to our answer above on the reporting of anticipated financial effects (questions over methodology, robustness of any anticipated scenarios, and utility for investors of such reporting given the degree of immaturity). It should also be highlighted that listed undertakings already publish information relating to their risk exposure, useful for investors and lenders, in their Universal Registration Document (see the chapter on risk management). Given the above considerations, and most notably the efforts that would be required to calculate the monetary amounts and percentages required by E1-40, 41 and 42 with a sufficient degree of certitude for them to be useful for investors/lenders, we cannot agree - in this "ramp-up" phase of sustainability reporting - that an acceptable balance is being achieved. Would propose to postpone this question to a few years later, when all undertakings, regulators and external auditors have gained in maturity in applying the ESRS.			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	We support the changes introduced to enhance interoperability with the ISSB standards, especially the harmonisation of the reporting boundary for GHG emissions.			

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Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	First, we consider amendments will improve the quality of the information disclosed, highlighting the compromise between the value and the cost to publish the information and then enhancing the effectiveness of sustainability reporting. The qualitative datapoints in particular were considered heavy and too detailed, at risk of drawing attention away from the essential information and "losing" the reader. The clear distinction between "shall" and "may" datapoints is also very welcome. However, we cannot answer the question whether a balance has been achieved between burden reduction and the fulfilment of the objectives of the Green Deal. While preparers can share their views on the question of burden reduction, only the Commission services can evaluate to what extent the greater objectives of the Green Deal will also be met.			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	First, we consider amendments will improve the quality of the information disclosed, highlighting the compromise between the value and the cost to publish the information and then enhancing the effectiveness of sustainability reporting. The qualitative datapoints in particular were considered heavy and too detailed, at risk of drawing attention away from the essential information and "losing" the reader. The clear distinction between "shall" and "may" datapoints is also very welcome. However, we cannot answer the question whether a balance has been achieved between burden reduction and the fulfilment of the objectives of the Green Deal. While preparers can share their views on the question of burden reduction, only the Commission services can evaluate to what extent the greater objectives of the Green Deal will also be met.			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	22.E2.	Comments on deleted datapoints in ESRS E2	I partially agree and partially disagree	First, we consider amendments will improve the quality of the information disclosed, highlighting the compromise between the value and the cost to publish the information and then enhancing the effectiveness of sustainability reporting. The qualitative datapoints in particular were considered heavy and too detailed, at risk of drawing attention away from the essential information and "losing" the reader. The clear distinction between "shall" and "may" datapoints is also very welcome. However, we cannot answer the question whether a balance has been achieved between burden reduction and the fulfilment of the objectives of the Green Deal. While preparers can share their views on the question of burden reduction, only the Commission services can evaluate to what extent the greater objectives of the Green Deal will also be met.			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	22.E3.	Comments on deleted datapoints in ESRS E3	I partially agree and partially disagree	First, we consider amendments will improve the quality of the information disclosed, highlighting the compromise between the value and the cost to publish the information and then enhancing the effectiveness of sustainability reporting. The qualitative datapoints in particular were considered heavy and too detailed, at risk of drawing attention away from the essential information and "losing" the reader. The clear distinction between "shall" and "may" datapoints is also very welcome. However, we cannot answer the question whether a balance has been achieved between burden reduction and the fulfilment of the objectives of the Green Deal. While preparers can share their views on the question of burden reduction, only the Commission services can evaluate to what extent the greater objectives of the Green Deal will also be met.			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	22.E4.	Comments on deleted datapoints in ESRS E4	I partially agree and partially disagree	First, we consider amendments will improve the quality of the information disclosed, highlighting the compromise between the value and the cost to publish the information and then enhancing the effectiveness of sustainability reporting. The qualitative datapoints in particular were considered heavy and too detailed, at risk of drawing attention away from the essential information and "losing" the reader. The clear distinction between "shall" and "may" datapoints is also very welcome. However, we cannot answer the question whether a balance has been achieved between burden reduction and the fulfilment of the objectives of the Green Deal. While preparers can share their views on the question of burden reduction, only the Commission services can evaluate to what extent the greater objectives of the Green Deal will also be met.			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	22.E5.	Comments on deleted datapoints in ESRS E5	I partially agree and partially disagree	First, we consider amendments will improve the quality of the information disclosed, highlighting the compromise between the value and the cost to publish the information and then enhancing the effectiveness of sustainability reporting. The qualitative datapoints in particular were considered heavy and too detailed, at risk of drawing attention away from the essential information and "losing" the reader. The clear distinction between "shall" and "may" datapoints is also very welcome. However, we cannot answer the question whether a balance has been achieved between burden reduction and the fulfilment of the objectives of the Green Deal. While preparers can share their views on the question of burden reduction, only the Commission services can evaluate to what extent the greater objectives of the Green Deal will also be met.			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	22.S1	Comments on deleted datapoints in ESRS S1	I partially agree and partially disagree	First, we consider amendments will improve the quality of the information disclosed, highlighting the compromise between the value and the cost to publish the information and then enhancing the effectiveness of sustainability reporting. The qualitative datapoints in particular were considered heavy and too detailed, at risk of drawing attention away from the essential information and "losing" the reader. The clear distinction between "shall" and "may" datapoints is also very welcome. However, we cannot answer the question whether a balance has been achieved between burden reduction and the fulfilment of the objectives of the Green Deal. While preparers can share their views on the question of burden reduction, only the Commission services can evaluate to what extent the greater objectives of the Green Deal will also be met.			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	22.S2	Comments on deleted datapoints in ESRS S2	I partially agree and partially disagree	First, we consider amendments will improve the quality of the information disclosed, highlighting the compromise between the value and the cost to publish the information and then enhancing the effectiveness of sustainability reporting. The qualitative datapoints in particular were considered heavy and too detailed, at risk of drawing attention away from the essential information and "losing" the reader. The clear distinction between "shall" and "may" datapoints is also very welcome. However, we cannot answer the question whether a balance has been achieved between burden reduction and the fulfilment of the objectives of the Green Deal. While preparers can share their views on the question of burden reduction, only the Commission services can evaluate to what extent the greater objectives of the Green Deal will also be met.			

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Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	22.S3	Comments on deleted datapoints in ESRS S3	I partially agree and partially disagree	First, we consider amendments will improve the quality of the information disclosed, highlighting the compromise between the value and the cost to publish the information and then enhancing the effectiveness of sustainability reporting. The qualitative datapoints in particular were considered heavy and too detailed, at risk of drawing attention away from the essential information and "losing" the reader. The clear distinction between "shall" and "may" datapoints is also very welcome. However, we cannot answer the question whether a balance has been achieved between burden reduction and the fulfilment of the objectives of the Green Deal. While preparers can share their views on the question of burden reduction, only the Commission services can evaluate to what extent the greater objectives of the Green Deal will also be met.			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	22.S4	Comments on deleted datapoints in ESRS S4	I partially agree and partially disagree	First, we consider amendments will improve the quality of the information disclosed, highlighting the compromise between the value and the cost to publish the information and then enhancing the effectiveness of sustainability reporting. The qualitative datapoints in particular were considered heavy and too detailed, at risk of drawing attention away from the essential information and "losing" the reader. The clear distinction between "shall" and "may" datapoints is also very welcome. However, we cannot answer the question whether a balance has been achieved between burden reduction and the fulfilment of the objectives of the Green Deal. While preparers can share their views on the question of burden reduction, only the Commission services can evaluate to what extent the greater objectives of the Green Deal will also be met.			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	22.G1	Comments on deleted datapoints in ESRS G1	I partially agree and partially disagree	First, we consider amendments will improve the quality of the information disclosed, highlighting the compromise between the value and the cost to publish the information and then enhancing the effectiveness of sustainability reporting. The qualitative datapoints in particular were considered heavy and too detailed, at risk of drawing attention away from the essential information and "losing" the reader. The clear distinction between "shall" and "may" datapoints is also very welcome. However, we cannot answer the question whether a balance has been achieved between burden reduction and the fulfilment of the objectives of the Green Deal. While preparers can share their views on the question of burden reduction, only the Commission services can evaluate to what extent the greater objectives of the Green Deal will also be met.			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	23.	Six datapoints exceptionally moved from “may” to “shall” In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, “may disclose” datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	E3 : Introducing the concept of discharges and withdrawal are making sense. However, due to the lack of equipment of all of our industrial sites, it will be impossible to provide exact data for all sites. Either estimation should be allowed or relying on only material sites based on other metrics should be allowed. ESRS E4 : considering the lack of maturity on biodiversity methodology, the obligation to publish should remain voluntary. ESRSR G1-4 : Business conduct confirmed incidents. We strongly reject the number of confirmed incidents. -It is potentially self-incriminating, as it contradicts the right not to incriminate oneself guaranteed by the European Convention on Human Rights (note that a conviction may be appealed). it also appears to go beyond the requirements of the French "Sapin II" law, which ensures that the pillars of corruption risk management (the "means") are in place, and does not impose a result. -it is not a reliable indicator to assess the effectiveness of an undertaking's governance. For example, a low number of confirmed incidents could attest to a good anticorruption policy that prevents the risks from materialising, a high number could reflect an efficient reporting and enforcement mechanism. -It could be used a tool by third country authorities against EU undertakings. For example, the US Department of Justice, could use this disclosure to pursue EU companies. In addition, the specific point on CS3D and CSRD made in the recent statement on a US/UE framework on an agreement on reciprocal, fair and balanced trade, will lead to alleviate US companies from the main constraints of CSRD and create an unlevel playing field. On this point, therefore, we cannot agree with the EFRAG position that the draft "do not add new obligations, as they refer to an already existing disclosure objective ...".			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	E2-4: It must be reminded that the definition of secondary microplastics is not officially established, and their impacts are not yet clearly addressed by science. Option should be given to refer to the relief on uncertainty when they consider official information is incomplete on this issue. E5-4: At present, the notion of critical and strategic raw materials may evolve over time with the development of the Critical Raw Materials Act, and as the delegated acts deriving from the Eco-design for Sustainable Products Regulation are not yet approved. Companies consider this information hard to access and publish, particularly since these materials are often mixed with others. In this evolving context, this datapoint shall be inserted in the NMIG			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	25.	Emphasis on ESRS being a “fair presentation” reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	Michelin supports the changes proposed to move from a rule and "tick the box" compliance-based framework to a principle-based framework. This provides a needed flexibility to ensure cost-effective and pertinent reporting that reflects the "reality" of the undertaking's sustainability ecosystem. However, considering the lack of practice and experience in sustainability reporting and the concept of fair presentation in sustainability reporting, we have concerns with the reference to "fair presentation" requirement that is well defined for financial reporting but still to be defined for sustainability reporting. This point needs to be better clarified to ensure a common understanding and practice per all stakeholders, including auditors.			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We recognize the critical importance of integrating biodiversity into transition plan, but taking into account the evolution of science-based evidence on this local and complex topic, it is premature to set any application requirements. Disclosure requirements should be voluntary, providing the source of information is detailed. Review of EFRAG ESRS within 3/5 years should integrate an update on ESRS E4.			
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary (“may”) datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	With regard to remuneration, whether it be the pay gap or the ratio (S1-15), we question the value of unadjusted indicators that do not provide any useful information and which, if reproduced without contextual explanation, may contribute to damaging their reputation. The adjusted pay gap is the only metric that directly measures compliance with the principle of "equal pay for equal work or work of equal value."			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Michelin	Preparer (non-financial preparing a sustainability report)	France	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Information on non-employee triggers difficulties to access information for people who are per definition not employee of the company. To meet comparability objectives, we recommend to focus only on own employees.			
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The materiality analysis is the cornerstone of sustainability reporting, as sustainability matters are reportable only if material impacts, risks, or opportunities are identified through this process. It is reassuring and important that double materiality has been preserved, ensuring a thorough approach to sustainability reporting. The principle of double materiality must always be upheld and must not be weakened by any simplification or dilution of the regulation. We support including stakeholder engagement and recognizing employees and their representatives as key stakeholders, as suggested in the new draft. However, their involvement should not only be "central" but "mandatory" in the DMA process. It must also be added in the draft that employee representatives must participate in all key steps of the materiality analysis process. Employee representatives need to be involved in all stages of the materiality analysis, as they directly represent the interests of the workforce and possess unique insights into the everyday operations and challenges faced by employees. The amended ESRS 1 AR 11 no longer includes the explanation on stakeholder involvement in the materiality assessment process. Specifically, the previous standard emphasized that: "Engagement with affected stakeholders is central to the undertaking's ongoing due diligence process (see chapter 4 Due diligence) and sustainability materiality assessment. This includes processes to identify and assess actual and potential negative impacts, which then inform the assessment of material impacts for sustainability reporting." This clarification from section 3.1 of the old standard must be reinstated. Otherwise, there is a risk that employee representatives will not be properly involved in these processes and will have no real influence.			
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	The draft suggests that when determining material impacts, only gross risks are considered, and existing mitigation measures are not taken into account. We consider it important that companies report not just their net impacts but also their gross impacts, and the proposed text maintains this principle. For this reason, we support the draft.			
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Many explanations and examples, including guidance on calculations, have been removed. While this reduces the overall scope and complexity of the ESRS, it increases the need for external examples and support. Moreover, no prescribed structure of reporting is provided (e.g., general disclosures, environment, social, governance), leaving content organization to the company. This poses a risk to transparency and may make it difficult for users to locate the information they need.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The elimination of duplicate requirements through the reassignment between general requirements (ESRS 2) and topic-specific standards significantly reduces the number of reporting points. However, it is unacceptable that the draft ESRS weaken stakeholder engagement by removing essential reporting requirements on the involvement of employee representatives and other stakeholders. In particular, the deletion of reporting on strategic and business model changes in response to stakeholder views eliminates information that is crucial for transparency and accountability. Equally concerning is the removal of provisions detailing how companies engage with their own employees and employee representatives about significant actual and potential positive or negative impacts, and how the perspectives of the workforce are reflected in decision-making processes. Unlike the old standards, the draft no longer specifies: •whether engagement takes place directly with employees or through their representatives, •at which stage(s) the engagement occurs, the type and frequency of such engagement, and •the role and highest-ranking position within the company responsible for ensuring that this dialogue happens and that its results are integrated into company practices. Leaving reporting on these critical processes optional undermines meaningful participation. Without clear and mandatory disclosure requirements, there is a high risk that employees and their representatives will not be adequately involved.			
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Many of the 'may' (voluntary) data points should not be removed. Voluntary disclosures on working conditions for employees without collective agreements, for example, are important because they concern a particularly vulnerable group.			
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	-The NMIG contains important explanations that were moved from the standards into the NMIG for the purpose of streamlining the standards. In our view, this does not represent a real improvement for users, since the NMIG, while not formally part of the standards, will in practice likely be treated as implementation guidelines. For this reason, and against the background of the stated goal of "burden reduction," the essential and indispensable content of the NMIG should either be reintegrated into the respective standards or the NMIG should formally become part of the standards.			
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	The clause on "undue cost or effort" lacks sufficient clarity and leaves companies with too much discretion. Similarly, limiting the use of data in value chain reporting weakens transparency, as direct data is indispensable. In addition, the exemption for operations not deemed "significant drivers of IROs" creates excessive flexibility and weakens the reliability of reporting. The relief measures, in their current form, extend beyond what is reasonable and risk undermining the balance between feasibility and transparency.			
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I would like to skip this question and provide my feedback in Part 3	No comment.			
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Estimating financial effects is essential for integrating sustainability into strategy, planning, and risk management, and for determining financial materiality. Reporting these effects is key to aligning sustainability and financial reporting under the EU's double materiality approach. Companies must remain required to assess financial impacts to provide investors with reliable data and to support sound business planning.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3	No comment.			
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	No comment.			
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	22.S1	Comments on deleted datapoints in ESRS S1	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The reduction in both mandatory and voluntary data points far exceeds a reasonable balance between reporting effort and transparency. The deletion of the S-1 data points should be reversed. It affects the following disclosures: •Breakdown of the company's age structure •Information on non-employees (except for their total number), as no further data is provided (e.g., deletion of disclosures on working conditions, fair remuneration, career development discussions, deaths due to illness) •Information on pension payments (social protection) •Breakdown by gender (e.g., employees without guaranteed working hours, persons with disabilities, career development discussions, training and skills development indicators) •Gender pay gap, adjusted by employee category or country/segment •Data point 'complaints filed with the OECD National Contact Point' •Voluntary disclosures on working conditions for employees without collective agreements. As part of the updated standards, several data points that were previously mandatory have now become voluntary. However, certain data points should remain mandatory, including participation in performance and career development, average training hours with a gender breakdown, parental leave uptake, and annual total remuneration adjusted for purchasing power differences. The reporting structure has been simplified to consist solely of topics and subtopics, which is acceptable as long as former sub-subtopics are fully integrated into their respective subtopics. While data points for S2 correspond to those of S1, those related to water and sanitation have been removed. These data points should be reinstated, as they are critical factors in the value chain outside of Europe.			
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Adding a datapoint on training of the procurement team is needed to support the implementation of human rights in the supply chain. The addition of a datapoint on confirmed incidents of bribery is needed to improve transparency on the effectiveness of bribery/corruption policies and measures.			
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	No comment.			
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	Regarding fair presentation and regardless of the chosen approach - top-down or bottom-up - the result of the materiality analysis needs to be accurate, transparent, and free from distortion. The standards must ensure that any simplifications in the materiality analysis - such as the chosen approach or the omission of the consideration of time horizons or severity dimensions - do not result in incomplete or inadequate assessments. This requirement and the associated obligations should be emphasized much more strongly by the standards and clearly expressed.			
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	We very much welcome the improvements in country-specific reporting on employment. Reporting will now apply to the ten countries with the largest number of employees, with a threshold of 50 or more employees - instead of the previous requirement for countries representing 10 % of the total workforce. For these "Top 10" countries, disclosures on employment numbers, collective bargaining coverage, and social dialogue are now mandatory. Shifting to a "Top 10" country approach is a clear step forward, as it ensures that reporting captures a larger and more representative portion of the workforce. Under the previous 10 % threshold, country-level disclosures often reflected only a small fraction of employees, leaving gaps in understanding the real impacts. Expanding coverage to the largest 10 countries provides more meaningful insights into how collective bargaining and social dialogue are applied across different regions.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	An analysis of the first year ESRS reports shows that most companies are simply reporting that they pay minimum wages, whereas the intention (as outlined in the ESRS Basis for Conclusions) is that companies should be enabled to disclose commitments to paying a wage "sufficient to support themselves and their families in dignity" as well as the extent to which they do this. This shows that the methodology for non-EU countries needs to be changed. Furthermore, the new ILO agreement on a methodology for living wages needs to be taken into account. While the proposed new methodology takes a step forward in both regards, two key changes are needed: •The methodology for reporting on 'adequate wages' should measure actual wages against an adequate/living wage for all employees, not only those within the EU. In particular, for employees outside the EU, the methodology should allow employees' actual wages to be measured: oA) against the local legal minimum wage only when this is set in line with the ILO principles on estimating living wages; or oB) against living wage estimates that are set in line with ILO principles on estimating living wages. •Companies should be able to rely on local legal minimum wages or living wage estimates when the authorities or organisations that set them provide public evidence of their alignment with the ILO principles for estimating living wages. Furthermore, the transitional provision for the EU needs to be reinstated, as not all Member States have transposed the Adequate Minimum Wage Directive.			
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	The unadjusted gender pay gap should be kept as mandatory, since the methodology for calculating it is clear. The adjusted pay gap figure as voluntary, since the methodology for calculating the adjusted figure is not standardized.			
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Regarding the social standards, we are opposed to the removal of key data points and the shift of previously mandatory data points to voluntary. We are concerned that the elimination of many worker-related data points will result in unspecific disclosures, providing less insight into impacts, risks, and opportunities. The reduction in specificity and granularity diminishes the usefulness of the reporting for understanding the real effects on different employee groups. At the same time, we fully support the improvements in country-specific reporting, particularly for disclosures on employment numbers, collective bargaining coverage, and social dialogue. We appreciate the clarification that, when a company applies ESRS S1, the following disclosures must always be reported: S1-5: Characteristics of the company's employees S1-6: Characteristics of the company's non-employee workers S1-16: Discrimination and other human rights violations. In addition, the draft now introduces reporting on all human rights incidents, rather than only "serious" cases. This represents a very positive improvement.			
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	I.M.U. der Hans-Böckler-Stiftung	Academia	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		In conclusion, the draft ESRS weaken stakeholder engagement by removing previously mandatory provisions. Specifically, it eliminates reporting on strategic and business model changes in response to stakeholder views, as well as requirements on how companies engage with employees and their representatives—covering who is consulted, when and how often, and which senior role is responsible. Turning these obligations into optional disclosures undermines transparency, accountability, and meaningful workforce participation. The scope of the definition of "own workforce" should be broadened to explicitly include franchise workers. On a positive note, we welcome the clarification in the draft that companies may voluntarily include information on non-material topics. In addition, the draft now includes explicit references to Article 19a(5) and Recital 52 of the CSRD, requiring management to inform and consult employee representatives and, where relevant, share their feedback with governing bodies. It also clarifies reporting on how boards are informed about the views and interests of key stakeholders, including employee representatives. This marks a notable step forward in transparency and stakeholder engagement and represents a significant enhancement in reporting clarity.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	These simplifications will, in principle, have little impact on the DMA approach already implemented by La Poste for the FY 2024 Sustainability report and the assumptions that we already applied. The approach of using materiality as the cornerstone of reporting was already favoured in La Poste first Sustainability statement (points 2, 3, 4, 5, 6, 7 and 8 add nothing to what we are already doing). However it is of course understandable that some preparers need this to be made explicit. We also find it unfortunate that the materiality analysis has been extended to ESRS2: this will require us to document the materiality analysis on topics where it seems doubtful that their materiality would be called into question for many companies (especially if we restrict them to wave 1 companies).			
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	The DMA is the cornerstone of CSRD reporting. The foreseen shift from gross to net analysis for the impact materiality is therefore fundamental. This change would require a complete overhaul of the analysis and rating process, as well as a complete review of the processes for maintaining and updating the DMA. As currently drafted, this net analysis of impacts under certain conditions will inevitably generate interpretations, which we believe will be a source of complexity rather than simplification. The impacts of this change on the DMA need to be clarified. Furthermore, one identified risk is that issues that are material to a company but for which it has made every effort to prevent and remediate their negative impacts will disappear from the DMA even though they are of major importance. The effects on the audit verification work are also unknown at this stage; there is a risk that they will become more complex. For example, will auditors want to carry out additional work on the impacts which are material in gross but that are not material in net It is also unfortunate that the clarifications provided focus solely on impacts. We would equally need clarification on opportunities, on which all benchmarks agree that French companies have been particularly cautious, even timid. It would therefore be useful to have more methodological details in order to better identify these opportunities in light of the convictions and strategic positions of companies' executive management, even if they have not yet translated into strict financial terms.			
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	These changes do not have a significant impact on the reporting burden. However, they may improve the readability of certain sections, although La Poste Group had already taken advantage of the possibility of cross-referencing different parts of its Sustainability report to avoid repetitions in its FY2024 sustainability report.			
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	The removal of redundancies between ESRS2 and thematic standards (point 3 in particular) is an excellent thing, even if it is unfortunate that exceptions are still provided for in E1. The simplifications envisaged here are a step in the right direction.			
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	These amendments are a step in the right direction, but it would have been interesting to take the exercise further and leave only mandatory datapoints and mandatory application requirements in the ESRS (normative text). Anything that remains purely illustrative in the ARs should be presented in an interpretation document (with the NMIGs) outside the ESRS in order to clearly separate what is normative/mandatory from what is non-mandatory/illustrative.			
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Either it is mandatory/normative and must remain in the ESRS, or it is non-mandatory/ not normative and must – without any possible ambiguity – be provided for illustrative purposes in a separate document.			

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Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We support option 1 for publishing both qualitative and quantitative information. This respects the principle of connectivity between financial and sustainability information, which is the very essence of the CSRD. This principle of connectivity must not be removed from the CSRD as it allows ESG performance and economic performance to be assessed on an equal footing. In order to combine these two elements of a company's performance, it is necessary to be able to anticipate and measure the anticipated financial impact related the various standards and the financial resources required to mitigate risks in order to build a long-term economic vision on these issues. Given the current lack of mature methodologies and in order to allow companies the necessary time to assess properly these financial impacts, this publication should be made mandatory as of 2028.			
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	Overall comment: this enables a burden reduction but it doesn't preserve the information neccessary to fullfil the objectives of the green deal. The main issue is the removal of the connectivity between ESG and financial information which puts at risks the ambition of the CSRD.			
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	Overall comment: it would be useful to have an updated version of IG3 with the new list of mandatory DPs (with both the old and new ID numbers), to be published at the same time as the new set of revised standards. The change in the structure and numbering of the DP/DR will have an impact on the tagging of sustainability reports (currently manual) and on the tree structure in the IT systems. A transition table would facilitate the updating work generated by these simplifications.			
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				

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Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	This was our approach in our first Sustainability report. We agree that "ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it"			
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree				
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	We agree under the condition that for each geographical area, all the companies concerned will be able to refer to the same minimum standard and provided that access to a database such as the Fair Wage Network is available.			
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree				
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The foreseen modifications on the DMA will require to redo the DMA exercice.			
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Aligning the structure of ESR S1 and S2 is definitely valuable in terms of both readability and process: companies will thus be able to capitalise on their maturity in S1 to make progress in S2. There is a risk of external providers being reclassified as employees. There is information available for our own workforce that we cannot get for our service providers (to respect the principle of non-interference in their management).			
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Le Groupe La Poste	Preparer (non-financial preparing a sustainability report)	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We consider that the suggested revisions/simplifications to move from a gross to net analysis of the negative impacts in the DMA as well as the removal of the connectivity principle/link between ESG and economic performance put at risk the ambition of the CSRD.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Responsible Business Alliance	Business association (other than association of financial institution)	United States	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	The improved clarity in the language surrounding the Double Materiality Approach represents a significant step forward. By providing clearer guidance, the amendments facilitate a more consistent understanding and application of the concept across undertakings, supporting both comparability and reliability in sustainability reporting. Maintaining alignment between the ESRS and international due diligence standards is of critical importance. The RBA welcomes the improved consistency achieved between the Double Materiality Approach and risk-based due diligence under widely recognized international frameworks. Ensuring this alignment is essential to avoid creating parallel or disconnected processes, and to promote a unified, strategic approach to sustainability and due diligence.			
Survey	Responsible Business Alliance	Business association (other than association of financial institution)	United States	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The RBA welcomes the simplification measures introduced by EFRAG, including the removal of duplicative requirements and the broader efforts to clarify and improve the application of the double materiality approach. We recognize that, particularly within the Social section of the Standard, many deletions represent genuine simplifications without compromising the quality or comprehensiveness of the required disclosures.			
Survey	Responsible Business Alliance	Business association (other than association of financial institution)	United States	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Responsible Business Alliance	Business association (other than association of financial institution)	United States	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Responsible Business Alliance	Business association (other than association of financial institution)	United States	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The new methodology introduced under ESRS S1 to assess whether employees are paid an adequate wage establishes a benchmarking system based on comparison with the lowest wage. While in the EU this matter is addressed through the Adequate Minimum Wages Directive, challenges arise when looking outside the Union. The language in the revised ESRS not only repeats but also amplifies the shortcomings of the previous methodology. It creates disparities between EU and non-EU employees: the proposed disclosure still directs companies to prioritize the use of local legal minimum wages when calculating the gap between lowest wages and "adequate" wages for employees outside the EU, even though local legal minimum wages are typically much lower than both a local adequate wage (as defined under the EU directive) or other references such as living wage (as established in line with ILO principles on estimating living wage). In our view, this methodology raises several legal and practical challenges. It risks creating a discriminatory approach toward employees outside the EU, obliges companies to collect complex data across multiple jurisdictions, and undermines the comparability of reported information, while not fostering the adoption of internationally agreed global standards that support policy coherence. The RBA remains available to support and dialogue with EFRAG to identify forward looking options that address these concerns.			
Survey	Federation of the European Sporting Goods Industry (FESI)	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We welcome the clearer linkage between impacts, risks and opportunities (IROs) and topics, the option to disclose at IRO level, and the streamlining of the illustrative topic list. These changes support the "fair presentation" approach and can reduce the risk of a compliance-checklist mindset. At the same time, several pain points experienced by preparers remain insufficiently addressed: •Value chain data: While estimation is acknowledged, the high "reasonable effort" bar remains problematic. In practice, primary data is rarely available, and stringent preconditions risk creating a disproportionate trickle-down burden on SMEs. •Auditability and documentation: The revisions reduce narrative effort, but the documentation burden could be lowered further. Focus should be on recording key judgements, methods, and outcomes rather than exhaustive logs of every step. •Aggregation/disaggregation: Clarifications on site-level reporting are welcome, but more emphasis is needed on pragmatic aggregation (e.g. by portfolio, business line, or topic) to keep sustainability statements concise and decision-useful. •Financial materiality: Financial risks and opportunities are not described in the same level of detail as impact materiality, because there is a reliance on existing financial statements. However, assessing financial materiality involves its own process that extends beyond the financial reporting scope. Further guidance should be provided on how to operationalize this assessment specifically and the boundaries with the financial reporting.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Federation of the European Sporting Goods Industry (FESI)	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The proposed changes complicate the application of double materiality by introducing new distinctions among risks, opportunities, impacts, and now "topics." Companies already rely on established ESG topic lists, materiality matrices, and industry maps such as MSCI. Greater clarity is needed: what makes a topic material? Is one significant risk, opportunity, or impact enough, or are multiple required? If a topic presents a negative impact but no opportunity, is it still material? The link between IRO assessment and overall topic materiality remains ambiguous. Traditionally, companies addressed risks, opportunities, or impacts at the topic level, keeping the process straightforward. The new granularity at the IRO level risks inconsistent interpretation. For example, "diversity" under S1 Own Workforce could be reported as a risk, opportunity, or impact depending on semantics. To ensure consistency, the EU should provide explicit guidance at the topic-listing stage, e.g. designating "setting a diversity strategy" as the topic to be assessed. Several issues remain insufficiently addressed: •Thresholds for materiality: unclear whether one significant IRO is enough to make a topic material. •IRO-level granularity: creates confusion and risks inconsistent, semantics-driven reporting. •Significant changes: no clear guidance on what qualifies, risking over or under-reporting in DMAs. •Aggregation/disaggregation: flexibility is welcome, but without clearer rules comparability may suffer. •Positive impacts: important concept, but definitions and examples are missing. •Sector-specific guidance and stakeholder input: absence risks incomplete or inconsistent reporting. •Actual negative impacts: clarify how many "previous years" should be assessed. •Gross vs. net impacts: Net should always be the default. While the scale and severity of a topic may be high, the company's mitigating actions are put in place to mitigate the impact. Applying a gross lens gives the false impression that impacts are unmitigated and presents the risk that material impacts may be overstated.			
Survey	Federation of the European Sporting Goods Industry (FESI)	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We welcome the proposed amendments aimed at improving the readability, flexibility, and connectivity of ESRS sustainability statements. The explicit option to include an executive summary, the stronger use of appendices to separate detail from key messages, and the emphasis on connected information and avoidance of repetition are all very positive developments that directly address preparers' concerns. These changes represent a significant step toward making sustainability reports more concise, relevant, and user-friendly, helping preparers focus on key messages while still providing sufficient detail for those who need it. To maximise the benefits, we suggest further clarification where more guidance could be beneficial. For example, without clear examples or minimum expectations, companies may interpret "conciseness" and "connectivity" differently, which could lead to inconsistent reporting practices. The amendments do not address how these changes will work in digital or web-based sustainability reports, where navigation and connectivity are even more important. Finally, there is little guidance on how auditors should assess whether information is sufficiently connected or whether key information has been inappropriately moved out of the main narrative.			
Survey	Federation of the European Sporting Goods Industry (FESI)	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The proposed amendments appear to achieve a better balance between prescriptive requirements and preparation effort, while still supporting the need for relevant and comparable information. By reducing mandatory data points and allowing greater flexibility in reporting PAT, the amendments help to lower unnecessary reporting burden. Removing the requirement to disclose future PAT plans and timelines further streamlines disclosures, focusing on what is actually in place and material. Essential disclosures are maintained, such as indicating which material topics are not covered by PATs and ensuring a clear link between PATs and material IROs. Allowing reporting at a higher aggregation level also makes the information more relevant to how companies manage their impacts, risks, and opportunities. To maximise clarity, we would like to make the following two recommendations: •Provide guidance for companies and assurance providers, illustrative examples, and clear expectations for minimum disclosure. This will be important to ensure that the balance between flexibility and comparability is maintained in practice. •Clarify whether datapoints apply to which parts of the value chain. Clearer instructions would reduce the risk of inconsistent interpretation and unnecessary data collection.			
Survey	Federation of the European Sporting Goods Industry (FESI)	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We welcome the deletion of the 'may' disclosure provisions and recommend checking against similar unclear terms are deleted throughout the text.			
Survey	Federation of the European Sporting Goods Industry (FESI)	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We welcome the introduction of horizontal burden reliefs. The undue cost or effort relief, the flexibility to use either direct data or estimates, and the allowance for partial scope reporting with disclosure of improvement plans are all important measures that will reduce the disproportionate reporting burden, particularly on SMEs and complex value chains. The new acquisition relief and the clarification on resilience disclosures are also pragmatic adjustments. The amendments focus on reducing unnecessary reporting requirements and clarifying expectations, which should help ease the preparation burden for companies. At the same time, they retain key disclosures and ensure that the information provided remains relevant, comparable, and transparent for stakeholders and regulators. However, it will be important for EFRAG and the Commission to continue monitoring implementation and stakeholder feedback, so that further adjustments can be made if new challenges or unintended consequences arise.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Federation of the European Sporting Goods Industry (FESI)	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We welcome the introduction of a relief that allows reporting with a partial scope where reliable data are not available. This provides much-needed flexibility for preparers, particularly in complex value chains where complete and reliable coverage cannot yet be achieved. The requirement to disclose actions to improve data coverage over time is also positive, as it maintains transparency and creates an incentive for progressive improvement. At the same time, an important challenge remains: •Reasonable effort expectation: While the new relief addresses situations of incomplete scope, it does not fully resolve the difficulty created by the high "reasonable effort" bar when deciding between primary and estimated data. In practice, preparers may still feel obliged to exhaust all options to obtain primary data before relying on estimates. A more workable approach would be to require transparency on the proportion of primary versus secondary (estimated) data, clarify that estimated data is acceptable as part of a "reasonable effort" used or utilizing the "good faith" concept, rather than demonstrating that "reasonable effort" has been applied. By allowing companies to report metrics with a partial scope when reliable data is not available, the amendments acknowledge the practical challenges many organizations face, especially in complex value chains or when collecting data from external partners or lack of data. The relief requires companies to be transparent about the limitations of their data and to explain what actions they are taking to improve coverage in the future.			
Survey	Federation of the European Sporting Goods Industry (FESI)	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	The disclosure requirements on anticipated financial effects should be reconsidered. The concept of "anticipated financial effects" is not established or standardised, and ESRS 2 does not provide guidance on how such effects should be calculated. For example, it remains unclear whether the basis for calculation should be planning data or figures from the last financial year, and what level of granularity is required with regard to financial position, financial performance, and cash flows. Without clear methodology, these disclosures risk producing inconsistent and non-comparable information, undermining their usefulness. If the requirement is retained, it should not be left to company discretion, as this weakens regulatory enforcement. Instead, the provision should either apply consistently to all companies or be removed altogether. At the same time, companies already retain flexibility to provide additional voluntary disclosures through materiality assessments. A pragmatic compromise, if any mandatory reporting on anticipated financial effects is maintained, would be to limit it initially to climate-related matters, where methodologies and expertise are comparatively more advanced.			
Survey	Federation of the European Sporting Goods Industry (FESI)	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	The amended paragraphs 40, 41, and 42 of ESRS E1 simplify climate-related financial disclosure by focusing on the most important information for investors and lenders, while reducing unnecessary detail. However, while these amendments represent progress, significant challenges remain regarding the broader concept of "anticipated financial effects." Methodologies are still immature and not standardised, risking inconsistent and non-comparable disclosures.			
Survey	Federation of the European Sporting Goods Industry (FESI)	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	The amendments streamline reporting and reduce unnecessary complexity, helping companies avoid double reporting and making disclosures more globally comparable. Overall, the amendments achieve a good balance: they improve interoperability with global standards while still meeting the EU's simplification and policy objectives. However, continued monitoring and cooperation between EFRAG, the EC, and the ISSB will be important to address any remaining or future gaps.			
Survey	Federation of the European Sporting Goods Industry (FESI)	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	Federation of the European Sporting Goods Industry (FESI)	Business association (other than association of financial institution)	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	The proposed reduction in "shall disclose" datapoints under materiality reflects a systematic review that removes non-essential elements, particularly in narrative disclosures, and prioritises more relevant, quantitative information, the actual simplification impact should not be overstated. The amendments reduce the effort in documentation and coordination with auditors, but the scope and complexity of the disclosures remain largely unchanged, as the deleted datapoints primarily affect presentation rather than substance. In this sense, the revised standards still help companies focus on what is most material and decision-useful, while maintaining the transparency and comparability required for effective sustainability reporting. However, it is important to clearly communicate that the underlying disclosure obligations remain intact despite the reduction in datapoints. This distinction will help manage expectations and avoid misinterpretations about the extent of simplification achieved. Finally, we recommend reconsidering the introduction of new mandatory disclosure requirements and suggest deleting them, in order to stay aligned with the stated purpose of the ESRS revision—namely, to streamline reporting and reduce unnecessary burden.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Federation of the European Sporting Goods Industry (FESI)	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from “may” to “shall” In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, “may disclose” datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	The simplification approach should not result in the introduction of new mandatory datapoints, nor in the conversion of voluntary datapoints into mandatory ones. While we acknowledge that the number of datapoints moved from "may" to "shall" is limited and that these disclosures are aligned with existing objectives, the principle of not increasing reporting requirements should be applied consistently. Even when datapoints are not technically new or complex, their change in status to mandatory creates additional demands in terms of interpretation, internal coordination, and alignment with auditors. This effort should not be underestimated, particularly during first-time implementation. We therefore recommend maintaining the rule of no additional reporting obligations. For example, making E4 on biodiversity transition plans mandatory would not accelerate their development. The decision to disclose biodiversity transition plans should remain voluntary. We also note that certain revised disclosure requirements appear to expand reporting obligations. For instance, there is now a requirement to report on all "human rights incidents," whereas previously the scope was limited to "severe human rights incidents." Such changes increase the reporting burden without clear evidence that they will provide more decision-useful information.			
Survey	Federation of the European Sporting Goods Industry (FESI)	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We recognise the intention behind requiring companies to state that they have applied the general requirements of ESRS 1, as this could provide users with clarity on which principles and standards have been followed. Likewise, we acknowledge that information on exposure to critical and strategic raw materials may be of interest to some stakeholders. However, we do not support the introduction of new mandatory datapoints. In our view, these additions create significant extra effort for reporting entities without delivering a corresponding increase in decision-useful information. ESRS 1 already provides the framework for preparation of sustainability statements, and an explicit datapoint confirming its application would only increase the audit burden without improving the quality of reports. Similarly, the proposed disclosure of critical and strategic raw materials goes beyond the purpose of sustainability reporting, as it risks turning the ESRS into a tool for broader data collection linked to geo-strategic interests rather than ESG objectives. We also note that introducing new datapoints such as E2-4 on secondary microplastics is not appropriate, as only narrative information is currently available. In such cases, additional mandatory requirements will not enhance transparency or comparability. Overall, we recommend deleting these proposed datapoints in order to remain consistent with the objective of the ESRS revision, namely to reduce unnecessary burden while preserving relevant and decision-useful information for users.			
Survey	Federation of the European Sporting Goods Industry (FESI)	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a “fair presentation” reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Federation of the European Sporting Goods Industry (FESI)	Business association (other than association of financial institution)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking’s employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	The proposed adjustment may require further assessment. Changing the ratio from 10% to a range of 5–10% could support proportionality, whereas introducing a threshold of 50 employees would increase reporting requirements and shift the focus away from the most significant operational locations toward overall operations. For large organisations with globally distributed workforces, such as those with more than 20,000 employees, it would not be meaningful to report on countries where only 50 employees are present. We therefore suggest reverting to the previous threshold or, alternatively, requiring disclosure limited to the top five countries by headcount. This would ensure proportionality and maintain the relevance of the information reported.			
Survey	Federation of the European Sporting Goods Industry (FESI)	Business association (other than association of financial institution)	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	We appreciate EFRAG's efforts to clarify this datapoint but regret that the deadline to participate in this field test was so short, not widely advertised, and fell during most companies' annual leave, which resulted in very limited opportunity for meaningful industry engagement. We therefore encourage EFRAG to ensure that future field tests are announced with sufficient notice, communicated more broadly, and scheduled to maximise stakeholder participation, so that the resulting guidance reflects a wider range of practical experiences. We further would like to note that more explicit definitions and methods for assessing Adequate Wage would be helpful for economic operators. In this regard, we recommend adopting the ILO definition of a living wage in the future. For the moment, however, wage-setting mechanisms vary widely outside the EU. Some countries lack statutory minimum wages or have weak enforcement, making alignment with ILO principles difficult. Therefore, we suggest that outside the EU, it should still be permissible to use benchmarks provided by external consulting companies.			
Survey	Federation of the European Sporting Goods Industry (FESI)	Business association (other than association of financial institution)	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG’s approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a “human rights policy” in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	We recognise the importance of ensuring alignment with SFDR to support the correct flow of information to financial market participants and to avoid double reporting. The consolidation of several SFDR-related datapoints in the amended ESRS 2, particularly in the area of human rights policies and incidents, is a positive step toward simplification. At the same time, we reiterate our concern that not all SFDR PAIs are equally relevant or clearly defined in practice. For example: •S1-17 (human rights violations): It is unclear how "violations" are to be defined. Should this reflect the total number of complaints received, or only those found to be substantiated? Without a clear definition, comparability and reliability are at risk. •G1 – Payment terms: Disclosure of supplier payment terms may expose companies to competitive disadvantage, strained negotiations, financial exposure, or confidentiality risks. This datapoint remains problematic and should be reconsidered.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Federation of the European Sporting Goods Industry (FESI)	Business association (other than association of financial institution)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	As biodiversity and ecosystem methodologies are evolving rapidly, and science-based frameworks like SBTN are setting new standards for target-setting, it is important that the application requirements reflect the latest best practices and expectations from stakeholders and investors. When setting biodiversity- and ecosystems-related targets, undertakings should consider the latest science-based frameworks and methodologies, such as those provided by the SBTN. For companies with direct land management or manufacturing operations, targets may address aspects like the size and quality of areas protected or restored, the recreation of natural surfaces, or the number of sites with improved ecological integrity. Lastly, while AR26 provides a useful starting point for guiding undertakings in setting biodiversity and ecosystem related targets, further review to ensure alignment with evolving framework such as SNFD and SBTN would be useful. This would strengthen consistency with current methodological trends and enhance relevance.			
Survey	Federation of the European Sporting Goods Industry (FESI)	Business association (other than association of financial institution)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Federation of the European Sporting Goods Industry (FESI)	Business association (other than association of financial institution)	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	Disclosing detailed payment practices can impact competitiveness because it reveals sensitive business information to the public and competitors. If a company's payment terms are less favorable, it may face reputational risks, lose suppliers to competitors, or be pressured to change its practices. Competitors could also use this information to adjust their own terms and attract suppliers. Public disclosure limits flexibility in negotiations and may increase scrutiny from stakeholders and regulators. Reporting payment practices under the broader PAT provisions allows companies to explain their overall approach to managing supplier relationships, including payment practices, in a way that fits their specific business model and sustainability strategy. This disclosure can include how these companies engage and support SMEs. This approach gives companies flexibility to highlight positive actions, improvements, or challenges, rather than just disclosing raw data that may lack context.			
Survey	Federation of the European Sporting Goods Industry (FESI)	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The amendments recognise that phase-in provisions exist and may be updated in the future, but they do not offer new or detailed instructions on how companies should apply phase-in data disclosure in practice. Until further guidance is provided, companies should continue to follow the original CSRD and ESRS texts for specifics on phase-in requirements. To stay consistent with the goal of simplifying and streamlining reporting, phase-in provisions should not become mandatory disclosure requirements. The ESRS amendments partly improve simplification, timing, and scope, but it is critical for the Commission and EFRAG to monitor implementation and consider possible future adjustments in line with future reglementary developments.			
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	-ESRS Chapter 3.3 – Paragraph 29 : It is currently unclear as to the frequency and depth of materiality reassessments based on the amendments. Additional clarity should be provided through prescriptive language indicating a three year-cycle for DMAs. Further, it should indicate that previous results of DMAs can be used in the re-assessment which should focus on changes to the business and its operations and should changes be minimal, the original DMA can continue to be utilized. -ESRS Chapter 3.5 – Paragraph 47 -48 and AR 17-19 : Additional clarity should be provided over the definition of "Undue cost and effort" (recognizing that an insufficient definition is provided at ESRS 1 – Chapter 7.3). ESRS should clarify how this can be determined. For example, ESRS could enhance ESRS 1 Chapter 7.3 Paragraph 89 identifying that the materiality consideration for "undue cost and effort" does not align to general materiality or significance, but rather considers the cost and effort compared to the estimated delta between the estimated value of the indicator and the potential actual value of the indicator.			
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	The new guidelines are too complex, opening up new questions.			
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Different reporting schemes to be aligned require flexibility, but flexibility leads to less consistency and comparability of ESRS reports.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The amendments ease reporting burden and improve practicality, but the reduced prescriptiveness risks undermining consistency and comparability across reports.			
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	NMIG are going in the direction of simplification which is something that we welcome.			
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E2; E5; S1	-NMIG – ESRS S1: The additional information provided is somewhat ambiguous and may inadvertently increase the complexity of the Disclosure Requirements. -ESRS E5 & E2: Further clarification would be helpful to ensure consistent understanding and application of the requirements.			
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Reliefs might be beneficial but larger the gap between financial and non-financial reporting quality, consequently there must be an option provided to publish the CSRD statements outside of the Annual Report, otherwise the quality gap within one report is too large. While the proposed amendments provide some relief and respond to stakeholders' demands, further alignment with international standards (IFRS S1 and S2) would be beneficial to balance burden reduction with transparency and comparability.			
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	The option to disclose the CSRD statement outside of the annual report should be provided to allow necessary flexibility for preparers. However, linking this disclosure with other documents could increase the overall complexity and reduce the ease of readability.			
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	General alignment to IFRS S1 and S2 is helpful for reporting entities that hold requirements in multiple jurisdictions, limiting the need for full reperformance of disclosure language. To further enhance this, Option 1 should further align to IFRS S1 and S2 by removing the small differences identified. This will aid in reporting entities ability to meet the regulations and enhance the comparability of reported information under ESRS to the reported information under IFRS S1 and S2.			
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	User's needs require an objective assessment, the basis for this should be provided externally, with companies then explaining any deviations or mitigations and optionally adding additional IROs. Currently, the approach leads to varied company evaluations with little added value despite significant effort.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	According to the ISSB interoperability report, many differences between ESRS and IFRS S1/S2 remain unresolved, and new differences have emerged. This creates a significant burden for international companies. The ISSB report circulated at the end of August highlights these gaps, emphasizing the need for better alignment with international standards.			
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	In general, there might be some reductions, but especially in the quantitative are new filters where added which might reduce the scope but at the same time creates new burdens for data generation.			
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree				
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree				
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	Fair presentation is already a common reporting principle within the annual report, so introducing it explicitly into ESRS would add little value. Its inclusion or omission is unlikely to make a material difference.			
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	The challenges mentioned are not limited to financial institutions.			
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I would like to skip this question and provide my feedback in Part 3				
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Given the rapidity of change to stakeholder expectations, data availability, and general consensus of business impacts on environmental topics, continued reassessment of ESRS language will be crucial, including over E4 AR26.			
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	With the simplification, ESRS now has many cross-references. These cross-references present potential difficulties for reporting entities when understanding definitions, meanings, etc. within the context of specific ESRS sections and chapters. Additional elaboration or links should be provided when cross-referencing between topical standards or to other standards outside of ESRS. Recognizing the desire to be less prescriptive within the amendments, it is unclear the frequency and depth of materiality reassessment based on the amendments. Adding additional details such as an outline when materiality reassessments are required and if a deep dive is required or if a high-level check is sufficient will provide reporting entities with a deeper understanding of how they need to consider materiality on an annual basis. Additionally, it would encourage the publication of a list of disclosure requirements and further implementation guidance as questions arise during implementation. Comments on specific data points are covered in Part 3.			
Survey	MedTech Europe	Business association (other than association of financial institution)	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	MEDEF	Business association (other than association of financial institution)	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	Compagnies welcome the following simplifications to the double materiality assessment process: –Possibility of adopting a top-down approach in addition to a bottom-up one, –Shift in focus from the IRO level to the topic level, –Clearer identification of internal and external sources to be used at the beginning of the section, –Enhanced prominence given to the materiality of information, –Simplification of AR 16. However, companies are concerned by the definition of impact materiality laid down in paragraph 21 (b) of ESRS 1. In particular, the definition of 'general purpose' according to AR3 is too vague and could result in multiple requests from a variety of stakeholders. They call for a simplification of the update requirement by specifying that the DMA process and its conclusions shall be updated only in case of significant events or material changes in circumstances (§29). Furthermore, additional structural and editorial changes are still needed to ensure that the drafting consistently reflects the intended simplification: –Requirement to describe the DMA process in IRO 1 §26 are too detailed. –Purpose of the top-down approach is sometimes weakened by elements carried over from Set 1, which do not make it sufficiently clear that an IRO-level assessment is not systematically required during the DMA. –Some methodological or illustrative elements should be moved into the AR (severity-related factors (§31), criteria for assessing positive impacts (§32), details on risks and opportunities (§41), dependencies (§42)); –Nuance the requirement to use thresholds (§28 and AR5c): when ranking material issues, severity may be assessed through comparison without the need to score each sub-criterion separately or define strict thresholds. –Certain terms remain imprecise and risk creating contentious discussions with auditors, such as "relevant information" in §22 and "appropriate level of aggregation" in AR 23 of ESRS 2.			
Survey	MEDEF	Business association (other than association of financial institution)	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	The use of the terms "gross" and "net" can be confusing for preparers. It would be clearer to specify when mitigation and remediation measures can and cannot be taken into account. Furthermore, Appendix C is not clear and creates confusion because: –It is different from the principles. –It adds the theoretical case of information to be produced in the next reporting period (year N+1). In practice, when producing a sustainability report, companies are always focusing on the reported period. Impacts cannot be artificially divided into different periods. Therefore, companies consider that Appendix C should be removed to avoid difficulties related to diverging interpretations. If the "gross versus net" approach is maintained and to enable consistency between impacts, risks and opportunities, a gross assessment should remain the main principle, while a net approach should be possible in some circumstances according to the company's judgement. This more flexible approach seems to preserve interoperability with ISSB, which does not prescribe whether or how an entity is required to consider risk mitigation activities. Regarding the time horizon, a distinction should be made between: –Actual impacts: to be assessed, taking into account actions already implemented at the date of the materiality assessment. –Potential impacts: to be assessed before considering future mitigation actions; past actions can be taken into account.			
Survey	MEDEF	Business association (other than association of financial institution)	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	Companies are supportive of the changes (possibility to better organize the report in a meaningful way, to put some granular datapoints in appendix…) as they deem very important to have a concise report, focused on important subjects, enabling the reader to better understand their strategy, politic and actions.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	MEDEF	Business association (other than association of financial institution)	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	MEDEF	Business association (other than association of financial institution)	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We welcome the improved presentation of the Standards, including: −the reduction of the length of the text, the simplification of narrative paragraphs deemed overly technical or detailed; −the positioning of AR directly after the disclosure requirements, focusing only on essential methodological elements and key presentation points, which significantly improves readability and understanding of the standards. Nevertheless, the overall length of ESRS 1 could be further reduced, including by simplifying Chapter 3 on double materiality assessment (similar length as in Set 1 and simplified ESRS, 34 pages, 25 without annexes). Regarding the datapoints which are kept from the set 1, EFRAG should confirm that the wording changes brought to improve conciseness of the standards shouldn't lead to additional burden for the first application due to a "fresh interpretation" by the auditors or regulator.			
Survey	MEDEF	Business association (other than association of financial institution)	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The NMIG should remain outside of the standards. The first wave companies' experience shows that EFRAG Q&As and Implementation Guidance have been used by auditors as a binding reference, with preparers expected to comply. Despite being issued by EFRAG for illustrative purposes only, the NMIG could be considered by stakeholders as having the same authority than the reporting standards. It is therefore essential that the NMIG remains outside the delegated act adopting the ESRS and is drafted in a way that cannot, under any circumstances, be used for audit purpose. The NMIG should remain a document published by EFRAG only and not by the European Commission. Furthermore, the treatment of previous lengthy and numerous Q&A and non-authoritative implementation guidance issued by EFRAG on Set 1 needs to be clarified by EFRAG. Companies shouldn't be required to read layers and layers of text to draft their sustainability reports, a reduction of the number and length of documents to consider and an improvement of their readability being particularly crucial for wave 2 companies. The basis for conclusion are very useful and should integrate the precise list of clarifications brought on the existing datapoints without requiring a modification of the standards. Indeed, it would enable preparers and auditors to already take them into account for the 2025 reporting. Some disclosures currently proposed by EFRAG in the environmental field should be transferred to the NMIG as mentioned in Questions 24 and 30 (see also EXCEL file on environmental standards).			
Survey	MEDEF	Business association (other than association of financial institution)	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We welcome the proposed reliefs which should lead to a more cost-effective reporting without compromising quality: −clarification that the starting point for reporting is the scope of consolidated financial statements; −reduced emphasis on direct data collection from value chain partners, with possibility to use estimates; −the concept of "undue cost or effort" consistent with financial reporting practice; −clarification that non-material activities may be excluded from the calculation of certain metrics. We ask that the relief regarding skills and resources be included in the ESRS. Even if some reliefs go beyond the ISSB provisions, being "optional," we do not believe this will hinder interoperability. However, clarifications are necessary regarding how these reliefs fit into the fair presentation framework if it is adopted. Concerning joint operations, ESRS §92 seems increase the burden, implying that undertakings must include data from joint operations over which they have operational control, whereas preparers interpretation of the current standards (E1 apart) was that only own operations were concerned (except in the specific case of entity-specific indicators if this scope was deemed relevant by the company). In any case, ESRS S1 should also be targeted as it may be very delicate to obtain data on joint operations' workforce. We also wonder how this extension to operationally controlled joint operations fits in with the relief regarding data quality. For the setting of climate objectives (E1-8) : the relief mentioned in ESRS1 §91 on "undue costs and efforts" should also be applicable for setting scope 3 objectives. They are most of the time very hard to quantify as they address actors across the whole value chain, without certainty for applying effectively the expected action plans. In any case, this relief should also apply to E1-8 on GHG emissions if estimates are subject to too much uncertainty.			
Survey	MEDEF	Business association (other than association of financial institution)	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We are very supportive of this proposal because it is often very difficult to obtain even estimates on assets operated by third-party companies, for example. Even if companies implement improvement processes, it is not always certain that reliable data can be obtained at a later date, particularly when third parties operate in jurisdictions that are not subject to ESRS. We also agree that no time limit should be imposed since as mentioned in the basis for conclusion, transparency about such limitation would provide sufficient incentive for the undertaking to improve the data quality and achieve a more complete scope in the calculation of the metrics. However, as this paragraph currently stands, companies would be obliged to calculate and publish GHG emissions across their entire value chain regardless of data availability and quality. This would not be compatible with the ESRS's qualitative characteristics of information and fair presentation requisites. The relief should also apply to GHG emissions, at least to scope 3 emissions. Regarding joint operations, the lack of data can also occurred for social datapoints.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	MEDEF	Business association (other than association of financial institution)	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Companies consider that information on anticipated financial effects is problematic because it can reveal confidential and strategic information and raise issues in terms of liability considering the uncertainties attached to any projections or forecasts. In the field of financial reporting, companies are not required to disclose their financial planning. Although disclosure of sensitive information will be dealt with ongoing developments on level 1, companies consider that anticipated financial information deserves specific relief in the ESRS. Companies point out the risks of disclosing projections covering medium and long-term horizons based on assumptions that change rapidly and dramatically. Such disclosures would significantly increase companies' liability without providing useful information to users. Furthermore, it is impossible to provide quantitative information without disclosing the underlying assumptions which could contain highly sensitive financial information. Companies understand the expectations of some stakeholders for forward-looking financial information but highlight that they are useful only when they are reliable without exposing confidential information. High-quality qualitative information is thus preferable to forcing companies to present unreliable and sometimes misleading quantitative data. The reliefs included in Option 1 are not sufficient as many stakeholders see these exemptions as temporary.			
Survey	MEDEF	Business association (other than association of financial institution)	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Quantitative reporting on anticipated financial effects is still premature given the immaturity of methodologies. Mandatory qualitative disclosure should be the baseline, with quantitative elements allowed on a voluntary basis (see option 2 for relief ESRS2 §23 a). Therefor, §40, §41 and 42 should be suppressed as they leads to too much uncertainty.			
Survey	MEDEF	Business association (other than association of financial institution)	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Companies operate globally and have investors outside of the EU who may be asking for ISSB compliance or operating in jurisdictions planning to make ISSB standards compulsory. Any reporting duplication or discrepancy of principle should therefore be avoided. Nevertheless, in our view, the international standards shouldn't necessary be the absolute global baseline and some datapoints may remain specific to this framework without being always embedded in the ESRS. Indeed, to allow a real simplification of the ESRS without hampering the interoperability, any DP and DR which can be considered as less of a priority or too complex should be withdrawn from the standards and flagged in an appendix as necessary for the interoperability. It would enable any company needing to be interoperable an easy identification of what is needed without imposing an unnecessary burden on others.			
Survey	MEDEF	Business association (other than association of financial institution)	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	MEDEF	Business association (other than association of financial institution)	France	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	Compagnies support EFRAG's proposal, as planned in the Commission's mandate, to reduce the number of DPs by deleting the voluntary DPs, reducing overlap and increasing the focus on quantitative DPs with a reduction of the numerous narratives. Beyond the quantitative diminution of the number of DPs, companies highlight the difficulty to evaluate the concrete effect of that reduction on the reporting burden. Indeed, the quantitative DPs represent an important burden for companies considering the data collection in all the subsidiaries based in different countries with different legislations. Companies note that some alleviations listed in the French proposals for a simplification have not been considered by EFRAG - notably the deletion of some difficult DPs - which, cumulatively, could enable a more significant decrease in the reporting burden. Therefore we believe that further alleviation is feasible and necessary.			
Survey	MEDEF	Business association (other than association of financial institution)	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	Companies reject any additional requirements as the main goal is to simplify the ESRS reporting. E3: Companies do not have water meters installed at each point. They calculate their water consumption through estimations and modelling (no use of water balance approach). Consequently, these new datapoints contradict the principle of simplification create greater complexity, and increase the audit costs. E4: The notion of "transition plan" is not yet clearly defined. Companies explore the best ways to develop action plans, whether through national or international initiatives, but no official certification of such analyses and plans exists to date. Making this datapoint mandatory would discourage companies from taking initiatives, as it would trigger compulsory verification by auditors without existing auditing standards. Such a compulsory publication should be removed from the standard. G1-2 : Percentage of functions most at risk in respect with corruption and bribery should be included in G1-4 (sub topics). G1-4 : We strongly reject the number of confirmed incidents. –It is irrelevant : it is not a reliable indicator to assess the effectiveness of the anti-corruption policies (a low number could mean a good policy to prevent the risks, a high number could mean a reliable reporting mechanism). –It is dangerous for EU competitiveness as it contradicts the right not to incriminate oneself guaranteed by the European Convention on Human Rights. Third countries authorities, such as the US Department of Justice, would investigate against EU companies to the benefit of their major strategic non-EU competitors who are not subject to similar reporting obligations. Finally, the specific point on CS3D and CSRD made in the recent joint statement on a US/UE framework on an agreement on reciprocal, fair and balanced trade, will lead to alleviate US companies from the main constraints of CSRD and create an unlevel playing field.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	MEDEF	Business association (other than association of financial institution)	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	Any simplification of the already highly complex framework should be achieved without introducing new requirements or by moving "may" datapoints to "shall" datapoint, that also exceed the Commission's mandate given to EFRAG. E2-4: Neither the definition of secondary microplastics nor the associated risk assessement along the value chain are not officially established, and their impacts are not yet clearly addressed by science. Given the lack of robust and consistent methodologies to date, this item must be supressed. E5-4: At present, the notion of critical and strategic raw materials may evolve over time with the development of the Critical Raw Materials Act, and as the delegated acts deriving from the Eco-design for Sustainable Products Regulation are not yet approved. Companies consider this information hard to access and publish, particularly since these materials are often mixed with others. In this evolving context, this datapoint shall be inserted in the NMIG			
Survey	MEDEF	Business association (other than association of financial institution)	France	25.	Emphasis on ESRS being a “fair presentation” reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	Fair presentation is a new concept not used in the Accounting Directive which only refers to "true and fair view" regarding financial statements. Fair presentation is not clearly defined to prevent any ambiguity, ensure consistent application, mitigate audit risk and preserve the intended simplifications Therefore companies do not support introduction of "fair presentation" in the ESRS. Since the mandate given by the Commission is to reduce and streamline, new concept should not be introduced in the ESRS, especially when not clear. Given the existing concepts, notably in ISSB or IAASB sustainability auditing standard ISSA 5000, French and European stakeholders have diverging interpretations of potential impacts and consequences : for some key stakeholders, it means the addition of supplementary datapoints in the report and it increases liability for both preparers and auditors to reach completeness, thus not reducing the reporting burden. French auditors consider that they will have to perform more due diligence and that the audit burden will be increased. Regarding liability, companies highlight that consequences in a double materiality reporting framework are different to those in a financial one given the number of affected stakeholders, the importance of narrative and forward-looking information required by the ESRS. EFRAG is trying to frame the double materiality assessment, stating that undertakings are not required to assess every possible IROs but this provision is not sufficient in case of litigation. As regards interoperability with the IFRS, the ISSB claims a level of interoperability of 95% regarding climate reporting. The remaining 5% are rather technical and clearly identified; they can be addressed directly without introducing fair presentation.			
Survey	MEDEF	Business association (other than association of financial institution)	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 (“when only setting intensity targets”), to disclose also the associated absolute values” (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking’s progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Financial institutions' GHG emissions typically stem from financing activities (Scope 3, Category 15), which means that their GHG emissions depend on companies and households that they finance. Therefore, too many hypotheses are needed to calculate targets in absolute value, and the results are neither reliable nor comparable, because they ultimately depend on clients. Moreover, absolute value targets are appropriate only for sectors where financing may be phased out due to lack of transition. While for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. Estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. For this reason, we strongly believe that financial institutions should be exempted from disclosing GHG emission reduction targets in absolute terms. Intensity targets alone should be sufficient.			
Survey	MEDEF	Business association (other than association of financial institution)	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking’s employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	Companies have analysed the new definition of the threshold above which it is necessary to break down indicators relating to the characteristics of company employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of the amended version of ESRS S1). They are not in favour of this change in the definition of significant company workforce because they consider that: –the information is difficult to gather, –it involves a significant burden in terms of preparing information for companies that sometimes have a small workforce in these countries –when a company employs a small number of employees, the information will not be relevant for assessing the social or HR policies implemented. A top10 desagregation would lead companies to disclose non-material information (less than 10% of the workforce) which contradicts the objective of simplification. They therefore wish to return to the previously proposed definition, both for DR S1-5 and S1-7, but also for the majority of DRs, in particular S1-9 and S1-15.			
Survey	MEDEF	Business association (other than association of financial institution)	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	We still consider it irrelevant and very complicated to publish information outside the EU on this datapoint ; however, we are satisfied with the amendment made to AR 22. Outside the EEE, we believe it is entirely appropriate to compare the lowest wages in the company with the statutory minimum wage established by legislation or collective bargaining;. However, in countries where an adequate minimum wage does not exist, which is the most critical issue met by preparers in 2024, the ILO principles are too vague and will necessarily make information difficult to audit and compare. To overcome the absence of a clear database of adequate wages, we recommend limiting the quantitative information to employees for whom a minimum wage is defined by regulation or by collective bargaining. For those operating in contexts where no adequate wage is clearly defined, we recommend disclosing a qualitative information explaining how the preparer ensures alignment with the ILO's principles.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	MEDEF	Business association (other than association of financial institution)	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	Simplifications brought in the ESRS must trigger changes in other regulations of the sustainable finance framework to ensure consistency between the different pieces of legislation. In particular, the upcoming review of SFDR should lead to deleting some PAI that are not particularly relevant and introduce a materiality principle. PAI should be strictly based on the information required by the ESRS and not impose additional disclosure requirements to investee companies. Prudential obligations need to be reviewed accordingly.			
Survey	MEDEF	Business association (other than association of financial institution)	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	We welcome the intention to provide guidance for companies in setting biodiversity targets, provided that the future application guidance remains voluntary and is integrated into the NMIG.			
Survey	MEDEF	Business association (other than association of financial institution)	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	With regard to remuneration, whether it be the pay gap or the ratio (S1-15), companies question the value of unadjusted indicators that do not provide any useful information and which, if reproduced without contextual explanation, may contribute to damaging their reputation. The adjusted pay gap is the only metric that directly measures compliance with the principle of "equal pay for equal work or work of equal value."			
Survey	MEDEF	Business association (other than association of financial institution)	France	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	We are in favour of deleting paragraph 14, which poses a feasibility problem for companies with tens of thousands of direct suppliers. This disclosure requirement raises the question of how to identify SMEs around the world: what definition should be applied in non-EU jurisdictions ? It is therefore impossible to calculate and provides no useful information (payment terms can differ between economic sectors rather than based on the size of companies). Companies consider that paragraph 14 should be deleted. In addition, this requirement is not aligned with Directive 2011/7 of 16 February 2011 on combating late payments in commercial transactions which does not make any distinction based on the size of companies.			
Survey	MEDEF	Business association (other than association of financial institution)	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Please note that this answer is shared by AFEP, MEDEF and France Industry. - E1-1/E1-6: Companies remind that the European Commission committed to define by end of 2025 the meaning of "compatibility between companies' target and 1.5°C targets". Until such a definition is published, no obligations are legitimate on this issue. They stress that the Paris Agreement also refers to "well below 2°C objective" which should be reinserted in the amended CSRD. –When disclosing an absolute emissions target would provide to competitors key sensitive information (i.e.: production forecasts), they should be entitled to publish only a target in intensity. A clarification that the "relief" mentioned in ESRS 1 §98 is effectively applicable for section E1-6 appears essential. –E1 3: The notion of resilience used in this section is very much unclear (see glossary); if the concept refers to adaptation, then it should be replaced by climate adaptation (without any reference to transition) –E1-6/E1-8: The distinction between financial control and operational control remains insufficiently clear, and it is uncertain whether the current drafting produces a positive outcome for preparers. This lack of clarity risks confusion in the interpretation of scope 1 and 2 emissions –E1-5/E1-9 : some obligations have been added (§24 a ; §24c ; § 34) and should be suppressed. ESRS E2: Requiring undertakings to disclose information on substances of concern goes beyond the obligations set by REACH and creates a significant additional burden. The same remark applies to the 0.1% threshold mentioned for disclosures relating to the quantities of SVHC which are part of procured/sold components or articles. Indeed, REACH only requires companies to share the name of those substances. Therefore, reporting on substances of concern should be suppressed, as proposed by the French Accounting Standards Authority, and datapoints 20(a) and 20(b) amended accordingly.			
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	We support simplifying the DMA and strengthening the information filter. The option to disclose at topical or IRO level (§22) is positive, aligning with risk-based practices. We also strongly support AR17 on allowing both top-down and bottom-up approaches. However, stating that the top-down approach 'leads to the same outcome' invites auditor validation and undermines simplification. We suggest deleting this sentence. Articles 34–36 should also clarify that risks already addressed are not material at the outset. Overall, the DMA remains overly complex, and the proposed changes are unlikely to reduce reporting burden. Ultimately, the DMA's objective must be to identify material IROs. One particular point of concern is §21(b), which refers to information 'necessary for users' without defining criteria, risking disproportionate obligations. 'Necessary' leaves a lot of room for interpretation, and risks leading to excessive audit burden. We therefore recommend deleting §21(b) to avoid these unintended consequences. If retained, it should specify that disclosure is required only when the information can reasonably be expected to be necessary for users, with this assessment resting with the entity's management. Furthermore, the information materiality filter should explicitly apply to all DR, AR, and datapoints. ESRS 1 should affirm a principles-based approach, allowing reliance on sectoral regimes (e.g., Solvency II) and requiring reassessment only when strategies, models, or contexts change. Identical wording risks conflating materiality of information with financial materiality. These concepts should be clearly distinguished (e.g., ESRS 1 3.5 and 3.3.1). Chapter 3 conflates 'topics' with entity-specific IROs, risking unnecessary auditor scrutiny. Topics and IROs should be clearly separated, with 3.2 clarifying that topics serve as the strategic entry point. Appendix A should be moved to the NMIG as flexible guidance, without expanding ESRS scope, and provided that the CSRD establishes clear boundaries to avoid an inflation of reported topics.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	The new gross vs. net guidelines (paragraphs 34–35) introduce unnecessary complexity, highlighting the challenge of defining when a net approach is appropriate. To preserve comparability, gross impacts should form the basis of the assessment. We therefore recommend deleting paragraphs 34–35 and retaining existing requirements, as set out in Set 1, as the common baseline, with an optional net evaluation to provide flexibility in reporting. Thus, we see no added value in retaining EFRAG's proposed methodology for net assessments. The new guidelines introduce three additional layers of assessment: (1) effectiveness tests of mitigation actions, (2) distinctions between significant ongoing and temporary actions, and (3) separate assessments for current and future reporting years. These add complexity and risk interpretive inconsistencies. Although we welcome the reference to "supportable evidence" and "ongoing mitigation actions," calculating and verifying "remaining impacts" is highly challenging. Within the assessment, a balanced approach should clearly distinguish between prevention and remediation measures already implemented (included in the assessment) and those only possible or planned (excluded). Remediation and prevention measures could still be transparently captured in the disclosures where appropriate, and thereby preserving fair presentation without compromising clarity, auditability and transparency. We recognise and welcome the intent of Appendix C to clarify how mitigation, prevention, and remediation actions are considered in the DMA. However, we suggest relocating Appendix C to the NMIG. To enhance usability, it could be supplemented—or replaced—by a decision tree providing step-by-step guidance.			
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We welcome the increased flexibility introduced by the amendments, particularly the ability to use appendices and sub-parts. This enables preparers to separate technical or detailed content from the main narrative, thereby improving the readability and accessibility of the sustainability statement for a broad range of users. The possibility of including an executive summary is also a useful addition to enhance relevance and conciseness, and we urge that this be allowed in a free format. Furthermore, flexibility should be allowed in structuring the narrative to avoid fragmentation and repetition across different standards or their sections. We also note that EFRAG has introduced additional obligations (ESRS 1, paragraphs 111 and 113) regarding the connections within the sustainability statement, with other corporate documents, and between PAT and IROs. Even if these obligations require only reasonable and sensible information, they still represent an objective additional reporting burden and risk contradicting the EC mandate. Hence, we propose to delete these additional obligations.			
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We support the amendments balancing prescriptiveness and preparation effort with information relevance and comparability. We welcome reducing 'shall' datapoints for PATs through conversion to ARs and relocating key elements to topical standards. Maintaining PAT disclosure for material IROs while removing future intentions enhances clarity without affecting its purpose. The changes to MDRs (GDRs) in ESRS 2 appear to reflect a pragmatic approach. However, we do not agree with the new prescriptive disclosure requirements at the PAT level in GDR-M, §41. 41(a) requires disclosure of data types and sources for each metric, which we suggest deleting. 41(b) introduces additional obligations on environmental conditions and characteristics for all environmental metrics, including value chain metrics, which were not part of Set 1. We therefore recommend removing paragraph 41(b) entirely. In ESRS E1, mitigation and adaptation are combined (21(a)), and resilience analysis is required annually (AR 9), which may blur distinctions and add complexity without improving reporting quality. For insurers, resilience analysis is linked to the ORSA climate stress test, conducted at least every three years, so ESRS should allow flexibility and align with the ORSA cycle. Scenario requirements also differ: EFRAG specifies one high-emission and one 1.5°C scenario, while ORSA requires one below and one above 2°C. ESRS should accommodate such sector-specific practices and avoid mandating specific scenarios, instead requiring disclosures on any resilience analysis undertaken. Companies should be able to rely on ORSA results without additional ESRS-specific demands, consistent with the "report only once" approach in Set 1. We recommend softening the significance criteria in SBM1 AR10, which currently require disclosure based on 10% of turnover or connection to material impacts. The quantitative threshold should be removed, with disclosure focused solely on information that is material. This would avoid disproportionate reporting effort while ensuring clarity on the business model's sustainability links.			
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I disagree	While we welcome the proposed changes, they fall short of delivering genuine simplification. The standards remain highly complex and accessible mainly to experts. We support the objective of eliminating 'may disclose' datapoints to enhance focus and reduce confusion. However, some 'may' DRs remain (e.g., ESRS 1.114 and 1.115), and several 'may' datapoints persist in the ARs (e.g., ESRS 2 AR25 and AR27). We propose moving these remaining 'may' datapoints to the NMIG to provide guidance without expanding mandatory reporting. We welcome the relocation of all mandatory disclosure requirements into the main body of the standards, along with the placement of application requirements directly below each relevant DR and Chapter in ESRS 1. ARs are intended to provide clarifications and constitute mandatory requirements, while all guidance or illustrative examples should be moved to the NMIG. In this context, the 46 DP (40 'shall' and 6 'may') that EFRAG moved from the ESRS to the AR (Appendix 3 of the Basis for Conclusions) should be deleted. Maintaining them in the AR risks introducing new obligations indirectly and undermines the goal of simplification, potentially causing confusion for preparers and auditors. To limit adjustment costs, we encourage EFRAG to publish a new Excel sheet of datapoints as soon as possible, with a correlation table linking the previous and updated datapoints. Regardless of the thresholds for reporting, this would provide relevant guidance and benefit companies. We appreciate the efforts to improve language consistency, clarity, and conciseness. Nonetheless, we caution that changes to established terminology should be implemented with care, as many undertakings are already preparing or reporting under the original ESRS.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	E3	NMIG 3 for para 22: References are still made to policies related to both climate change mitigation and climate change adaptation. We would recommend clarifying in the NMIG that the examples can relate to both mitigation and adaptation, while emphasizing that mandatory reporting only focusses on climate change policies. The NMIG should clearly state its non-authoritative nature for both preparers and auditors. We support EFRAG's recommendation not to include the NMIG in the Delegated Act, as doing so would undermine simplification by reintroducing voluntary datapoints and creating unnecessary pressure on preparers. The NMIG should be concise and limited to clarifications and practical examples of how to apply the ESRS, not a repository of prescriptive datapoints or "best practices," which risks confusing stakeholders and preparers about its role. We note that the current NMIG retains prescriptive datapoints from Set 1 which do not illustrate application but suggest additional disclosures (e.g. data breakdowns or granular specifications), especially in E1 (except E1-2 and E1-4), E2, E4, E5-5, and S1-2. These should be deleted altogether, as otherwise the NMIG risks being interpreted as a set of best practices that undertakings are implicitly expected to follow. Reducing its volume would also improve efficiency and lessen the burden on preparers. We further stress the need for a strict separation between mandatory and voluntary requirements. Implementation guidance is useful, but examples framed as "the undertaking could consider/apply" risk becoming de facto obligations if auditors and stakeholders treat them as best practice. These should be labelled explicitly as "non-mandatory illustrative examples" and excluded from the Delegated Act. In addition, the introduction of new terminology such as "can" (e.g. AR4) blurs the line between voluntary and mandatory requirements. To avoid confusion, EFRAG should maintain consistent language and refrain from introducing new terms in the revised standards.			
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	We recognise efforts to reduce reporting burdens while maintaining transparency, alignment with the Green Deal, and interoperability with ISSB standards. With targeted improvements, the amendments could better balance relief and transparency. We welcome the "undue cost or effort" exemption, which eases burdens for complex data collection, and the flexibility for newly acquired subsidiaries, which reflects operational realities and clarifies consolidation timing. To ensure legal certainty and prevent divergent interpretations, it should be explicitly confirmed that applying these reliefs within the ESRS framework does not compromise the fair presentation of reported information. It is also essential that these reductions of reporting burdens are foreseen as permanent. We support removing the systematic preference for direct value chain data. Section 5.2 should clarify that upstream and downstream information only applies when performing materiality assessments, not to metrics disclosure. As drafted, §60–67 and AR28 could require collection across all metrics, imposing excessive burdens. The principle on direct data (§62) should be nuanced to avoid creating a hierarchy over estimates. For financial institutions, managed assets—particularly off-balance-sheet fiduciary assets—pose challenges because clients control investment decisions, risks, and sustainability choices. Reporting these assets could impose undue data collection costs. We suggest excluding these managed assets from the CSRD scope and making their impact reporting voluntary. For insurers and financial institutions, reliable Scope 3 data are difficult to obtain. Extending the partial data coverage relief (§91) to E1-8 would support practical implementation while maintaining the Green Deal's objectives. We also recommend extending the relief for excluding joint operations without control from environmental metrics beyond E2–E5 to E1, given similar data constraints, while clarifying that the choice of an operational control approach remains optional.			
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We support the introduction of the 'undue cost or effort' relief and welcome its consistent application across all reporting areas, including the identification of material IROs and the calculation of metrics. Furthermore, we agree that flexibility without a fixed time limit provides companies with realistic pathways to improve data quality progressively, especially in complex or data-scarce contexts. We support the flexibility introduced by paragraph 91 but recommend clarifying that, in cases of limited data availability, value chain metrics may be entirely or partially estimated, rather than just "partially estimated." This would better reflect preparers' realities and align with other existing international frameworks. The relief in paragraph 91 of ESRS currently excludes GHG emissions, despite these being highly uncertain, costly, and often based on unreliable or unavailable data. As drafted, full coverage would be required regardless of feasibility or data quality, potentially incentivizing low-quality estimates rather than high-quality, verified data for management purposes such as target setting. Regulation should emphasise accuracy and reliability, limiting mandatory estimates to cases that enhance understanding of the company's activities. We fully support the relief concept in paragraph 91 and strongly call for including GHG emissions. In case an operational control is chosen, paragraph 92 is presented as a relief but appears to establish disclosure requirements for joint operations with operational control under ESRS E2–E5, contradicting the defined consolidation scope.			
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	We acknowledge and support the changes to anticipated financial effects but believe that Option 1 raises significant concerns, including estimation uncertainty, increased litigation risk, and the lack of standardised methodologies and comparable data to ensure consistent disclosures. Such forward-looking and sensitive information is particularly difficult to report at present and may give a false impression of certainty. We therefore recommend adopting Option 2, as it offers a more balanced and realistic approach. It recognises the practical challenges, legal risks, and audit impracticability of forward-looking disclosures and allows time for the development of reliable data and methodologies. We also note that Option 2 allows for the voluntary disclosure of quantitative information, so that ISSB interoperability is still achievable. Should Option 1 be adopted, it should be strictly limited to climate topics and made fully interoperable with ISSB Standards to avoid unnecessary additional burden. This means removing the specification that relief applies only when no reasonable and supportable information from business plans is available, as even minor wording differences create extra work, and including an explicit provision allowing undertakings to omit quantitative information where they lack the skills, capabilities, or resources to provide it. In addition, implementation should be phased in over the long term, and only as sufficient data and methodologies become available, to avoid imposing significant additional effort on companies. Judgement on the use of relief should remain at the undertaking's discretion. While larger undertakings may typically have the necessary capabilities, there will be cases where such preconditions are not met due to the complexity and immaturity of these disclosures.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	We welcome and appreciate the effort to simplify the DR on Anticipated Financial Effects, particularly through the reduction in scope from the previous E1-9. However, further adjustments are needed. If Option 2 is adopted, the datapoints related to financial effects in the topical standards should be modified accordingly to reflect their different nature. Under Option 2, DR and AR E1-11 should be voluntary provisions and focus on qualitative rather than quantitative disclosures across all topics. Also under Option 2, disclosures should relate to assets as part of the company's own operations and not to assets in the value chain, such as financial and non-financial investments. Regarding paragraphs 40 and 41, if Option 1 is adopted, the requirements should be aligned with the DMA approach, deleting the phrase "before considering climate change mitigation actions." Paragraph 40(b) is challenging because 'key assets' and location details are ambiguous, potentially leading to inconsistent reporting. For 41(c), while narrowing the scope to "real estate used as loan collaterals" is positive, breaking down these assets by energy-efficiency class may not provide material information. The revised wording in 41(e) remains ambiguous regarding whether revenue figures should be reported gross or net of mitigation actions; a consistent approach would be to include the effect of mitigation actions already taken while excluding possible future actions. Without clarification, this could lead to inconsistent interpretations and reduced comparability.			
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We welcome reliefs, including the "undue cost or effort" provision, which offer flexibility without reducing transparency. Allowing qualitative disclosures or ranges where quantitative data is unavailable balances practicality with investor needs. Streamlined language, removal of redundant datapoints, and partial alignment with IFRS and the GHG Protocol reduce complexity and reporting burdens while maintaining quality. E1 AR 19 and AR 20 (para. 32) set the financial control boundary of the GHG Protocol. When this fails to convey a fair presentation, undertakings should also disclose scope 1 and 2 emissions using the operational control approach. Reporting both boundaries may create redundant metrics and complicate fair presentation, so flexibility is needed to align with EC objectives. Financial consolidation should not automatically define operational boundaries, as this could misrepresent control over leased or sub-leased assets. Requiring parallel disclosure under both financial and operational control would confuse stakeholders; allowing one method with clear justification is more practical. We suggest clarifying that all assets held for investment purposes—not just leased assets—should be treated as downstream value chain (scope 3) for GHG emissions, in line with ESRS 1 paragraph 70, rather than included in scope 1 or 2. Current wording risks auditors applying this only to leased assets. We also note remaining interoperability issues with the GHG protocol. Under IFRS S2 and the GHG Protocol, undertakings may choose either financial control or operational control to define GHG boundaries. By contrast, ESRS E1 AR 18-20 currently diverge and effectively push a financial-control approach. We therefore call for the same flexibility as IFRS S2 and the GHG Protocol. This is especially important for insurers, where financial control often exists without operational control due to business models and prudential rules; therefore, requirements should reflect actual control over investments – or align fully with IFRS S2.			
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	We welcome the reduction in length of the revised ESRS, as well as EFRAG's efforts to clarify interactions between ESRS 2 and the topical standards – particularly on PAT. We also support the prioritisation of quantitative datapoints over lengthy narratives and the clearer distinction between mandatory and voluntary requirements. However, the Log of Amendments indicates that many DPs were moved, merged, or amended rather than deleted. In addition, a shorter standard does not necessarily equate to a lower reporting burden. It is essential that the proposed reduction is real and effective; therefore, burden should be assessed by the weight of datapoints, not merely by their count. Initial analysis suggests limited relief, with extensive rewording and restructuring creating interpretation and implementation challenges for wave-1 undertakings, potentially undermining the grandfathering objective. In addition, significant concerns remain regarding newly introduced concepts and methodologies, which may, in fact, increase the reporting effort. To consolidate the benefits of the revision, three adjustments are recommended. First, complete the removal of duplication by deleting overlapping DPs across ESRS 2 and the topical standards; while progress on PAT is welcome, the PAT DP should also be removed from the ARs. Second, DPs for which no robust, shared methodology or data exists should be deleted. Lastly, it should be ensured that reductions are substantive rather than nominal. Notably, we should avoid shifting complexity from standards to guidance, by simply relocating DPs to NMIG which should instead be deleted altogether.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	23.	Six datapoints exceptionally moved from “may” to “shall” In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, “may disclose” datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We don't support reclassifying 'may' datapoints into 'shall' datapoints or adding any new ones, we particularly oppose the introduction of new metrics in G1. These changes would represent a significant increase in reporting burden and contradict the Commission's simplification mandate. If these datapoints are retained, we note that: ESRS E4: While disclosure is only required if a plan has already been publicly released, this risks uneven reporting across sectors and implicit pressure, especially on high-impact entities, to publish plans prematurely, before robust methodologies or guidance are available. As expectations on biodiversity transition planning evolve, requirements should remain proportionate, clear, and aligned with frameworks like the TNFD. Moreover, plans published outside the financial statements are subject to a lesser level of control and audit, so EFRAG's claim that mandatory inclusion in the sustainability statement adds no burden is misleading. Making such disclosure mandatory may even discourage companies from publishing plans at all. ESRS G1 Training: While consolidating scattered datapoints into one provision is welcome, the current approach creates avoidable ambiguities. In particular, the term "depth of coverage" in the context of training remains unclear – e.g. does it refer to the type of training or the functions included. Training requirements should therefore be clearly defined and disclosures limited to what is material (see Part 3 under G1 for details). ESRS G1 confirmed incidents: While we support transparent reporting on corruption and bribery, we do not favour quantitative metrics over narrative disclosures. Narrative information provides context on nature, scale, and remediation, while simple counts risks misinterpretation – overstating issues in companies with strong controls or understating them in those with weaker ones. In addition, the proposed quantitative datapoints are insufficiently defined and overly sensitive. However, if a count is required, it should be limited to incidents confirmed by judicial or equivalent rulings.			
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We oppose the introduction of new mandatory datapoints. The revised ESRS should prioritise simplification, and adding new mandatory requirements runs counter the European Commission's mandate. However, if these datapoints are retained, we recommend the following: Regarding ESRS 2 BP-1, we acknowledge the consolidation of multiple disclosure requirements into a single statement of compliance. While we appreciate the streamlined 'comply or explain' approach to only state deviations from the ESRS 1 General requirements provisions, we find it useful to provide that information in the relevant context and to not list all the details in the first section. However, we suggest amending BP-1 to provide clearer guidance on the definition of "own operation", by, for instance referring to paragraph 70 of ESRS 1 (regarding lessor and lessee). To further improve clarity and avoid redundancy, we suggest removing the datapoint on value chain coverage ESRS 2 (§4b), since Section 5.2 of ESRS 1 already adequately addresses value chain treatment within sustainability reporting, limiting it to the undertaking's scope of responsibility for PAT and generally excluding it for metrics. This datapoint overlaps with existing provisions (e.g., SBM 3, IRO 1, PAT GDR). Additionally, we advise against using lettered lists (a, b, c, etc.) for provisions, to prevent confusion or misinterpretation as separate datapoints or tagged disclosures. Furthermore, we propose deleting BP-2 on phasing in related material topics. Instead, disclosure of phased-in material topics (§6) should be relocated to IRO 2 where applicable, and the specification of phased-in provisions and minimum PAT content (§7) should be aligned with the General Disclosure Requirements (GDR) or ESRS 1 Chapter 10 on transitional provisions. This would better align the standard with CSRD requirements and help reduce complexity.			
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	25.	Emphasis on ESRS being a “fair presentation” reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We support emphasising fair presentation (FP) in ESRS to reinforce materiality and improve decision-usefulness of information. However, the current wording risks reintroducing a compliance mindset, especially in the absence of auditing standards for sustainability reporting. Formalising "completeness", "comparability", "accuracy", and "verifiability" may lead preparers and auditors to adopt overly conservative interpretations. FP must be applicable to forward-looking or uncertain disclosures; those based on estimates, evolving methodologies, or scenario analysis. "Accuracy" and "verifiability" should not imply absolute precision. "Completeness" risks being read as exhaustiveness, conflicting with simplification and encouraging over-reporting and over-auditing; we recommend removing "complete" from the definition. FP should be defined as an overarching principle prioritising relevance and proportionality. We suggest integrating into ESRS1 the concept articulated in the Basis for Conclusions (para 169). Compliance with ESRS should be presumed to achieve fair presentation, and the framework should emphasise the reasonable, informed judgment of the undertaking. It should be clarified that FP enables both additions and omissions: decision-useful context may be added when necessary, and requirements may be omitted as an outcome of the DMA or the information-materiality filter. An explicit formulation could be included: "Where the strict application of an individual disclosure requirement would be disproportionate or not relevant to the undertaking's circumstances, the undertaking may adapt or omit such information, provided that the sustainability statement as a whole still achieves fair presentation of the undertaking's material impacts, risks, and opportunities." Additionally, the Commission should issue Q&As clarifying the application/intent of FP for auditors – avoiding burdensome interpretations–and make explicit that the sustainability notion of FP differs from financial reporting and should not be treated as identical to the ISSB's. Finally, there should be alignment with the limited-assurance context under CSRD: disclosures need not be "true" in an absolute sense, particularly for forward-looking, qualitative, or complex quantitative matters.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We support exempting only financial institutions from disclosing absolute GHG emissions values when intensity targets are set. This is particularly relevant for insurers, whose emissions are largely indirect. Calculating absolute values requires extensive assumptions and complex modelling, producing results with low reliability and limited value to stakeholders, which raises concerns regarding the qualitative characteristics of useful information and potential distortions due to business growth. We recommend amending the wording as follows: (a) GHG emission reduction targets for Scope 1, 2 and 3, either separately or combined, expressed as absolute or intensity-based values. The undertaking shall specify, in case of combined GHG emission reduction targets, which GHG emission Scopes (1, 2 and/or 3) are covered and, where relevant, the share related to each respective scope. The breakdown of Scope 1, 2, and 3 shall not be required if the undertaking has not set targets in this way, in line with its management approach. Furthermore, by using intensity targets, financial institutions can support sectoral transition, for example by financing companies gradually reducing fossil fuel dependence or investing in technological transformation (e.g., electrification of vehicles), without imposing artificial limits through absolute values. A key difficulty lies in interpreting portfolio intensity metrics, which can be affected by market volatility or portfolio allocation rather than actual investee emissions. Estimating future portfolio size can lower absolute financed emissions without affecting real-world emissions, risking misinterpretation. Requiring absolute emissions disclosures provides limited insight and may create unintended consequences.			
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	We support efforts to improve the availability and comparability of country-level social data where it is relevant for users. However, we disagree with the new threshold for country-by-country disclosure in ESRS S1-5 and S1-7, as it significantly increases both the burden of global data collection and the number of data points to be disclosed. Metrics on employees are often collected primarily by operating entity rather than by country, as is the case in many companies for internal steering purposes. At the same time, an increased number of data points may reduce the readability and conciseness of the final Sustainability Statement. While the shift in threshold has the potential to improve transparency without fundamentally altering the scope of disclosures for most undertakings, it introduces methodological adjustments and additional disclosure requirements. Preparing consistent and assurance-ready disclosures—especially on collective bargaining coverage and social dialogue—may require considerable additional effort, particularly for companies with decentralised HR systems or operations across jurisdictions with varying labour regulations. We therefore encourage EFRAG to further evaluate the practical implications of this change and to consider reviewing and streamlining the wording of the standard, especially in §§5, 9, 11, 19, and 21, to eliminate redundancies and reduce the interpretative burden.			
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	We support the objective of promoting fair and transparent wage practices and welcome the reference to international frameworks. The amended methodology for calculating non-EU adequate wages under ESRS S1 AR 22 introduces a more structured approach that recognises jurisdictional wage-setting mechanisms while aligning with global expectations on living wages. However, we partly disagree with the amended Adequate Wage benchmark outside the EU outlined in the new AR 22(b). We do not consider it the responsibility of individual undertakings to ensure that statutory minimum wages are "periodically reviewed/adjusted every two years and take into account the ILO wage-setting principles" (AR 22(b)(i)). Similarly, we disagree with the newly introduced last sentence of AR 22(b), which indicates that adequate wage benchmarks outside the EU "should take into account both the needs of workers and their families, as well as economic factors." Again, this is not a responsibility that individual undertakings can assume. Beyond these points, the proposed change does not simplify reporting and adds complexity.. Changes to permissible sources for living wage estimates require companies to reassess previously relied-upon data, while the lack of clarity on which methodology prong to apply may reduce comparability. Positioning living wage data as a fallback rather than a primary benchmark may also affect relevance in jurisdictions where statutory wages fall below adequacy thresholds. From a sectoral perspective, the disclosure requirement on adequate wages (ESRS S1 paragraph 32 and related AR) is of limited value for the insurance industry. Fair compensation is generally not a material concern in this sector, yet the proposed reporting obligation would impose significant effort and cost. Pending the outcome of the ongoing field test, we recommend that disclosure of non-EU adequate wages be made voluntary or phased in to ensure feasibility, promote consistency, and avoid misleading disclosures based solely on minimum wage data.			
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	We support maintaining alignment between the ESRS and SFDR frameworks and welcome the careful review undertaken by EFRAG, which appropriately deleted or consolidated certain SFDR-related datapoints where information was duplicated, could be derived from other disclosures, or lacked material relevance. However, the materiality of certain SFDR PAIs remains variable in practice, and the final set of retained datapoints may still include indicators that are not relevant for all undertakings. In this context, we reiterate our broader position that alignment with SFDR should not bypass the materiality filter. Consequently, for product-level reporting, the mere presence of an SFDR PAI should not, by itself, result in a mandatory ESRS disclosure, except for an explicit indication of non-materiality where the indicator is not material to the undertaking. We also caution that several indicators, particularly in the environmental standards (E1–E5), may require complex methodologies or granular data that could challenge reporting entities, especially smaller or less mature companies. It is important to consider the forthcoming review of the SFDR, which may lead to the removal or amendment of certain PAI indicators. Any such changes should be promptly reflected in the corresponding ESRS datapoints to ensure consistency over time. This could be achieved by establishing an explicit dynamic link between the ESRS and the SFDR PAIs, allowing the standards to evolve with future regulatory developments. Certain remuneration-related datapoints (such as those in ESRS S1-16) already represent a significant reporting burden, and any amendments to the corresponding SFDR PAIs should be promptly reflected in the ESRS to avoid unnecessary complexity and duplication. Further, PAI reporting under SFDR at entity level should be removed when group-level aggregated disclosure is provided. That is, upon (group aggregate) PAI disclosure under CSRD, the Art. 4 SFDR requirement for entity-level disclosure should be deemed as complied with.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We support the review of AR 26 in Amended ESRS E4, insofar as it contributes to the overall simplification of the standard and maintains a degree of methodological guidance that can assist undertakings in defining relevant biodiversity and ecosystem-related targets. However, the current target-setting guidance in AR 26 is primarily oriented towards the real economy, focusing on direct actions such as habitat restoration or number of projects/sites, which suit production sectors. For financial institutions, biodiversity targets are instead linked to portfolio alignment, sector inclusion, engagement targets, or impact reduction based on investee metrics, emphasizing the shift of capital rather than direct operational control. Given these differences, we suggest that ESRS avoid prescriptive target guidance, allowing each sector flexibility to define targets relevant to its role and impact. We also recommend EFRAG to refrain from integrating immature methodologies in the biodiversity reporting landscape in the ESRS, including science-based frameworks such as the SBTN. While we acknowledge the value of consistency with Set 1 and the simplification objectives, the fast-evolving methodological context means that more time is needed for those methodologies to mature before being integrated in the ESRS. We also note that the application requirements should retain flexibility and avoid turning into de facto mandatory expectations. AR 26 should remain illustrative and optional in nature, supporting undertakings in understanding what targets may cover without implying standardised metrics. We are concerned about excessive granularity in ESRS E4, particularly regarding site-specific disclosures, such as the location of material IROs (§20a). Such requirements can be disproportionately burdensome for companies operating across diverse jurisdictions or complex supply chains. In this context, guidance under AR 26 should promote proportionality and scalability in reporting practices.			
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	We acknowledge the rationale behind deleting the voluntary datapoint on the adjusted gender pay gap by employee category in ESRS S1, as part of EFRAG's effort to streamline and simplify the standards. However, while its voluntary status previously allowed flexibility, its full removal risks limiting undertakings' ability to provide meaningful and comparable information on gender pay equity. We therefore recommend clarifying in the Non-Mandatory Implementation Guidance (NMIG) that such flexibility remains available.			
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	We welcome the inclusion of paragraph 33(b) in the revised ESRS G1, which introduces a clear requirement to disclose standard payment terms by supplier category, including SMEs, and the percentage of payments aligned with those terms. However, requiring disclosure of the percentage of payments aligned with standard terms (in days) would be overly burdensome, as the necessary data is often unavailable at sufficient detail. We therefore propose removing this requirement or limiting it to cases where a material number of payments are late. Paragraph 79 permits alternative definitions for medium- and long-term horizons in certain cases. These cases are equally relevant to short-term horizons. We therefore propose extending paragraph 79 to allow different definitions for the short term as well.			
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Reporting across all ESRS should focus on relevant, decision useful information while avoiding unnecessary over-reporting. The materiality assessment must stay strategic and flexible, allowing each preparer to adapt it to its own strategy, business model, and specificities. We therefore call for further simplification across the framework—limiting requirements to the minimum and adopting a principles-based approach that better reflects business realities.			
Survey	CIMA	National supervisory authority & regulator	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Materiality and Relevance a.Overall, we support disclosures where sustainability matters have a material medium- or long-term impact on financial position. Investors consistently demand this information and so believe it is relevant to global capital allocation. b.We do not support disclosures where no discernible link exists to an entity's financial viability within a reasonable and proportionate business model. c.We are therefore supportive of the revised EFRAG standards' focus on disclosure of organizational business models. d.However, we would support a greater reduction in the need for a Double Materiality Assessment.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CIMA	National supervisory authority & regulator	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	CIMA	National supervisory authority & regulator	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree				
Survey	CIMA	National supervisory authority & regulator	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Excessive Standards and Data Points Currently, there are too many standards and an overwhelming number of data points that businesses are required to report. We therefore fully support the 57% reduction in standards and urge that these reporting requirements remain commensurate with the risks identified by companies' own assessments. Additionally, we are supportive of the following technical amendments - a.The removal of all voluntary standards. b.The elimination of overlaps in climate reporting between ESRS 1 & 2. c.The alignment of climate transition plan wording with IFRS S2. d.Maintaining high-level alignment with global objectives e.Inclusion of resilience considerations, as highlighted in the CIMA report, on uncertainty and adaptive capacity. f.The removal of net zero terminology, which was unrealistic and confusing, in favour of broader and clearer concepts. g.Concentration on biodiversity through a single disclosure metric.			
Survey	CIMA	National supervisory authority & regulator	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Implementation a.Companies already prepared for old ESRS will be fully prepared for simplified reporting, as metrics remain consistent. b.We welcome the option of executive summaries and appendices but call for guidance on how presentation can avoid greenwashing. c.Clarification is needed on appendices versus main text content and how these elements remain subject to assurance and digitalization rules.			
Survey	CIMA	National supervisory authority & regulator	United Kingdom	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Guidance We would suggest the following clarifications to the Exposure Draft : a.the development of guidance with illustrative examples on the Disclosure of Materiality Assessment (DMA). b.addressing sector-specific burdens through guidance rather than mandatory requirements.			
Survey	CIMA	National supervisory authority & regulator	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Thresholds for Compliance The increase in the turnover threshold from €150 million to €450 million for companies within the EU is a welcome step in reducing the burden on smaller businesses. However, we would note that those who have already started the journey on sustainability reporting may now feel unsure as to how to proceed and this uncertainty may act as a drag on investment.			
Survey	CIMA	National supervisory authority & regulator	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I would like to skip this question and provide my feedback in Part 3				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CIMA	National supervisory authority & regulator	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Alignment with ISSB Standards We urge EFRAG to minimise divergences and ensure full connectivity with financial statement disclosures. Specifically, we would suggest: a.reinstating mandatory cross-referencing between sustainability disclosures and financial statements (ESRS 1 pa114). In our view, the proposed wording on this impairs connectivity, undermines user understanding, and diverges from ISSB standards. b.harmonising materiality definitions c.addressing differences in evidence and relief concepts d.aligning Green House Gas emissions boundaries and simplifications e.clarifying treatment of leased assets and Scope 3 categories			
Survey	CIMA	National supervisory authority & regulator	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	Fair Presentation and Understandability a.We believe disclosures should be fair, balanced, and understandable. b.We note that while certain clarifications may not reduce reporting burden directly, the simplifications in DMA and amendments do help achieve this.			
Survey	CIMA	National supervisory authority & regulator	United Kingdom	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We are supportive of the move away from separate EU standards on assurance. The IAASB has developed a global assurance standard to be used for sustainability information, and we believe that the EU's approach should involve support for these. As many businesses still face difficulties in ensuring the accuracy of non-financial data assurance guidelines would be welcome.			
Survey	LBP AM	Asset manager/Investor	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	LBPAM supports efforts to clarify and simplify DMA requirements, iming to avoid overly detailed, resource-intensive "tick-the-box" approaches while preserving essential elements: consideration of own operations and value chain, alignment with sustainability due diligence, and stakeholder engagement. However, LBPAM identifies key risks : (i)excessive flexibility could lead to omission of critical information for users (ii)guidance remains too high-level for less advanced companies (iii)The continuous improvement approach is weak, as companies are not incentivized to integrate user feedback To mitigate these risks, we suggest : -Climate change: retain the ESRS 1 §32 requirement for companies deeming climate non-material to provide a detailed explanation, and extend this to workforce and business conduct. ESRS 2 §28(b) is too generic; the previous ESRS 1 §32 should be reinstated -Robust DMA: specify in Application Requirements that DMA should be science-based and aligned with recognized standards -Updating DMA (ESRS 1 §29) : require undertakings to disclose if and to what extent they considered feedback received from users on their previous sustainability reports. ESRS 2 SBM-2 should also require companies to disclose "whether and how the administrative, management and supervisory bodies are informed about remarks from users relating to pervious sustainability statements" could be added -Nature-related issues: emphasize that dependencies on ecosystem services must be considered, given ECB evidence of strong economic reliance on biodiversity and natural resources -Sector-specific Guidance : provide guidance or materiality matrixes tailored to sectoral specificities. Companies should provide clarifications when excluding topics flagged as material -Provide a list of external resources that companies should consider and notably : guidance on responsible business conduct published by OECD, guidance from the German Federal Office for Economic Affairs and Export Control on the identification, weighting and prioritization of risks (https://www.bafa.de/SharedDocs/Downloads/EN/Supply_Chain_Act/guidance_risk_analysis.html?nn=1469810). Multiple useful references p.19			
Survey	LBP AM	Asset manager/Investor	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	LBPAM welcomes the effort to provide additional guidance and strongly supports : -Differentiating 'actual' from 'potential' impacts and stressing that potential impacts should be duly considered in the double materiality assessment. -Opening the debate "not or gross". However, LBPAM does not support the proposed approach as : -Appendix C seems overly complex. For instance, internal discussions and discussions with peers and other stakeholders led to various and sometimes diverging interpretations. -The assessment of whether remediation is sufficient could vary across undertakings. For identical impacts and actions, some undertakings may conclude the impact no longer exists while others may deem further actions necessary. This decision should not rest solely with the undertaking, users must be able to make their own opinion and challenge the conclusion of the undertaking if necessary. Material impacts should therefore be reported on a gross basis. Should EFRAG stick to the current approach, proposed approach in appendix C regarding potential impact for which companies must maintain significant ongoing actions seems not in line with the intention described in the consultation document. More specifically, for potential impact for which the undertaking has to maintain significant ongoing mitigation, appendix C states that companies should "Report the potential impact after prevention or mitigation actions if it remains material, and report the significant ongoing action for as long as it is necessary to manage the residual material impact. Companies should instead "Report the potential impact before prevention or mitigation and report the ongoing actions as long as it is necessary to maintain the potential impact below the materiality threshold" in order to aline with the provision thereof : "For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported."			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	LBP AM	Asset manager/Investor	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The key point that must be maintained is the removal of duplicate indicators (which we welcome) as well as simplification supported by guidelines to enable smoother discussions with auditors. Furthermore, we support the proposal from ANC to introduce a presentation rule requiring undertakings to directly reference the disclosure requirement (DR) numbers within their sustainability statement (e.g., in section headings or paragraph titles), without the need for a separate mapping table. This "visual tagging" approach is already used by many companies and facilitates comparability for users.			
Survey	LBP AM	Asset manager/Investor	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	LBPAM welcomes the efforts and proposal from EFRAG to strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other. However, LBPAM believes that EFRAG could provide more optional guidance that could be used by companies which do not have clear views and how they should present the information. In other words, EFRAG could suggest where undertaking "may" present the information, letting to companies decide whether they have more relevant approaches for presenting information. In this regard, EFRAG could provide further guidance on where to present information published in accordance with ESRS 2 in the structure impose by ESRS 1 § 105 (general information, environmental information, social information and governance information). LBPAM make the following suggestions : -GOV 1, 2, 3 and 4 : Comapnies may include the disclosures in the section "general information" or in section "governance" -SMB 1 and 2 : General information -SBM-3 : If the high-level approach is common to all topics, undertakings may present it in section "general information". If there is specificities depending on the nature of the topic (E, S and G), companies may provide the information in introductory parts of topical sections. Anticipated financial effects may be provided at topical or sub-topical level depending on the disaggregation approach of the company. -IRO 1 : General information -§35 relating to international standards : undertaking may present it in an introductory part of section "Social Information".			
Survey	LBP AM	Asset manager/Investor	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	LBP AM	Asset manager/Investor	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Overall, LBPAM supports the necessity of non-mandatory guidance			
Survey	LBP AM	Asset manager/Investor	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	LBPAM generally agrees with EFRAG proposal in order to reach a balanced approach between relief for preparers and maintaining sufficient and comparable information for users. However, LBPAM fears that the relief on "undue cost or effort" may go too far at the expense of meaningfulness and comparability of information. LBPAM therefore suggests: -For climate disclosures, do not allow to use the relief except for scope 3 GHG emissions. -As for relief for lack of data quality, require undertakings to disclose whether and how the undertaking will try to collect the data in future period To enhance clarity, LBPAM would recommend to -Regarding the relief on "undue cost or effort", move the clarifications provided in §47 ("information that is used by the undertaking in preparing its financial statement, operating its business model, setting its strategy, conducting sustainability due diligence, and managing its impacts, risks and opportunities is considered available to the undertaking without undue cost or effort") to chapter 7.4 or make a reference to this paragraph -In ESRS 2 DGR-M (General Disclosure for Metrics), make reference to ESRS 1 chapter 7.4 (rules for using reliefs relating to "undue cost or effort" and "lack of data quality") To enhance transparency and ease the understanding from users, undertakings using the reliefs relating to "undue cost or effort" or "joint operations" (ESRS 1 §92) should disclose it in the information disclosed in accordance with ESRS 2 § 5 (BP-1).			
Survey	LBP AM	Asset manager/Investor	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	LBPAM understands the rationale for simplification but is against this proposal. There is a need for a clear phasing-in schedule. Without such a timeline, investors will face the same lack of comparability between companies as they do today. Implementing this proposal would represent a step backwards and would deepen the lack of comparability and data consistency across companies. We recommend, at the very least, clearly defining the scope to avoid misleading outcomes and to improve comparability. Furthermore, this would disadvantage companies that produce a "full" report, as the published data would be less "favourable." Regarding the proposal for companies to specify the actions taken to improve the coverage of their calculation in subsequent periods, we request that companies also be required to indicate the timeframe by which they expect to achieve full (100%) coverage of the scope. The following wording would therefore be more appropriate: "actions taken to cover 100% of their activities," with the aim of aligning sustainability reporting expectations with the company's financial reporting. Once a company considers an activity to be material, it should provide a precise timeframe for obtaining the relevant data. Estimates should therefore be framed within a clear consumption limit, with a deadline and details of the actions planned to address the gap. Finally, we request the deletion of the provision stating: "no time limit is included for the use of the relief."			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	LBP AM	Asset manager/Investor	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Quantitative anticipated financial effects are one of the core pieces of information for investors and are essential for financial materiality. In the developments of the ESRS, is has been a priority to provide investors with this data, which is a fundamental requirement for managing the risks in their portfolios. While we acknowledge that there can be challenges connected to producing this information, the effort is worth the benefit for a company, its investors and the wider economy. Understanding these often existential risks is necessary for resilience both at the level of the enterprise, and the economy as a whole. Option 1 would be a workable compromise and the only solution (as opposed to option 2) to maintain the credibility of the ESRS – clearly establishing the expectation to provide quantitative data to users, while granting adequate reliefs for reporting companies when they encounter legitimate challenges to do so. To accommodate the difficulty that might arise in providing quantitative data in absence of common methodologies, we could support both a phase-in implementation starting with mature topics (e.g. climate) and continuing with less mature topics and specifying that companies are required to provide quantitative elements on a best effort basis.			
Survey	LBP AM	Asset manager/Investor	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	LBP AM	Asset manager/Investor	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	LBP AM	Asset manager/Investor	France	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	LBPAM is of the view that the proposal goes in the right direction as it achieves a very significant reduction in the overall framework reporting length, activates a number of operational user and producer led improvements, while safeguarding fundamental objectives of the original CSRD and enable the UE to remain both a driving force and a driving force that is well connected to international soft standards. However, to stick to the latter point, LBPAM believes that EFRAG's proposal corresponds to the maximum data-reduction achievable, below which the objective of the original CSRD would be endangered.			
Survey	LBP AM	Asset manager/Investor	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Data relating to water withdrawal and discharge is of primary importance for understanding the efficiency of water resource use within a company and for benchmarking against peers. Water resources are getting increasingly critic in the context of global warming and higher frequence of droughts Publication of biodiversity transition plans should become a standard element in corporate disclosures to demonstrate the strategy for impact reduction and mitigation of biodiversity-related risks which macro analysis prove to be systemic. Moreover, biodiversity transition plans are essential for achieving Goal D and Target 14 of the Global Biodiversity Framework. Such plans should be based on standardized processes, notably with a dependency and impact assessment via thematic tools, helping corporates in recognizing the main risks they are facing. In that context, a strategy with clear objectives to reduce those risks should be implemented, with measurable KPIs to monitor progress over years. Current EFRAG proposal should in our view allow to reach this goal. To strengthen comparability and meaningfulness, we would suggest the following adjustments : -To ensure reliability and comparability, corporates should align with recognized frameworks for the assessment and analysis part (like the TNFD), and science-based targets compatible with Global Biodiversity Framework (like the SBTN). Moreover, companies could refer to all other sector guidance available on the market, to address material topics they face -As for climate transition plan, require companies to disclose whether the target set are science-based (e.g. SBTn) -If material, plans could include details on restauration or renaturation strategies on protected areas, disclosing methodologies of reference and progress updates -As for climate transition plan, if any biodiversity offsets in action plans, to not make it a major contributor of corporates transition plan Information on business conduct incident is key for investors stewardship and allow for peer comparison.			
Survey	LBP AM	Asset manager/Investor	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	As regards E2-4, LBPAM acknowledges that undertakings may have difficulties in the short term to measure the amount of secondary microplastics produced. However, this is a major source of pollution that needs to be properly addressed. Incentivizing companies to measure their production is a necessary first step for treating this serious issue.			
Survey	LBP AM	Asset manager/Investor	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We understand that the ability to provide an associated indicative absolute value to intensity-based GHG emissions reduction targets is highly variable depending on the nature of the financial player (bank or investment), its balance sheet and on the chosen intensity methodology. However, information on absolute values is key and should be reported. Given the heterogeneity in the sector previously mentioned we could support either limiting the exemption in time with a review clause or requiring absolute values from day 1 but in form of ranges to account for the uncertain nature of the info for some players and some methodologies.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	LBP AM	Asset manager/Investor	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I would like to skip this question and provide my feedback in Part 3				
Survey	LBP AM	Asset manager/Investor	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The definition of an adequate wage should be aligned with the ILO methodology for estimating a decent wage—namely, a weekly remuneration sufficient to meet the needs of the worker and their family, including food, water, housing, and education. The definition proposed by EFRAG risks creating confusion between the concepts of minimum wage and adequate wage, which are fundamentally distinct. Minimum wages generally do not represent the threshold for a decent wage. Furthermore, the ESRS should require disclosure of gaps between actual pay, decent wage, and minimum wage—at least at the country level of operation.			
Survey	LBP AM	Asset manager/Investor	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	In order to deepen comparability and meaningfulness of information, we would suggest the following adjustments : -The current focus seems too narrow—centered on land-use change—while ESRS E4 should link pressure reduction (e.g. climate, pollution, water use, waste) to improvements in the state of nature. Therefore, target set in biodiversity transition plan should go beyond land use. -To ensure reliability and comparability, corporates should align with recognized frameworks for the assessment and analysis part (like the TNFD), and science-based targets compatible with Global Biodiversity Framework (like the SBTN). Moreover, companies could refer to all other sector guidance available on the market, to address material topics they face. -As for climate transition plan, require companies to disclose whether the target set are science-based (e.g. SBTn) -If material, plans could include details on restauration or renaturation strategies on protected areas, disclosing methodologies of reference and progress updates. -"phasing out" indicators to avoid adverse biodiversity impacts should also be considered -As for climate transition plan, if any biodiversity offsets in action plans, to not make it a major contributor of corporates transition plan. Finally, to ensure improvement on the topic of biodiversity, we believe this issue should be revisited in the coming years such that a review clause would be welcome. The purpose of this clause would be to confirm that the topic is currently insufficiently mature to provide the necessary data, while ensuring that these thematic indicators will be revisited in a few years' time (3 to 5 years) once progress has been made. This would also encourage companies to adopt a long-term perspective on the issue			
Survey	LBP AM	Asset manager/Investor	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		LBPAM commends EFRAG's swift and comprehensive work to analyze initial reports and consult stakeholders. Revisions significantly streamline reporting requirements, introduce practical improvements while preserving core objectives of CSRD and ensuring EU remains a driving force on sustainability. Continuous improvement LBPAM recommends adding a provision in ESRS 2 SBM-2 requiring to disclose whether and how governance bodies are informed of user feedback, fostering iterative quality enhancement (see_q11) Historical Comparability Companies should maintain a dedicated section on their website hosting all CSRD sustainability statements. Climate risk We supports EFRAG's approach to climate risk transparency, notably: •Inclusion of own operations and upstream/downstream value chain. •Consideration of short-, medium-, and long-term horizons. •Clear distinction between physical and transition risks. •Use of climate scenarios and disclosure of mitigation/adaptation measures. However, comparability and robustness require: -Require Standardized baseline scenarios, with the possibility to use alternative scenarios if proved that the alternative scenario is more accurate. This is notably to avoid references to undisclosed /black box internal scenarios. For transition risks : IPCC SSP1 ("Sustainability"), for physical risks : IPCC SSP5 ("Fossil-fueled development") and SSP2 ("Middle of the road") for current trends •Mandatory quantitative disclosure of anticipated financial effects (supporting Option 1 in EFRAG's consultation) Climate transition plan : LBPAM welcomes requirements for : -Gross GHG reduction targets (Scopes 1, 2, 3) without offsets. -Science-based targets aligned with 1.5°C and EU objective by 2050. -Disclosure on governance, financial planning, follow-up, locked-in emissions, and fossil-fuel Capex. However, fossil-fuel Capex disclosure should be mandatory, not conditional on "significance" to avoid inconsistent interpretations. NetZero Targets LBPAM regrets the removal of "net zero" from ESRS. Its inclusion in Set 1 improved disclosure quality and mitigated greenwashing risks. LBP AM recommends reinstating the glossary definition and E1-7 §60, clarifying residual emissions and removals			
Survey	Coca-Cola Europacific Partners	Preparer (non-financial preparing a sustainability report)	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The proposed amendments have greatly simplified the DMA process. Clarification around flexibility of structure, the scope of required disclosures when a subtopic is material, value chain data limitations, and frequency of required DMA updates is all useful and will alleviate much of the confusion experienced in the first year of reporting. In relation to AR23 for para 52 – criteria for disaggregation, is there guidance provided to assurance providers on "shall consider"? It will remove a potential conflict if this is clearly defined for both practitioners and assurance providers. Is just considering it enough? What needs to be true for a company to consider and decide against further disaggregation?			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Coca-Cola Europacific Partners	Preparer (non-financial preparing a sustainability report)	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The clarification of gross risk is helpful, although this will still likely require significant internal engagement efforts to ensure leadership understanding. Within new paragraph 35 the text "However, if the undertaking needs to maintain significant ongoing mitigation and/or prevention actions, to contain the severity and/or likelihood of occurrence of the potential impact below a materiality level, the impact shall be assessed without considering the mitigation and/or prevention actions." Would benefit from defining "significant ongoing mitigation". Are ongoing efforts to improve guarding and create a safety of culture significant? These will always be required, but does that mean they should be excluded from the assessment? Some mitigation efforts that have been in place for decades will still require ongoing investment and focus. The revised draft provides explicit guidance in the context of actual and potential impacts, but no equivalent guidance is provided for actual and potential risks and opportunities. Under certain circumstances, such as the ones described under the Amended ESRS 1, Section 3.3.1 (35), mitigation and prevention is considered in assessing the materiality of the impacts, which creates a divergence between the guidance around impacts, and risks and opportunities. This asymmetry may result in situations where an event is assessed as not material from an impact perspective (because mitigation is taken into account), while at the same time being deemed material from a financial risk perspective (because no such consideration is allowed). We advocate for explicit guidance on whether, and to what extent, mitigation, adaptation or strategic measures can influence the assessment of risks and opportunities under financial materiality. The provision of illustrative examples and alignment with other standards such as IFRS S1 and S2 will help streamline and simplify the reporting of companies operating under different jurisdictions.			
Survey	Coca-Cola Europacific Partners	Preparer (non-financial preparing a sustainability report)	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The simplification, additional flexibility and clarification around structure, incorporation by reference, and use of appendices is clear and will result in a more readable and concise report. Adhering to the specific order and structure previously required was one of the biggest challenges in gaining leadership support to implement ESRS. These changes will improve the outcome for readers and preparers.			
Survey	Coca-Cola Europacific Partners	Preparer (non-financial preparing a sustainability report)	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	The amendments related to the interaction between ESRS 2 and the topical sections reduce confusion and duplication between the topical sections and ESRS 2. The increased flexibility of how to present policies related to material topics will help increase the readability of the report. Overall this section is a lot easier to understand and implement with the proposed amendments.			
Survey	Coca-Cola Europacific Partners	Preparer (non-financial preparing a sustainability report)	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	Moving all the required datapoints into the main body disclosure requirements instead of being split between the disclosure requirements and application requirements makes the standards easier to navigate. It ensures no required datapoints are overlooked within the application requirements as readers would expect to find them all in the same place. Removal of the "may disclose" datapoints shortens the standard, makes it easier to navigate, allows practitioners to focus on crucial datapoints and will result in more comparable reports.			
Survey	Coca-Cola Europacific Partners	Preparer (non-financial preparing a sustainability report)	United Kingdom	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Removing the "may" disclosures from the guidance helps to streamline and clarify the standards and allows practitioners to focus on what is most important and required. The non-mandatory illustrative guidance is helpful in that it provides useful examples and things to consider, however we are in agreement with EFRAG that it should not be included as part of the delegated act. It's inclusion into the delegated act would likely cause unnecessary confusion in determining what is required to disclose, defeating the point of its removal. Publishing the NMIG as a separate, optional reference online is a possibility, so long as it is clear it is optional guidance only, not part of the delegated act, and that neither assurers nor regulators should use it as anything more than optional reference information provided by EFRAG. If this cannot be made sufficiently clear, the NMIG should be eliminated completely.			
Survey	Coca-Cola Europacific Partners	Preparer (non-financial preparing a sustainability report)	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We acknowledge EFRAG's efforts to balance preparers' need for simplification with the need to maintain transparency and interoperability. Alignment is achieved with IFRS S1 and S2 with the inclusion of an overarching principle related to "reasonable and supportable information available without undue cost or effort" concept. Nevertheless, the broader application under ED ESRS 1 (covering all value chain information and metrics) may reduce comparability and complicate interoperability. Conversely, IFRS reliefs not mirrored in ESRS (e.g. omission of commercially sensitive opportunities) and additional ESRS-specific reliefs (partial scope, acquisitions/disposals) create divergence. Reliefs need to be clearly mapped against IFRS equivalents, explaining differences and considering convergence where possible to ease multi-jurisdiction reporting. The absence of a time limit for partial scope reporting may reduce incentives for timely data quality improvements. Introducing a transitional period for the use of the relief could encourage progress while maintaining flexibility. Clear guidance on expected improvements and disclosures during this period would support transparency. Finally, the removal of mandatory cross-referencing to financial statements may hinder connectivity. We recommend, at minimum, mandating reconciliation disclosures for material metrics to support users in linking financial and sustainability data. Overall, while the reliefs offer meaningful simplification, targeted refinements could better balance preparer burden with the need for robust, interoperable, and decision-useful disclosures. The revised value chain cap set in July 2025 sets a cap to the information that can be requested from value chain undertakings outside of CSRS scope. This is likely to translate into greater reliance on estimates based on secondary data.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Coca-Cola Europacific Partners	Preparer (non-financial preparing a sustainability report)	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Option 1 aligns more closely with IFRS S1 paragraph 37, preserving interoperability and encouraging entities to build internal capabilities over time. However, its effectiveness depends on clear articulation with other reliefs, particularly those related to partial scope metrics, qualitative disclosures, and the use of reasonable and supportable information. We recommend EFRAG provide additional guidance and illustrative examples to help undertakings interpret and apply these interconnected reliefs consistently.			
Survey	Coca-Cola Europacific Partners	Preparer (non-financial preparing a sustainability report)	United Kingdom	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	Most of the requirements previously set out in section E1-9 have been transferred to the new section E1-11 in the Amended ESRS. This transition appears reasonable, particularly in light of the reliefs introduced in ED ESRS 1, most notably the use of "reasonable and supportable information available without undue cost or effort." However, the requirement to disclose gross anticipated financial effects, excluding the impact of mitigation and adaptation actions, presents a disconnect with internal risk management practices, which typically focus on residual risk – the actual exposure after controls have been applied. This approach may result in disclosures that do not accurately reflect the entity's true risk profile. We encourage EFRAG to provide additional guidance, including illustrative examples and decision trees, to help preparers distinguish between implemented/actual and future mitigation and adaptation actions. Without such clarity, the concept of gross impact may remain theoretical and risk misrepresenting the actual business exposure. We also note that the new guidance on how to consider remediation, mitigation, and prevention actions in the assessment of the materiality of negative impacts is not aligned with the approach taken for financial risks and opportunities. This divergence introduces complexity and may lead to inconsistencies in how risks are assessed and reported across the ESRS.			
Survey	Coca-Cola Europacific Partners	Preparer (non-financial preparing a sustainability report)	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	CCEP supports the objective of maintaining a high degree of interoperability between the ESRS and the IFRS Sustainability Disclosure Standards (ISSB S1 and S2). This is particularly important for large undertakings operating across multiple jurisdictions, such as CCEP, which are subject to both ESRS and ISSB requirements. We particularly recommend the inclusion of additional guidance on the application of the new overarching principle related to "reasonable and supportable information available without undue cost or effort", as full alignment between ESRS and IFRS S1 and S2 is not achieved due to differences in scope where this concept is applied. Clear guidance is essential to prevent inconsistent interpretations and applications by preparers and auditors. In the absence of such guidance, there is a significant risk of subjective and divergent assessments, which could undermine the reliability, comparability, and decision-usefulness of sustainability information across entities and jurisdictions.			
Survey	Coca-Cola Europacific Partners	Preparer (non-financial preparing a sustainability report)	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Coca-Cola Europacific Partners	Preparer (non-financial preparing a sustainability report)	United Kingdom	22.E2.	Comments on deleted datapoints in ESRS E2	I partially agree and partially disagree	The new draft standards are streamlined and many of the less useful and more difficult to understand and/or calculate "shall" datapoints have been removed. The biodiversity and pollution topics have been greatly improved through the elimination of datapoints unrelated to the most material and strategic topics, while still requiring information related to the biodiversity and pollution-related objectives of the EU Green Deal.			
Survey	Coca-Cola Europacific Partners	Preparer (non-financial preparing a sustainability report)	United Kingdom	22.E4.	Comments on deleted datapoints in ESRS E4	I partially agree and partially disagree	The new draft standards are streamlined and many of the less useful and more difficult to understand and/or calculate "shall" datapoints have been removed. The biodiversity and pollution topics have been greatly improved through the elimination of datapoints unrelated to the most material and strategic topics, while still requiring information related to the biodiversity and pollution-related objectives of the EU Green Deal.			
Survey	Coca-Cola Europacific Partners	Preparer (non-financial preparing a sustainability report)	United Kingdom	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Most of the 6 datapoints that have been switched from "may" to "shall" will not add any meaningful reporting burden as they are already part of disclosed datapoints (the water datapoints). Disclosure of a biodiversity transition plan is dependent upon having a public biodiversity transition plan already. While it is not yet common to have a transition plan, ESRS does not mandate the creation of one, only the disclosure of one if it exists and is already public. However, switching G1 business conduct confirmed incidents from "may" to "shall" does introduce new information that was not previously required. The current definitions of "corruption" and "substantiated" allow for a level of subjectivity and variation between entities that reduces the comparability of the information.			
Survey	Coca-Cola Europacific Partners	Preparer (non-financial preparing a sustainability report)	United Kingdom	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	ESRS 2- BP1, ES-4, and ES-5 clarify existing required disclosures and do not require the calculation or gathering of new information. However, E2-4 16 b ii asks organisations to disclose the quantity of microplastics connected to downstream value chain, resulting from larger plastics breaking down, but provides no guidance on how to calculate this information. Unlike GHG emissions, there is no generally accepted calculation methodology for microplastics generated in this manner. Until this is developed, this specific disclosure will likely result in information that is inconsistent and incomparable between organisations.			

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Survey	Coca-Cola Europacific Partners	Preparer (non-financial preparing a sustainability report)	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	We support the principle of "fair presentation" throughout the disclosure requirements. This principle will complement the materiality filter and will reduce unnecessary reporting and enhance interoperability with the ISSB standards.			
Survey	Coca-Cola Europacific Partners	Preparer (non-financial preparing a sustainability report)	United Kingdom	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	We agree that that change of threshold will result in more useful information and will not result in an increased reporting burden as this information should be readily available.			
Survey	Coca-Cola Europacific Partners	Preparer (non-financial preparing a sustainability report)	United Kingdom	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	As this topic was not material to us, we do not have direct experience attempting the required calculations. We will defer to those that participate in the field test on adequate wages.			
Survey	Coca-Cola Europacific Partners	Preparer (non-financial preparing a sustainability report)	United Kingdom	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Since nature-related metrics are still relatively new and there are no widely used metrics to reference, it is particularly useful to give guidance related to what metrics entities should consider related to E4 impacts. TNFD and SBTN are the two most widely used that would be worth referencing in addition to those already included in the guidance.			
Survey	Coca-Cola Europacific Partners	Preparer (non-financial preparing a sustainability report)	United Kingdom	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Coca-Cola Europacific Partners	Preparer (non-financial preparing a sustainability report)	United Kingdom	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	The replacement of datapoints with PAT provisions is effective in reducing reporting burden while still requiring entities to be transparent about their payment practices with SMEs. The remaining requirement to report percentage of payments aligned with the standard terms provides useful information. The following data point, number of legal proceedings currently outstanding for late payments will be difficult to track and does not indicate the decision the courts made in relation to the cases, which makes the information provided less useful. We suggest making this requirement contingent on the previous one. Entities should only be required to report this information if they are reporting alignment below a certain defined percentage			
Survey	MSCI ESG Research	User (analyst, data provider, rating agency, etc.)	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We support the overall direction of the amendments, which provide greater clarity and flexibility in the application of the Double Materiality Assessment (DMA) while aiming to reduce unnecessary complexity. However, sector specific guidance is needed for preparers to determine which information is relevant. This is particularly important with respect to the value chain boundaries in the financial sector.			
Survey	MSCI ESG Research	User (analyst, data provider, rating agency, etc.)	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	MSCI ESG Research	User (analyst, data provider, rating agency, etc.)	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We support the proposed amendments, which aim to improve readability, clarity, and coherence of sustainability reports. These changes can make reports more user-friendly by ensuring that key information is both accessible and better integrated with broader corporate disclosures. That said, further guidance on the order and structure of "executive summaries" and "appendices" would enhance clarity and comparability of reports. These additional sections should focus on the most important data. Currently, each preparer uses their own approach which makes it difficult for users to find the relevant information and compare it between reports.			
Survey	MSCI ESG Research	User (analyst, data provider, rating agency, etc.)	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We welcome the restructuring of ESRS 2 and its interaction with topical standards. We acknowledge that a more principles-based approach can improve usability for preparers while supporting consistency of application. The simplification of General Disclosure Requirements and the reduction of prescriptive datapoints for policies, actions, and targets (PAT) can reduce administrative burden and enhance flexibility. However, it is important that these changes do not compromise the readability and comparability of disclosures. The disclosures should still be provided at a level which allows users to understand and assess material impacts, risks, and opportunities (IROs). While higher degrees of aggregation at the PAT level may be useful for preparers, this should not come at the expense of clear insights into how material IROs are being addressed.			
Survey	MSCI ESG Research	User (analyst, data provider, rating agency, etc.)	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	The amendments will improve clarity and accessibility by eliminating "may disclose" datapoints and re-organising mandatory requirements. These steps will reduce ambiguity, improve comparability, and make disclosures more decision-useful for investors. Voluntary standards do not help to close existing data gaps. Instead, they risk widening disparities between SMEs and listed companies, leaving smaller firms underrepresented in sustainability data. This undermines comparability and limits investors' ability to access information across the full investment universe.			
Survey	MSCI ESG Research	User (analyst, data provider, rating agency, etc.)	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We welcome the decision to allow undertakings to use estimates, rather than systematically requiring direct data from suppliers and customers. EFRAG should however require transparency as to which data are estimates and how they were derived.			
Survey	MSCI ESG Research	User (analyst, data provider, rating agency, etc.)	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We note the introduction of "undue cost or effort" relief. From our perspective, ensuring interoperability with ISSB standards is key. Against this backdrop, transparency on where data is partially disclosed and clear explanation of the rationale for partial disclosure should be required.			
Survey	MSCI ESG Research	User (analyst, data provider, rating agency, etc.)	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Enhancing interoperability between ESRS and IFRS S1 and S2 improves comparability for global investors and reduces duplication for preparers. We welcome the adoption of the fair presentation framework, alignment of materiality definitions, financial consolidation approach for GHG emissions, and permanent reference to ISSB IFRS S1 and S2 standards. These changes strengthen consistency and comparability across jurisdictions. However, we are concerned that some of the additional reliefs introduced in ESRS, which go beyond those in IFRS S1 and S2, risk weakening interoperability. In particular, wider use of estimates or partial-scope reporting could reduce data quality, comparability, and ultimately decision-usefulness for investors. Any such reliefs must be an exception and must be complemented with information on how coverage will be improved over time.			
Survey	MSCI ESG Research	User (analyst, data provider, rating agency, etc.)	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	MSCI ESG Research	User (analyst, data provider, rating agency, etc.)	United Kingdom	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	The objective of reducing reporting burdens must be balanced with the need to safeguard quality and integrity of sustainability disclosures. Our internal mapping suggests that the revised datapoint set is largely consistent with this balance, with most decision-useful indicators retained. Additional guidance for the financial sector on value chain boundaries would support consistent application of DMA and disclosure requirements. Moreover, the inclusion of a limited set of basic financial datapoints (e.g., revenue and asset breakdown by operating segment) could further strengthen comparability and enhance the usefulness of disclosures for investors.			
Survey	MSCI ESG Research	User (analyst, data provider, rating agency, etc.)	United Kingdom	23.	Six datapoints exceptionally moved from “may” to “shall” In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, “may disclose” datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	MSCI ESG Research	User (analyst, data provider, rating agency, etc.)	United Kingdom	25.	Emphasis on ESRS being a “fair presentation” reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	MSCI ESG Research	User (analyst, data provider, rating agency, etc.)	United Kingdom	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	MSCI ESG Research	User (analyst, data provider, rating agency, etc.)	United Kingdom	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG’s approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a “human rights policy” in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree				
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: “[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process”.Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in “Gross versus Net” as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We acknowledge the efforts made by EFRAG, including the work of the SRB and SR TEG, in developing the Exposure Drafts and refining the DMA. The proposed changes represent clear progress toward greater clarity and usability, and we welcome several important improvements. Recognition of existing processes and data: We appreciate that companies can rely on structured stakeholder engagement conducted as part of due diligence to inform the materiality assessment. This pragmatic approach avoids duplication of effort and reflects how sustainability processes are embedded in companies. Additional stakeholder input should only be sought when existing information is insufficient or outdated. Flexibility in methodology: We support the option to adopt either a top-down or bottom-up approach, enabling alignment with internal governance and decision-making processes. Proportionality and qualitative assessment: We welcome the recognition that quantitative scoring is not always required and that qualitative analysis can suffice, particularly where metrics are difficult to obtain or a qualitative understanding is more appropriate. Despite these improvements, some aspects of the DMA process continue to raise concerns regarding clarity, consistency, and implementation effort. The separation of practical guidance from normative provisions risks reducing usability in real-world application. Without clear documentation requirements and harmonized guiding criteria, assessments may be inconsistent, subjective, or poorly evidenced. Reliance on external guidelines also creates interpretative uncertainty for entities seeking consistent and verifiable compliance. To address these risks, we recommend integrating practical guidance into the core standard, specifying minimum documentation requirements, and including clearer normative references. Companies should transparently document how they carried out the materiality process, including information sources, criteria applied, and reasons for key decisions, especially when excluding potentially relevant topics. This approach would strengthen internal governance and provide auditors, investors, and regulators with the necessary information to evaluate reliability, ultimately improving consistency, comparability, and the overall usability of DMA.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We acknowledge the efforts made by EFRAG, including the work of the SRB and SR TEG, in refining the DMA. The proposed changes show progress toward greater clarity and usability, and we welcome improvements such as the recognition of existing internal processes and structured stakeholder engagement, flexibility in methodology, and the possibility to rely on qualitative assessment. However, some aspects remain unclear or complex. While the guidelines recognize existing actions, without clearer rules, minimum documentation requirements, and integration of practical guidance into the core standard, the assessment process may still result in inconsistent, subjective, or poorly evidenced decisions. This can limit comparability and the effectiveness of DMA as a tool for planning and reporting.			
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We acknowledge the efforts made by EFRAG, including the work of the SRB and SR TEG, in enhancing the ESRS framework. The proposed changes show progress toward greater clarity, usability, and flexibility, supporting more pertinent and concise reporting and improved connectivity with overall corporate reporting. Positive elements include recognition of existing internal processes, structured stakeholder engagement, flexibility in methodology, proportionality in assessment, and strengthened mandatory datapoints. However, certain aspects remain unclear or complex. The practical applicability of the DMA still raises concerns regarding clarity, consistency, and documentation requirements. The Fair Representation principle lacks precise definition and guidance, introducing subjectivity and potential inconsistencies. Reliance on non-mandatory illustrative guidance (NMIG) can also create interpretative uncertainty. Overall, while the amendments contribute to readability and connectivity, additional clarifications and stronger guidance are needed to ensure consistency, comparability, and practical usability across organizations.			
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We acknowledge the efforts made by EFRAG to enhance clarity, usability, and flexibility in the ESRS framework. The proposed modifications improve readability, support more pertinent reporting, and strengthen certain mandatory disclosures. However, the balance between prescriptiveness and preparers' effort versus the need for relevant and comparable information remains only partially achieved. Concerns persist regarding the complexity of the DMA, unclear guidance on Fair Representation, potential subjectivity in disclosures, and reliance on non-mandatory illustrative guidance. Without clearer rules, minimum documentation requirements, and detailed practical guidance, preparers may still face interpretative uncertainty, inconsistent application, and increased effort to achieve comparability and reliability across organizations.			
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	While we recognize that the Non-Mandatory Illustrative Guidance (NMIG) contains useful annexes, examples, and flowcharts that support the preparation of sustainability statements, some formulations remain overly generic or ambiguous. This can create interpretative uncertainty, increase preparers' effort to align with auditors, and risk inconsistent application. Therefore, while the NMIG contributes to clarity and accessibility, further refinement is needed to ensure that guidance is clear, practically applicable, and consistently interpreted across organizations.			
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We acknowledge that the proposed amendments aim to improve alignment with the SFDR and to reduce preparers' effort while maintaining transparency. Some measures provide useful relief and enhance practical applicability. However, certain aspects, such as the remaining complexity of the DMA, unclear guidance on Fair Representation, and interpretative uncertainties, limit the overall effectiveness. While the amendments partially balance reduced burden and transparency, further clarifications and more precise guidance are needed to fully achieve the intended objectives, safeguard transparency, and support consistent reporting in line with the EU Green Deal and interoperability with IFRS S1 and S2.			
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We acknowledge that the proposed relief for the lack of high-quality data provides necessary flexibility for preparers, especially where metrics are difficult to obtain. However, without clearer guidance and minimum documentation requirements, there remains a risk of inconsistent, incomplete, or subjective reporting. While the measure partially balances flexibility and the need to avoid loss of information, further clarifications are needed to ensure reliable, comparable, and meaningful disclosures.			

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Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	We express a clear preference for Option 2, which prioritizes qualitative disclosure while providing companies with the voluntary possibility to quantify such effects if they consider it relevant and appropriate, We believe that this approach offers several significant advantages. First, it ensures a high degree of flexibility, which is particularly important given the current diversity in company maturity, and reporting capacity for whom mandatory quantitative disclosure of financial impacts could represent an excessive and disproportionate burden. Second, Option 2 enhances the practical applicability and inclusiveness of the ESRS framework across a broad range of organizations. Moreover, we recognize that achieving full comparability in quantitative financial impact disclosures is extremely challenging. Variations in methodologies, assumptions, and data availability make it unlikely that such figures will be directly comparable across entities in the short to medium term. As a result, imposing strict quantitative requirements risks generating information that is inconsistent, potentially misleading, or overly sensitive, especially where disclosure may touch upon confidential or commercially sensitive data. Option two effectively addresses preparers' concerns by allowing organizations to manage disclosure in a way that respects confidentiality and the limitations of current measurement capabilities, while still encouraging transparency through qualitative explanations. This reduces the risk of arbitrary or incomplete reporting, promoting more reliable and meaningful communication. For these reasons, we strongly recommend adopting Option 2 as the preferred approach for disclosing anticipated financial effects in the ESRS.			
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	We acknowledge that the amended paragraphs 40, 41, and 42 of ESRS E1 represent progress toward simplification and provide some flexibility for preparers. However, certain aspects remain complex, and without clearer guidance and minimum documentation requirements, there is still a risk of inconsistent application, interpretative uncertainty, and increased reporting effort. While the amendments partially balance preparers' efforts and users' information needs, further clarification is needed to ensure practical usability, comparability, and meaningful disclosure.			
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We acknowledge that the proposed amendments improve interoperability with other frameworks and represent progress toward simplification. However, some aspects remain complex, and interpretative uncertainty persists due to unclear guidance, reliance on non-mandatory illustrative materials, and remaining documentation requirements. While the amendments partially balance interoperability and simplification, further clarifications are needed to ensure consistent, practical, and usable reporting across organizations.			
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	We acknowledge that the proposed reduction of "to disclose" data, based on relevance, helps decrease preparers' burden while maintaining key information. However, some simplifications risk omitting important disclosures necessary for meaningful transparency and comparability. Without clearer guidance and documentation requirements, there remains a risk of inconsistent application and reduced usefulness of reported information. The amendments partially balance burden reduction and preservation of essential information, but further clarification is needed to ensure alignment with the objectives of the EU Green Deal.			
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	This change reflects a recognition of the transversal relevance of these datapoints across all types of organizations, regardless of size or sector. By making these disclosures mandatory, the standards promote greater consistency and comparability of sustainability information, which is essential to enable meaningful benchmarking and informed decision-making by stakeholders. We believe this enhancement will support the overarching goal of the ESRS framework—to drive real, measurable change in corporate sustainability performance. For these reasons, we fully support this amendment and encourage its prompt and effective implementation.			
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We acknowledge that explicitly requiring correct presentation in ESRS sustainability statements can support a more effective materiality filter, helping ensure relevant disclosures and reducing the risk of excessive information. However, without clearer guidance and minimum documentation requirements, there remains a risk of inconsistent application and interpretative uncertainty, which may limit the intended benefits of this requirement.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Even for financial institutions, reporting both intensity and absolute emissions targets is necessary to provide a complete understanding of climate progress. Intensity targets alone may mask increases in absolute emissions, while absolute targets capture total impact. A sector-specific exception could create inconsistencies and unfair treatment compared to other sectors. Although estimating absolute targets may require assumptions, such complexities exist across all sectors and do not justify omitting these disclosures, which remain relevant for investors and stakeholders evaluating climate-related performance.			
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	We acknowledge that modifying the country-by-country disclosure threshold may reduce preparers' burden and improve practical applicability. However, depending on the specific level of the threshold, there could be a risk of omitting relevant information necessary for stakeholders to fully understand the company's geographic exposure, tax contributions, and operational impact. While the amendment partially balances reporting effort and transparency, further clarification is needed to ensure consistency, comparability, and meaningful disclosures across organizations.			
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	We acknowledge that the proposed modification to the methodology for calculating adequate remuneration outside the EU aims to improve clarity and consistency. However, depending on the approach, there may still be challenges in comparability and practical implementation across different jurisdictions. While the change partially enhances usability and alignment, further guidance may be needed to ensure reliable, consistent, and meaningful reporting of remuneration practices.			
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	We acknowledge that integrating the SFDR Principal Adverse Impacts (PAI) into the amended ESRS represents progress toward alignment with existing regulatory frameworks and can support more consistent reporting. However, some aspects remain complex, and the guidance could benefit from further simplification and clearer instructions to avoid interpretative uncertainty and reduce preparers' effort. Streamlining the mapping of SFDR PAI to ESRS disclosures, providing clearer examples, and minimizing reliance on external guidance would enhance usability while maintaining transparency and comparability.			
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We acknowledge that the revision of AR 26 in the amended ESRS E4 improves clarity and provides more structured guidance. However, some aspects remain complex and could create interpretative uncertainty for preparers. While the changes partially enhance usability and alignment with other ESRS requirements, further clarification and practical examples would be beneficial to ensure consistent, comparable, and meaningful reporting.			
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	We acknowledge that removing the voluntary disclosure on adjusted gender pay gap may reduce preparers' burden and simplify reporting. However, such information can still be relevant for stakeholders seeking a comprehensive understanding of gender equality and pay practices. While the elimination partially balances flexibility and reporting effort, providing clear guidance on alternative ways to ensure transparency on gender pay disparities would help maintain meaningful disclosure.			
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	While the effort to make the standards more flexible and applicable to SMEs is recognized, concerns remain regarding clarity, practicality, and proportionality, which could still impose a significant burden on smaller companies.			
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

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Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

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Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Sustainability Makers	Business association (other than association of financial institution)	Italy	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We appreciate the effort that EFRAG has put into trying to simplify and clarify the ESRS requirements. While the DMA simplification proposals by EFRAG are a first step in the right direction, we would like to emphasis that the proposed changes however will not result in effort reduction for wave 1 companies who already report based on ESRS. We would also like to highlight the following points based on the listed changes: 1. Strengthening the top-down approach is a welcome change, especially for large multinational companies with diverse portfolios as it allows for a more practical implementation. 2. Giving more prominence to information materiality might help to reduce discussions with auditors. However, the definition of when information is material is very broad. Not only are primary users not further defined but point (b) „necessary for users of general purpose" opens the discussion on what constitutes material information even further (especially considering the new introduced "fair presentation" principle). The proposed wordings risk an expansion of the information provided by companies as also (non-material) sustainability information might be interesting/ necessary for a very broad group of users. "Decision-usefulness" should be key for sustainability information as well. Further specification and explanations are therefore needed. 5. While we support shifting sustainability reporting from a "compliance" to a more "principle-based" approach by referencing the fair presentation principles, further clarification on the intention and scope of the fair presentation principle is needed. The "fair presentation" concept in combination with the "materiality of information" (see also comment related to point 2) need precise definition to avoid subjectivity and discussions on materiality and to minimize audit burden.			
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We appreciate the intention of clarifying remediation, mitigation and prevention implemented action, however EFRAG's proposed approach on assessing potential and actual impacts raises several concerns regarding complexity and practical implementation. Disregarding mitigation actions when assessing impacts during the reporting period could lead to overreporting. As it is unclear how "significant ongoing mitigation actions" should be interpreted, companies may end up disclosing numerous potential negative impacts that, in reality, are not material given their low likelihood and limited severity once (significant) mitigation measures are taken into account. It should generally be possible to consider the effectiveness of actions and controls directly during the assessments as it is already common practice in the already conducted DMAs and published statements. Moreover, the framework outlined in Appendix C further adds to the complexity and fails to provide clear guidance on how to weigh mitigation and prevention actions when evaluating potential negative impacts. Appendix C also risks practical implementation difficulties for companies and auditors as it suggests a checklist approach rather than being principle-based requiring the need for additional documentation on how that guidance was followed. Given these challenges, we advocate for deleting Appendix C. There is also the need to still address gross / net in relation to the risk assessment as this has led to many discussions in preparing the DMA. The approach should be aligned with financial reporting practices, focusing on net assessments and reporting.			
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	While we appreciate the proposed amendments and the increased flexibility, such as the encouraged use of appendices, these modifications merely clarify existing possibilities rather than deliver meaningful simplification. The changes, though positive for improving document structure and readability, do not contribute to substantially reducing implementation burdens or overall reporting complexity.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The revised architecture and clearer relationship between ESRS 2 and the topical standards improve the framework's overall accessibility and practical application. By simplifying GDRs, reducing mandatory PAT data points, and eliminating duplications, the amendments reduce complexity enabling preparers to better navigate the ESRS requirements. However, a "drastic reduction of 'shall datapoints PAT" is overstating the changes especially considering the type of datapoints deleted and the need for esp. wave-1 companies to rework their approaches to reflect on the new reformulations. Moreover, certain changes (e.g. significant resources related to key actions) might actually risk broadening the scope of information to be disclosed and related efforts, going against the simplification and reduction aim of EFRAG. For further details, please refer to the uploaded Excel Template.			
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We agree that the proposed amendments enhance the clarity and accessibility of the ESRS. The changes make it easier for companies to identify mandatory content and increase the usability (especially for first-time reporters). By positioning mandatory Application Requirements directly below their corresponding Disclosure Requirements, the new layout creates a more cohesive and user-friendly document structure that reduces navigation complexity. However, the changes do not reduce the fundamental reporting requirements that companies must fulfill. Moreover, we strongly object to the introduction of new mandatory disclosures, as this contradicts the EU Commission's request and undermines the goal of reducing reporting requirements. Additional mandatory data points should be removed completely. We would recommend reviewing and streamlining the language across the standards again based on the following points: •Some amendments seem to indicate rather behavioral obligations than disclosure requirements (e.g. E1-2 AR 5 for para. 18, ESRS 1, Paragraph 84c) contradicting Paragraph 5 stating that "the ESRS do not mandate behavior but set Disclosure Requirements[...]". •Additionally, some previously changed datapoints were changed from may to shall due to the reformulation (S1-3 new para. 19 (b)) •Sometimes the terms "shall consider", sometimes "shall" and sometimes "may" are used in the application requirements creating confusion on whether it is mandatory or not.			
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1; G1	NMIG can serve as an orientation tool—especially for preparers in the early stages of implementation—by illustrating how disclosures might be structured or interpreted. However, the effectiveness of the NIMG depends on universal recognition of its non-binding status. Its non-binding status should be explicitly stated and uniformly understood by preparers and auditors, with no implied obligation to follow the provided examples. To reinforce this position, NMIG should be explicitly excluded from audit procedures, kept separate from legislative text and be strictly aligned with the ESRS standards through robust due process. This approach will ensure NMIG serves as a helpful reference tool while preventing unintended reporting burdens and complexity. However, we do still see the need for sustainability assurance standards for auditors to harmonize audit practices and to minimize the audit burden. Audit firms across member states and within countries are currently inconsistent in the level of detail they require for (limited) assurance engagements (e.g. evidence request) and in the way they interpret regulatory requirements. To avoid divergences between audit firms and between member states, the EU Commission should provide timely assurance standards for sustainability reporting as it was originally foreseen in the CSRD (i.e. by 2026). On G1: The table on standard payment terms (G1-6) should be deleted. Disclosing information of the standard payment terms by "main category of suppliers, including SME's" is not feasible and does not provide any value. The standard payment terms generally do not make any differentiation between supplier types. Additionally, for multinational companies with thousands of suppliers globally, a categorization of suppliers into SMEs and Non-SMEs is not possible.			
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	While welcoming the removal of the systematic preference for direct data in value chain metrics, we see the other proposed reliefs related to metric reporting (i.e. "undue cost or effort" principle and "partial scope" reporting) very critical. While we understand that it might reduce the effort for smaller companies (i.e. first-time reporters), we think that the proposed "undue cost or effort" principle and "partial scope" reporting significantly weaken data quality, availability and comparability, undermining sustainability reporting's role in the sustainability transformation and an even level playing field. We therefore propose eliminating these reliefs. Instead, we think that there are other measures to further facilitate implementation and reporting without weakening sustainability reporting in such an extreme sense. This includes: •Further simplify and reduce qualitative datapoints – focus should be on quantitative reporting •Fewer mandatory indicators but clearly defined by the ESRS •Removing current anticipated financial effects from the requirements Moreover, other measures to facilitate metric reporting that companies can make use of already include : •Using estimates where real and precise data is not yet available (incl. clearly describing assumptions and limitations) •Use of materiality thresholds as part of data reporting (as in financial reporting) •Reporting only topics that are material based on the results of the DMA (incl. materiality of information filter) •The availability of phase-ins for certain (more complex) requirements (e.g. disclosures on social dialogue and work-life balance; phase-ins for undertakings < 750 employees) We think that it is important to advance sustainability reporting by promoting greater accuracy, comparability, and reliability and to reach a situation in which sustainability has a status comparable to that of financial information. Designed and implemented the right way, the sustainability reporting regulations can be a strategic asset for the EU's sustainability transformation and competitiveness.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	While supporting the explicit mentioning of excluding (immaterial) activities from metric calculation that are not a significant driver of IROs, we see the other proposed reliefs related to metric reporting (i.e. "undue cost or effort" principle; "partial scope" reporting) very critical. While we understand that it might reduce the effort for smaller companies (i.e. first-time reporters), we think that the proposed "undue cost or effort" principle and "partial scope" reporting significantly weaken data quality, availability and comparability, undermining sustainability reporting's role in the sustainability transformation and an even level playing field. We therefore propose to eliminate these reliefs. We think that there are other measures to further facilitate sustainability reporting without weakening it in such an extreme sense. This includes: •Further simplify and reduce qualitative datapoints – focus should be on quantitative reporting •Fewer mandatory indicators but clearly defined by the ESRS •Removing current anticipated financial effects from the requirements Moreover, other measures to facilitate metric reporting that companies can make use of already today include: •Using estimates where real and precise data is not yet available (incl. clearly describing assumptions and limitations) •Use of materiality thresholds as part of data reporting (as in financial reporting) •Reporting only topics that are material based on the results of the DMA (incl. materiality of information filter) •The availability of phase-ins for certain (more complex) requirements (e.g. disclosures on social dialogue and work-life balance; phase-ins for undertakings < 750 employees) We think it is important to advance sustainability reporting by promoting greater accuracy, comparability, and reliability and to reach a situation in which sustainability has a status comparable to that of financial information. Designed and implemented the right way, the sustainability reporting regulations can be a strategic asset for the EU's sustainability transformation and competitiveness.			
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	We strongly oppose mandatory disclosure of current and anticipated financial effects in sustainability reporting, as it goes beyond any comparable financial reporting requirements and creates unnecessary burden, while offering limited comparability across organizations. Fundamental challenges include data uncertainty, inability to isolate specific risks, and lack of mature assessment methodologies, while at the same time the definition of "current and anticipated financial effects" remain unclear. Also, ISSB and their examples lack in our opinion clear definition and do not provide clarity based on the following reasons: •it's uncertain whether anticipated financial effects refer to "monetary risk quantification" (if so, gross or net?) or something else entirely; •it is also not clear, what / where is the boundary compared to (significant) current / anticipated CapEx/OpEx related to actions managing the risk/opp. and which is also another disclosure requirement. Additionally, the requirements pose significant legal and practical risks due to potential misinterpretation of forward-looking statements). The requirements to disclose current and anticipated financial effects should therefore be removed.			
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Overarching: We strongly oppose mandatory disclosure of anticipated financial effects in sustainability reporting (also climate-related), as it goes beyond any comparable financial reporting requirements and creates unnecessary burden, while offering limited comparability across organizations. While also a requirement of the IFRS Sustainability Disclosure Standards, the lack of clear and harmonized guidance leads to inconsistent and unreliable information and the practical use of such granular data remains questionable and does not justify the significant effort required from companies. Additionally, the disclosure requirement can also reveal sensitive strategic information, leading to competitive disadvantages for European companies. See also our comments regarding question #19.			
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	Generally, we don't think that the amendments have helped to enhance the interoperability with the ISSB Standards significantly (e.g. extended scope of "undue cost and effort principle" for ESRS compared to ISSB, failing to align GHG emission boundaries with GHG Protocol). However, we would also like to point to the fact that the ISSB Standards should not be considered as "gold standard". To streamline global reporting requirements, the focus should be on a constructive collaboration between standard setters such as EFRAG, ISSB and other government organizations. This is why we recommend, as soon as EFRAG finalizes its recommendation for simplified ESRS, that the standard setters work towards full convergence. Furthermore, in the long-term, they should develop a globally accepted sustainability reporting standard similar to financial reporting – this is even more essential from a level playing field perspective than trying to create interoperability.			
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				

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Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	Overarching: The removal of voluntary as well as duplicative datapoints do not automatically result in a correspondingly reduced reporting burden or scope. The 57% datapoint reduction that has been communicated is in our view misleading when it comes to effort reduction. Our estimates rather point at a (maximum) of 5-10% effort reduction for wave 1 companies (in the long-run). Many datapoints that were deleted are either redundant or not associated with major effort since other information still needs to be reported (e.g. water consumption and net revenue are reported anyways, making a calculation of intensity values not difficult). Also, some reformulations increase reporting efforts as esp. Wave-1 companies are now required to review their approach and interpretation with their auditors. Hence, we urge EFRAG to rectify their communication messages around 57% datapoint and to recalculate the actual reduced reporting volume under the amended ESRS by involving preparers. Clear communication of this distinction is crucial to prevent misunderstandings about the actual extent of simplification. We think that the qualitative datapoints can clearly be further reduced and simplified (e.g. further deletion of datapoints on policies and stakeholder engagement). The report can still be significantly condensed, as many data points are unnecessary and contribute to its length, deterring stakeholders from reading it. It's essential to focus on well-harmonized and clearly defined quantitative data points and provide clear explanations of developments for external reporting. Furthermore, the introduction of new mandatory disclosure requirements contradicts the revision's simplification objectives and should be removed.			
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We do not agree with moving datapoints from may to shall. The ESRS revision must strictly focus on the reduction of reporting requirements, with no introduction of new mandatory disclosures or conversion of voluntary datapoints to mandatory ones. We especially do not agree with the decision to make "the number and nature of the confirmed incidents of corruption or bribery" (G1 new para. 6) mandatory. Not only are the scope and definition of incidents subject to interpretation, but disclosing a simple numerical number on the nature & number without linking the often underlying complexities of the cases can lead to misunderstandings. Moreover, any severe cases should be already covered by financial and risk reporting requirements in the financial report. For G1- Training of procurement team: It is unclear whether the requirement "Training of procurement team" is intended to cover topics such as anti-corruption and anti-bribery, or if it is solely focused on improving suppliers' sustainability performance. A clear thematic separation between compliance-related topics (e.g. corruption, bribery) and broader sustainability aspects is necessary to avoid ambiguity. The scope of the requirement must be clearly defined.			
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We strongly disagree with the introduction of new mandatory datapoints. The ESRS revision must strictly focus on the reduction of reporting requirements, with no introduction of new mandatory disclosures or conversion of voluntary datapoints to mandatory ones. We especially disagree with the introduction of the new datapoints in E5 due to the following reasons: •The new metrics impose additional reporting burdens as resource inflow and outflow need to be reported on a more granular level, which increases the data requirement again and thus require extensive and costly IT development or resource-intensive manual reporting processes •The introduction of new terms such as "strategic" and "key" adds significant uncertainty due to their lack of clarity •Disclosing this information on purchased (critical/strategic) materials is sensitive information leading to competitive disadvantages for European companies			
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	While we support shifting sustainability reporting from a "compliance" to a more "principle-based" approach by referencing the fair presentation framework, further clarification on the intention and scope of the fair presentation principle is needed (especially against the background of relevance of sustainability reporting for different stakeholder groups). The "fair presentation" concept in combination with the "materiality of information" (see also comments for question 11) need precise definition to avoid subjectivity and discussions on materiality and to minimize audit burden. We also see the risk that the concept of fair presentation might extend Board members' responsibility beyond compliance with standards to ensuring information is presented fairly to all stakeholders. While fair presentation is well-established in financial reporting, its boundaries in sustainability reporting are less defined, creating a grey area that could lead to litigation if stakeholders dispute the adequacy of the provided information.			
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	We strongly disagree with the proposal to change the threshold for the disclosure as the European Commission's intention to reduce reporting burdens is not achieved by this change. While the intent to gather more granular data is understandable, this change will, in many cases, significantly increase both the reporting requirements and the audit scope. Changing the reporting requirement from "50 employees and 10% of total headcount" to the "top 10 largest countries by employee headcount (if >50 employees)" will force many multinational companies to report on more countries than before. Each new country added to the reporting list creates its own unique challenges for data collection, especially since there are often large differences between the established data infrastructure and IT systems (especially in relation to the disclosures for S1-7 Social Dialogue (former S1-8)).			
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree				

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Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	We would advocate for the opposite approach: the adjusted gender pay gap should be the mandatory datapoint, while the unadjusted gap should either be made voluntary or eliminated. The overall aim is to provide transparency on whether a company pays an equal wage for the same type of work, no matter the gender (i.e. equal pay for equal work). While the adjusted gender pay gap compares gender pay gap based on the same job type, the unadjusted pay gap only compares men and women overall. Depending on the industry, this can lead to a distorted picture. Additionally, including benefits in the calculation further distorts the pay gap as they are managed individually by the respective countries independently of gender. For meaningful and comparable reporting, the adjusted pay gap is the more accurate metric.			
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	We appreciate the deletion of former paragraph 33(a) as it provided limited insights and was difficult to interpret in a decision-useful way. However, we also question the relevance and practicality of the remaining datapoint on "standard payment terms". The percentage of payments made under "standard terms" is hard to interpret and doesn't yield useful conclusions regarding impacts on suppliers. Additionally, disclosing information of the standard payment terms by "main category of suppliers, including SME's" (as also suggested in the NMIG) is not feasible as our financial systems do not track suppliers by size, and implementing such a classification would require significant effort. Moreover, our standard payment terms generally do not make any differentiation between supplier types. Similarly, the requirement to report legal proceedings due to late payments (former ESRS G1-6 §33c) provides limited value without contextual information such as delay reasons or materiality thresholds. Since material cases are already covered in legal risk reporting, including this information in sustainability reports creates unnecessary duplication.			
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The ESRS 1 cross-cutting standard continues to be especially important, as it lays the foundation for the sustainability statement. While certain changes introduce more clarity or strengthen pragmatic and focused sustainability reporting, others increase the complexity and risk limiting the comparability of sustainability information. We especially oppose the proposed "undue cost or effort" principle and "partial scope" reporting as they will significantly weaken data quality, availability and comparability, undermining sustainability reporting's role in the sustainability transformation and an even level playing field. We therefore propose to eliminate these reliefs. We think that there are other measures to facilitate implementation and reporting without weakening sustainability reporting in such an extreme sense.			
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Reducing the number of datapoints (e.g. for MDR-P and GOV disclosure requirements) and streamlining the requirements between ESRS 2 and the topical standards are perceived positively. However, we would like to point out the following issues: •The requirements on disclosing current and anticipated financial effects should be removed (see also response to questions 19 and 20) •The scope of financial resources for actions has been widened, which increases complexity •A further reduction of qualitative datapoints should be possible (e.g. related to GDR-P, IRO-1, SBM-1)			
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The proposed structural changes are received positively and are welcomed as it results in a clearer representation and reduced complexity compared to the original distribution of requirements. Also the removal of the operational control concept is considered a relief for many companies as it reduces the documentation effort. However, a number of key issues remain: •The proposed changes in reporting on financial resources related to the transition plan and actions increase the reporting burden. The proposed formulation seems to indicate that the complete financial and investment planning needs to be disclosed and the ranges of short-, medium and associated long-term CapEx/OpEx are an extension of reporting requirements, going against the aim of reducing the reporting requirements. Not only are future financial resources always anticipated, but the requirements go beyond anything that is required in financial reporting. •Changes in reporting on climate scenario analysis (i.e. application requirements for climate-related physical and transition risks) indicate rather behavioural obligation instead of being only reporting requirements •More clarity on how to treat leasing in GHG emission reporting would be appreciated. •As intensity values are frequently asked by external stakeholders, we would suggest keeping the KPI.			
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The KPI "Water intensity" was removed without specific reason. As the "intensity KPIs" are frequently asked by external stakeholders, we would suggest keeping the KPI as there is anyway no real reduction in reporting effort associated with the disclosure of this KPI (water consumption and net revenue data is needed anyway).			
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	While we appreciate the streamlining of the requirements and removal of duplicative requirements, we would suggest on the one hand to consider keeping quantitative datapoints in the standard that are commonly asked also by external stakeholders (e.g. number of sites near or in protected areas). In addition, the impact (own operations) on the biodiversity can only hardly be evaluated without analyzing the sites near or within a protected area. On the other hand, the requirement to disclose financing effects of biodiversity offsets in monetary terms (direct and indirect costs) should be deleted. The cost of offsets does not reflect whether a company is effectively reducing its harm to ecosystems, as high spending does not always mean real ecological benefits. Offset prices vary and lack standardized valuation, potentially making financial reporting inconsistent and misleading. Transparency on risks and impacts showcase how operations affect biodiversity, rather than disclosing financial compensation to overshadow the need for real impact reduction.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The draft introduces several issues that create additional challenges for companies: •New metrics impose additional reporting burdens as resource inflow and outflow need to be reported on a more granular level, which increases the data requirement again •The introduction of new terms such as "strategic" and "key" adds significant uncertainty due to their lack of clarity •Disclosing this information on purchased (critical/strategic) materials is sensitive information leading to competitive disadvantages			
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Please see answers to questions 27 and 31 on why we do not think that the changes result in significant simplification. Additionally, health and safety related metrics and definitions in the glossary should be reviewed as there are still terms which are not clearly defined and/or consistently used on this topic (see also feedback in Excel).			
Survey	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	While we appreciate the structural changes, certain topics still need to be further revised and adapted (especially for the metric section). Please refer for details to the Excel sheet and to questions 23 and 32).			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	While welcoming the simplification, we consider that ESRS should explicitly recognize European and international standards as means to to demonstrate compliance and ensure coherence with other EU frameworks. Using standards will help make the DMA workable, comparable and avoid duplication in many areas.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The clarification is useful but the implementation should remain coherent across EU frameworks and proportionate for preparers.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	After removing most topical add-ons there is a comparability risk. Hence, to keep the balance, we suggest that EFRAG and the EC explicitly allow the use of recognized standards to implement policies, actions and targets. Where methods aren't developed consider the possibility for the European standards bodies to develop supporting standards with pre-standardization support.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The NMIG should remain outside the delegated act with its non-binding character explicitly affirmed and include a neutral standards - signposting section indicating relevant European and international standards and their national adoptions, thereby providing low-burden implementation tools without creating de-facto obligations. Development of methodologies should be addressed through formal standardization requests under REG 1025/2012.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	As Romania's national standards body, ASRO does not take a substantive position on the sufficiency of the proposed horizontal burden-reliefs, which are a reporting policy calibration rather than a standardization matter. Accordingly, we refrain from responding to this question.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	As Romania's national standards body, ASRO does not take a substantive position on the sufficiency of the proposed horizontal burden-reliefs, which are a reporting policy calibration rather than a standardization matter. Accordingly, we refrain from responding to this question.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We recommend that, to avoid duplication, a single standards-based management measurement (methods and controls) may be used across EU requirements and cross-referenced once without recalculation.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	Feasible in principle, but to control effort and keep comparability we recommend a clear rule to avoid duplication: allow a single standards-based calculation for anticipated financial effect under 40-42 para to be reused across EU requirements with a single cross-reference without calculation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We acknowledge the interoperability gains but to avoid duplication and preserve EU coherence, clarify that where metrics / definition are implemented via standards developed by ESOs, the same measurement may be reused or cross-referenced within ERS and other EU requirements without recalculation.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	We support upgrading E3 withdrawals / dischargers and G1 confirmed incidents as they improve comparability with limited additional burden. The E4 transition plan is acceptable given it applies only where a plan is already public. For G1 procurement-team training require disclosure when supplier-risk is material, to preserve proportionality, especially for ESG. To avoid duplication allow reuse of CEN/CENELEC standards based measurements and control across EU requirements via cross-reference.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	We support ESRS2, BP-1, E5-4 and E5-5. For E 2-4 implementation should use standards developed by ESOs. Where no standards exist, the EC should issue a formal standardization request and SME guidance should signpost the EN, to one standard-based measurement which can be re-used across EU requirements without parallel methods.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	For coherence and comparability across sectors, absolute targets are complementary; a sector-specific exception would undermine a level-playing field and investor insight. Address estimation challenges via conditional relief using recognized methods rather than removing absolute targets for one sector.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	Maintaining the SFDR data flow is appropriate, but to avoid duplication and ensure consistency, EFRAG should publish a clear ESRS- SFDR mapping-table and clarify that where data points are implemented via standards developed by ESOs, the same measurements may be reused and cros-referenced across ESRS and SFDR without recalculation.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree				
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	Replacing quantitative "payment practices" with narrative provisions reduces observability of SME protection. Introduce a minimal decision useful metric - share of invoices to SME suppliers paid within agreed terms, with a complimentary past dues and allow cross-reference to processes based on European and international standards. This restores comparability while preserving proportionality through materiality.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The re-architecture improves readability and connected information. However, to avoid duplication across EU instruments and provide preparers with practical tools, ESRS 1 should explicitly acknowledge the role of European and international standards as acceptable methodological bases to evidence compliance. A short, front-section "standards signposting" (by topical area) would guide consistent application—especially for SMEs—while preserving the non-prescriptive nature of ESRS.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The principles-based approach reduces prescriptiveness, but comparability risks arise when topical add-ons are removed. We recommend an ESRS standards bridge indicating where CEN/CENELEC (and ISO/IEC) methods can operationalize policies, actions and targets. This keeps flexibility while anchoring practice in recognised methodologies.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Boundary alignment and fair-presentation improvements are welcome. To reduce burden and ensure coherence, clarify that a single standards-based calculation may be reused via cross-reference across EU requirements without recalculation. For anticipated financial effects, maintain conditional flexibility while asking for a brief methods-and-assumptions note.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The new datapoint on secondary microplastics is decision-useful, but methodologies remain immature. The Commission should issue a formal standardisation request to CEN/CENELEC to develop an EN method, referenced in SME guidance to keep burden proportionate.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The focus on withdrawals/discharges supports water balance and comparability. It is recommended to add signposting to relevant EN/ISO water-related standards so companies can implement once and reuse measures across obligations.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Support reviewing AR 26 and aligning targets with science-based frameworks (e.g., SBTN). Method development should be channeled through CEN/CENELEC mandates to avoid parallel guidance and to deliver measurable, time-bound indicators with SME-proportionate pathways.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	New metrics on critical/strategic raw materials and unknown waste destinations improve decision-usefulness. Ensure consistency with CRMA/Ecodesign by referencing CEN/CENELEC standards (mass balance, material traceability) to prevent duplicate systems.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The "top-10 countries ≥50 employees" threshold enhances visibility with limited burden. However, deleting the adjusted gender pay gap weakens interpretive validity. We recommend to retain it at least in NMIG and develop a European method for adjustment, referenced for SMEs.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Simplification is welcome. To preserve comparability, include a minimal quantitative core for due-diligence outcomes: (i) share of value-chain workers covered by risk screening; (ii) share with corrective actions agreed and closed on time; and (iii) incidence rate of serious non-compliance. Permit cross-reference to processes implemented under standards developed by CEN/CENELEC (and, where relevant, ISO/IEC), with SME-proportionate procedures.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Clarify minimum expectations for impact identification and stakeholder engagement while allowing proportionality. Where methods are immature (e.g., community impact valuation), mandate supporting standards via CEN/CENELEC rather than embedding de facto methods in guidance.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Maintain simplification but provide standards signposting for safety, accessibility and product information metrics (CEN/CENELEC), enabling reuse of established conformity-assessment practices and reducing burden.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Consolidation is helpful. To meet the CSRD objective on SME protection, re-introduce a minimal quantitative metric on timely payment to SME suppliers, allowing cross-reference to CEN/CENELEC-based processes for controls and assurance.			
Survey	ASRO - National Standards Body in Romania	Standard setting initiative	Romania	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The streamlined glossary improves usability. For consistency across EU instruments, align key terms with existing EN/ISO definitions where available and maintain a versioned change-log, so preparers, assurers and regulators can map terminology without duplication			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	ANC acknowledges that EFRAG has introduced meaningful simplifications to the double materiality assessment process. In particular, ANC welcomes: •the possibility of adopting a top-down approach rather than a bottom-up one; •the shift in focus from the IRO-level to the topic-level; and •the simplification of AR 16 (Appendix A). However, ANC considers that further structural and editorial changes should be undertaken to ensure consistency with the top-down approach (detailed comments provided in Part 3 – Excel file): 1.Streamline references to materiality assessment in ESRS 2, in particular IRO-1 (§26), which currently requires eight data points to describe the DMA process, as this conflicts with the simplified approach proposed in ESRS 1; 2.Relocate methodological or illustrative elements specific to the bottom-up approach to the Application Requirements, including factors on severity, precedence of severity over likelihood, criteria for positive impacts, methodological elements on dependencies (§31-32, §41-44); 3.Address remaining ambiguity between top-down and bottom-up approaches, including the formulations overly focused on individual IROs and clarify terms such as "relevant information" (§22) and "appropriate level of aggregation" (ESRS 2 AR 23); 4.Clarify that thresholds serve to determine and prioritise material topics, without implying the need for separate scoring of each criterion or severity characteristic (§28, AR 5c, AR 7); and 5.Simplify update requirement by specifying that the DMA process and its conclusions shall be updated only in case of significant events or material changes in circumstances (§29). [See proposed wording in Part 3 – Excel file regarding IRO-1 (ESRS 2 §26), thresholds (ESRS 1 AR5c), update of the DMA (ESRS 1 §29), and ambiguous wordings (ESRS 1 §22, ESRS 2 AR23).]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	ANC does not support the new guidance on gross versus net approach, for the following reasons: •The proposed rules are overly complex and introduce significant judgement. •They would impose burden on companies by changing the methodology. •Information on gross impact is key to understand the context of mitigation measures. In particular, Annex C creates confusion by mixing reporting for the current and subsequent year, which is conceptually inconsistent. ANC therefore recommends deleting it. The ESRS should focus on a general principle: potential impacts shall be assessed before prevention or mitigation measures (i.e., expected effects of ongoing or future actions). The terms gross and net should be avoided, since they cause confusion, especially relative to logic of business risk assessment. A distinction could be made between: •Actual impacts: to be assessed at the reporting date. In practice, the occurrence of impacts at the reporting date reflects the situation as it stands. While past mitigation actions may have reduced their severity, once an impact has occurred, it is recognised as such. •Potential impacts: to be assessed before considering prevention or mitigation actions. This reflects that sustainability actions are typically implemented over a multi-year horizon (e.g., carbon trajectory) and that some impacts may never be fully eliminated (e.g., health and safety). At this stage, ANC has not extended its analysis to risks, as it should be conducted jointly with ISSB Proposed wording for gross versus net approach (ESRS 1 §34-36): •"For actual negative impacts, the undertaking shall assess the materiality (severity) of impacts as they have already materialised. •For potential negative impacts, the undertaking shall assess the materiality (severity and likelihood) prior to considering future prevention and remediation measures. Past mitigation actions can be disclosed to contextualise the result of the assessment. "			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	ANC supports retaining the four required parts of the sustainability statement. In addition, ANC proposes introducing a presentation rule requiring undertakings to directly reference the disclosure requirement (DR) numbers within their sustainability statement (e.g., in section headings or paragraph titles), without the need for a separate mapping table. This "visual tagging" approach is already used by many companies, facilitates comparability for users and may enhance the efficiency of future AI data processing. The proposed changes in the exposure-draft appear to weaken the objective of enhancing connectivity between financial statements and the general-purpose sustainability statement, as certain provisions on connectivity have been downgraded from "shall" to "may." ANC recommends solving the inconsistency between §111 ("shall provide information that enables users of its sustainability statement to understand the connections") and §§114-115, which use "may." Preserving mandatory language is essential to safeguard the principle of connectivity. Proposed wording for DR referencing (ESRS 2 BP-1 §6): •[new]: "The undertaking shall indicate the disclosure requirement number in section headings or paragraph titles presenting the related information (e.g., "S1-1")."			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	ANC supports the removal of the topical requirements from ESRS 2, as they create redundancies in sustainability statements in most cases. However, ANC encourages retaining a specific reference to biodiversity resilience analysis to provide transparency on the undertaking's ability to manage its risks and dependencies on ecosystem services and biodiversity. Such analysis is crucial for certain sectors to capture financial materiality, reflecting the complexity and uncertainty of biodiversity-related risks and dependencies affecting business models after remediation actions. While references to resilience and dependencies were removed from ESRS E4 on the grounds that these aspects are addressed in ESRS 2, their treatment in ESRS 2 is generic and lacks the specificity needed. We therefore recommend mentioning these elements in ESRS 2 §24. Proposed wording for resilience analysis (ESRS 2 §24): •"The undertaking shall disclose a qualitative analysis of its resilience to the material risks disclosed in accordance with paragraph 22, including how the analysis was conducted and the time horizons considered, which may be particularly relevant for climate and biodiversity topics in high impact sectors."			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	ANC welcomes the improved presentation of the Standards, including: •the reduction of the length of the text, notably through the removal of paragraphs related to general principles and the simplification of narrative paragraphs deemed overly technical or detailed; •the positioning of AR directly after the disclosure requirements, focusing only on essential methodological elements and key presentation points. ANC encourages further improvements (detailed comments provided in Part 3 – Excel file): 1.Reduce overall length of ESRS 1, including by simplifying Chapter 3 (currently 34 pages, 25 excluding annexes, comparable to Set 1); 2.Avoid merging topics for ESRS S1 & S2 and regroup animal welfare subtopics under G1 "corporate culture" (listed in a simple footnote); consolidate social topics for value chain workers into one or two subtopics (e.g., working conditions and human rights), to better reflect that remediation actions are generally limited to responsible purchasing practices and due diligence activities; 3.Revise ESRS 2 wording to reflect a top-down approach by referring to "sustainability topics and their material IROs (or groups of them)," rather than framing it primarily through the lens of IROs; 4.Consolidate all deviations from ESRS 1 principles under a single datapoint (basis for preparation), to facilitate tagging; 5.Remove mandatory datapoints from AR such as direct biodiversity loss drivers in AR 6 of ESRS E4, relocating them to the main body of ESRS E4 in relation to IRO-2; 6.Improve drafting in ESRS S1 by addressing unclear wording and eliminating repetition (e.g., duplication of GDR content); 7.Reassess AR in ESRS S1 to distinguish glossary definitions, essential guidance, and explanatory content better placed in the NMIG; 8.Consolidate ESRS on value chain stakeholders to reduce redundancy, streamline requirements, and allow flexibility for preparers based on their specific circumstances.			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	ANC notes a consensus among French stakeholders that the NMIG should remain outside of the standards. In addition, the usefulness of a significant number of NMIGs appears questionable, as many merely restate the standards or state the obvious. A thorough review and refocus is needed to ensure they provide real added value Preparers are genuinely concerned that, despite being explicitly issued by EFRAG for illustrative purposes, the NMIG could gradually be perceived as a de facto reference for implementation like previous Q&As and Implementation Guidance. Expectations were expressed by certain regulators and auditors to duly consider those materials in the application of the text. It is therefore important that both EFRAG and the Commission clearly reaffirm the non-authoritative nature of the illustrative NMIG. This clarification also raises a broader concern about supporting the application of the revised ESRS going forward. To avoid any ambiguity, we suggest adding an explicit statement clarifying that the NMIG are purely indicative and non-prescriptive, and consequently are not meant for audit or supervisory enforcement purposes. At the same time, ANC encourages EFRAG to clarify how the application of the ESRS will be supported and interpretation uncertainties addressed in the future – whether through Q&A, non-authoritative implementation guidance, or other means. Such prospective clarification is essential to facilitate implementation and reduce interpretative risks. ANC also wishes to clarify what will be the status of the existing Q&A and Implementation Guidance relating to Set 1. The following disclaimer should be added at the beginning of the NMIG: "These NMIG provide illustrative examples of how undertakings may disclose information required by ESRS disclosure requirements. They shall not be construed as an interpretation of the standards, nor as covering the full range of possible facts and circumstances, but only as one possible form of relevant disclosure among others."			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	ANC supports the introduction of burden reliefs while sustainability reporting is maturing. While companies support the relief "undue cost or effort" aligned with the approach of financial reporting, regulators, auditors and users have raised concerns regarding its scope and definition, and the risk of incomplete information. The dynamic nature of this relief is of importance, as the assessment must be conducted at each reporting date, recognising that facts, circumstances and the information available are expected to evolve. Proposed wording for the relief "undue cost or effort" (ESRS 1 §84): •"The assessment of what constitutes undue cost or effort depends on the undertaking's specific circumstances and requires a balanced consideration of the costs and efforts for the undertaking and the benefits of the resulting information for users. Applying a requirement would result in 'undue cost or effort' because of either excessive cost or excessive endeavours by employees in comparison to the benefits that the users of the undertaking's general purpose sustainability statements would receive from having the information. •When assessing whether the preparation of a disclosure would involve "undue cost or effort," the undertaking shall consider, individually or jointly, criteria such as (a) its size, resources, and technical readiness in relation to the scale and complexity of its value chain; (b) the availability of tools to access and share information, including digital tools balanced with the usefulness to the users of general-purpose sustainability statements. •That assessment can change over time as facts, circumstances and available information change. Assessing whether a requirement will result in 'undue cost or effort' should be based on information available at the reporting date."			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	ANC proposes revising the drafting of the relief for metrics in §91 to clarify that it is about permitting partial reporting when data is unavailable without undue cost or effort. This relief should also apply to E1-8 GHG emissions (Scope 3 at least), recognising that subsets of the value chain may be excluded depending on the sectors where the beginning or the end of the life cycle is too far in the value chain to be reliably known. Proposed wording for the relief for lack of data quality on metrics (ESRS 1 §91): •"When the undertaking cannot provide (using reliable direct or estimated data) a metric related to a material IRO in its own operation or value chain without incurring undue cost or effort, the undertaking can disclose the metric on a partial reporting boundary or for a subset of the value chain. In this circumstance, the undertaking shall disclose the actions it has taken to increase the coverage and quality in future reporting periods, and the progress compared to the previous reporting period. [Deletion: The undertaking shall also assess at the subsequent reporting dates whether reliable data or input to be used in the estimate has become available, and if this is the case, adjust the estimates and the disclosure accordingly.]" ANC supports extending the relief on joint operations (i.e., their exclusion due to lack of operational control), currently applicable to pollution-, water- and biodiversity-related metrics, to all other ESG-related metrics for consistency. In addition, while §92 specifies the conditions under which joint operations may be excluded from the reporting boundaries, the Standards do not clarify how they should be accounted for in all other cases. This gap should be addressed. [See proposed wording in Part 3 – Excel file regarding joint operations (ESRS 1 §69).]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	We have different views in our jurisdiction. In that context, ANC supports a hybrid approach. Option 1 could apply only to anticipated financial effects of material climate risks, reflecting financial materiality and ensuring ISSB interoperability, given the maturity of climate reporting. Option 2 could apply to other environmental topics. Requirements in ESRS 2 and E1 should explicitly refer to ISSB reliefs. Commercial sensitivity should be addressed through a relief at Level 1. ANC recalls that AFE already benefit from phasing-in provisions. It should be clarified that they apply from the date of adoption of the Delegated Act at EU level, not from the transposition date at Member State level, to ensure level playing field. Support for Option 1: •Public authority, auditors, civil society highlight that quantitative information refine risk assessment, complements resilience analysis, provide forward-looking information, supporting financial materiality and ISSB interoperability. •Option 1 offers flexibility regarding estimates, scope, granularity. •Climate-related reporting has matured since the TCFD (2017). •Asset managers support Option 1, as they rely solely on public disclosures. Support for Option 2: •Companies point out risks of disclosing projections covering medium- and long-term horizons based on assumptions that change rapidly. •It would significantly increase companies' liability. •It is impossible to provide such quantitative information without disclosing sensitive financial information; in the field of financial reporting, companies are not required to disclose financial planning. Proposed wording: •ESRS 2 §23 (b): "the anticipated effects of its material climate risks on its financial position, financial performance and cash flows, including the time horizons for which those effects could reasonably be expected to occur;" •"The undertaking may comply with ESRS 2 SBM-3, by reporting only qualitative disclosures for the first three years, starting from the application date specified in a Commission Delegated Act"			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	Considerations developed in response to Q19 apply to AEF of climate risks: Option 1 should only be retained for anticipated financial effects of material climate risks, while Option 2 would apply to other environmental topics. In addition to adapting the datapoints in ESRS 2 to reflect this limitation, ANC proposes a reduction of datapoints in E1-11 under Option 1. Proposed wording (ESRS E1-11 §40-42): •"The undertaking shall disclose an estimation of anticipated financial effects from material physical risks, including: a)the estimated monetary amount and percentage of assets at material physical risk before considering climate adaptation actions; and b)the estimated monetary amount and percentage of net revenue from business activities at material physical risk before considering climate adaptation actions. The undertaking shall disclose an estimation of anticipated financial effects from material transition risks, including: a)the estimated monetary amount and percentage of assets at material transition risk before considering climate mitigation actions; b)a breakdown of the carrying amount of its real estate assets that have been used as loan collaterals by energy-efficiency classes c)the estimated monetary amount and percentage of net revenue from business activities at material transition risk; and d)the estimated potential liabilities from material transition risks that do not meet the accounting recognition criteria at the reporting date but that may have to be recognised in financial statements; and •The undertaking shall disclose an explanation of the results, including where relevant key locations at material physical risks, methodology used, and an indication of the relevant line items or notes in the financial statements to which significant financial amounts relate." Certain datapoints should be deleted (or made voluntary), in particular: •§40(b): location; •§40(c): adaptation actions; •§41(b): mitigation actions; •§40(f): potential stranded assets (redundant with §40a); •§42: climate opportunities.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	The integration of elements from the ISSB framework (e.g., fair presentation, reliefs) represents a positive step towards interoperability. However, several points should be underlined. •ANC does not consider the ESRS approach to GHG emissions reporting boundaries inconsistent with the options permitted by the ISSB. ESRS E1 selects one of the GHG Protocol methods (financial control) and, in limited cases, additionally requires operational control – an exception rather than the general rule. Interoperability on reporting boundaries, particularly on climate disclosures, should therefore be carefully assessed (detailed comments provided in Part 3 – Excel file). •Unlike the ESRS, the IFRS framework has not yet undergone a large-scale field test with broad jurisdictional implementation and external audit of sustainability statements. The first ESRS implementation exercise has already revealed practical challenges, which are critical for any simplification process. Convergence efforts undertaken jointly by EFRAG and the IFRS should be continued. Nevertheless, it is important to recognise that maintaining certain differences between the two frameworks remains acceptable, beyond the well-known divergence on materiality, particularly where the ESRS already incorporate lessons learned from implementation. To address interoperability in a pragmatic manner, ANC recommends that EFRAG and the ISSB update the interoperability mapping table. This would allow undertakings wishing to align more closely with IFRS S1 and S2 to disclose additional datapoints, without creating additional burden for other undertakings.			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	General response: EFRAG has clearly engaged in a simplification effort, reflected in the reduced overall volume of the standards, improved readability, and a clearer distinction between may and shall provisions. Importantly, the key information required by investors to conduct ESG analyses remains available. The proposal aims at striking a reasonable balance between reducing the reporting burden and preserving the information necessary to meet the objectives of the EU Green Deal. Nevertheless, ANC considers that further simplifications could be proposed. Special scrutiny should be given to the one hundred datapoints EFRAG has kept in its exposure draft that were proposed as voluntary datapoints in ANC proposal (fossil energy breakdowns, details on removals and carbon credits, details on climate-related financial effects for instance). ANC urges EFRAG to review its counting methodology, particularly for narrative requirements, to avoid excessive granularity. According to ANC's calculation, the revised ESRS include 293 mandatory datapoints, compared to 376 in EFRAG's count. The current Excel count is unclear and should be revised—for example, "Basis for Preparation-1 §5" is counted as six datapoints (a–e), with two for §5b, whereas ANC proposes a single datapoint with one associated digital tag. Companies reviewing the revised standards have expressed concerns about potential costs (e.g., IT development for data collection and correction) arising from changes in retained datapoints. Companies and auditors therefore call on EFRAG to clearly distinguish between clarification of existing requirements and introduction of new requirements. This distinction should not be part of the delegated act but set out in the basis for conclusions. [See detailed comments in Part 3 – Excel file]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	22.E1.	Comments on deleted datapoints in ESRS E1	I agree	[See detailed comments in Part 3 – Excel file]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	22.E2.	Comments on deleted datapoints in ESRS E2	I agree	[See detailed comments in Part 3 – Excel file]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	22.E3.	Comments on deleted datapoints in ESRS E3	I agree	[See detailed comments in Part 3 – Excel file]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	22.E4.	Comments on deleted datapoints in ESRS E4	I agree	[See detailed comments in Part 3 – Excel file]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	22.E5.	Comments on deleted datapoints in ESRS E5	I agree	[See detailed comments in Part 3 – Excel file]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	22.S1	Comments on deleted datapoints in ESRS S1	I agree	[See detailed comments in Part 3 – Excel file]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	22.S2	Comments on deleted datapoints in ESRS S2	I agree	[See detailed comments in Part 3 – Excel file]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	22.S3	Comments on deleted datapoints in ESRS S3	I agree	[See detailed comments in Part 3 – Excel file]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	22.S4	Comments on deleted datapoints in ESRS S4	I agree	[See detailed comments in Part 3 – Excel file]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	22.G1	Comments on deleted datapoints in ESRS G1	I agree	[See detailed comments in Part 3 – Excel file]			

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Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	23.	Six datapoints exceptionally moved from “may” to “shall” In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, “may disclose” datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	ANC supports mandatory datapoints on water withdrawal and discharges in ESRS E3, as they provide a more accurate reflection of the water cycle and reinforce impact materiality. ANC recommends retaining datapoints on the management of relationships with suppliers in ESRS G1 (previously in G1-2, now deleted) as a higher priority than training of procurement teams. ANC strongly rejects changing datapoints on confirmed incidents from "may" to "shall" in ESRS G1, as they are highly sensitive and of limited relevance. Such disclosure could conflict with the right against self-incrimination under the European Convention on Human Rights and expose companies to investigations by third-country authorities (e.g., US Department of Justice), giving non-EU competitors an advantage. Furthermore, confirmed incidents are not a reliable proxy for assessing anti-corruption policy effectiveness. ANC considers that safeguards around the disclosure of a biodiversity transition plan in ESRS E4 do not create an undue burden and improve reliability through audit. However, clarifications are required: •The plan should be made public by the company itself, not by a third party and the term "publicly available" should be clearly define. •A distinction should be made between a biodiversity action plan and a biodiversity transition plan. ANC supports adding a definition of "transition plan" in the ESRS glossary and enhancing consistency between ESRS E1-1 and E4-1. A transition plan should be understood, as in E1, as a transformative tool for the business model, requiring only key elements: integration into strategy, alignment of targets, actions, and resources, and governance approval. Finally, compatibility with the Kunming-Montreal Global Biodiversity Framework raises practical challenges. Companies should be allowed to present a plan even if not yet fully compatible, provided they disclose current compatibility and steps toward improvement. The contradiction between "alignment" (main body) and "compatibility" (application requirements) should be resolved by retaining "compatibility".			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	ANC partially supports the new BP-1 datapoint in ESRS 2. In principle, any sustainability statement under the ESRS should already comply with ESRS 1, making a blanket affirmation of full application of limited value and potentially boilerplate. ANC acknowledges simplification efforts on secondary microplastics in ESRS E2, as only qualitative information is required, which reflects the greater difficulty for undertakings and a proportionate approach. Companies have raised concerns about the absence of an official definition of secondary microplastics and the limited scientific knowledge of their impacts, stressing the need for guidance and public support. ANC does not support the introduction of datapoints in §15 (a), (b), (c) and (e) on critical and strategic materials in ESRS E5, as they would create burden and investment for preparers. There is no clear or stable definition of "key," "strategic," "critical" materials", "key biological sustainably sourced". And the data would be technically complex to obtain, since these materials are often mixed, transformed, or embedded in products, making it difficult to determine their exact weight without reverse engineering. French stakeholders propose requiring only a qualitative description of resource inflows. Proposed wording (ESRS E5 §15a-c): •"When 'Resource Inflows' is assessed as a material topic, the undertaking shall disclose: a)which materials used in manufacturing were put on the market or were part of the delivery of the undertaking's products and services can be considered as key for its business model, including, where appropriate, critical materials, and the major reasons behind; b)which of these materials are biological and sustainably sourced; c)the percentage of total weight of secondary resourced materials." ANC disagrees with the datapoint on the percentage or total weight of waste with unknown final destination in ESRS E5, because this information is not critical, and do not contribute to the reduction of datapoints.			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	25.	Emphasis on ESRS being a “fair presentation” reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	ANC notes the introduction of the fair presentation objective in the ESRS, to be applied at management report's and sustainability statement's level. This objective also reflects the approach adopted by the ISSB in IFRS S1. French stakeholders share mixed views. ANC invites EFRAG and the European Commission to provide further clarification on the concept of fair presentation, to avoid divergent interpretations by preparers and auditors. Guidance is needed on how this principle will be applied by assurance providers and whether its inclusion may have implications for the simplification efforts. Specifically, ANC recommends clarifying: •The definition of fair presentation as a way of taking into consideration the strategic specificities of the business model and activities of the undertaking; •The hierarchy between the use of reliefs and the requirement of fair presentation: Confirm that applying a relief does not contradict the principle of fair presentation in general. In particular, the absence of quantified anticipated financial effects does not undermine fair presentation. For example, an undertaking should be able to use the relief on commercially sensitive information without being required by auditors to disclose them under the fair presentation clause. •The audit procedures expected to ensure compliance with this principle. Proposed wording for fair presentation (ESRS 1 §17): •ESRS 1 §17: "[…] This means in particular that providing non-standardised entity-specific information and omitting non material or sensitive information does not compromise fair presentation." •"The use of reliefs in accordance with the principles set out in the Standards is without prejudice to §17: their application does not compromise the achievement of a fair presentation. The same applies to the application of materiality of information (section 3.1), entity-specific disclosures (§10) or additional disclosures that do not relate to a topic to be reported following the materiality assessment (§108)."			

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Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	ANC proposes defining an exception in the AR for financial institutions' absolute climate reduction targets, allowing disclosure of intensity-based targets provided they disclose contextual information and the potential trend in absolute value (see proposal below). Furthermore, ANC recommends introducing targeted application requirements for the financial institutions in addition to the exception for absolute climate reduction targets. Such adjustments are necessary, as the current sector-agnostic ESRS present significant implementation challenges for undertakings in the banking, insurance, and asset management sectors. ANC proposes an alternative drafting approach, detailed in a separate annex, based on the following principles: •Adapt certain concepts not suited to financial institutions, so as to bring ESRS terminology in line with the financial sector's lexicon (see separate Annex); •Clarify the concept of the value chain and double materiality analysis for these industries; and •Further leverage existing and upcoming sectoral regulations (e.g., SFDR for asset management and insurance activities, Pillar 3 ESG for banking activities, SRD II, etc.) (see separate Annex) The proposed adjustments do not seek to establish a dedicated sector-specific standard but rather to provide immediate clarifications in the delegated act. Proposed wording on target setting (ESRS E1-6): •AR X for §E1-6 §26a or amendment to AR12 for §26: "Financial institutions may instead disclose targets in terms of physical intensity value for each invested or financed sector for which it has set a target, and, for sectors subject to a phase-out target, the related financial exposure (portfolio gross carrying amount, underwriting or asset under management)." Adaptation of concepts and lexicon, clarifications regarding (i) double materiality assessment and (ii) value chains considerations, links with sectorial regulations: see separate Annex.			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	While providing a better picture of the geographical location of employees, the new threshold will increase the number of information to be disclosed and the reporting work, in particular when this threshold is used to disaggregate other disclosure requirements such as collective bargaining and social dialogue. French stakeholders have different views on this new threshold definition (between preparers and trade unions). As a result, we recommend maintaining the requirement to disclose the 10 largest countries in terms of employee's number for S1-5 - Characteristics of the undertaking's employees, provided that the undertaking has 100 or more employees in these countries, 100 being 10% of the current proposed CSRD scope at 1000 employees. However, for S1-7 - Collective bargaining coverage and social dialogue, which requires a detailed screening of applicable laws across multiple jurisdictions, we suggest reverting to the previous threshold ('at least X employees representing at least 10% of the total workforce'), with X to be aligned with the final outcome of Level 1 discussions on the CSRD scope (e.g., if the scope is set at 1,000 FTE, then X = 100).			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	While ANC had initially proposed to make this metric voluntary due to the lack of maturity, we acknowledge the importance of ensuring reliable disclosure on adequate wages. We see limitations in the current benchmark hierarchy proposed under ESRS S1 AR 22, particularly for countries outside the EEA. Reliance on statutory minimum wages may result in benchmarks that are socially inadequate. We therefore recommend placing recognised adequate wage estimates before statutory minimum wages. As regulation cannot mandate the use of proprietary tools, the most effective solution would be the development of an accessible, open-source standard. Comparability could be enhanced through collaboration between EFRAG and the ILO to develop a public, country-by-country benchmark. As a compromise, we propose a flexible model with mandatory transparency. Undertakings should be allowed to use either statutory wages or recognised adequate wage estimates, provided they disclose the methodology and country-level context. Given the novelty of this concept, companies should retain flexibility to select the most appropriate reference, while avoiding premature lock-in to a rigid framework. The ILO's work, although not yet fully comprehensive, could serve as a starting point. We also encourage EFRAG to clarify how materiality should be applied for adequate wages. Proposed wording: •[new]: "The undertaking shall disclose the reference and methodology used to determine the adequate wage benchmark and provide country-level context." •AR 22. "The adequate wage benchmark used for comparison with the lowest wage shall not be lower than: b)Outside the EU: i.Any recognised adequate wage estimate, which considers ILO principles on estimating an adequate wage; ii.If (i) is not available without undue cost or effort, the statutory minimum wage or the wage level established through collective bargaining, which is periodically reviewed or adjusted and considers ILO wage-setting principles. The benchmark used under points (i) or (ii) (…)."			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	The French financial sector stresses the need for coherence between the ESRS, SFDR, and other EU regulations, as well as greater harmonisation. We call on the European Commission to ensure that simplifications are reflected in SFDR disclosure requirements, particularly with regard to PAI indicators and their calculation methodologies. ESRS should remain the primary source of corporate sustainability data, ensuring consistency and efficiency across the EU sustainable finance framework. On EFRAG's specific proposals: •We support merging policies on human rights, alignment with the UNGP, and OECD MNE Guidelines into a single "human rights policy" under ESRS 2 GDPR-P for the four stakeholder groups. •We support consolidating severe human rights incidents into one data point. Instead of requiring overly granular disclosures, companies should describe the stakeholders affected. •We support excluding fatalities from the scope of days lost. On reassessing PAI relevance: •Revised ESRS should guide the determination of PAI indicators, which in turn should meet transparency needs of financial market participants. The previous sequencing—where PAI preceded ESRS—has resulted in certain indicators of limited relevance. •Coverage should be balanced across ESG pillars, avoiding duplication. Where gaps exist, new PAI could address them (e.g., governance approval of climate transition plans, circular economy). •The distinction between mandatory (Table 1) and additional (Tables 2-3) indicators should be reconsidered. A streamlined set of 10–15 mandatory PAI would improve usability and comparability. Principles for simplification: •Merge indicators with overlapping objectives to reduce overall numbers; •Remove additional indicators that have effectively become mandatory in practice; •Clarify materiality at the investee level, in line with ESRS 2 IRO-2; and •Restrict the calculation of certain PAI indicators to clearly defined and relevant scopes to preserve their relevance and comparability.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	As regards biodiversity-related target setting, we support providing more guidance to reflect the latest methodological trends and ensure stronger alignment with science-based frameworks in the NMIG. Proposed wording on target setting (NMIG): •[New]: "Biodiversity-related targets should: orely on material impacts and dependencies, prioritising significant activities, high-risk watersheds, and high-impact commodities; ocontribute to alignment with ecological thresholds, policy objectives, and recognised frameworks, including SBTN and the Kunming-Montreal Global Biodiversity Framework; and ofocus on key impacts, such as land use change and ecosystem conversion (e.g., expanding from zero-deforestation to zero-conversion policies for all natural ecosystems), while considering the local ecological context. •When appropriate, the undertaking may refer to the following sources: oTNFD, which provides examples of quantifiable targets related to direct biodiversity pressures and nature state; oSBTN, which provides guidance for establishing targets and/or collecting associated data on pressures, impacts, and dependencies, as well as more detailed guidance for targets related to terrestrial ecosystem use (e.g., non-conversion of natural ecosystems, reducing land footprint, and landscape-level commitments)." Key considerations for implementation and open questions from French stakeholders to be addressed in the longer term by EFRAG: •How to reconcile local site-level targets with global science-based ambitions? •How to balance ambitious global targets, which may currently be unattainable, with practical and credible action plans? •How to define the appropriate scope/geography: site, watershed, country, or consolidated? •How to apply ecological thresholds locally in alignment with global commitments? •How should target-setting differ between physical economy actors and financial actors? Finally, we encourage a progressive implementation approach. Expanding coverage of activities and subsidiaries in phases allows for learning, internal acceptance, and capacity building. [See key additional considerations in Part 3 – Excel file regarding value chain (§9), direct biodiversity pressures (AR6), and standardised metrics (§21).]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	ANC recommends that the gender pay gap be reported on an adjusted basis, with a breakdown by employee category. Employee category is the main driver of the pay gap, and both preparers and users view this breakdown as critical to ensure the metric's relevance and decision-usefulness. By contrast, making only the unadjusted gap mandatory risks misinforming stakeholders and unfairly penalising companies based on their sectoral or organisational structure rather than actual pay practices. If reproduced without context, the unadjusted metric may also damage companies' reputation. For this reason, we do not support the deletion of the voluntary datapoint on adjusted pay gap. On the contrary, we recommend the opposite approach: the adjusted gender pay gap should be the mandatory datapoint, while the unadjusted gap should remain voluntary (or be deleted). The adjusted pay gap is the only metric that directly measures compliance with the principle of "equal pay for equal work or work of equal value." By controlling for factors such as role, seniority, location, or performance, it provides a precise and actionable measure of pay equity. For example, in a multinational company employing both office and production staff, the adjusted metric allows stakeholders to identify discrepancies within comparable roles, rather than conflating very different job categories. The unadjusted pay gap, in contrast, conflates pay equity with workforce composition. It is therefore less informative and may be misleading, particularly for global or multi-sector companies. Issues of representation can instead be addressed through complementary disclosures, such as the gender diversity of governance bodies. Proposed wording on pay gap (ESRS S1 §44a): •"The undertaking shall disclose: a)the gender pay gap, defined as the difference of average pay levels between female and male employees, expressed as a percentage of the average pay level of male employees by employee category; and (…)."			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	French large companies do not support the proposed requirement to describe standard payment terms in number of days by main supplier category, including SMEs, and to report the percentage of payments aligned with these terms, as they do not always distinguish between large suppliers and SMEs in their systems. Instead, they propose using the Average Days Payable Outstanding (DPO), accompanied by a narrative description of standard payment terms, with particular attention to SMEs. The DPO is the most feasible metric, as it is widely tracked internally and used for management purposes, whereas the proposed metric would be difficult to construct and require significant investment to modify data collection systems. This approach allows companies to qualitatively describe how they manage SME-related risks and impacts in a manner adapted to their specific facts and circumstances.			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	[See detailed comments in Part 3 – Excel file]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	[See detailed comments in Part 3 – Excel file]			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	[See detailed comments in Part 3 – Excel file]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	[See detailed comments in Part 3 – Excel file]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	[See detailed comments in Part 3 – Excel file]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	[See detailed comments in Part 3 – Excel file]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	[See detailed comments in Part 3 – Excel file]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	[See detailed comments in Part 3 – Excel file]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	[See detailed comments in Part 3 – Excel file]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	[See detailed comments in Part 3 – Excel file]			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	[See detailed comments in Part 3 – Excel file]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	[See detailed comments in Part 3 – Excel file]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	[See detailed comments in Part 3 – Excel file]			
Survey	Autorité des normes comptables (ANC)	(National) standard setter	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Net-zero targets: The reference to net zero was removed from the standard. This is regrettable, as standardising this notion has demonstrably improved the quality of disclosures on a topic particularly exposed to greenwashing risks. The concept, together with its definition, should therefore be retained in the standard. Proposed wording: •Add in glossary the previous "Net zero target" entry •Retain current Set 1 E1-7 §60 with clarifications regarding removals vs offsets: "where the undertaking discloses a net zero target […] and how the residual GHG emissions (after approximately 90-95% of GHG emission reduction with the possibility for justified sectoral variations in line with a recognised sectoral decarbonisation pathway) are intended to be neutralised by GHG removals." Taxonomy consistency: ANC calls for harmonisation between the Environmental Taxonomy and the ESRS. As the ESRS are simplified, the Taxonomy should also be streamlined to ensure coherence and complementary of sustainability information. We support applying the materiality principle in the Taxonomy, as in the ESRS and IFRS, relying on qualitative and, where appropriate, quantitative criteria consistent with current practice. Given that DNSH criteria and minimum safeguards are often complex and inconsistently interpreted, we recommend aligning them with information on ESG PAT, metrics, and due diligence already reported under the ESRS. The Taxonomy's main value lies in ratio calculations, which users can interpret alongside ESRS disclosures. Audit - the usefulness of a standard compared to guidelines: The audit has posed significant challenges in the first year of ESRS implementation. While clarifications in the ED help, further issues will arise as audit practice develops and new concepts (e.g., fair presentation) are introduced. To ensure a consistent and comparable level of audit diligence across all EU jurisdictions, a binding audit standard applicable to all auditors is needed, which would provide a more robust framework than guidelines.			
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	The proposed changes are worse both for preparers and users. Introducing more presentation choices for preparers and introducing fair presentation only creates more questions for preparers, and will create more questions from assurance providers for which the preparers will need to provide more justifications. Most changes proposed decrease the usability and comparability of the data for users. The comment included in the log of amendments that currently "reporting and presentation of disclosures could only be made within very strict limits" could not be further from reality. In this first wave of reports, we users have seen companies already taking liberties with their presentation to the point that the disclosures are not usable, as they are unclear and not comparable with any other issuers when the company chooses an entity-specific presentation. We already find that it is has been extremely difficult for us to find the values that were supposed to correspond to the ESRS metrics in published documents. It is impossible to find most of the metrics for SFDR in many statements, and for the rest, it is impossible to be confident about it. Companies are free to disclose a "gender pay gap" and stay vague about its definition. Companies are free to disclose "non-recycled waste" amounts using a different definition for "recycled" than the one in the ESRS. Information collection was already very difficult in practice, and the proposed changes seem like they encourage the practices that make information collection difficult, and that make the use of misleading presentations easier. Are the ESRS giving up on the idea of being a reliable framework for providing information to sustainable finance users? With this revision and data no longer eing comparable, companies will be sent questionnaires asking them to provide the metrics users actually need.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	I agree with the sentiment that impacts should be reported on when the company has to maintain significant actions to mitigate them. However, I think this phrasing may be a source of confusion and therefore additional preparer-assurance discussions and costs. In what cases is there an impact that would be material before mitigation actions, immaterial after mitigation action, but the mitigation action wouldn't be significant? Unless EFRAG provides clear examples of that, and guidelines to that notion of "significant", this will just be another additional point of debate and cost between preparers, assurance providers, and users.			
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I disagree	This is detrimental to users. Executive summaries are not useful to users, and I doubt they would actually meet the qualitative characteristics, but paragraph 109 would often justify the inclusion of such a summary, that would dilute the material information. Appendices are detrimental to users. Moving specific material information to remote places of the report can be used to attempt to change a user's overview of the company's situation. I don't find the amendment to be discouraging fragmentation, to the opposite. Paragraph 112 needs to require the reference to be in both parts. Currently, this paragraph allows a company to disclose information without mentioning that complements are available in appendices, given that the company may be allowed to only mention in the appendix that the appendix information is relevant to information from the main body. Additionally, wording the need to reference inside a 'may" clause if likely to be interpreted as meaning that referencing is optional, while it is essential for users.			
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The restriction of the consideration given to stakeholder interests to social topics has not been explained and is not justified in our opinion. The precisions regarding the capex/opex for allocated resources are appreciated. However, a lot of companies seemed to have considered this disclosure as completely optional past year (unless no company allocated significant resources to their action plans?), so a change to insist on the required character would seem necessary. Adding explanations about what consitutes an action is appreciated, but the clarifications do not match our expectations. This year, action sections were cluttered with so-called actions that were essentially 'we are working on our policy', i.e. not actually remediation actions. We would have expected the clarifications to explain that these are not remediation actions. Clarifications on entity-specific metrics and targets are appreciated overall. Many entity-specific metrics were disclosed without units this year. The deletion of the MDR-T requirement to disclose the current performance for the target metric is not appropriate. The justification is that it is "included in the objective", but objectives are generally vague and do not define the data the report must disclose.			
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The NMIG being separated from the main body makes them more difficult to use than when they were in the main body. A preparer reading through the main body of the standard has no way to know that there is supporting guidance available in the NMIG. Generally speaking, we consider that removing guidance or making it more difficult to access is the opposite of simplification.			
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	For acquisitions: we recognize that there is a current practical challenge where companies subject to ESRS acquiring subsidiaries not subject to sustainability reporting often are not able to collect the data from the subsidiary. However, this is the wrong way to address the issue. At worst we should have disclosure that the company was unable to collect that information, together with some activity metrics to help users estimate the missing part. At best this should just be reasonable effort estimates included in the disclosed figures. With the proposed relief, users may end up with no hint at all to help them estimate the gap. Issues should be temporary, and companies should be pushed to fix this data collection issue instead of delaying it. The acquisition of a subsidiary is a lengthy process, and candidates to acquisition should be made aware that they will need to report sustainability metrics. Just as they currently know that they need to prepare for IFRS consolidation. With the proposed solution, many large groups that acquire or dispose of subsidiaries in most periods would probably have a permanent offset between their financial and sustainability reporting scopes, which is not compatible with the expectations and regulations on sustainable finance. On loss/disposal: when a company disposes of a subsidiary during the reporting period, that subsidiary is no longer part of the scope of reporting for the financial statement, so we have always been assuming that the sustainability statement also would exclude it. Loss of control is the same. This reads as if the exclusion from the scope becomes optional, so we may have yet another discrepancy between the scope for the financial statements and sustainability statements where a company may report figures corresponding to a subsidiary that was disposed of.			

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Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	It is essential that the information is not presented in a way that would mislead readers into thinking this is the full scope information. This year, many companies included partial information, and the disclosure of the partial measurement was hidden away from the actual value.			
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree				
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	All content that is necessary for sustainable finance disclosure, or generally to meet user needs when user have a legal need to collect that information from companies should not have been deleted or aggregated with other data points.			
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	Fair presentation is not compatible with the objective of the CSRD to provide comparable data, especially to answer user needs to specific data points required for sustainable finance reporting, or for governance from a statistical standpoint. Fair presentation would remove most of the usability from sustainability reports. As mentioned earlier, this year's reports were already taking a lot of liberty with their presentation, with a worrying amount of cases where companies were employing ESRS vocabulary with a different meaning. More strictness on the definition of metrics is required to make the ESRS meet the EU's objectives, definitely not less. I agree with the view that fair presentation is more complex in practice for preparers, as it requires more judgment and will be more costly, in additional to being much less useful to users. Consolidated financial reporting (IFRS) is moving away from fair presentation in practice in recent standard IFRS 18 from similar reasons.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	Many companies are not reporting any breakdown information this year, when they operate in many countries. They would under this requirement.			
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	I agree with the concern that the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, and therefore does not inform users on the payment of adequate wages.			
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	The general usefulness of the ESRS as a whole is questionable if it does not even ensure consistency with the rest of EU sustainability information requirements.			
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Corporatings	User (analyst, data provider, rating agency, etc.)	France	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	ACEA	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Agreement on DMA adding clarity. Howver, simplifications of the DMA process mainly reduce effort for wave 2 companies, not companies already reporting according to ESRS Some wordings in Ch. 3 are still not sufficiently clear and leave room for interpretation, E.G., 3.2(22): if the provided options refer to only the presentation of IROs this can lead to a lack of comparability between reports of different companies. Presentation in tables/overviews etc. should be preferred on IRO level and should be clearly stated, 3.3.1(34): a clear definition of how many previous periods need to be included in the identification of actual impacts is missing. S1-16 could be easily mapped to sub-topics such as discrimination/harassment or child/forced labour. Therefore 11.2 only makes sense if IRO mapping and information materiality can be really used. AR16 is now very confusing as there is no clear differentiation between sub-topic and former sub-sub-topic. This makes it hard to identify the material topics on a detailed level. Sub-topic level should be deleted and sub-sub-topics should become new sub-topics. No "mingling" of the two levels.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Lack of clarity which can lead to additional burdens: For example, in which cases a mitigation or prevention action is considered "significant" and in which cases not remains unclear High burden: If all mitigation efforts that need to be maintained over time cannot be considered in the assessment of a potential negative impact, companies would have to report a high number of potential negative impact, even though the likelihood and severity of occurrence would be non-material in reality. Contradictory language in ESRS: It states that, while an undertaking cannot state a positive impact e.g., for implementing actions to prevent human rights violations along the value chain, it could at the same time report a positive impact, because with these actions, the companies helps to mitigate negative impacts of its upstream suppliers on these human rights topics. Overall, uncertainties exist that leave room for interpretation and unnecessary reporting burdens.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	In general, the increased flexibility introduced throug the proposed amendments are welcome. The possibility of including an executive summary and the emphasis on using appendices to seperate detailed info from key messages can be helpful steps toward increased readability and structure. However, we understand the changes primarily as clarifications of existing options, rather than substantial simplifications. They do not result in significant relief in terms of implementation effort or reporting complexity.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ACEA	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	Mainly the enhanced readability and usability of the standards under Level 3, reduction of complexity and duplication through simplification of GDRs and reducing mandatory PATs, and shifting towards more principle-based approach and the ability to report PATs at higher aggregation level. These changes reduce complexity and duplication, making it easier for preparers to navigate the requirements and focus on material information.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Removal of "may disclose" datapoints, separation between mandatory and non-mandatory content, revision of the lay-out e.g., the relocation of mandatory Application Requirements under the relevant Disclosure Requirements are all welcomed. However, while structure and readability have improved, the overall reporting requirements remain largely unchanged. On top of that, new mandatory disclosures have been added, clearly against the request of the EU Commission and the aim of the revision to reduce reporting burdens. We also recommend eliminating all the unclear terms, such as "Shall reflect", "shall consider", "may present", "may implement", "may include",... to avoid misunderstandings with auditors.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	NMIG can serve as an orientation tool, however, the non-binding nature of NMIG should remain clearly communicated and consistently understood by preparers and auditors. There should be no implicit expectation that the examples provided must be followed or justified if not applied. The NMIG shall not be integrated in the Delegated Act, in order to minimize risks of auditors interpretating it as "the law" to follow, rather than the non-binding orientation tool it is. Therefore it should be kept separate from the delegated act and included in a separate Excel file with the list of mandatory data points published by EFRAG. This document should be seen as guidance on voluntary disclosures, if needed.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Introduction of "undue cost or effort" relief and the removal of the systematic preference for direct data in value chain metrics and allowing the use of estimates. The offer flexibility and support a more proportionate and pragmatic implementation of ESRS, without compromising transparency or alignment with EU Green Deal objectives. However, there may be an increase in burden of proof if auditors challenge whether sufficient effort has been made to fulfil reporting requirements, especially under the "undue cost or effort" points. On 17.4 the question arises why joint operations can only be excluded for environmental metrics, and not also for social metrics if operational control is not fully given. On 17.6 regarding ESRS 2, AR16 paragraph 23(b): The amendments made to the anticipated financial effects do not solve the issue of data availability and reliability, as assumptions for this data point will vary so widely that any comparison between companies would be misleading. All datapoints on anticipated financial effects should be deleted On 17.7 on relief for acquisitions: We welcome the proposed relief for acquisitions, however the one-year timeframe for integrating a subsidiary for sustainability reporting purposes could be insufficient and unrealistic. More flexibility should be offered here.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	It is important to note that many Wave 1 undertakings will benefit only to a limited extent from this relief. In many cases, data collection approaches, often based on workarounds, have already been agreed upon with auditors and implemented. Continuing with these established methodologies may require less effort than reassessing and justifying the application of the new relief.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ACEA	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	We oppose the quantitive disclosures of anticipated financial effects. Underlying data is unclear, and risks cannot be isolated, making any disclosure legally risky and prone to misinterpretation. Such information lacks comparability and does not offer decision-useful insights for stakeholders. With qualitative disclosures, issues exist with disclosures going beyond other existing standards, harming a harmonized approach to this topic. We suggest to make the qualitative disclosures of anticipated financial effects voluntary for the first years after entry into force of the revised standards. Financial estimates involve uncertainty and there are no industry standards/methodologies to develop these. E.g., it remains unclear what the basis for the calculation of the financial effects should be: planning data or data from the last financial year. Other examples include unfeasibility e.g., reputational risks that cannot be quantified. Additionally, required disclosure of financial estimates leads to disclosure or reverse engineering of confidential product planning information, or lead to multiple sets of forecast information in the public space. Guidance on full year results are issued already, accompanied by significant caveats. Additional forecast estimates for future periods could be misconstructed by others. Mandatory disclosure of anticipated financial effects will negatively impact financial and non-financial ratings issued by specialized agencies and credit institutions, regardless of the amounts published. Banks don't favour such disclosure. Disclosures, especially on climate, can lead to a significant negative "financial reputation" for industries like automotive, especially vis-a-vis other regions such as the U.S. and China, who abide by different requirements. This negatively affects competitive positioning of EU companies, while the disclosures have little added value. Removal of the disclosure requirement is of significant importance. IFRS defines when future risks and related current and anticipated financial effects must be reflected in financial reporting. Sustainability reporting should not override/extend these through financial disclosure requirements in the sustainability statement.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	We highlight that the level of detail required often risks commercially sensitive information, particularly in the precise location of assets exposed to environmental or climate-related risks. We call for a deletion of the quantative disclosures on anticipated financial effects. The reduction in words written helps the reader focus on what is required, but the disclosures have not been reduced/meaningful simplified. There is no methodology to link specific climate-related risks or opportunities to financial metrics. A direct mapping of sustainability risks to financial metrics would entail disproportionate effort/complexity. Comparability across undertakings is hindered due to the absence of guidance on the required level of detail for qualitative disclosures. Market participants rely on standardized models and data sources, which are not meaningfully enhanced by inconsistent, company-specific disclosures. The use of granular data remains questionable and doesn't justify the effort required from companies. E1-40 (c): Often, adaptation measures cannot be directly linked to specific assets. Doing so requires enormous efforts/results in imprecise data that offers little. Therefore, a one-to-one attribution is not practical/feasible. E1-40 (d) : It is nearly impossible to calculate the amount/percentage of net revenue at risk from physical climate impacts before considering adaptation measures. Complexity arises from the high uncertainty of climate projections, the difficulty in quantifying future physical damages, and the challenge in modelling how risks will evolve. The lack of standardized methodologies/reliable data further complicates estimations. See comments on E1-41 and others in Part 3 of this consultation.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	1) It is recommended that the fair presentation framework not to be required, but is voluntary to use (see also our comments to 25)) Some relief is provided, but the wording in the context of disclosure following the operational control approach is very vague and hence might be part of discussions with auditors. This has to be clarified, in particular to emphasize that it is a "may" disclosure. Additionally concerns arise given the fact ISSB standards were never implemented. The question arises why the "Fair Presentation" framework would take into account ISSB standards given that fact. This would lead to additional complexities, especially if the vagueness in wording that is proposed remains. 2) IFRS allows for any GHG boundary to be used while the use of financial control is made mandatory by ESRS, failing to align to the GHG Protocol. The ensure alignment with IFRS, companies should be provided flexibility to choose the boundary line with the GHG Protocol. 3) The introduced relief clauses are welcome and needed by preparers, however the timeline for Level 1 remains unclear. 4) It is important to maintain the additional reliefs, since in the ESRS we go beyond climate aspects, where methodologies are less advanced, thus these clauses are needed. 5) Agree 6) We support the reference to SASB Standards and IFRS industry-based guidance as a source of possible disclosure to enhance transparency and interoperability with ISSB standards.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ACEA	Business association (other than association of financial institution)	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	Changes are purely editoral or aimed at improving readability and comrehension, instead of an actual reduction in the number of disclosures. The overall scope and complexity of the disclosures remain largely unchanged. The deletion of datapoints primarily affects how requirements are presented, not what is required. Deletion of datapoints does not necessarily translate into a proportional reduction in the substantive reporting scope or effort. We do not expect a significantly reduced reporting volume under the amended ESRS. Instead, the changes may help reduce effort in documentation and coordination with auditors. For example, the introduced options for burden reliefs may simplify internal discussions and reduce the need to justify the omission of non-material items. It is important that this distinction is clearly communicated: while the number of datapoints has decreased, the underlying disclosure obligations remain intact. This will help manage expectations and avoid misinterpretations regarding the actual simplification impact of the amendments. Additionally, we have concerns with the addition of new mandatory disclosures, going against the purpose of the revision of the ESRS. Simplification should be focused on reduction of efforts in data collection, documentation, and coordination with auditors.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	22.E1.	Comments on deleted datapoints in ESRS E1	I disagree	Changes are purely editoral or aimed at improving readability and comrehension, instead of an actual reduction in the number of disclosures. The overall scope and complexity of the disclosures remain largely unchanged. The deletion of datapoints primarily affects how requirements are presented, not what is required. Deletion of datapoints does not necessarily translate into a proportional reduction in the substantive reporting scope or effort. We do not expect a significantly reduced reporting volume under the amended ESRS. Instead, the changes may help reduce effort in documentation and coordination with auditors. For example, the introduced options for burden reliefs may simplify internal discussions and reduce the need to justify the omission of non-material items. It is important that this distinction is clearly communicated: while the number of datapoints has decreased, the underlying disclosure obligations remain intact. This will help manage expectations and avoid misinterpretations regarding the actual simplification impact of the amendments. Additionally, we have concerns with the addition of new mandatory disclosures, going against the purpose of the revision of the ESRS. Simplification should be focused on reduction of efforts in data collection, documentation, and coordination with auditors.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	22.E2.	Comments on deleted datapoints in ESRS E2	I disagree	Changes are purely editoral or aimed at improving readability and comrehension, instead of an actual reduction in the number of disclosures. The overall scope and complexity of the disclosures remain largely unchanged. The deletion of datapoints primarily affects how requirements are presented, not what is required. Deletion of datapoints does not necessarily translate into a proportional reduction in the substantive reporting scope or effort. We do not expect a significantly reduced reporting volume under the amended ESRS. Instead, the changes may help reduce effort in documentation and coordination with auditors. For example, the introduced options for burden reliefs may simplify internal discussions and reduce the need to justify the omission of non-material items. It is important that this distinction is clearly communicated: while the number of datapoints has decreased, the underlying disclosure obligations remain intact. This will help manage expectations and avoid misinterpretations regarding the actual simplification impact of the amendments. Additionally, we have concerns with the addition of new mandatory disclosures, going against the purpose of the revision of the ESRS. Simplification should be focused on reduction of efforts in data collection, documentation, and coordination with auditors.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	22.E3.	Comments on deleted datapoints in ESRS E3	I disagree	Changes are purely editoral or aimed at improving readability and comrehension, instead of an actual reduction in the number of disclosures. The overall scope and complexity of the disclosures remain largely unchanged. The deletion of datapoints primarily affects how requirements are presented, not what is required. Deletion of datapoints does not necessarily translate into a proportional reduction in the substantive reporting scope or effort. We do not expect a significantly reduced reporting volume under the amended ESRS. Instead, the changes may help reduce effort in documentation and coordination with auditors. For example, the introduced options for burden reliefs may simplify internal discussions and reduce the need to justify the omission of non-material items. It is important that this distinction is clearly communicated: while the number of datapoints has decreased, the underlying disclosure obligations remain intact. This will help manage expectations and avoid misinterpretations regarding the actual simplification impact of the amendments. Additionally, we have concerns with the addition of new mandatory disclosures, going against the purpose of the revision of the ESRS. Simplification should be focused on reduction of efforts in data collection, documentation, and coordination with auditors.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	22.E4.	Comments on deleted datapoints in ESRS E4	I disagree	Changes are purely editoral or aimed at improving readability and comrehension, instead of an actual reduction in the number of disclosures. The overall scope and complexity of the disclosures remain largely unchanged. The deletion of datapoints primarily affects how requirements are presented, not what is required. Deletion of datapoints does not necessarily translate into a proportional reduction in the substantive reporting scope or effort. We do not expect a significantly reduced reporting volume under the amended ESRS. Instead, the changes may help reduce effort in documentation and coordination with auditors. For example, the introduced options for burden reliefs may simplify internal discussions and reduce the need to justify the omission of non-material items. It is important that this distinction is clearly communicated: while the number of datapoints has decreased, the underlying disclosure obligations remain intact. This will help manage expectations and avoid misinterpretations regarding the actual simplification impact of the amendments. Additionally, we have concerns with the addition of new mandatory disclosures, going against the purpose of the revision of the ESRS. Simplification should be focused on reduction of efforts in data collection, documentation, and coordination with auditors.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ACEA	Business association (other than association of financial institution)	Belgium	22.ES.	Comments on deleted datapoints in ESRS E5	I disagree	Changes are purely editoral or aimed at improving readability and comrehension, instead of an actual reduction in the number of disclosures. The overall scope and complexity of the disclosures remain largely unchanged. The deletion of datapoints primarily affects how requirements are presented, not what is required. Deletion of datapoints does not necessarily translate into a proportional reduction in the substantive reporting scope or effort. We do not expect a significantly reduced reporting volume under the amended ESRS. Instead, the changes may help reduce effort in documentation and coordination with auditors. For example, the introduced options for burden reliefs may simplify internal discussions and reduce the need to justify the omission of non-material items. It is important that this distinction is clearly communicated: while the number of datapoints has decreased, the underlying disclosure obligations remain intact. This will help manage expectations and avoid misinterpretations regarding the actual simplification impact of the amendments. Additionally, we have concerns with the addition of new mandatory disclosures, going against the purpose of the revision of the ESRS. Simplification should be focused on reduction of efforts in data collection, documentation, and coordination with auditors.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	22.S1	Comments on deleted datapoints in ESRS S1	I disagree	Changes are purely editoral or aimed at improving readability and comrehension, instead of an actual reduction in the number of disclosures. The overall scope and complexity of the disclosures remain largely unchanged. The deletion of datapoints primarily affects how requirements are presented, not what is required. Deletion of datapoints does not necessarily translate into a proportional reduction in the substantive reporting scope or effort. We do not expect a significantly reduced reporting volume under the amended ESRS. Instead, the changes may help reduce effort in documentation and coordination with auditors. For example, the introduced options for burden reliefs may simplify internal discussions and reduce the need to justify the omission of non-material items. It is important that this distinction is clearly communicated: while the number of datapoints has decreased, the underlying disclosure obligations remain intact. This will help manage expectations and avoid misinterpretations regarding the actual simplification impact of the amendments. Additionally, we have concerns with the addition of new mandatory disclosures, going against the purpose of the revision of the ESRS. Simplification should be focused on reduction of efforts in data collection, documentation, and coordination with auditors.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	22.S2	Comments on deleted datapoints in ESRS S2	I disagree	Changes are purely editoral or aimed at improving readability and comrehension, instead of an actual reduction in the number of disclosures. The overall scope and complexity of the disclosures remain largely unchanged. The deletion of datapoints primarily affects how requirements are presented, not what is required. Deletion of datapoints does not necessarily translate into a proportional reduction in the substantive reporting scope or effort. We do not expect a significantly reduced reporting volume under the amended ESRS. Instead, the changes may help reduce effort in documentation and coordination with auditors. For example, the introduced options for burden reliefs may simplify internal discussions and reduce the need to justify the omission of non-material items. It is important that this distinction is clearly communicated: while the number of datapoints has decreased, the underlying disclosure obligations remain intact. This will help manage expectations and avoid misinterpretations regarding the actual simplification impact of the amendments. Additionally, we have concerns with the addition of new mandatory disclosures, going against the purpose of the revision of the ESRS. Simplification should be focused on reduction of efforts in data collection, documentation, and coordination with auditors.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	22.S3	Comments on deleted datapoints in ESRS S3	I disagree	Changes are purely editoral or aimed at improving readability and comrehension, instead of an actual reduction in the number of disclosures. The overall scope and complexity of the disclosures remain largely unchanged. The deletion of datapoints primarily affects how requirements are presented, not what is required. Deletion of datapoints does not necessarily translate into a proportional reduction in the substantive reporting scope or effort. We do not expect a significantly reduced reporting volume under the amended ESRS. Instead, the changes may help reduce effort in documentation and coordination with auditors. For example, the introduced options for burden reliefs may simplify internal discussions and reduce the need to justify the omission of non-material items. It is important that this distinction is clearly communicated: while the number of datapoints has decreased, the underlying disclosure obligations remain intact. This will help manage expectations and avoid misinterpretations regarding the actual simplification impact of the amendments. Additionally, we have concerns with the addition of new mandatory disclosures, going against the purpose of the revision of the ESRS. Simplification should be focused on reduction of efforts in data collection, documentation, and coordination with auditors.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	22.S4	Comments on deleted datapoints in ESRS S4	I disagree	Changes are purely editoral or aimed at improving readability and comrehension, instead of an actual reduction in the number of disclosures. The overall scope and complexity of the disclosures remain largely unchanged. The deletion of datapoints primarily affects how requirements are presented, not what is required. Deletion of datapoints does not necessarily translate into a proportional reduction in the substantive reporting scope or effort. We do not expect a significantly reduced reporting volume under the amended ESRS. Instead, the changes may help reduce effort in documentation and coordination with auditors. For example, the introduced options for burden reliefs may simplify internal discussions and reduce the need to justify the omission of non-material items. It is important that this distinction is clearly communicated: while the number of datapoints has decreased, the underlying disclosure obligations remain intact. This will help manage expectations and avoid misinterpretations regarding the actual simplification impact of the amendments. Additionally, we have concerns with the addition of new mandatory disclosures, going against the purpose of the revision of the ESRS. Simplification should be focused on reduction of efforts in data collection, documentation, and coordination with auditors.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ACEA	Business association (other than association of financial institution)	Belgium	22.G1	Comments on deleted datapoints in ESRS G1	I disagree	Changes are purely editoral or aimed at improving readability and comrehension, instead of an actual reduction in the number of disclosures. The overall scope and complexity of the disclosures remain largely unchanged. The deletion of datapoints primarily affects how requirements are presented, not what is required. Deletion of datapoints does not necessarily translate into a proportional reduction in the substantive reporting scope or effort. We do not expect a significantly reduced reporting volume under the amended ESRS. Instead, the changes may help reduce effort in documentation and coordination with auditors. For example, the introduced options for burden reliefs may simplify internal discussions and reduce the need to justify the omission of non-material items. It is important that this distinction is clearly communicated: while the number of datapoints has decreased, the underlying disclosure obligations remain intact. This will help manage expectations and avoid misinterpretations regarding the actual simplification impact of the amendments. Additionally, we have concerns with the addition of new mandatory disclosures, going against the purpose of the revision of the ESRS. Simplification should be focused on reduction of efforts in data collection, documentation, and coordination with auditors.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	The affected datapoints do not appear to introduce fundamentally new reporting obligations, and the rationale for each is understandable. However, the principle of not increasing reporting requirements should be applied consistently. The change in status to mandatory for these datapoints will require additional interpretation, internal coordination, and alignment with auditors. For E4: E4-1, particularly paragraph 12, should not be mandatory. The obligation to prepare and disclose a biodiversity transition plan should only arise if biodiversity impacts and risks are deemed material through its DMA. There are practical challenges in disclosing "key features", such as proportionality of the level of detail required. Additionally, obtaining precise, site-specific biodiversity data from complex value chains is often unfeasible. G1: the 10(c) update, while clarifying low-risk roles, overlooks the dynamic nature of global corporation, making a precise percentage of at-risk functions unfeasible. Disclosure focus should be on robust mitigation policies, processes, and identification of at-risk roles, not percentages. Additionally, disclosure 14, requiring legal violation disclosure imposes a new, potentially serious obligation in Europe where no affirmative duty currently exists.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	E5-4 and E5-5: We recommend to remove these disclosures. In 15(c), the proposed datapont is impractical and potentially misleading. Weight-based critical material calculation can prioritize lgher weight materials that may be of lower risk. The CRMA's narrow strategic definition can miss broader industry specific vulnerabilities. Furthermore, tracking precise raw material weights across complex supply chains is an immense burden, yielding data of questionable value for circularity or true risk assessment. We strongly oppose the addition of any new datapoints as they typically result in significant additional effort for reporting entities, without a corresponding increase in useful information for decision-making. The cost-benefit ratio of expanding disclosure requirements must be carefully considered, and the current framework already places substantial demands on preparers. Addtionally, in the Commission task given to EFRAG there was a clear message not to introduce new datapoints. This should be respected.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	The Fair Presentation reproting framework cannot be implemented as is. Both companies and auditors need progressivity and more detailed guidance, with concrete intermediate milestones converging to the vision given by Appendix B in a reasonable and implementable timeline. Given the evolving state of the regulation and various stages of adoption by various industries, as well as various experience levels of assurance providers, maintaining the "Fair Presentation Framework" as voluntary would allow time for the industry to develop that capability in a more standardized way. Auditing procedures would possible have to be revised, therefore involving more work and greater uncertainty. A fair presentation opinion will drive scope beyond a limited assurance opinion. Fair presentation would also introduce further subjectivity in the ESG space, at a time when ESG reporting standards are still evolving. Assurance costs and lack of clarity would increase as a result of this requirement, given the vagueness of wording and lack of definition that could lead to subjectivity at the auditing stage. Additionally, increased accountability for Board Members would exist, given their obligation to ensure not only compliance with standards, but also that the information is presented fairly to all relevant stakeholders. At this stage, a voluntary approach is therefore appropriate. Additionally see our comments in question 21 with regards to the framework.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	General agreement that data is usually available when collecting the related data points. However, a top 10 of countries might be overdone as not all companies are active in so many countries and information might not lead to information-material insights. A top 5 for example would suffice.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	It is agreed to include the ILO framework in the adequate wages metric, with opportunity to participate in EFRAG's targeted field test to understand practical implication. The ILO living-wage framework has become the globally recognized standard for assessing adequate wages because of its rigorous methodology, international legitimacy, and broad stakeholder acceptance. For that reason, we agree EFRAG should base the adequate-wage metric on the ILO framework. The impact on companies remains uncertain, pending EFRAG field-test results and a new global renumeration review; current data suggests a reporting impact is unlikely but this must be confirmed.			

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Survey	ACEA	Business association (other than association of financial institution)	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	The importance of feasibility and coherence in reporting according to different legislations should always be taken into account. Removing some of the SFDR datapoints is appropriate, the ESRS simplification will need to be coordinated with the review of the SFDR.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	Further simplification on AR 26 is needed. Specification of the, until now, optional examples of how targets can be set is not needed because companies are best placed to assess which targets are most appropriate for them. Flexible target setting options are essential. Additionally, detailed guidance undermines the DMA by creating a "checklist" effect. This pressures companies to report on a topic even if their own assessment deems it non-material. It is strongly recommended that AR 26 is reviewed and replaced with simpler, principles-based guidance. This would empower companies to set targets that are relevant to their specific material impacts, if any exist, rather than forcing compliance with a one-size-fits-all standard.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	When it comes to alignment with the EU Payment Transparency Directive (EU PTD), we are still missing total alignment with the EU PTD, with regards to salary/wage components. This might lead to different calculation approaches, especially when the EU PTD is translated differently in the member states. Therefore we recommend to keep the datapoint regarding gender pay gap, but make it voluntary in nature.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	This change should still ensure support for SMEs while streamlining processes. Support for the removal of the datapoint on "average time to pay an invoice", as it did not offer meaningful insights and was difficult to interpret in a decision-useful way. We do question the relevance and practicality of the remaining datapoint on "standard payment terms". This metric lacks clarity, especially in international contexts where no legal standard exists, and does not provide useful information for assessing supplier relationships. The percentage of payments made under "standard terms" is difficult to interpret and does not allow conclusions about actual impacts on suppliers. Disclosures on standard payment terms are already partially covered by existing financial reporting requirements. As such, there is a risk of duplication between ESRS and IFRS requirements. To avoid inconsistencies and unnecessary reporting burden, alignment and clarification on the scope and purpose of such disclosures is essential. Additionally, the categorization of suppliers (e.g., SMEs) remains problematic. Our financial systems do not track suppliers by size and implementing such a classification would require disproportionate effort. Similarly, the requirement to report the number of legal proceedings due to late payments, is not decision-useful in isolation. Without qualitative context, such as reason for delays or materiality thresholds, the raw number lacks relevance.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS 1 (partially agree): The exposure drafts reduce the volume of the S1 significantly, especially redundancies. However, the associated efforts are not being reduced proportionally. The change in nomenclature alone is now leading to high implementation efforts. The new structure could lead to confusion with view to the IRO mapping. The categorization into sub-topics is less consistent. They should be fully distinct and clear and not mixed between previous sub-topics and sub-sub topics. Also S1-16 should be a datapoint that can be mapped and should not be material of its own.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	ESRS 2: The revision of ESRS 2 is not sufficient to reduce the reporting volume and burden significantly. Many proposed changes to ESRS 2 DRs are only cosmetical and do not change the substance of the reporting. Furthermore, merging several datapoints is not a reduction. We object the introduction of new reporting requirements as well.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	ESRS E1: The ESRS revisions are not satisfactory overall. Although some areas have been shortened and disclosure obligations have been eased, some data points have been added or tightened further. We do not see any general simplification of the DRs. There is currently no balance.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ACEA	Business association (other than association of financial institution)	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See Part 3			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See Part 3			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See Part 3			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See Part 3			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See Part 3			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See Part 3			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See Part 3			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See Part 3			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ACEA	Business association (other than association of financial institution)	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS G1 (partially agree): The reductions are reasonable. However, the new structure could lead to confusion with view to the IRO mapping The categorization into sub-sub-topics is less consistent, e.g., regarding the sub-topc "corruption and bribery" and the previously more clearly separated sub-sub-topics "prevention and incidents". It would be helpful for a granular and effective materiality assessment if the topics were subdivided more distinctly again.			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See Part 3			
Survey	ACEA	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Particularly in the Environmental standards, the standards now increasingly refer to other EU Directives and laws. Unfortunately, we could not recognize any convergence in the Glossary. Definitions differ greatly from existing definitions from other Regulations. This complicates the collection and coordination effort enormously and sometimes leads to extra effort being incurred and the existing definitions cannot be used. It would be desirable to standardize the definitions in the Glossary with definitions existing in Regulations and laws E 1- 5/6 Reporting on actions and resources should be raised to the levers level for achieved and expected GHG emission reductions and quantitative short and medium-term CapEx and/or OpEx figures at the lever level should be made voluntary as this gets into competitive information like product plans			
Survey	Social and Labor Convergence Program (SLCP)	NGO	Netherlands	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Despite the reduction in number of data points, SLCP's perspective is that the most relevant disclosures have either been kept in this standard or moved to ESRS 2 (General Disclosures), without compromising overall impact. Additionally, most data points moved to the Non-Mandatory Illustrative Guidance (NMIG) were already voluntary in the previous standard. However, the removal of paragraph 28 from ESRS Set 1 (Delegated Act 2023) - partly moved to AR 4 and NMIG 8 - marks one of the few cases where a mandatory requirement has been downgraded to voluntary. This change should be reversed. It is critical that undertakings be required to disclose whether and how they assess value chain workers' awareness of and trust in grievance mechanisms, as well as whether policies are in place to protect individuals using them against retaliation. Such disclosures are essential and should remain mandatory. Except for this identified disclosure, the amended draft adequately addresses the potential impacts that business operations may have on workers in supply chains. In particular, the sub-topics identified in paragraph 4 are well aligned with those covered in SLCP's social assessment tool, the Converged Assessment Framework (CAF): working conditions (including working time, adequate wages, and social protection), freedom of association, health and safety, diversity and equal treatment, child labor, and forced labor. SLCP also welcomes the standard's increased clarity and readability, specifically: The clear articulation of the objective of this standard, supported by the reference in paragraph 2 to international and European human rights instruments and conventions, which provides important guidance for undertakings reporting on this standard, The inclusion of application requirements directly after each disclosure requirement, rather than grouping them all at the end of the document, The introduction of each disclosure requirement with a disclosure objective, making it clearer what undertakings should focus on when reporting.			
Survey	Arbeitskreis Externe Unternehmensberichterstattung (AKEU) of the Schmalen-bach-Gesellschaft für Betriebswirtschafte. V.	Other - please specify (required)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The AKEU member organizations partially agree that the proposed amendments to the Double Materiality Assessment (DMA) simplify the process and reinforce the role of information materiality, but the practical impact remains limited. The majority of respondents (58%) expect no change in the set of material topics identified, while 23% foresee only a moderate decrease. This indicates that the revisions are perceived as easing the documentation and structuring of the DMA, rather than altering substantive outcomes. The revised wording of Chapter 3 is seen as clearer and more business-oriented, but companies stress that simplification will only reduce burden if external auditors accept the streamlined approach in practice. Several respondents welcome the stronger emphasis on linking the DMA to core business activities and strategy. For some, this may lead to a more focused set of material topics - particularly, a reduction in environmental issues that are material mainly upstream. Others note that certain topics, such as "G1 Business Conduct," are currently over-identified and could be reduced under the revised guidance. One respondent described using a top-down, risk-based approach with a defined materiality threshold (20–25%), which yielded relatively few material sub-topics; they see the amendments as supportive of this approach. At the same time, many firms already integrate DMA with strategy and thus expect only incremental changes rather than a significant shift in outcomes. They see the benefit of the amendments therefore as largely procedural: less documentation, greater clarity, and potentially stronger alignment with corporate strategy. In sum, AKEU members expect the revised DMA framework to improve readability and orientation and to modestly reduce the number of reported topics. However, the overall simplification is seen as partial, with much depending on auditor interpretation and the continued need for extensive internal analysis and documentation.			

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Survey	Arbeitskreis Externe Unternehmensberichterstattung (AKEU) of the Schmalen-bach-Gesellschaft für Betriebswirtschaft e. V.	Other - please specify (required)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The AKEU member organizations partially agree that the new guidelines on considering remediation, mitigation, and prevention (RMP) actions in the DMA can contribute to more relevant and comparable reporting. Respondents acknowledge that the principle of assessing impacts on both a gross and net basis is important for avoiding overstating issues that are already well managed, and for better alignment with existing risk management practices. Some expect the guidance to help them narrow the set of material issues by recognizing the effect of management's RMP actions, thereby reducing non-material disclosures. At the same time, significant uncertainty remains. Many respondents call for clearer interpretation on when RMP actions may be taken into account, and how the guidance applies to risks as well as impacts. Without further clarification, these respondents worry about inconsistent application, additional documentation requirements, and audit challenges. Several anticipate that the requirement to evidence management processes for auditors could increase the reporting burden. Others noted that, whereas the new approach could reduce the number of identified IRO topics, those topics deemed material will still require the same depth of disclosure, limiting any real cost relief. Overall, 64% of survey AKEU member organizations expect no change, 9% a moderate decrease, but 27% a moderate or strong increase in reporting burden. Overall, the net effect is expected to be neutral , unless a clear net perspective is explicitly permitted and supported with practical guidance. In sum, while the new guidance has potential to improve relevance and comparability, AKEU members feel it requires sharper definitions and examples as well as more consistent guidance (e.g., related to IROs) to be effective, without which the balance between simplification and robustness will be only partially achieved.			
Survey	Arbeitskreis Externe Unternehmensberichterstattung (AKEU) of the Schmalen-bach-Gesellschaft für Betriebswirtschaft e. V.	Other - please specify (required)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The AKEU member organizations partially agree that the proposed amendments will improve readability and may enhance connectivity between sustainability and financial reporting, but expect these gains to remain limited. Survey results show that 56% of respondents expect no change, 22% foresee moderate improvement, and 22% anticipate reduced connectivity. This reflects a mixed outlook: Whereas some steps forward are acknowledged, structural and scope-related barriers continue to constrain integration of corporate reporting. The most positively received change is the explicit confirmation of the financial control approach for defining the reporting boundary. This is expected to better harmonise ESRS scope with IFRS, reduce unnecessary "walkovers" and documentation, and allow exclusion of non-material subsidiaries. The amendments to the DMA and the fair presentation principle are also welcomed as conceptually supporting better alignment with corporate strategy and financial reporting. However, respondents highlight several persistent obstacles, including that the sustainability statement must remain a standalone, separate section of the management report. They also note that, in practice, sustainability and financial reporting still rely on different data sources and logics, often not aligned with legal-entity boundaries, which hinders deeper integration. A major unresolved issue is the mismatch in GHG reporting scope: The ESRS notion oflayered operational control differs from the GHG Protocol and ISSB/IFRS, raising concerns about interoperability and consistency for users. Respondents urge further alignment on this point. Other ESRS–ISSB differences were judged as less problematic for primary users. In sum, AKEU member organizations are of the view that the amendments modestly enhance clarity and readability, and that the alignment on financial control is a meaningful step. Yet the overall connectivity benefits are seen as incremental, with significant barriers and scope mismatches still limiting the integration of sustainability and financial reporting			
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The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The AKEU member organizations partially agree that the proposed amendments on burden reliefs strike a better balance between easing preparers' reporting challenges and preserving transparency in line with the EU Green Deal and global interoperability. Respondents generally welcome the horizontal burden reliefs as a meaningful step providing a legal basis for practices such as using estimates or partial-scope calculations, reducing the need for creating entirely new datapoints, and facilitating discussions with auditors. These clarifications can help companies focus on strategically relevant topics and reduce complexity in specific cases, such as acquisitions close to year-end or the exclusion of non-significant activities. AKEU members assess the expected overall impact on reporting costs as moderate rather than substantial. According to our member survey, 54% anticipate a moderate reduction, 31% no change, and 8% even a moderate increase. The ability to use estimates, partial-scope calculations, and reliefs for acquisitions are seen as the most practical provisions, but many companies already apply such approaches in practice, making incremental savings limited. Opinions on the "undue cost or effort" clause are mixed: while some value it as pragmatic, others view it as too vague to deliver consistent relief. The reliefs also affect preparers differently depending on their stage of implementation. Wave-1-companies have already built systems and auditor-aligned processes, so they consider the new reliefs as coming too late to reduce current effort; benefits may materialize later, particularly for value-chain-datapoints. By contrast, Wave-2 and less mature preparers are likely to benefit more from the flexibility, as the reliefs allow them to avoid strategically irrelevant disclosures and better align reporting with corporate strategy. Overall, AKEU members consider the reliefs a positive step but not as fundamentally reducing the reporting burden. They are most effective when targeted at new preparers (e.g., Wave-2-firms), while many Wave-1-preparers expect only incremental gains.			

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The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Preparers among the members mostly support Option-2, under which anticipated financial effects (AFE) are only disclosed qualitatively. This reflects the overwhelming majority view in the survey (83%), while only 8% favoured mandatory quantitative disclosure and 8% disagreed with both options. Our evidence from more than 700 first-wave-CSRD-reports also indicates that few firms have provided these disclosures to begin with, and even less provide quantitative inputs. Respondents indicate that reliable and comparable quantitative AFE-disclosures are currently infeasible. Respondents consistently highlighted that such figures are highly uncertain, methodologically immature, and extremely resource-intensive. Data collection would require substantial new modelling, with limited connectivity to existing risk- and financialreporting-systems, and little audit-ready evidence available. There is also a legal and reputational risk that forward-looking numbers could be misinterpreted, given the sensitivity of valuation-related assumptions. Several respondents stressed that IFRS already governs the recognition of future risks in financial statements and that sustainability disclosures should not override that framework. Qualitative disclosures are common practice in management reporting and can provide meaningful context at relatively low additional cost. Respondents noted that qualitative commentary is easier to align with IFRS risk discussions and better suited to stepwise integration with ISSB-ESRS-interoperability once methodologies mature. Some incremental work is expected (designing new KPIs, aligning narratives internally), but the longer-term-impact is considered neutral. 31% of the surveyed members expect no change, 23% a moderate reduction, and 38% a moderate increase linked to one-off implementation efforts. No strong changes were expected. Preparers among the members think that Option-2 strikes the right balance by ensuring transparency through qualitative reporting, avoiding premature quantitative disclosures of low reliability, and providing flexibility for more robust metrics to evolve over time. From an academic perspective, we note that making quantitative AFE-disclosure optional indefinitely may fail to incentivize companies to build their AFE-related management and reporting capabilities.			
Survey	Arbeitskreis Externe Unternehmensberichterstattung (AKEU) of the Schmalen-bach-Gesellschaft für Betriebswirtschaft e. V.	Other - please specify (required)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	The AKEU member organizations partially agree that the proposed amendments contribute to interoperability while supporting simplification objectives, but the balance remains incomplete. On the positive side, respondents acknowledge that some changes, such as greater emphasis on materiality filtering and clarifications in the DMA, can make ESRS reporting more principle-based and closer in spirit to ISSB standards. In principle, aligning ESRS with global initiatives could reduce duplication and facilitate reporting for companies active in multiple jurisdictions. However, the survey evidence shows limited optimism about interoperability in practice. Among respondents, 73% expect no change in their likelihood of adopting or aligning with ISSB, 18% see the amendments as making alignment less likely, and only 9% more likely. None expect a strong positive effect. The main concerns relate to areas where ESRS and ISSB continue to diverge. The most frequently mentioned examples are: Anticipated financial effects (AFE): ESRS maintains mandatory expectations that go beyond the ISSB framework, creating inconsistency and additional reporting burdens. GHG boundaries and scopes: ESRS relies on layered operational control, whereas ISSB and the GHG Protocol are more widely applied globally, creating challenges for comparability and investor use. Changing requirements: Frequent amendments increase near-term reporting effort, reducing appetite for parallel adoption of ISSB. Furthermore, external demand drivers are weak: Respondents see little investor or peer pressure to adopt ISSB in addition to ESRS. Most plan to focus on ESRS compliance first, with only opportunistic or partial references to ISSB disclosures planned in the medium term. In sum, AKEU members think that, while the amendments offer incremental clarification and simplification, they do not yet deliver the level of interoperability needed to encourage meaningful ISSB adoption. The balance struck is therefore only partial, and stronger convergence on key technical areas would be required to unlock the intended benefits.			
Survey	Arbeitskreis Externe Unternehmensberichterstattung (AKEU) of the Schmalen-bach-Gesellschaft für Betriebswirtschaft e. V.	Other - please specify (required)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Arbeitskreis Externe Unternehmensberichterstattung (AKEU) of the Schmalen-bach-Gesellschaft für Betriebswirtschaft e. V.	Other - please specify (required)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	The AKEU member organizations partially agree that the proposed reduction in mandatory datapoints represents a step toward balancing burden reduction with the objectives of the EU Green Deal. The revisions improve readability and structure, and in some areas the amendments reduce unnecessary scope. However, the impact on reporting costs is expected to remain modest at best. Respondents consistently emphasize that the datapoints removed are often qualitative and low-cost to maintain, while the most resource-intensive datapoints remain. Chief among these are quantitative metrics requiring internal operational or value chain data, such as Scope 3 emissions, which demand extensive coordination, validation, and methodological development. Similarly, anticipated financial effects impose high recurring costs due to uncertainty, lack of guidance, and sensitive forward-looking estimates. Social datapoints such as S1-9 (adequate wages, requiring checks against ~500 ILO benchmarks), S1-15 (remuneration medians), and health- or discrimination-related indicators are seen as disproportionate burdens, particularly given data protection issues and high manual effort. With respect to amendments, AKEU preparer members point to increased costs from S1-5 (broader employee country breakdown), E2-4 ("any material pollutant"), and E1 transition plan requirements (fossil CapEx, locked-in emissions, interim targets, financial planning). While some changes create simplifications, others add granularity or new concepts (e.g., gross vs. net reporting, fair presentation), resulting in a mixed net effect. Quantitatively, 69% of respondents expect very limited cost reductions and 23% none at all. 45% see some cost relief from amendments, while 27% report no change, and 27% expect some increases. 50% plan to stop reporting deleted datapoints, though 25% will continue selected disclosures for investor expectations, ratings, or internal KPIs; the remaining 25% are undecided. In sum, AKEU members think that the revisions modestly streamline ESRS but do not eliminate the costliest datapoints. The resulting practical cost relief is therefore limited.			

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Survey	Arbeitskreis Externe Unternehmensberichterstattung (AKEU) of the Schmalen-bach-Gesellschaft für Betriebswirtschaft e. V.	Other - please specify (required)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The AKEU member organizations partially agree that the six datapoints moved from "may" to "shall" are appropriate and justified. Respondents generally accept the rationale for strengthening certain disclosures, but consider the overall effect on reporting burden mixed. For some datapoints, the added effort is limited. Confirmed incidents of corruption and bribery (G1 para. 14) and procurement team training (G1 para. 10(c)) are already tracked by many firms and can be disclosed without major new processes. Likewise, water withdrawal and discharge metrics (E3) are already established in many reporting systems. For these items, moving from voluntary to mandatory appears reasonable. By contrast, other datapoints are perceived as costly and complex. E5 paragraph 15(c) (critical and strategic raw materials) and E2-4 (secondary microplastics) stand out as the most burdensome, given supply-chain transparency requirements, definitional uncertainty, and the need to develop new methodologies. These datapoints will require extensive data collection and supplier coordination, with significant recurring costs. E4 (biodiversity transition plan) is also seen as challenging due to uncertainty in scenario design and feasibility. Respondents also highlighted the need for transitional reliefs, phased implementation, and clearer guidance to reduce the costs of alignment and auditor discussions. Overall, AKEU members agree that some new datapoints are justified, but others impose disproportionate costs. Agreement is therefore only partial			
Survey	Arbeitskreis Externe Unternehmensberichterstattung (AKEU) of the Schmalen-bach-Gesellschaft für Betriebswirtschaft e. V.	Other - please specify (required)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The AKEU member organizations partially agree that the four new mandatory datapoints are appropriate and justified. While one of the datapoints codifies existing practice with little added burden, the others are seen as disproportionately costly. The new requirement under ESRS 2 BP 1—confirmation that ESRS 1 general requirements have been applied—is straightforward and reflects existing reporting practice. Its burden is negligible. In contrast, E5-4 (critical and strategic raw materials) and E2-4 (secondary microplastics) are widely regarded as highly burdensome. Both require substantial supply-chain transparency, new tracking processes, and the development of robust methodologies in areas where definitions remain unclear. Respondents highlighted the difficulty of obtaining consistent data across suppliers and the additional effort needed to align with auditors. These datapoints are expected to drive significant recurring costs once implemented. E5-5 (unknown final destination of materials) also adds to the burden, though to a lesser degree, by requiring companies to set up additional tracking and classification systems. Across all nine datapoints (five moved plus four new), 50% of respondents expect no change in burden, 42% foresee a moderate increase, and 8% a strong increase. This suggests that the new datapoints materially contribute to higher costs, especially during first-time implementation. Overall, while AKEU members acknowledge the intent behind these disclosures, they consider the balance between burden and benefit to be negative. Transitional measures, phased implementation, and clearer definitions would be necessary to ensure these datapoints are feasible and proportionate.			

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Survey	Decathlon	Preparer (non-financial preparing a sustainability report)	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Double materiality is a key concept of the CSRD. Nevertheless, the lack of implementation guidance and of clarity regarding the establishment of IROs (Impacts, Risks, and Opportunities) leads to the non-comparability of reports. It is important to clarify the determination process for IROs, taking into account sectoral specificities. The audits performed must also be standardized. The gross versus net position within double materiality must be clarified. A clear position must be established and made applicable to all in order to facilitate comparability among undertakings. In the event that the net basis is adopted,a common methodology for net assessment must be provided and applied uniformly for undertakings subject to the CSRD.			
Survey	Decathlon	Preparer (non-financial preparing a sustainability report)	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Double materiality is a key concept of the CSRD. Nevertheless, the lack of implementation guidance and of clarity regarding the establishment of IROs (Impacts, Risks, and Opportunities) leads to the non-comparability of reports. It is important to clarify the determination process for IROs, taking into account sectoral specificities. The audits performed must also be standardized. The gross versus net position within double materiality must be clarified. A clear position must be established and made applicable to all in order to facilitate comparability among undertakings. In the event that the net basis is adopted,a common methodology for net assessment must be provided and applied uniformly for undertakings subject to the CSRD.			
Survey	Decathlon	Preparer (non-financial preparing a sustainability report)	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Decathlon welcomes the evolutions introduced and the simplifications proposed. Nevertheless, it is essential to have a globally interoperable standard across the world to avoid reporting burden. In order for the regulatory evolutions related to non-financial reporting to be an argument to engage undertakings in their transitions, it is important that the obligations and methodologies are globally interoperable. Furthermore, it is necessary to simplify concepts, such as double materiality, both in its approach and to foster comparability among undertakings. It is also necessary to rely on the core principles of the CSRD by adopting a pragmatic and progressive approach. Clear implementation guides are necessary to ensure uniformity in the responses and in the published CSRDs.			
Survey	Decathlon	Preparer (non-financial preparing a sustainability report)	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Decathlon welcomes the evolutions introduced and the simplifications proposed. Nevertheless, it is essential to have a globally interoperable standard across the world to avoid reporting burden. In order for the regulatory evolutions related to non-financial reporting to be an argument to engage undertakings in their transitions, it is important that the obligations and methodologies are globally interoperable. Furthermore, it is necessary to simplify concepts, such as double materiality, both in its approach and to foster comparability among undertakings. It is also necessary to rely on the core principles of the CSRD by adopting a pragmatic and progressive approach. Clear implementation guides are necessary to ensure uniformity in the responses and in the published CSRDs.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Decathlon	Preparer (non-financial preparing a sustainability report)	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Decathlon welcomes the evolutions introduced and the simplifications proposed. Nevertheless, it is essential to have a globally interoperable standard across the world to avoid reporting burden. In order for the regulatory evolutions related to non-financial reporting to be an argument to engage undertakings in their transitions, it is important that the obligations and methodologies are globally interoperable. Furthermore, it is necessary to simplify concepts, such as double materiality, both in its approach and to foster comparability among undertakings. It is also necessary to rely on the core principles of the CSRD by adopting a pragmatic and progressive approach. Clear implementation guides are necessary to ensure uniformity in the responses and in the published CSRDs.			
Survey	Decathlon	Preparer (non-financial preparing a sustainability report)	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	The anticipated financial effects are complex to implement given the existing methodologies, a more significant phase-in must be implemented to permit a comparable implementation among undertakings.			
Survey	Decathlon	Preparer (non-financial preparing a sustainability report)	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	it is essential to have a globally interoperable standard across the world to avoid reporting burden. In order for the regulatory evolutions related to non-financial reporting to be an argument to engage undertakings in their transitions, it is important that the obligations and methodologies are globally interoperable.			
Survey	Decathlon	Preparer (non-financial preparing a sustainability report)	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	Fair presentation needs to be clearly defined and not considered only as a concept in order to avoid inconsistencies and foster comparability			
Survey	Decathlon	Preparer (non-financial preparing a sustainability report)	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Decathlon	Preparer (non-financial preparing a sustainability report)	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The Living wage is is the minimum salary needed to ensure that the employee and family can afford a decent standard of living. The minimum wage is the legal minimum cash salary fixed by the government (consultation with social and industrial) and can be below the living wage. In some countries, an employee does not live decently with a fixed wage (minimum wage). We believe that the objective is to pay our employees with a wage which ensures a decent standard of living even if the minimum wage is lower. Thus we want to highlight the following points : A statutory minimum wage or collective bargaining can be lower than a living wage calculated and defined by official data providers taking into account ILOs definitions. Then a fixed wage, is not the most relevant adequate wage and should not be the first criteria to take into account in the CSRD hierarchy but the last one. NB : a living wage is defined by non profitable official data providers but not by institution mandated by the public authorities. On the contrary, the hierarchy requires companies to only assess relevant living wage data sets as a last resort which should be the first one. Living wage should be the first criteria to take into account and then, if not managed by the company, take into account other "degraded" adequate wages such as minimum wage or wage established through collective bargaining. Indeed a company managing the most favourable living wage for employees should be able to report this data and not the "degraded" adequate wage. It will also influence companies to take into account the living wage, which makes sense with Green deal. Another option could be to propose alternatives without hierarchy. We should add Methodology disclosure which would facilitate the comparability.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Decathlon	Preparer (non-financial preparing a sustainability report)	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	An unadjusted gender pay gap is not relevant and does not allow comparability. The metric makes more sense with the disclosure of the adjusted gender pay gap (which is comparable), and should be kept as voluntary.			
Survey	Decathlon	Preparer (non-financial preparing a sustainability report)	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	> Human Rights disclosures centralised in ESRS 2 GDR-P rather than in each Social Standards (S1-S4) => (I agree) > Simplification and merger of ESRS S1-S4 DR2 & DR3 into one disclosure requirement => (I agree)			
Survey	Decathlon	Preparer (non-financial preparing a sustainability report)	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Regarding the climate transition plan, it is necessary to align the requirements with the CSDDD, but also with other global, European, and local regulations, as well as the expectations of civil society			
Survey	Decathlon	Preparer (non-financial preparing a sustainability report)	France	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	To foster the reporting of comparable data and to promote interoperability with global frameworks such as the TNFD, we believe it would be beneficial to maintain a common set of specifications for biodiversity metrics. Can those metrics be based on already existing methodological references? ENCORE (UNEP tool), GRI Biodiversity, SBTN, or at a minimum within closely associated guidance, would provide undertakings with the necessary clarity to select and report practical, credible, and comparable information. It would also support alignment with the TNFD's disclosure metrics. In this context, ensuring that any illustrative guidance remains connected to the Standard and is subject to a timely update process is essential, particularly for topics where reporting tools and methodologies are evolving rapidly. Furthermore, to enhance the standard's comprehensiveness and internal consistency, consideration could be given to explicitly including aquatic ecosystems alongside terrestrial and marine ecosystems. Similarly, to strengthen the alignment with other thematic ESRSs, introducing a specific indicator for land use change could be considered, reflecting its significance as a key driver of biodiversity impacts.			
Survey	Decathlon	Preparer (non-financial preparing a sustainability report)	France	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	> S1.5 Characteristics of employees - deletion of the metric of total departures => I partially agree and partially disagree Justification : We agree to delete it. If we keep it, we recommend a specific focus on permanent contracts only. deletion of breakdown by age => (I disagree). Justification : This metric makes sense for the comparability and the management of age diversity into a company. > Characteristics of non employees : reduced to one data point and clarification of when these people are material added via AR. New flowchart in NMIG (I disagree) Justification : Need to simplify and provide a clear definition which will be easy to be managed and reported. > S1.15 Remuneration - removal of the voluntary datapoint on adjusted gender pay gap by employee category and breakdown by country. SFDR datapoints kept => (I disagree) - cf explanations above > S1.16 Incidents of discrimination & other human rights incidents => I partially agree and partially disagree. Justification : Need more clarification on that point.			
Survey	Decathlon	Preparer (non-financial preparing a sustainability report)	France	35.S1-10.	Do you agree with the amendments of this chapter?	I disagree	Parental leave has been replaced by maternity leave and retirement is proposed to be deleted on the social protection definition (I disagree)	S1	Disclosure Requirement S1-10 - Social protection	
Survey	Decathlon	Preparer (non-financial preparing a sustainability report)	France	35.S1-12.	Do you agree with the amendments of this chapter?	I disagree	gender breakdowns removed => (I disagree) Justification : The split by gender can show that all genders have the same conditions to perform on their job.	S1	Disclosure Requirement S1-12 - Training and skills development metrics	
Survey	Decathlon	Preparer (non-financial preparing a sustainability report)	France	35.S1-13.	Do you agree with the amendments of this chapter?	I agree	Fatalities due to ill health among non employees or on-sites workers excluded => (I agree) Deletion of days lost to fatalities → (I agree)	S1	Disclosure Requirement S1-13 - Health and Safety metrics	
Survey	Decathlon	Preparer (non-financial preparing a sustainability report)	France	35.S1-14.	Do you agree with the amendments of this chapter?	I disagree	now only reports entitlement to family-related leave (not those that took the family-related leave => (I disagree) Justification : It makes more sense to report on the percentage of entitled employees that took family-related leave (with a breakdown by gender) than the percentage of employees entitled to take family-related leave, which is theoretical and not	S1	Disclosure Requirement S1-14 - Work-life balance metrics	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	Support: -We appreciate stronger emphasis on the materiality of disclosures, with only information truly relevant for users of the sustainability statement being reported. Clearer instructions on the presentation of DMA results would support more consistent and comparable reporting across undertakings. -Broad agreement among respondents that the DMA process has been streamlined and simplified in form. - Inclusion of the "fair presentation" principle provides flexibility but ensures material topics are not omitted. -Positive views on clarification that reporting on non-material topics is permitted. -Flexibility in using top-down and bottom-up approaches for materiality assessment. -Consolidation and clearer wording of materiality-related definitions and criteria. Areas of improvement: -The current framework does not provide clear criteria for determining when certain information becomes material for users. Instead of narrowing reporting requirements, the absence of clear boundaries could unintentionally broaden them. -While allowing the use of Top-Down vs. Bottom-Up Approaches is helpful, it may lead to inconsistent outcomes across companies. - Additional clarification is required regarding whether a full double materiality assessment must be conducted annually, even when there are no material changes to business model or strategy. -Uncertainty around the application of the materiality filter, as virtually any data point could potentially be classified as immaterial unless directly connected to an IRO. -The rationale behind permitting non-material information is unclear, including assurance requirements. This could result in overuse of omissions and reduce comparability. -For financial materiality, it is important that any requirements for the identification and assessment of material matters are fully aligned with IFRS. -Further clarification is required on what constitutes as "undue costs and efforts". -Explanation on how the concepts that make up 'severity' (scale, scope and irremediable character) should be considered in combination, to determine the severity of an IRO.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Support: -We acknowledge the effort to clarify how remediation, mitigation, and prevention actions should be considered in the DMA. -The guidance is seen as a step forward in providing structure to a previously ambiguous area, for aligning disclosure with the fair presentation principle, and clarifying how remediation actions factor into actual impact reporting. Areas of improvement: -The current guidance does not sufficiently resolve the ambiguity between applying a gross versus a net perspective. It remains unclear when impacts should be assessed before actions (gross) and when after actions (net). This lack of clarity may lead to inconsistent interpretations, which undermines both the comparability and the relevance of the disclosures. -Provide more clarity on whether IROs should be assessed 'gross or net', as the current ESRS does not give guidance. How it is currently described in the revised ESRSs is still difficult to interpret and Appendix C is also difficult to grasp. It could benefit from an alternative, simpler presentation (e.g. flowchart). -Provide clear examples on how to assess mitigating and preventive actions, and when a risk or impact has been fully mitigated (below materiality threshold). -Including additional guidance is necessary to ensure a common approach across companies. -Language should be reviewed to ensure that 'risks' are not referred to in the case of impacts. -For both actual and potential impacts, clarification is required for the cases when impact occurred during the year or became material in the reporting year. -We agree that the new guidance provides clarification on how to factor remediation, mitigation and prevention actions into the DMA. However, the interaction between severity and likelihood could still be challenging in practice. -There is a lack of clarity as to how to consider human rights impacts.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	Support: -Amendments to Chapter 8 clarify the presentation requirements and structure of the sustainability state. -Regarding Chapter 9, cross referencing within the Sustainability Statement (para 112) helps to reduce duplication and was widely implemented by Wave 1 Reporters. -The amendments improve readability and promote better connectivity with corporate reporting. -The sustainability statements now allow for a more concise and coherent narrative that integrates well with financial reporting. -The executive summary improves accessibility for key stakeholders, while appendices allow for detailed information without overwhelming the main report. These options help tailor disclosures to diverse user needs, ensuring material topics remain central while still accommodating additional relevant data. Areas of improvement: -The specific reference that repeating information 'may obscure material information' could be taken out. Preparers should have certain freedom in how to structure their content. In some cases, it can be useful to duplicate information instead of cross-referencing, to support the standalone readability of a section.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Support: -We support simplification of the minimum disclosure requirements and removal of duplication in the topical standards. -We agree with streamlining the DRs, which reduces redundant reporting and duplications. -The shift towards a more principles-based approach reduces the reporting burden and improves flexibility for preparers. -The ESRSs are much easier to read and have a more logical structure. Removing the ESRS 2 references within the topical standards makes a lot of sense and provides a -clearer structure to the topical ESRSs. Areas of improvement: -Whilst we acknowledge there has been a reduction in the total number of data points, many 'shall' data points have been consolidated into broader requirements. -The reduced granularity risks inconsistent interpretation and incomparable data from preparers. Therefore, the reporting effort is not expected to decrease significantly. -Retaining distinct PAT requirements per standard continues to hinder reporting efficiency and adds complexity. -Some respondents do not agree with the inclusion of human rights requirements under GDR when additional data points remain in the Social disclosures and recommend a specific new chapter is created in ESRS2 addressing all Human Rights requirements. -Disclosures relating to stakeholder engagement could be further streamlined as there is still significant duplication between ESRS2 and the Social standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Support: -Relocation of AR directly below relevant Disclosure Requirements (DR) enhances readability and reduces navigation effort. -The clearer split between mandatory ("shall disclose") and non-mandatory ("may disclose") data points improve clarity and structure. -The drafting is generally clearer, more accessible, and less complex than earlier versions. Areas of improvement: -Some technical terms remain highly specialized and ambiguous, potentially causing inconsistent interpretation (e.g., terms like "shall consider," "may present," "may implement"). -Reduced granularity in disclosure requirements could still lead to varied interpretations across reporters, especially between Wave 1 and Wave 2/3. -Language is unclear in some places; inclusion of concrete examples is recommended to improve understanding. -The overall reporting requirements remain largely unchanged, so simplification mainly aids navigation rather than reducing burden. -New mandatory disclosures have been added despite requests to reduce reporting burden, potentially increasing the workload.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Support: -The separation of non-mandatory guidance into the NMIG document has helped the overall readability and structure of the ESRS standards. It is important that EFRAG continue to update this guidance to ensure its relevance. -NMIG are helpful in terms of additional guidance and content to consider and potentially report. Areas of improvement: -We recommend replacing the NMIG with a more effective (not binding) FAQ (separate to the delegated act) aligned with the new standards. -Since most Wave 1 Reporters already exclude 'may' requirements from their Sustainability Statements, the purpose of retaining the NMIG is unclear. -Where robust, principles-based standards are developed with high standards of due process, we see limited need for the creation of or reference to additional guidance. -Many issues can arise when cross-referenced materials are used that are not developed using the same conceptual framework, leading to confusing and sometimes conflicting requirements. -NMIG do not address FAQs raised during ESRS adoption. NMIG doesn't provide much value or clarification but rather additional data points that no company may want to focus on it. -It is not always clear when information included in the AR is a requirement or voluntary. For example, AR 14 for para 25 in the E1 standard states "may" for the format of the disclosure. If it is voluntary, then it would make more sense for this to be included in the NMIG. -The NMIG for E5 should provide more guidance and practical examples on the methodologies for reporting on the E5 metrics. The current guidance is still too vague, which can result in a lack of comparability across companies.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Support: -Reliefs related to data quality, scope, and acquisitions strike a good balance between stakeholder expectations and transparency. -Pragmatic reliefs (e.g., on undue cost/effort, partial scope reporting, acquisition alignment) support smoother implementation. -Removal of repetitive content and some data point reductions improve readability and structure. Areas of improvement: -The "undue cost and effort" provision is welcome but is subjective and may lead to companies overusing this exemption, potentially reducing transparency. More clarity is needed on how it should be applied. -Reporting burdens remain high as no metrics have been removed; some new metrics (e.g., E5) add to the workload. For a significant number of metrics the reporting burden increased, mainly due to increased scope of a metric or increased granularity of the data/disclosure needed. -The reliefs are often temporary or procedural rather than structural. -The burden of proof for justifying reliefs may increase audit complexity. -There should be clearer minimum disclosure thresholds that all companies or sectors must meet (e.g., mandatory disclosure of GHG Scope 1 & 2 emissions). -Stronger reporting principles are needed to disclose scope coverage and data quality for trust and comparability. -Thresholds for scope exclusions should be clearer to avoid gaps in impact understanding and mitigation planning. -The acquisition/disposal reliefs are supported but the one-year timeframe to integrate subsidiaries is often insufficient due to sustainability reporting complexity. -Guidance on joint ventures/associates remains unclear, complicating reporting. -The relationship between reliefs and the "fair presentation" principle is unclear; guidance is needed to ensure reliefs (and their non-mandatory nature) do not conflict with audit expectations. -Some definitions (e.g., 'manufacturer', 'importer', microplastics) diverge from existing frameworks like REACH, increasing burden - alignment is recommended.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	Support: -We recognize the need for flexibility when reliable data are not yet available, particularly in complex value chains, and we support the principle that disclosures should not be omitted altogether. -It recognises the challenges preparers face in collecting data across complex value chains. This pragmatic approach helps avoid undue cost and effort. -We consider this to be a useful addition to the guidance, to allow for instances when it's not (reasonably) possible to collect certain information. -Forcing unreliable or incomplete data collection can harm quality, comparability, and legal reliability of reports. Reliefs help bridge current methodological gaps and prevent distorted reporting. -Relief acknowledging challenges in collecting data across complex value chains is welcomed as pragmatic and cost-effective. Areas of improvement: -Some question why relief applies only to certain environmental metrics, suggesting it should be broader since all topical standards are material. -Partial scope reporting is recognized as pragmatic given complex value chains and data challenges. -Respondents shared different views on the time limit: some support no fixed time limits, believing market and peer benchmarking will naturally drive improvement and standardization. Others argue that time limits or clearer expectations are necessary to prevent permanent partial reporting and encourage progress. -We recommend maintaining the relief as a pragmatic tool but combining it with clearer guidance on expected progress over time.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Most prepares opted for Option 2, as it balances transparency and feasibility while protecting sensitive information and recognizing current data limitations. Many of the FEA respondents abstained from the answer as they are of the opinion the best way forward is yet to be found. Option 1 was named by two preparers as they favoured alignment with IFRS and clearer phased approaches to eventual quantitative disclosure. Some preparers oppose any form of mandated anticipated financial effects disclosure due to inherent uncertainties and legal risks. Although FEA members support interoperability with IFRS SDS, critics state that quantitative disclosure is premature due to: -Lack of mature methodologies -High uncertainty and difficulty isolating sustainability-related financial effects. -Commercial sensitivity and competitive risks - Wide variation across industries undermines comparability. -Concern that detailed quantitative disclosures could lead to excessive scrutiny and legal risks. Option 2: Qualitative Disclosure (with voluntary quantitative info) -Favoured by many as more practical, flexible, and proportionate for current implementation stages. -Qualitative info allows users to understand nature and direction of impacts without unreliable or sensitive numeric data. -Voluntary quantitative disclosure allowed when reliable and meaningful. -Recognizes uncertainty and immaturity of financial effect assessment methods. -Avoids forced disclosure of sensitive or speculative figures, protecting competitive position. -Some argue no fixed time limits are needed, as market forces and peer benchmarking will naturally increase transparency over time.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	Areas of improvement: -We agree that the amended provisions in ESRS E1 strike a fair balance between simplification and the need to meet users' information needs. Nevertheless, some of the requirements, particularly around forward-looking scenario assumptions, may remain burdensome for smaller entities. -Additional proportionality measures would help ensure feasibility without compromising comparability. -Clear methodologies and guidance would help simplify qualitative and/or quantitative reporting of these disclosures. In addition, it would allow for increased comparability across companies. -For all anticipated financial effects disclosures in the E1 standard, more guidance and practical examples should be provided by EFRAG. -Forward-looking scenario assumptions may still be burdensome, especially for smaller entities. Additional proportionality measures recommended. -More practical examples and methodologies are needed to improve consistency, comparability, and ease of disclosure effort. -Disclosing exact asset locations or detailed environmental risk data may harm competitive position or security, especially in strategic industries. -Overly granular or sensitive disclosures that risk competitive harm or legal issues should be avoided. Specific par comments: 40. As currently drafted, it is not clear whether the disclosure objective (par 39) only requires us to consider the impact on revenue or also the impact on net profit and / or cash 40. (c) The purpose of the disclosure is and does not meet the granularity of requirements for banks. 41. There is a lack of clarity as to why scenario analysis applies only to stranded assets under this requirement and whether the results of the scenario analysis should be used in the quantification of anticipated financial effects. 42. Assets are now included, but the text is not necessarily clearer. Clear guidance should be provided to mitigate green-washing risk from disclosing potential revenues related to opportunities that have not yet been realised.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Support: -Stakeholders support ongoing collaboration between EFRAG and the ISSB, viewing increased interoperability as beneficial for comparability, simplification, and global consistency. Areas of improvement: - Divergence Despite Claims of Alignment - Respondents note that fundamental differences remain - GHG Emissions Boundary – Operational vs Financial Control - EFRAG's requirement to use financial control by default is praised by some for aligning with IFRS S2. - However, others strongly object: · Many companies currently use the operational control boundary, in line with the GHG Protocol. - Dual reporting burdens may arise if companies must report on both financial and operational control. - This could cause confusion, especially where climate targets are based on one boundary. - The subjective trigger for requiring operational control data ("complex ownership structures") could cause inconsistent application and audit issues. - Transition Plan Requirements: -Some simplification proposals may increase complexity or introduce new divergence from ISSB standards (e.g., additional disclosures, methodology requirements). -Clearer guidance and methodologies are needed to ensure consistent application across companies, Auditability, reduced subjectivity and misinterpretation risk. -Recommendation is to fully align ESRS with ISSB standards to the greatest extent possible. -Avoid mandatory dual reporting (financial + operational boundaries) for GHG emissions. -Allow flexibility and proportionality, especially where methodologies are underdeveloped. - Introduce a single, harmonised reporting boundary across ESRS and IFRS to avoid duplication.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				

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Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	General comment cross all standards: Support: -Stakeholders broadly welcome the improved structure, clarity, and consolidation of the ESRS standards. -Removal of certain prescriptive and qualitative disclosures, especially Process and Action Table (PAT) requirements, is seen as a positive development. -Streamlining of narrative disclosures, separation of mandatory vs. voluntary datapoints, and clearer grouping are seen as usability improvements. Areas of improvement: -The overall disclosure scope remains unchanged and true workload reduction will be minimal. -Reduction in Datapoints ≠ Reduction in Reporting Burden - The headline reduction in datapoints is viewed by many as misleading or overstated: Many "reduced" datapoints have been bundled into broader requirements or converted to Application Requirements, which does not meaningfully reduce workload. - Quantitative metrics (the most burdensome aspects) have mostly been preserved, so the core reporting effort remains unchanged. -Concerns that less granular disclosures may lead to greater interpretative variability between Wave 1 companies and later adopters. -EFRAG should publish a comprehensive updated list of datapoints, clearly showing which are narrative vs. metric, distinguishing clearly between deleted, merged, reclassified, and new requirements. -Introduce flexibility around data consolidation and provide guidance for phased-in integration to support assurance readiness. -Preparers call for clearer audit guidance to avoid unnecessary technical debates. Provide standardised audit methodologies and flexibility for phased-in disclosures. -Avoid introducing new mandatory datapoints during simplification efforts. -Ensure the net effect is an actual reduction in reporting burden, not just a reframing. -Prevent interpretation gaps by issuing detailed implementation guidance for all waves.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	23.	Six datapoints exceptionally moved from “may” to “shall” In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, “may disclose” datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Some preparers support selective increases in mandatory datapoints where they enhance decision-usefulness or align with existing frameworks. However, many stakeholders express strong concerns that new requirements contradict the objective of simplification, increase the reporting burden, and lack testing, particularly for Wave 1 companies. Some stakeholders accept the limited shift of certain disclosures from "may" to "shall", noting they address inconsistencies and improve comparability. Areas of improvement: -New datapoints add complexity, particularly when they: Have not been tested by Wave 1 reporters, lack clear rationale or decision-usefulness and require new data systems or manual processes. -Many companies are not yet ready to provide mature disclosures on biodiversity. -Disclosure expectations may exceed current capabilities and maturity of strategies. -G1 – Procurement Training - Seen as too vague. Ambiguity in scope: Is training about internal awareness or improving supplier performance? Lack of clear value added. -Stakeholders caution that new or significantly revised requirements should undergo thorough impact assessments and testing, be proportionate and aligned with EU law and global framework, avoid creating substantive behavioural obligations (beyond transparency). Conclusion: Stakeholders broadly support clarity, consistency, and usefulness, but believe these should not come at the cost of increased burden or unworkable mandates. The ESRS revision process should remain focused on its core aim of simplification, and exceptions should only be permitted where there is clear, demonstrable value. Poorly defined or premature datapoints risk damaging the credibility and practicality of sustainability reporting under the CSRD.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	1. E2-4 Secondary Microplastics Widespread objection to mandatory disclosure of secondary microplastics emissions: -Concept not well-defined or standardized; scientific understanding and measurement methods are immature, no reliable methodologies exist for estimation, in particular from products after use, creating audit and liability risks. -Secondary microplastics occur largely post-consumer and outside company control. Definitions and derogations are not aligned with other frameworks (e.g. REACH). -Reporting such data would be highly speculative, un-auditable, and reduce report credibility. 2. E5-4 Critical and Strategic Raw Materials Respondents disagree with mandatory disclosure of percentage weight of critical/strategic raw materials relative to key materials. -May be irrelevant for some industries (e.g., food sector). -Calculation could be misleading or less meaningful if definitions of "key materials" differ from critical/strategic materials. -Creates additional burden without clear benefits. -To be aligned with EU initiatives like the Critical Raw Materials Act. 3. E5-5 Unknown Waste Destinations -No need for a separate disclosure on unknown waste destinations. -Existing categories like "other recovery options" or "other disposal operations" already cover these cases. -Separate reporting is therefore unnecessary and increases administrative burden. Several respondents emphasize that untested new datapoints, especially quantitative ones, should not be introduced prematurely due to the risk of complexity, cost, and lack of practical feasibility. Conclusion: While stakeholders welcome simplification efforts and some clarifications, they strongly caution against introducing new mandatory datapoints due to: -Lack of methods for measuring secondary microplastics and critical raw materials accurately. -Without standardized methods, auditor assurance becomes difficult or impossible. -Need for IT developments and manual data collection increases costs and complexity. -Some metrics may be irrelevant or misleading in certain industries. -Data might not meaningfully inform stakeholders due to uncertainty or lack of maturity.			

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Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	Support: -Clarity on fair presentation is welcomed as it improves alignment between ESRS and IFRS S1 & S2. -Fair presentation is expected to: oStrengthen materiality assessments, oReduce checklist-driven compliance, oEncourage professional judgment and focus on truly material, decision-useful information, oAlign sustainability reporting better with financial reporting practices. Areas of improvement: - Overly broad application, risk of under-reporting, especially if companies apply it to disclosures like ESRS2 (detailed requirements) where materiality is less clear. - No clear guidance from EFRAG on minimum mandatory disclosures (e.g., GHG Scope 1 and 2 emissions). - Companies could omit critical disclosures, reducing comparability and compliance with EU Green Deal goals. - Insufficient clarity on how to manage trade-offs between financial and non-financial users when their information needs conflict. - Some requirements (e.g., site-specific disclosures) may increase reporting burden, cause clutter, obscuring material information, reduce overall decision-usefulness. - Fair presentation should be explicitly linked to the specific business model and activities of the company, acting as a filter for material disclosures. - Provide clearer guidance to avoid overly broad use; clarify scope for ESRS2 disclosures. - Define mandatory minimum disclosures (e.g., GHG Scope 1 and 2) to ensure consistency and compliance. - Clarify priorities and streamline reporting to balance financial and non-financial user demands. - Provide a precise, operational definition to reduce subjectivity and audit risk. - Clarify fair presentation boundaries to reduce legal risks. Conclusion: The explicit inclusion of fair presentation in ESRS is seen as a positive step to enhance reporting quality and relevance. However, for this principle to be effective and practical, further clarity is needed on its definition, application, interaction with materiality, and minimum reporting expectations. Without this, there is a risk of inconsistent implementation, increased audit challenges, and excessive reporting burdens.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	Support: -Some respondents support for the revised threshold, which requires disclosing workforce metrics for the top 10 largest countries by employee headcount with at least 50 employees. -Seen as a fair balance between meaningful disclosure and avoiding excessive burden, especially for global companies. -Helps focus reporting on material jurisdictions where workforce impacts are most significant. -Impacting only presentation and not data collection. Areas of improvement: - This requirement, while not complex, adds to the reporting obligations for large companies, and the specific reasons or benefits for adjusting the threshold are not clearly identified. -Increased Reporting and Audit Burden -Data collection across many jurisdictions involves navigating different labour laws, diverse HR systems, data consistency challenges, country-specific compliance requirements. This information is not easily accessible and will raise complexity, costs, and time for both companies and auditors. -Unclear or Inconsistent Terminology. Ambiguity exists regarding the term "country of significant employment". -Potential Overreach and Practical Challenges: manual calculations, revising internal processes, possibly increasing data points without clear benefits. Companies operating in many smaller markets may find the threshold particularly burdensome. Conclusion While aiming for more granular and transparent reporting, the revised threshold for country-level workforce disaggregation may significantly increase reporting and assurance burdens without clear added value, conflicting with simplification goals. Clearer guidance and a balanced threshold approach would better support practicality, proportionality, and comparability in sustainability reporting.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	Support: -Agreement that the proposed methodology is more consistent and pragmatic for global entities. -Support for the field-testing exercise with EFRAG to refine approaches. -Call for further guidance on adapting wage calculations to local labour market conditions to improve accuracy and comparability globally. Areas of improvement: -The previous standard version allowed for a simpler approach, such as benchmarking against a fair or living wage - including using providers like the Fair Wage Network. Given global footprint on many reporters, the new proposed approach would introduce more complexity and leave room for subjective interpretation across countries. - No requirement for companies to disclose which part of the methodology they apply, risking poor comparability, reduced transparency, difficulty for stakeholders to assess what benchmarks are reflected. - The newer, more detailed approach introduces greater complexity compared to the previous simpler benchmarking options (e.g., Fair Wage Network). It requires complex assessments such as determining what counts as an "adequate" minimum wage, identifying authoritative public institutions, aligning with ILO wage-setting principles, which vary widely across countries, are hard to standardize globally and might be impractical for companies using more recent global datasets. - Without a single authoritative reference or common database for adequate wages companies may report using inconsistent or more convenient benchmarks. -Require companies to explicitly disclose which wage methodology they apply. -Elevate living wage data higher in the hierarchy, ideally as a preferred benchmark. -Provide clearer guidance or a standardized approach to assess adequate wages that accounts for local contexts. -Develop or endorse a centralized, authoritative database of adequate wages for non-EU countries. -Simplify reporting by applying the living wage definition uniformly across all jurisdictions. -A common database of adequate wages accessible to all companies would improve consistency and reduce preparers' burden.			

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Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	Support: -Recognition of the rationale behind the consolidation effort to better align ESRS with SFDR PAIs. -Support for removing some SFDR datapoints to reduce burden and enhance feasibility. -Emphasis on the need for feasibility and coherence when aligning reporting across different legislations. -Suggestion that the three-yearly SFDR review should be better coordinated with ESRS simplification efforts. Areas of improvement: -Fragmentation of Disclosure Requirements - It is unclear why some human rights disclosure requirements remain in topical standards, while others are under ESRS2 General Disclosures (GDR). -Visibility and Clarity of Reporting on Severe Human Rights Incidents. Moving these disclosures into the main body of standards would improve visibility for preparers. -It remains unclear whether SFDR data points are mandatory minimum disclosures or subject to the materiality principle under ESRS. This ambiguity complicates preparers' understanding of what must be reported versus what is optional based on materiality. -The list of datapoints stemming from various EU legislation (including SFDR) is still seen as overly complex and burdensome. Calls for further simplification and clarification to avoid duplication and reduce reporting fatigue. -Question whether all SFDR datapoints should be included in the sustainability statement at all, especially for companies outside SFDR scope or with limited EU Taxonomy impact. -Recommendation to simplify and coordinate the integration of SFDR datapoints with ESRS to reduce duplication and reporting burden. -Consider excluding certain SFDR datapoints from sustainability statements for companies outside the scope of SFDR or with minimal EU Taxonomy relevance. Conclusion Addressing fragmentation, improving visibility of key disclosures, clarifying materiality requirements, and better coordination with EU legislation reviews are essential to reduce complexity and enhance the quality and usefulness of sustainability reporting.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	Support: -Further guidance on setting biodiversity targets is needed due to current uncertainty in requirements. -However, guidance should only be provided once methodologies are robust, scientifically sound, and standardized. Areas of improvement: -Suggested alignment with established frameworks such as SBTN (Science Based Targets Network), ISSB standards, TNFD (Taskforce on Nature-related Financial Disclosures), admitting that current biodiversity target methodologies are still evolving. -The current AR26 text does not acknowledge: oDifficulty in setting standalone biodiversity targets. oThe interconnectedness of biodiversity with other environmental issues (climate, water, pollution). -EFRAG should review and revise AR26 to provide practical, effective, and clearer guidance. oThe revised guidance should explicitly allow cross-referencing to existing environmental targets in other ESRS topical standards, recognizing that biodiversity loss is intertwined with broader environmental challenges (e.g., climate change). Conclusion While further guidance on biodiversity targets is welcomed, it should wait until methodologies mature and be based on robust science and standards. Meanwhile, AR26 should be revised to support integrated, efficient reporting that reflects the complex, interconnected nature of biodiversity and environmental issues, avoids overburdening companies, and maintains comparability.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	Support: -The removal of the voluntary data point requirement is reasonable, as it ensures that efforts to address the gender pay gap remain aligned with the EU Pay Transparency Directive, which already mandates detailed breakdowns. Areas of improvement: -Including the adjusted pay gap, even on a voluntary basis, improves transparency, stakeholder relevance, alignment with gender equality commitments. -It is valuable for driving impactful pay equity actions, despite being more complex to calculate. -The adjusted pay gap is the only metric truly reflecting "equal pay for equal work or work of equal value." Conclusion The views on this step differ significantly. Many find the adjusted gender pay gap metric is critical for meaningful, fair, and actionable pay equity reporting and should be retained. Others refer to the upcoming EU Pay Transparency Directive, which will mandate detailed disclosures. Until a consensus on definition is reached it does not meet EFRAGs objective of simplified and comparable reporting.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	Support: -Support for clarified reporting boundaries and value chain scope to reduce preparer uncertainty. -The amended provisions better balance ambition and feasibility, but challenges persist in collecting reliable data across complex global supply chains. Areas of improvement: -For a (large) preparer, it is practically very complex and labour/cost intense to identify SMEs within the global supplier base and maintain this classification in its master data. -Challenges with SME Identification and Reporting - Identifying and maintaining classification of SMEs within a global supplier base is complex, costly, and labour-intensive. It requires assessing supplier turnover, full-time equivalents (FTEs), and asset value, often needing financial statements from local registries. -No global or consistent definition of SMEs exists; definitions vary by country and legal entity vs. consolidated levels. -A pragmatic, simplified approach is recommended, ideally one that does not require external information to identify smaller suppliers. -Practical implementation guidance, including how to measure and report, is needed. -The "standard payment terms" datapoint is questioned for clarity and relevance, especially internationally where no legal standard exists. -The percentage of payments made under standard terms is hard to interpret and provides limited insight into supplier relationships or impacts. Conclusion The current G1 structure and SME payment disclosures require significant rethinking for clarity, practicality, and usefulness. Simplified SME definitions, focused and meaningful metrics, and clear guidance are needed to ensure the disclosures truly support investor decision-making without undue burden on preparers.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Support: -The amended ESRS 1 clarifies drafting conventions, strengthens the role of fair presentation, and refines guidance on value-chain scope, phasing-in and incorporation by reference, making the cross-cutting framework more usable in practice. -The explicit treatment of double materiality and entity-specific disclosures is helpful, while transitional provisions are pragmatic for first-time reporters. -The inclusion of guidance on how to deal with acquisitions and disposals is helpful and reflects the practical challenge preparers face with large acquisitions. -Readability of the ESRS 1 standard has significantly improved. The DRs are phrased clearer and simpler. Areas of improvement: -The materiality principle and undue cost and effort concept may result inconsistent / non-comparable reporting and recommend clearer guidance for their application. -To further support comparability, EFRAG could add a short set of non-prescriptive examples on disaggregation levels and on balancing qualitative and quantitative evidence in materiality determinations. -Some elements of the DMA remain complex. The value chain assessment and particularly how to include JVs and associates remains complex. This would much benefit from clear practical guidance. -EFRAG needs to provide a clearer position of the minimum data points companies or sectors should disclose to ensure the objectives of the European Green Deal are met. -Further work may be needed on reporting boundaries to enhance interoperability with ISSB and align with the GHG Protocol following the completion of ongoing updates. Conclusion There is broad agreement that the ESRS 1 amendments improve usability and clarity while balancing simplification and core Green Deal objectives. However, specific areas—especially materiality application, reporting boundaries, treatment of acquisitions/disposals, and value chain scope—need clearer, more detailed guidance to avoid inconsistency and ensure comparability across companies.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Support: -In general, we support the simplifications and clarifications made under ESRS 2 Areas of improvement: -While we recognise the removal of duplicative data points between ESRS2 and the topical standards, we do not consider this measure sufficient to significantly reduce the volume of disclosures required in the Sustainability Statement. -Furthermore, although we are aligned that the 'Objective' chapters within the topical standards are necessary to set the context of each standard, we are concerned that the proposed amendments may result in inconsistent application of the ESRS2 GDRs. -There is insufficient clarity and updated guidance provided regarding current and future anticipated financial effects to be able to prepare a reliable and comparable disclosure. -Many respondents find that many of the proposed revisions will ultimately have minimal effect on reporting burden, and in some cases may be either more complicated, more burdensome, or both in their application. -The ESRS continue to maintain a de facto parallel sustainability-related financial reporting system, rather than leveraging existing financial reporting standards.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Support: -We acknowledge improvements to the structure and length of the standard. -Some simplifications are beneficial, such as removing revenue-based intensity metrics (although we would argue intensity metrics may be more useful in some cases than absolute measures), links to EU taxonomy and financial statement disclosures. -Clarifications on gross GHG targets (exclusion of removals), allowance for intensity targets with associated absolute values, and the requirement to reference a 1.5°C-aligned pathway materially improve target quality. -Energy consumption and mix disclosures are clearer and more actionable. -The proposed amendments to the E1 standard enhance conciseness by removing repetition. -In addition, the proposal maintains the metrics which are most relevant for stakeholders. Areas of improvement: -It is our view that this has not resulted in significant reduction in disclosures or reporting effort. -Uncertainties remain about scenario analysis requirements, the definition of 'compatibility with 1.5 degrees' for Transition Plans, and a sector-agnostic approach that overlooks industry differences relating to climate risks and impacts. Additionally, alignment issues persist with IFRS S2 on scenario analysis and changes to operational control for gross emissions reporting. -Further alignment of scope boundaries and estimation methods for GHG emissions would aid comparability across sectors. -The E1 standard includes several complex and detailed disclosures on anticipated financial effects. To achieve the right balance, EFRAG should release clear guidance and examples for quantitatively and qualitatively disclosing these requirements.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Areas of improvement: -We overall support the proposed amendments to the E3 standard. -Whilst we agree with proposed simplifications for water intensity and water stored metrics, some companies disagree with the proposed new water withdrawal metric. -We would recommend amendments focus on further guidance and basic clarifications for existing metrics such as specifying the measurement periods and providing clear definitions.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Areas of improvement: -The proposed amendments to the E4 standard improve the link with biodiversity and other topical standard. -Biodiversity is a relatively new reporting topic for many companies; therefore, EFRAG should do the following: oUpdate NMIG to reflect alignment with the ISSB, TNFD, SBTN, and reduce misalignment risk. oClarity on the specific metrics linked with other topics.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Areas of improvement: -Resource use and circularity is still a very new topic for many reporters and that we see many different approaches taken by companies for the disclosure of the KPIs, resulting in comparability challenge. -The consolidation around resource inflows, outflows and waste supports the circular-economy focus while reducing duplication. Transitional reliefs for complex value-chain data remain important for feasibility. -The proposed scope amendments are unclear and contain overlapping definitions for resource inflows (everything), marine resources biological and non-biological), and biotic marine resources (living or previously living organisms), making them difficult to understand. -Whilst we generally support more focussed metrics, the proposal to report "key" materials introduces an additional materiality level within a sub-topic, which may undermine the DMA and could create ambiguity regarding the understanding of materiality. The introduction of new terms such as "strategic" and "key" adds significant uncertainty due to their lack of clarity. -A general concern is the difficulty of obtaining statistic on the market about waste destination and treatment (globally). -More guidance and examples for reporting on E5 metrics should be included within the standard or the non-mandatory illustrative guidance.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Areas of improvement: -The proposed amendments to ESRS S1 bring useful simplification to reporting obligations and clearer structure and may ease the burden on companies. -The revised S1 improves clarity on incident reporting, training and grievance mechanisms, and the proportional thresholds for country-level metric disaggregation are reasonable. The approach to calculating adequate wages outside the EU is more consistent, though additional guidance on local adaptation would improve reliability. -However, several respondents expressed that is no significant simplification in reporting from our perspective. -Whilst marginal simplification is achieved through a proposed reduction in data points, this standard remains metric "heavy", with a high reporting burden. -It also retains metrics which are not decision useful for users of the Sustainability statement and are poorly defined, such as training and skills development. Inconsistent definition and data collection challenges for the disability metric could result in incorrect misinterpretation by readers. -Some datapoints, we are given the possibility to choose between narrative and table to disclose the data, which is welcomed by respondents. -Collective bargaining agreements datapoints require a big effort and are not sufficiently clear.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Areas of improvement: -We agree that streamlining disclosures related to the engagement of value chain workers, the existence of communication channels, and remediation strategies is necessary to eliminate redundancy. -However, we believe that EFRAG's proposals do not sufficiently simplify these disclosures considering disclosures within ESRS2, and it remains unclear why certain elements, such as Global Framework Agreements and outcomes, have been retained. -The standard rightly concentrates on salient risks in the value chain and strengthens expectations on supplier management, grievance mechanisms and escalation. However, consistent data collection remains challenging across geographies; proportionality, reliance on recognised certifications and clear phasing will be important. -We recommend that the topical standard be clarified to provide companies with a definitive understanding of whether disclosure requirements pertain solely to actions addressing negative impacts or extend to all IROs, including positive impacts, risks, and opportunities. -We recommend that all human rights disclosures be consolidated into a new chapter within ESRS2, rather than being dispersed across various social disclosures.			
Survey	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Areas of improvement: -The consolidation of business conduct into clear DRs on policies, actions, targets and metrics improves usability and accountability. The added focus on training coverage for at-risk functions and boards is useful. -The proposed amendments to ESRS G1 bring useful simplification, clarification and improved structure. -Some datapoints however have been introduced or made mandatory, which is contrary to the general principle of simplifying the ESRSs. This includes the number and nature of confirmed incidents of corruption or bribery. -In the area of payment practices, we would welcome a pragmatic approach to identify SMEs as for a (large) preparer, this is practically very complex and labour/cost intense within a global supplier base.			
Survey	University of Warwick	Academia	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	University of Warwick	Academia	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	University of Warwick	Academia	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	University of Warwick	Academia	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	University of Warwick	Academia	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Removing all 'may disclose' elements is not helpful because it does not give companies an idea of what they could disclose. Especially for first-time preparers and those seeking to improve their disclosures, it would be helpful to have the 'may elements' in the standard as examples.			
Survey	University of Warwick	Academia	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	The proposed changes are likely to lead to incomplete and low quality data, which will make it harder for external stakeholders, such as academics, to use the data for research and analysis purposes. This means that research will become more time-consuming, possibly meaning that the research won't be carried out at all. Especially the partial scope of metrics is problematic if there is no clear and detailed description of what has been excluded. There, if there is partial disclosure, at least it should be explained what was left out. Similarly, removing the preference for direct data is problematic as it incentivises companies with below-average performance to rely on estimates rather than direct data. It should be a clear expectation that companies work towards direct information, rather than estimates. Finally, 17.7: there is a danger that this means a subsidiary is not reported on at all. This can lead to research results that are not representative of the actual sample.			
Survey	University of Warwick	Academia	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	The relief means that the inconsistencies in reporting will increase rather than decrease. It also incentivises companies to focus on those part of the disclosures that are more positive, opening the door to greenwashing. Ideally the relief is removed completely. If the relief is retained, at least there should be a time limit as to how long there can be a relief and the reporting entity should disclosure in detail was is left out of the disclosure			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	University of Warwick	Academia	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	University of Warwick	Academia	United Kingdom	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	University of Warwick	Academia	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	University of Warwick	Academia	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	University of Warwick	Academia	United Kingdom	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	These additional data points are particularly welcome, as they provide information that is crucial for assessing a firms sustainability performance and they do not impose any unnecessary burden, as highlighted.			
Survey	University of Warwick	Academia	United Kingdom	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	University of Warwick	Academia	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	University of Warwick	Academia	United Kingdom	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Exempting financial institutions from disclosing absolute GHG emission values would result in making it impossible to compare the financial sector to other sectors, preventing cross-sector comparison. In addition, intensity metrics and targets are influenced so much by other factors, such as inflation and market volatility, that it makes it hard to assess to what extent financial institutions make a meaningful contribution to the transition. Lastly, having both intensity and absolute emissions metrics provides a full comprehensive picture, so having both is very useful			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	University of Warwick	Academia	United Kingdom	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	University of Warwick	Academia	United Kingdom	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	University of Warwick	Academia	United Kingdom	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Clear and up-to-date guidance on biodiversity (targets) disclosure would be helpful to avoid that companies use only aggregate data or black-boxed model data, where it is difficult to assess the assumptions that were used to produce the data. At a minimum, metrics and targets related to biodiversity and ecosystems should include explicit mentioning of time and space			
Survey	University of Warwick	Academia	United Kingdom	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Greatest concerns around partial relief as outlined above.			
Survey	University of Warwick	Academia	United Kingdom	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	University of Warwick	Academia	United Kingdom	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	University of Warwick	Academia	United Kingdom	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	University of Warwick	Academia	United Kingdom	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	University of Warwick	Academia	United Kingdom	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	University of Warwick	Academia	United Kingdom	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	University of Warwick	Academia	United Kingdom	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	University of Warwick	Academia	United Kingdom	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	University of Warwick	Academia	United Kingdom	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	University of Warwick	Academia	United Kingdom	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	University of Warwick	Academia	United Kingdom	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	University of Warwick	Academia	United Kingdom	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Afep	Business association (other than association of financial institution)	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	Companies welcome the following simplifications to the double materiality assessment process: -the possibility of adopting a top-down approach in addition to a bottom-up one, -the shift in focus from the IRO level to the topic level, -the clearer identification of internal and external sources to be used at the beginning of the section, -the enhanced prominence given to the materiality of information, -the simplification of AR 16. However, companies are concerned by the definition of impact materiality laid down in paragraph 21 (b) of ESRS 1. In particular, the definition of 'general purpose' according to AR3 is too vague and could result in multiple requests from a variety of stakeholders. They call for a simplification of the update requirement by specifying that the DMA process and its conclusions shall be updated only in case of significant events or material changes in circumstances (§29). Furthermore, additional structural and editorial changes are still needed to ensure that the drafting consistently reflects the intended simplification: -The requirement to describe the DMA process in IRO 1 §26 are too detailed. -The purpose of the top-down approach is sometimes weakened by elements carried over from Set 1, which do not make it sufficiently clear that an IRO-level assessment is not systematically required during the DMA. -Some methodological or illustrative elements should be moved into the AR (severity-related factors (§31), criteria for assessing positive impacts (§32), details on risks and opportunities (§41), dependencies (§42)); -Nuance the requirement to use thresholds (§28 and AR5c): when ranking material issues, severity may be assessed through comparison without the need to score each sub-criterion separately or define strict thresholds. -Certain terms remain imprecise and risk creating contentious discussions with auditors, such as "relevant information" in §22 and "appropriate level of aggregation" in AR 23 of ESRS 2.			
Survey	Afep	Business association (other than association of financial institution)	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	The use of the terms "gross" and "net" can be confusing for preparers. It would be clearer to specify when mitigation and remediation measures can and cannot be taken into account. Furthermore, Appendix C is not clear and creates confusion because: -It is different from the principles. -It adds the theoretical case of information to be produced in the next reporting period (year N+1). In practice, when producing a sustainability report, companies are always focusing on the reported period. Impacts cannot be artificially divided into different periods. Therefore, companies consider that Appendix C should be removed to avoid difficulties related to diverging interpretations. If the "gross versus net" approach is maintained and to enable consistency between impacts, risks and opportunities, a gross assessment should remain the main principle, while a net approach should be possible in some circumstances according to the company's judgement. This more flexible approach seems to preserve interoperability with ISSB, which does not prescribe whether or how an entity is required to consider risk mitigation activities. Regarding the time horizon, a distinction should be made between: - Actual impacts: to be assessed, taking into account actions already implemented at the date of the materiality assessment. -Potential impacts: to be assessed before considering future mitigation actions ; past actions can be taken into account.			
Survey	Afep	Business association (other than association of financial institution)	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	Companies are supportive of the changes (possibility to better organize the report in a meaningful way, to put some granular datapoints in appendix...) as they deem very important to have a concise report, focused on important subjects, enabling the reader to better understand their strategy, politic and actions.			
Survey	Afep	Business association (other than association of financial institution)	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Afep	Business association (other than association of financial institution)	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	Companies welcome the improved presentation of the standards, including: -the reduction of the length of the text, the simplification of narrative paragraphs deemed overly technical or detailed; -the positioning of AR directly after the disclosure requirements, focusing only on essential methodological elements and key presentation points, which significantly improves readability and understanding of the standards. Nevertheless, the overall length of ESRS 1 could be further reduced, including by simplifying Chapter 3 on double materiality assessment (similar length as in Set 1 and simplified ESRS, 34 pages, 25 without annexes). Regarding the datapoints which are kept from the set 1, EFRAG should confirm that the wording changes brought to improve conciseness of the standards shouldn't lead to additional burden for the first application due to a "fresh interpretation" by the auditors or regulator.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Afep	Business association (other than association of financial institution)	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The NMIG should remain outside of the standards. The first wave companies' experience shows that EFRAG Q&As and Implementation Guidance have been used by auditors as a binding reference, with preparers expected to comply. Despite being issued by EFRAG for illustrative purposes only, the NMIG could be considered by stakeholders as having the same authority than the reporting standards. It is therefore essential that the NMIG remain outside the delegated act adopting the ESRS and is drafted in a way that cannot, under any circumstances, be used for audit purpose. The NMIG should remain a document published by EFRAG only and not by the European Commission. Furthermore, the treatment of previous lengthy and numerous Q&A and non-authoritative implementation guidance issued by EFRAG on Set 1 needs to be clarified by EFRAG. Companies shouldn't be required to read layers and layers of text to draft their sustainability reports, a reduction of the number and length of documents to consider and an improvement of their readability being particularly crucial for wave 2 companies. The basis for conclusion are very useful and should integrate the precise list of clarifications brought on the existing datapoints without requiring a modification of the standards. Indeed, it would enable preparers and auditors to already take them into account for the 2025 reporting. Some disclosures currently proposed by EFRAG in the environmental field should be transferred to the NMIG as mentioned in Questions 24 and 30 (see also EXCEL file on environmental standards).			
Survey	Afep	Business association (other than association of financial institution)	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Companies welcome the proposed reliefs which should lead to a more cost-effective reporting without compromising quality: -clarification that the starting point for reporting is the scope of consolidated financial statements; -reduced emphasis on direct data collection from value chain partners, with possibility to use estimates; -the concept of "undue cost or effort" consistent with financial reporting practice; -clarification that non-material activities may be excluded from the calculation of certain metrics. Companies ask that the relief regarding skills and resources be included in the ESRS. Even if some reliefs go beyond the ISSB provisions, being "optional," companies do not believe this will hinder interoperability. However, clarifications are necessary regarding how these reliefs fit into the fair presentation framework, if it is adopted. Concerning joint operations, ESRS §92 seems to increase the burden, implying that undertakings must include data from joint operations over which they have operational control, whereas preparers interpretation of the current standards (E1 apart) was that only own operations were concerned (except in the specific case of entity-specific indicators if this scope was deemed relevant by the company). In any case, ESRS S1 should also be targeted as it may be very delicate to obtain data on joint operations' workforce. Companies also wonder how this extension to operationally controlled joint operations fits in with the relief regarding data quality. For the setting of climate objectives (E1-8) : the relief mentioned in ESRS1 §91 on "undue costs and efforts" should also be applicable for setting scope 3 objectives. They are most of the time very hard to quantify as they address actors across the whole value chain, without certainty for applying effectively the expected action plans. In any case, this relief should also apply to E1-8 on GHG emissions if estimates are subject to too much uncertainty.			
Survey	Afep	Business association (other than association of financial institution)	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	Companies are very supportive of this proposal because it is often very difficult to obtain even estimates on assets operated by third-party companies, for example. Even if companies implement improvement processes, it is not always certain that reliable data can be obtained at a later date, particularly when third parties operate in jurisdictions that are not subject to ESRS. Companies also agree that no time limit should be imposed since as mentioned in the basis for conclusion, transparency about such limitation would provide sufficient incentive for the undertaking to improve the data quality and achieve a more complete scope in the calculation of the metrics. However, as this paragraph currently stands, companies would be obliged to calculate and publish GHG emissions across their entire value chain regardless of data availability and quality. This would not be compatible with the ESRS's qualitative characteristics of information and fair presentation requisites. The relief should also apply to GHG emissions, at least to scope 3 emissions. Regarding joint operations, the lack of data can also occurred for social datapoints.			
Survey	Afep	Business association (other than association of financial institution)	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Companies consider that information on anticipated financial effects is problematic because it can reveal confidential and strategic information and raise issues in terms of liability considering the uncertainties attached to any projections or forecasts. In the field of financial reporting, companies are not required to disclose their financial planning. Although disclosure of sensitive information will be dealt with ongoing developments on level 1, companies consider that anticipated financial information deserves specific relief in the ESRS. Companies point out the risks of disclosing projections covering medium and long-term horizons based on assumptions that change rapidly and dramatically. Such disclosures would significantly increase companies' liability without providing useful information to users. Furthermore, it is impossible to provide quantitative information without disclosing the underlying assumptions which could contain highly sensitive financial information. Companies understand the expectations of some stakeholders for forward-looking financial information but highlight that they are useful only when they are reliable without exposing confidential information. High-quality qualitative information is thus preferable to forcing companies to present unreliable and sometimes misleading quantitative data. The reliefs included in Option 1 are not sufficient as many stakeholders see these exemptions as temporary.			
Survey	Afep	Business association (other than association of financial institution)	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Quantitative reporting on anticipated financial effects is still premature given the immaturity of methodologies. Mandatory qualitative disclosure should be the baseline, with quantitative elements allowed on a voluntary basis (see option 2 for relief ESRS2 §23 a). Therefore, §40, §41 and §42 must be subject to this option 2.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Afep	Business association (other than association of financial institution)	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Companies operate globally and have investors outside of the EU who may be asking for ISSB compliance or operating in jurisdictions planning to make ISSB standards compulsory. Any reporting duplication or discrepancy of principle should therefore be avoided. Nevertheless, the international standards should not necessarily be the absolute global baseline and some datapoints may remain specific to this framework without being always embedded in the ESRS. Indeed, to allow a real simplification of the ESRS without hampering the interoperability, any DP and DR which can be considered as less of a priority or too complex should be withdrawn from the standards and flagged in an appendix as necessary for the interoperability. It would enable any company needing to be interoperable an easy identification of what is needed without imposing an unnecessary burden on others.			
Survey	Afep	Business association (other than association of financial institution)	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Afep	Business association (other than association of financial institution)	France	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	Companies support EFRAG's proposal, as planned in the Commission's mandate, to reduce the number of DPs by deleting the voluntary DPs, reducing overlap and increasing the focus on quantitative DPs with a reduction of the numerous narratives. Beyond the quantitative diminution of the number of DPs, companies highlight the difficulty to evaluate the concrete effect of that reduction on the reporting burden. Indeed, the quantitative DPs represent an important burden for companies considering the data collection in all the subsidiaries based in different countries with different legislations. Companies note that some alleviations listed in the French proposals for a simplification have not been considered by EFRAG - notably the deletion of some difficult DPs - which, cumulatively, could enable a more significant decrease in the reporting burden. Therefore companies believe that further alleviation is feasible and necessary.			
Survey	Afep	Business association (other than association of financial institution)	France	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	Companies reject any additional requirements as the main goal is to simplify the ESRS reporting. E3: Companies do not have water meters installed at each point. They calculate their water consumption through estimations and modelling (no use of water balance approach). Consequently, these new datapoints contradict the principle of simplification create greater complexity, and increase the audit costs. E4: The notion of "transition plan" is not yet clearly defined. Companies explore the best ways to develop action plans, whether through national or international initiatives, but no official certification of such analyses and plans exists to date. Making this datapoint mandatory would discourage companies from taking initiatives, as it would trigger compulsory verification by auditors without existing auditing standards. Such a compulsory publication should be removed from the standard. G1-2 : Percentage of functions most at risk in respect with corruption and bribery should be included in G1-4 (sub topics). G1-4 : Companies strongly reject the number of confirmed incidents. -It is irrelevant : it is not a reliable indicator to assess the effectiveness of the anti-corruption policies (a low number could mean a good policy to prevent the risks, a high number could mean a reliable reporting mechanism). -It is dangerous for EU competitiveness as it contradicts the right not to incriminate oneself guaranteed by the European Convention on Human Rights. Third countries authorities, such as the US Department of Justice, would investigate against EU companies to the benefit of their major strategic non-EU competitors who are not subject to similar reporting obligations. Finally, the specific point on CS3D and CSRD made in the recent joint statement on a US/UE framework on an agreement on reciprocal, fair and balanced trade, will lead to alleviate US companies from the main constraints of CSRD and create an unlevel playing field.			
Survey	Afep	Business association (other than association of financial institution)	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	Any simplification of the already highly complex framework should be achieved without introducing new requirements or by moving "may" datapoints to "shall" datapoint, that also exceed the Commission's mandate given to EFRAG. E2-4: Neither the definition of secondary microplastics nor the associated risk assessment along the value chain are officially established. Their impacts are not yet clearly addressed by science. Given the lack of robust and consistent methodologies to date, this item must be suppressed. E5-4: At present, the notion of critical and strategic raw materials may evolve over time with the development of the Critical Raw Materials Act, and as the delegated acts deriving from the Eco-design for Sustainable Products Regulation are not yet approved. Companies consider this information hard to access and publish, particularly since these materials are often mixed with others. In this evolving context, this datapoint shall be inserted in the NMIG.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Afep	Business association (other than association of financial institution)	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	Fair presentation is a new concept not used in the Accounting Directive which only refers to "true and fair view" regarding financial statements. Fair presentation is not clearly defined to prevent any ambiguity, ensure consistent application, mitigate audit risk and preserve the intended simplifications. Therefore companies do not support introduction of "fair presentation" in the ESRS. Since the mandate given by the Commission is to reduce and streamline, new concept should not be introduced in the ESRS, especially when not clear. Given the existing concepts, notably in ISSB or IAASB sustainability auditing standard ISSA 5000, French and European stakeholders have diverging interpretations of potential impacts and consequences : for some key stakeholders, it means the addition of supplementary datapoints in the report and it increases liability for both preparers and auditors to reach completeness, thus not reducing the reporting burden. French auditors consider that they will have to perform more due diligences and that the audit burden will be increased. Regarding liability, companies highlight that consequences of fair presentation in a double materiality reporting framework are different to those in a financial one given the number of affected stakeholders, the importance of narrative and forward-looking information required by the ESRS. EFRAG is trying to frame the double materiality assessment, stating that undertakings are not required to assess every possible IROs but this provision is not sufficient in case of litigation. As regards interoperability with the IFRS, the ISSB claims a level of interoperability of 95% regarding climate reporting. The remaining 5% are rather technical and clearly identified; they can be addressed directly without introducing fair presentation.			
Survey	Afep	Business association (other than association of financial institution)	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Financial institutions' GHG emissions typically stem from financing activities (Scope 3, Category 15), which means that their GHG emissions depend on companies and households that they finance. Therefore, too many hypotheses are needed to calculate targets in absolute value, and the results are neither reliable nor comparable, because they ultimately depend on clients. Moreover, absolute value targets are appropriate only for sectors where financing may be phased out due to lack of transition. While for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. Estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. For this reason, financial institutions should be exempted from disclosing GHG emission reduction targets in absolute terms. Intensity targets alone should be sufficient.			
Survey	Afep	Business association (other than association of financial institution)	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	Companies have analysed the new definition of the threshold above which it is necessary to break down indicators relating to the characteristics of company employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of the amended version of ESRS S1). They are not in favour of this change in the definition of significant company workforce because they consider that: -the information is difficult to gather, -it involves a significant burden in terms of preparing information for companies that sometimes have a small workforce in these countries, -when a company employs a small number of employees, the information will not be relevant for assessing the social or HR policies implemented. A top 10 desagregation would lead companies to disclose non-material information (less than 10% of the workforce) which contradicts the objective of simplification. They therefore wish to return to the previously proposed definition, both for DR S1-5 and S1-7, but also for the majority of DRs, in particular S1-9 and S1-15.			
Survey	Afep	Business association (other than association of financial institution)	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	Companies still consider it irrelevant and very complicated to publish information outside the EU on this datapoint ; however, companies are satisfied with the amendment made to AR 22. Outside the EEE, it is entirely appropriate to compare the lowest wages in the company with the statutory minimum wage established by legislation or collective bargaining. However, in countries where an adequate minimum wage does not exist, which is the most critical issue met by preparers in 2024, the ILO principles are too vague and will necessarily make information difficult to audit and compare. To overcome the absence of a clear database of adequate wages, quantitative information should be limited to employees for whom a minimum wage is defined by regulation or by collective bargaining. For those operating in contexts where no adequate wage is clearly defined, qualitative information should be disclosed explaining how the preparer ensures alignment with the ILO's principles.			
Survey	Afep	Business association (other than association of financial institution)	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	Simplifications brought in the ESRS must trigger changes in other regulations of the sustainable finance framework to ensure consistency between the different pieces of legislation. In particular, the upcoming review of SFDR should lead to deleting some PAI that are not particularly relevant and introduce a materiality principle. PAI should be strictly based on the information required by the ESRS and not impose additional disclosure requirements to investee companies. Prudential obligations need to be reviewed accordingly.			
Survey	Afep	Business association (other than association of financial institution)	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Companies welcome the intention to provide guidance for preparers in setting biodiversity targets, provided that the future application guidance remains voluntary and is integrated into the NMIG.			

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Survey	Afep	Business association (other than association of financial institution)	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	With regard to remuneration, be it the pay gap or the ratio (S1-15), companies question the value of unadjusted indicators that do not provide any useful information and which, if reproduced without contextual explanation, may contribute to damaging their reputation. The adjusted pay gap is the only metric that directly measures compliance with the principle of "equal pay for equal work or work of equal value."			
Survey	Afep	Business association (other than association of financial institution)	France	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	Companies are in favour of deleting paragraph 14, which poses a feasibility problem for undertakings with tens of thousands of direct suppliers. This disclosure requirement raises the question of how to identify SMEs around the world: what definition should be applied in non-EU jurisdictions ? It is therefore impossible to calculate and provide useful information (payment terms can differ between economic sectors rather than based on the size of companies). Companies consider that paragraph 14 should be deleted. In addition, this requirement is not aligned with Directive 2011/7 of 16 February 2011 on combating late payments in commercial transactions which does not make any distinction based on the size of companies.			
Survey	Afep	Business association (other than association of financial institution)	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		ESRS E1: -E1-1/E1-6: Companies also remind that the European Commission committed to define by end of 2025 the meaning of "compatibility between companies' target and 1.5°C targets". Until such a definition is published, no obligations are legitimate on this issue. They stress that the Paris Agreement also refers to "well below 2°C objective" which should be reinserted in the amended CSRD. -Companies consider, in the case where disclosing an absolute emissions target would provide to competitors key sensitive information (i.e.: production forecasts) which are very sensitive, that they should be entitled to publish only a target expressed in intensity. In this regard, a clarification that the "relief" mentioned in ESRS 1 §98 is effectively applicable for section E1-6 appears essential. -E1-3: The notion of resilience used in this section is very much unclear (see glossary); if the concept refers to adaptation, then it should be replaced by climate adaptation (without any reference to transition). -E1-6/E1-8: The distinction between financial control and operational control remains insufficiently clear, and it is uncertain whether the current drafting produces a positive outcome for preparers. This lack of clarity risks confusion in the interpretation of scope 1 and 2 emissions. -E1-5/E1-9 : some obligations have been added (§24 a ; §24c ; § 34) and should be suppressed. ESRS E2: Requiring undertakings to disclose information on substances of concern goes beyond the obligations set by REACH and creates a significant additional burden. The same remark applies to the 0.1% threshold mentioned for disclosures relating to the quantities of SVHC which are part of procured/sold components or articles. Indeed, REACH only requires companies to share the name of those substances. Therefore, reporting on substances of concern should be suppressed, as proposed by the French Accounting Standards Authority, and datapoints 20(a) and 20(b) amended accordingly.			
Survey	Institute of International Finance	Association of financial institutions	United States	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We generally agree that Chapter 3 of ESRS 1 is clearer and better organized. Nevertheless, some further targeted amendments are still needed. •We still see a significant issue with the concept of information materiality. The concept of information materiality in its renewed form is still not sufficient to allow for a more principles-based view and application of the ESRS and creates interoperability issues with the ISSB standards. Particularly, paragraph 21 (b) creates practical challenges. First, it is almost impossible to prove what kind of information is "necessary" for users, as necessity generally is a subjective criterion. •It is important to ensure there is a homogeneous definition of materiality assessment across EU legislation. Close alignment between the EBA's concept of materiality, the definitions applied to insurers (e.g., under Solvency II) and the new draft ESRS should be ensured to avoid discrepancies between outcomes of financial companies' materiality assessments for different exercises (i.e., ICAAP vs CSRD). •In ESRS 2 IRO-1, it should be clarified that a credit institution may refer to existing methodologies in describing its DMA process. •We recommend that ESRS 1 Chapter 3 and the Application Requirements (ARs) make explicit that financial sector firms may refer to Pillar 3 disclosures or omit information relevant only to supervisory authorities. •ESRS E1's ARs should explicitly permit disaggregation by asset class, sector and client type for financial sector firms. •While financial institutions do consider low-probability, high-impact outcomes, mandating firms to disclose such information in every case could lead to misstatements or overstatements. We recommend removing this expectation from ESRS 1 (and any related AR) to protect the reliability of disclosures.			
Survey	Institute of International Finance	Association of financial institutions	United States	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	IIF members do not agree that the new, detailed guidance on how to consider remediation, mitigation and prevention actions within the DMA will make reporting more relevant and comparable. We consider the new guidelines to be excessively complex, and that they risk being overly prescriptive, which could restrict firms from implementing a DMA process that accounts for firm-specific circumstances. For example, supportable evidence requirements introduce definitional ambiguity and increase reporting disclosures. We would welcome a more principle-based approach focused on whether impacts, after considering management's response, remain material to stakeholder decision-making. Preparers should be able to use reasonable judgement in determining whether a gross, net or hybrid approach is most appropriate. This would better align with the fundamental materiality principle while reducing implementation complexity and avoiding perverse incentives for effective risk management. It also echoes ISSB staff's view on risk mitigation, "It is the staff's view that whether and how an entity considers risk mitigation activities in the identification of sustainability-related risks depends on an entity's specific facts and circumstances. (IFRS Staff Paper, November; paragraph 17). IIF members would recommend the complete removal of the new guidelines on gross vs. net, i.e. paragraphs 34/35 and Appendix C of ESRS 1, and that time is permitted for the market practice to evolve. Any future guidance on this topic might be better placed in the NMIG. Future work could revisit the concepts of "gross" vs. "net" for financial institutions, including allowing a preparer to reflect prevention measures and the possibility of adapting the balance sheet. Finally, we note that the proposal is currently limited to impact materiality, while risks and impacts should be treated consistently. We believe it should equally apply to risk so that the approach is consistent and synchronized across both dimensions.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Institute of International Finance	Association of financial institutions	United States	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	IIF members agree that the proposed changes – notwithstanding amendments to respond to the challenges raised in this letter – would generally contribute to improve the overall readability and conciseness of the ESRS. IIF members consider the explicit flexibility provided in relation to the organization of the disclosures, the inclusion of an 'executive summary' and the emphasis on non-duplicative reporting, to be of particular benefit. However, we recommend that EFRAG considers incorporating further flexibility in some cases, such as permitting cross-referencing to other relevant sustainability reports by embedding links within the Sustainability Statement to further improve the overall readability of the report for stakeholders.			
Survey	Institute of International Finance	Association of financial institutions	United States	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The revised architecture is a clear improvement – the standards are more readable and better structured. Nevertheless, some additional revisions should be considered. Going forward, we recommend: -Clarifying the hierarchy from topic, to sub-topic, to datapoint, and ensuring every "shall disclose" requirement sits beneath the relevant topic/sub-topic. This would make it more intuitive to progress from DMA conclusions to the applicable disclosures. -Providing a navigable HTML edition of the final standards in which every reference to a defined term, another section or paragraph in the standards is a live link to the referenced paragraph or Application Requirement. This would materially improve accessibility and ease the implementation of the standards. Additionally, concerns remain regarding the General Disclosure Requirements for Metrics (GDR-M) paragraph 41. -First, Paragraph 41(a) requires, for each metric, information on data types and sources used as input to the calculation. While subject to information materiality, this is not relevant for most metrics and does not add value for users. We suggest deleting "data types and sources used as input to the calculation" from the provision. -Second, paragraph 41(b) introduces requirements for all environmental metrics regarding specific environmental conditions and characteristics of the area where the impact is occurring. This information is often unavailable, highly judgmental, and subject to significant uncertainties. We suggest deleting subparagraph 41(b) entirely.			
Survey	Institute of International Finance	Association of financial institutions	United States	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We welcome the relocation of all mandatory disclosure requirements into the main body of the standards, along with the placement of application requirements directly below each relevant Disclosure Requirement and Chapter in ESRS 1. However, some concerns remain: -Some "may disclose" datapoints remain (e.g., ESRS 1.114, 1.115) and should be reconsidered to ensure consistency in mandatory reporting. -Changes to established terminology should be approached with caution, given that many undertakings are already preparing or reporting under the original ESRS. The consistent use of "material IROs" should be ensured across the standards, avoiding references to "material topics," and wording should not alternate between "adverse" and "negative" impacts. -Members remain concerned by the wording of certain Application Requirements. Expressions such as "shall consider" create ambiguity, as it is unclear how "consideration" can be measured or audited. More generally, IIF members believe that merely reducing the total number of mandatory data points may not necessarily result in a reduction in reporting burden. For example, in ESRS E1, companies are still required to disclose GHG emissions broken down by scope 1, 2 and 3. Previously, disclosure of the overall total (as the sum of scopes 1, 2 and 3) was also required, however the burden arises from the need for firms to source scopes 1, 2 and 3 emissions, not from calculating a simple sum. Additionally, the merging of requirements should be considered a consolidation and not an elimination of requirements. It would also be helpful if EFRAG provided a clearly defined list of updated data points.			
Survey	Institute of International Finance	Association of financial institutions	United States	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	IIF members recognize that that some voluntary disclosure items have been relocated to non-mandatory illustrative guidance rather than being removed entirely. Some members would prefer that such data points are removed entirely from the requirements and the NMIG. More broadly, it should be made extremely clear that the NMIG is indeed voluntary for firms to refer to and is not an extension of the core requirements. For example, an explicit statement could be included clarifying that the NMIG cannot be used for audit purposes and are intended solely to facilitate implementation by preparers.			
Survey	Institute of International Finance	Association of financial institutions	United States	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	IIF members support the horizontal reliefs (including "undue cost or effort" and "reasonable and supportable information") and the permission to use proxies/estimates for Scope 3 where appropriate, for example where an appropriate and accepted methodology exists. However, members have some comments and concerns related to the following: •The undue cost and effort relief is worded differently to the same principle in the International Sustainability Standards Board (ISSB) disclosure standards, which creates confusion about interpretation and interoperability between the proposed revised ESRS and ISSB. EFRAG should also clarify that it is the firm's management that determines what constitutes "undue cost and effort" with respect to each entity in scope. •The drafting of ESRS 1, Section 7.4, Paragraph 91 is currently unclear and generating some confusion for firms as well as concerns that it would require low-quality disclosures of GHG emissions. Some read the text as explicitly excluding GHG emissions from the relief for undue cost and effort, however we believe it instead applies to the scope-related relief. Under either interpretation, it is not clear why GHG emissions would be excluded from the relief as it would likely lead to the required disclosure of poor quality GHG emissions data that would fail to meet the ESRS's own fair presentation and qualitative characteristics of information. •The relief for acquisition should be extended, considering that acquisitions are inherently complex, and require a longer period for transitions (at least two years) given complications with system integration and the typical period allowed under accounting rules for the acquiring company to finalize the measurement of assets and liabilities. •We think further guidance will be required for auditors to ensure that these reliefs are used as EFRAG intends.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Institute of International Finance	Association of financial institutions	United States	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	The proposed relief for lack of data quality is welcomed. IIF members support the overall objective of reducing unnecessary and low-quality data points to simplify the ESRS and make them more decision useful. However, although these reliefs help reduce the reporting burden, EFRAG should consider greater alignment with ISSB/IFRS reliefs for long-term alignment between the two standards. The proposed ESRS changes incorporate ISSB/IFRS provisions related to "reasonable and supportable information available without undue cost or effort" when reporting metrics; however, full alignment is not achieved due to differences in the scope of application. EFRAG should further address financial services firms' concerns regarding value chain assessment reporting obligation challenges.			
Survey	Institute of International Finance	Association of financial institutions	United States	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	As financial institution disclosure preparers, IIF members have concerns about the interoperability and practicality of the two options presented for disclosing anticipated financial effects in the amended ESRS. IIF members have different views on whether Option 1 or 2 is preferred, or if a different 'third way' ought to be developed that better reflects how anticipated financial effects can already be reflected by financial institutions within their risk frameworks. However, at this time, more members would prefer Option 2 as it is better aligned with the simplification objective and offers a more pragmatic and flexible approach, allowing for meaningful qualitative disclosures while avoiding the risks associated with premature quantification. Option 1 for the proposed "Relief for Anticipated Financial Effects" would be closer in alignment with ISSB principles – although not fully aligned – and would therefore support greater interoperability than Option 2. Members who prefer Option 1 believe that it should be fully aligned with ISSB if it were adopted. However, it entails challenges for preparers due to the absence of harmonized methodologies and comparable data to determine anticipated financial effects, high levels of uncertainty and lack of comparability. Option 2 does represent a deviation from the ISSB standards, but reflects the practical challenges, legal risks and audit impracticality of disclosing forward-looking financial information; it therefore better aligns with a simplification objective. This option still leaves room and provides encouragement for the industry to continue to improve on quantification approaches, however some firms question whether there would be sufficient incentive to do so under this option. Further guidance on qualitative disclosure requirements would be helpful to ensure clarity and consistency in implementation. As disclosure users, most IIF member banks and insurers do not consider that Option 2 would impair their access to necessary information for risk management purposes.			
Survey	Institute of International Finance	Association of financial institutions	United States	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	IIF members consider that the E1-11 disclosures continue to be complex and problematic, and that they should be amended and reduced. For many of the required data points, there are often no established standards and they extend far beyond what is required under financial reporting, often asking for potentially sensitive information with little relevance for stakeholders. Some of the datapoints could inadvertently create other adverse impacts for preparers, e.g., providing a misleading impression to investors, introducing legal risks for preparers. For example, see Paragraph 41(d) on "potential liabilities related to climate transition that do not meet the accounting recognition criteria at the reporting date but that may have to be recognised in financial statements" and Paragraph 42 on the "amount and percentage of assets or revenue derived from business activities aligned with climate-related opportunities, including the associated time horizons". If an opportunity is only material in the long term this will be impossible to quantify as the revenue is not likely to have been earned yet and this may lead to the wrong outcome (e.g., arbitrarily making up numbers that are not decision-useful information for end-users). It could also reveal sensitive strategic information in public disclosures. Some disclosures in E1-11 could be retained to allow banks to assess their physical and transition risk while other datapoints should be removed as they are not required for effective climate risk management. The requirements should be better aligned to those under the ISSB framework (e.g., 41 and 42 are incremental to ISSB). In addition, EFRAG could consider aligning the E1-11 requirements with the future revised EBA Pillar 3 ESG disclosures for banks. For example, since the majority of a financial institution's assets would be financial in nature, exposure to climate risk related to owned assets could be an optional disclosure.			
Survey	Institute of International Finance	Association of financial institutions	United States	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	While acknowledging that full alignment of ESRS and ISSB may be difficult to achieve, IIF members call for further efforts in this regard. Many legal entities listed on an EU regulated market within the scope of ESRS will also be caught within the future mandatory scope of ISSB in jurisdictions such as the UK. In such cases, producing ESG disclosures that can address both frameworks will reduce reporting burden and should improve clarity for disclosures users. In addition to the changes already made, EFRAG should consider aligning the fair presentation framework between the two standards. Differences in wording, such as in describing the fair presentation principle, necessitates further review to ensure consistent language across the ESRS and ISSB frameworks. Other areas of divergence that should be addressed include: -The requirements concerning financial and operational control (E1 AR 18. For para. 32/ E1 AR 19 for para. 32/ E1 AR 20 for para 32) diverge significantly from IFRS S2, where undertakings have the flexibility to choose their preferred approach. This dual approach may result in inconsistencies in reporting and interpretation, requiring the need for a careful review to ensure clarity and uniformity. -The deviations related to the detailed data points requirements around anticipated financial effects continue to be a concern (see response to Q20). -The inclusion of anticipated financial effects considerations to perform the resilience analysis (E1 AR 8 for par. 20) is another critical area that does not align with IFRS S2. This new consideration, not included in the original ESRS, introduces complexity and additional burdens for undertakings. -ESRS requires companies to report on energy consumption and mix metrics, while IFRS S2 does not.			
Survey	Institute of International Finance	Association of financial institutions	United States	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Institute of International Finance	Association of financial institutions	United States	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	We acknowledge that the proposed draft reflects some stakeholder feedback, however IIF members are concerned that proposed changes may not lead to a meaningful reduction in reporting burden in practice. Much of the reduction of data points comes from redrafting existing data points or removing voluntary ones, while the majority of mandatory data points remain, some even reappear in the NMIG or are newly introduced. The actual realization of a simplified framework, or not, will hinge on how new concepts are interpreted (such as undue cost and burden, fair representation, materiality filter etc.). We understand that the intention is to shift the focus toward meaningful disclosures rather than process-heavy reporting. However, as currently drafted, the standards still require significant effort to explain the process behind disclosures, justify omissions, and address assurance requirements. The remaining mandatory reporting requirements should be further assessed for decision-usefulness. For example, disclosures related to anticipated financial effects should be analyzed further (see response to Q20). Where such information may be produced, it is highly speculative, lacks reliability for current-period estimation, introduces auditing challenges, and is unlikely to be comparable between entities.			
Survey	Institute of International Finance	Association of financial institutions	United States	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	E4-1 AR1 para 12: The amended ESRS E4 introduces a mandatory requirement for undertakings to disclose biodiversity transition plan features when such plans exist and are made public. While framed as conditional ("if the undertaking has in place"), this requirement may increase pressure on institutions to develop biodiversity transition plans aligned with the Kunming-Montreal Global Biodiversity Framework. However, many IIF members would disagree that biodiversity transition plans are mainstream or becoming mainstreamed yet; indeed the concept presents a number of challenges. This new requirement and EFRAG's rationalization fails to acknowledge significant jurisdictional limitations, particularly in certain jurisdictions such as the United States, where financial institutions face restrictive legislation that may prohibit or limit the implementation of biodiversity transition plans. Re: ESRS G-1 paragraph 14: We strongly oppose this additional mandatory datapoint. Members have previously raised concerns about the application of the definition of "confirmed" incidents and the challenges with applying the Glossary definitions on a global scale. The new ARs 4-6 do not provide the flexibility required for reporters operating globally. The proposed mandatory disclosure of the number and nature of "confirmed" incidents of corruption and bribery would potentially impair an undertaking's and its parent company's legal strategy, defense, and risk mitigation. Determinations as to whether or not a legal violation has occurred, and the appropriate enforcement response are generally discretionary decisions by competent authorities. The proposed disclosure may be interpreted by authorities and other actors as an admission of violation by the undertaking/its parent company, regardless of specific facts and circumstances, which may bias an investigation, enforcement response, and reputational fallout. Consequently, the disclosure requirement can result in undue harm to the undertaking and its parent company. In fact, there is already a similar relief in this regard in the financial reporting framework for this reason.			
Survey	Institute of International Finance	Association of financial institutions	United States	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We believe that no additional data points should be added. This runs contrary to the Commission's mandate for EFRAG to streamline and reduce reporting burdens. Re: ESRS 2 BP-1 - Basis for preparation of the sustainability statement: We do not agree with the new provisions introduced by paragraph 5, as they create duplicated information throughout the Sustainability Statement. For example, if the reporting undertaking makes use of the relief for metrics with a partial scope (ESRS 1 paragraph 91), or changes sustainability information due to a restatement need or error correction (ESRS 1 paragraphs 95-97), sufficient transparency would be provided for the metrics concerned, i.e. by providing contextual information, disclosing the partial scope, and correcting/restating the previous reporting period figures. Following the new paragraph 5 and stating that the reporting undertaking has applied these "provisions" just creates duplicates and redundant information not helpful for readers and users. We therefore suggest limiting the disclosures required by paragraph 5 to those that do not create duplicated/redundant information with already existent disclosure requirements in the revised standards.			
Survey	Institute of International Finance	Association of financial institutions	United States	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	IIF members recognize the intention behind introducing the fair presentation principle and consider it a step in the right direction, as it creates a disclosure environment which is more aligned with ISSB and improves the relevance of disclosures. This inclusion not only ensures interoperability with the ISSB but also incorporates the concept of fair presentation that is already embedded in financial reporting and further aligns the reporting frameworks. Some members think that it could ultimately lead to a move away from a checklist-style compliance approach to a more coherent and meaningful disclosure framework. However, members see open questions about how the fair presentation principle would be applied in practice. Given these open questions, the potential net-benefits of the principle are unclear. Unlike financial reporting, there is no established and standardized benchmark regarding the fair presentation of sustainability information. This missing benchmark creates the risk of incurring inappropriate auditor requirements, demanding broader or more granular information that goes far beyond the intention of the disclosure requirements embedded in the standards. Nonetheless, if this requirement were adopted, a proper definition and explanation of the fair presentation principle in the ESRS context should be provided, with explicit anchor points for auditors. This should be aligned with the ISSB Standards to ensure consistency and interoperability across reporting regimes. There also needs to be clarification regarding the audit procedures expected to ensure compliance with this principle. A clear explanation (e.g., recitals and basis for conclusions) would also be required regarding the interaction between use of reliefs and the requirement of fair presentation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Institute of International Finance	Association of financial institutions	United States	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	IIF members agree that financial institutions should be exempted from the requirement to accompany intensity-based targets with absolute values where only intensity targets are set. IIF members, as already noted in the IIF input paper to EFRAG in advance of this consultation, strongly believe that financial institutions at least should not be required to translate intensity targets (if they have set them) into absolute targets for disclosure purposes. Financial institutions should only be required to disclose absolute emissions reduction targets where they have made such targets. At a fundamental level, disclosures should mirror the firm's strategic decisions and regulatory disclosures should be understandable vis-à-vis other disclosures a firm makes. Requiring a firm to disclose a target in a substantively different format to what the firm has set and communicated elsewhere is likely to generate unnecessary confusion for disclosure users. In many cases, financial institutions consider intensity-based targets to be more appropriate than absolute emissions-based targets, hence their strategic decision to set targets in that way. Intensity-based metrics can provide a more nuanced and actionable understanding of a company's or sector's environmental performance. The complexity and required assumptions to transpose intensity targets into absolute targets undermine their usefulness, reliability, auditability and comparability. The process involves numerous assumptions, such as future portfolio composition, client production and sales mix, volumes, and enterprise value etc. This is especially true for financial institutions. Since financed emissions footprints are an aggregate of corporate emissions footprints, translating a portfolio intensity target to an absolute target requires significant assumptions including growth trajectories for all portfolio companies. This type of calculation will not provide the accuracy or transparency desired. A tailored approach to target disclosure—recognizing the specific role and structure of financial institutions—is therefore recommended.			
Survey	Institute of International Finance	Association of financial institutions	United States	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	Regarding ESRS S1-5 and S1-7: IIF members believe that the proposed changes dilute the focus on material information by removing the relative 10% threshold. The updated definition expands the data gathering efforts for the disclosure with minimal value added: countries with low headcounts above 50 employees were formerly excluded if they were low percentages of the total workforce of the undertaking. However, countries with higher headcounts above 50 employees but with a low relative number of employees will now need to be disclosed. IIF members recommend EFRAG to reinstate the previous threshold.			
Survey	Institute of International Finance	Association of financial institutions	United States	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadequwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The revised ESRS S1 introduces a reference to non-EU living wage methodology based on International Labor Organization (ILO) principles. However, it lacks clarity regarding what this entails. The distinction between EU and non-EU countries adds more complexity. The revisions also introduce new requirements for firms that seem to go beyond a reporting institution's responsibility. For example, within AR 22 it is indicated that firms in establishing adequate wage benchmarks outside the EU "should take into account both needs of workers and their families, as well as economic factors, as stated in the ILO Minimum Wage Fixing Convention No.131."			
Survey	Institute of International Finance	Association of financial institutions	United States	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	The ESRS 2 Appendix provides a specific example of the issue of duplicative reporting requirements, which may lead to disclosures being developed purely for the sake of compliance and highlighting the need to simplify requirements across the EU legislative framework. The revision of the ESRS presents an opportunity to reduce reliance on Appendix datapoints driven only by regulation rather than by the meaningfulness and usability of information. IIF members consider that the current approach of including datapoints that overlap with both mandatory and voluntary datapoints from the SFDR creates unnecessary burdens for all reporting entities, especially when the datapoints tend to be sector specific (i.e. S1-13 metric on number of days lost to injuries, accidents, fatalities or illness), and the usage by financial institutions in their respective entity/product reporting remain low. Preparation of disclosures regardless of materiality constitutes a disproportionate burden and runs against what we understand to be the principles of the revised ESRS. One approach would be to explicitly state in the ESRS Appendix that only material information need be reported.			
Survey	Institute of International Finance	Association of financial institutions	United States	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	IIF members believe that EFRAG should not review AR26 for the Amended ESRS E4. The existing ESRS 2 GDR-T provides comprehensive guidance for target-setting disclosures, and additional prescriptive application requirement could create implementation complexity without proportional benefits. However, EFRAG should consider removing AR 5 (engagement with indigenous peoples) associated with paragraph 17 as this undermines EFRAG's stated simplification goals. If the objective is to reduce prescriptive guidance and rely on ESRS 2 GDR-T frameworks, then AR5 represents an arbitrary exception. Moreover, AR5 introduces problematic scope creep by embedding social governance mechanisms within an environmental disclosure requirement. ESRS S3 (Affected Communities) already addresses indigenous people.			
Survey	Institute of International Finance	Association of financial institutions	United States	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	IIF members agree that removing voluntary DPs generally aligns with the overall objective of the simplification mandate.			
Survey	Institute of International Finance	Association of financial institutions	United States	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	IIF members are generally supportive of the proposed formulation. However, we would note the following points. We note that the Log of Amendments published on the EFRAG website introduces an additional sentence to AR 4 paragraph 13 stating that "final decisions include all the decisions in the reporting year while awaiting the outcome of a possible appeal." However, under the European Criminal Records Information System (ECRIS), only final decisions not subject to appeals enter the criminal record. We recommend deleting that sentence to align AR 4 with the legal definition of "conviction" under ECRIS. Additionally, regarding AR 5 for paragraph 13, in order to keep coherence with the definition of "conviction", fines to be reported should be limited to those that are definitive (i.e., not subject to appeal judicially). This would be also consistent with the concept of "fair presentation" pursued in the new ESRS.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Institute of International Finance	Association of financial institutions	United States	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS 1 – Chapter 5.2 "Inclusion of upstream and downstream value chain information", Paragraph 63. Partially agree/ partially disagree The newly added paragraph 63 advances regulatory coherence. This provision explicitly adds the "value chain cap" principle, which recognizes the limitations on data collection by larger firms under relevant EU law and regulation and establishes clear boundaries: "the information required by the ESRS to be obtained from undertakings in the upstream and/or downstream value chain shall not exceed the limit set by the relevant EU law and regulation." Recommended Global Jurisdictional Expansion: To achieve optimal international applicability and reduce regulatory fragmentation, this framework (paragraph 63) should be broadened to also encompass global law and regulations. This measured approach would balance stakeholder information needs with practical implementation realities, ensuring that sustainability reporting remains both comprehensive and operationally viable across diverse regulatory landscapes. Such expansion would reduce conflicting obligations that may arise from overlapping international frameworks, enhance cross-border compliance efficiency by recognizing diverse regulatory environments, and better support multinational enterprise reporting.			
Survey	Institute of International Finance	Association of financial institutions	United States	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	•E1-1: The requirement to disclose how the plan is compatible with 1.5°C pathway is challenging given that the global economy itself and most jurisdictions are not yet aligned to this pathway. •E1-1: Further guidance is needed on how financial institutions would measure "locked in emissions" and assess their impact on the plan. •E1-1: Guidance is needed on whether financed emissions should be disaggregated by scope, country, segment, activity, GHG type, and source type. •E1-3: Paragraph 21(a) – IIF members recommend EFRAG to clarify that this disclosure is conditional on the undertaking having adopted a transition plan, and suggest the following wording: "and, where a transition plan has been adopted in accordance with DR E1-1, how that plan supports…" •E1-5: Disclosing Capex & Opex figures related to actions taken may be commercially sensitive. •E1-8 – para. 32 and AR 18-19: This should be aligned with the GHG Protocol and allow companies to select a boundary approach. •E1-18 – E1-19: We would suggest using more general language in 18(b) since transition risk scenarios may not be event based and may be more narrative driven. AR5 for paragraph 18(b) – For a global financial institution with highly diversified exposures to geographies, industries and products, a granular geospatial assessment at the level suggested is aspirational; it is especially challenging for a financial institution's supply chains. This creates unrealistic and overly burdensome requirements. We suggest adding at the end of AR5(c): "on a best-efforts basis, where reasonably obtainable, and using appropriate proxies where necessary." AR6 for paragraph 18(b) (formerly linked to paragraph 19b) – IIF members recommend EFRAG to delete the clause "taking into account the likelihood, magnitude and duration of the transition events," or qualify it as "high-level, qualitative judgements on a best-efforts basis."			
Survey	Institute of International Finance	Association of financial institutions	United States	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	•S1-5 and S1-7 – IIF members recommend EFRAG to reinstate the previous threshold approach. •S1-15 – IIF members recommend EFRAG to edit paragraph 43: "to allow an understanding of any gap in pay between women and men among the undertaking's employees, and to provide insight into remuneration inequality." The calculation text should be kept unchanged optional contextual disaggregation (e.g., by category or country) should be located in the NMIG. •S1-11 – The amendment that limits reporting to data that can be "lawfully collected" is sensible and addresses privacy constraints across jurisdictions. However, legal regimes often restrict not only collection but also the disclosure of sensitive data. IIF members recommend EFRAG to amend AR 23 to: "This DR requires the undertaking to report only data that can be lawfully collected and lawfully disclosed." •S1-13 – IIF members recommend EFRAG to revise AR 30 to require scheduled working days as the basis and require the inclusion of weekends/holidays only if they form part of the individual's contracted schedule. These disclosures should also be subject to an explicit materiality assessment. •S1-14 – IIF members recommend EFRAG to ensure the mapping of sub-topics to disclosure requirements and their titles do not lead to misleading disclosures or metrics not representative of the matter purported to be reported. In this case, rename the Disclosure Requirement to "Employees entitled to family-related leave". •S1-16 (AR 37–AR 41) - IIF members recommend EFRAG to move AR 37–AR 41 to the NMIG. The DR in the Standard should remain narrowly focused on reporting the number of substantiated incidents of discrimination and other human rights incidents and any related material fines, sanctions or compensation (with the 'substantiated' filter preserved).			
Survey	Institute of International Finance	Association of financial institutions	United States	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	•A potential concern is that the reduction in narrative disclosure could reduce the quality and effectiveness of due diligence processes – especially in sensitive areas within human rights. This would then misalign with efforts to improve the robustness of human rights risk management across the industry and through other regulatory expectations. •Across sustainability, and especially in human rights, there is a heavy weighting of qualitative indicators that can be used to evidence metrics, actions etc. However, further guidance is still needed on how to use these as effectiveness measures. •S2-3: While paragraph 19 represents improvement, it remains challenging to implement. An undertaking would need to define what constitutes an incident being "reported" and establish thresholds to stop spurious "incidents" being "reported". •S2-3: Further guidance is needed on how the undertaking might confirm if an incident that is reported is genuine or not if it relates to undertakings in its value chain.			
Survey	Institute of International Finance	Association of financial institutions	United States	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	•There is an ongoing concern around the need to report on human rights incidents connected to affected communities raises confidentiality and reputational sensitivities. Further guidance for reporting thresholds would support better compliance. •Further clarity is needed on expectations around remediation obligations which vary under the UN Guiding Principles (UN GPs) based on the type of connection (i.e., cause, contribute, directly linked). •One of the positive outcomes is that the UN GPs effectiveness criteria is now better embedded into the reporting requirements of grievance mechanisms.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Institute of International Finance	Association of financial institutions	United States	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS S4 requires disclosures related to consumers/end-users where sustainability impacts arise (e.g., health/safety, access, discrimination). Privacy/data protection risks are managed as part of enterprise operational risk, compliance and ICT/cybersecurity, with established controls, metrics and incident reporting. Treating them as "sustainability" topics blurs scopes and dilutes the focus of the ESRS. Adding "privacy" to S4 triggers duplicate narratives and assurance across two regimes (operational risk reporting and ESRS), without improving decision-useful sustainability information. Recommendation: Delete all remaining references to "privacy" from ESRS S4 and the cross-cutting list in ESRS 1, because privacy and data protection are already governed and reported as operational/ICT risks under existing legal and risk frameworks. ESRS should not present these matters as sustainability-related.			
Survey	Institute of International Finance	Association of financial institutions	United States	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Compatibility with 1.5 degrees: While we note that the meaning of "compatibility with 1.5 degrees" in the Transition Plans disclosure (ESRS E1) was not clarified or changed in the amended ESRS given it is subject to ongoing developments at Level 1 regulation, we would like to highlight the need for EFRAG to consider flexibility for firms operating outside of the EU on this matter. Specifically, entities should be allowed to account for the transition trajectories of the different jurisdictions in which they operate, rather than being held strictly to EU targets. Overarching messages: IIF members welcome EFRAG's efforts to revise and simplify the European Sustainability Reporting Standards (ESRS), and commend EFRAG on taking swift action to make sustainability reporting under the Corporate Sustainability Reporting Directive (CSRD) more proportionate and decision useful. This is aligned with the EU's broader goal of implementing a more effective, efficient and coherent sustainability reporting framework. Overall, IIF members consider that the proposed revisions to the ESRS represent an important and positive step forward. However, IIF members have concerns that some of the proposed changes may not deliver a significant degree of simplification or a meaningful reduction in reporting burden in practice. Key concerns include: - Number of data points - Simplification outcomes and interpretation of new concepts - DMA simplification - Appropriateness for financial institutions - Interoperability with ISSB. About the Institute of International Finance (IIF): The IIF is the global association of the financial industry, with around 400 members from more than 60 countries, including commercial and investment banks, asset managers, insurance companies, rating agencies, market infrastructure providers, and professional services firms. The positions in this letter have been informed by engagement with a global working group of policy, regulatory, and disclosure experts from IIF member financial institutions, predominantly banks and insurers.			
Survey	FSR – Danish Auditors	Auditor	Denmark	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	In general, we welcome the objective to clarify and simplify the double materiality assessment (DMA), and we support the application of the materiality of information filter for all disclosures. However, we do believe that there are some provisions that should be revised to provide clarity on the requirements and consistency in the application of the materiality of information. In particular, we suggest clarifying who the users are (in particular other users) and what types of decisions they make. In particular clarification on material information for users of sustainability statements in ESRS 1, pa. 21(b) needs revision to clarify what information is necessary for them to "understand" material IROs, and how the entity identifies and manages them.			
Survey	FSR – Danish Auditors	Auditor	Denmark	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We welcome the proposed changes to clarify how to consider remediation, mitigation and prevention implemented actions in the DMA. However, we suggest -clarifying the approach for potential impacts in ESRS 1 para 34 and 35 -revising the guidance in appendix C, in particular to ensure consistency with ESRS 1 para 34 and 35, and provide clarity whether it applies also to value chain or only for own operations -providing further clarification for "maintaining significant ongoing actions" as this is very judgmental. Appendix C stands as highly rule based leaving little flexibility in determining when netting is appropriate. It can, however, be useful to prevent lengthy discussions on a complex part of the DMA, provided that lacks and ambiguity raised in the consultation and the field test are resolved. Finally we suggest developing guidance for assessing risks.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	FSR – Danish Auditors	Auditor	Denmark	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	In general, we find that the understandability, clarity and accessibility is improved. However, we still find a need to further clarity and accessibility in relation to: 1)Paragraphs are widespread on expected sources of information, e.g. ESRS1, pa27, 47, 62, the expectation to use reasonable and supportable evidence, pa45, the principles on undue cost or effort and various paragraphs mentioning this relief. A gathering of these paragraphs may avoid different interpretations as to what applies when, supplemented with explanation of 'evidence' and whether data available inhouse shall be used in pa65. 2)ESRS1, pa58-59, attempts to explain concepts from financial reporting on consolidation. These paragraphs are neither accurate nor sufficient as accounting legislation on consolidation is complex. We encourage to ensure consistency to legal provisions for financial reporting and provide more elaborated guidance on how to present consolidated sustainability statements within the remit of level 1 regulation. 3)Sub-chapter 5.2 in ESRS 1 include to a large degree provisions covered else were in the ESRS, e.g. undue cost or effort, use of estimates, examples of data sources. Paragraphs clearly being AR should be separated, e.g. pa63-65. Furthermore, AR28 is difficult to understand. Is it a relief option ('do not require') or a requirement to exclude ('limited to own operations') up-/downstream data from mentioned DRs? This should be clarified. 4)Clarification is needed in sub-chapter 7.6 and 7.7 on what disclosures entities should make when revising an estimate or restating prior period errors, and further whether and when restatement of baseline data is required. Further, ESRS 1 pa94 need clarification whether an entity is only required to revise estimates when this is a material change (similar to "material errors"). 5)It creates confusion that pa86 and AR32 are not aligned with the relief for quantifying anticipated financial effects.			
Survey	FSR – Danish Auditors	Auditor	Denmark	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We acknowledge that the NMIG can be useful as non-authoritative guidance, but in the current form the role of the content is unclear. We recommend, that EFRAG's intentions with the different content in NMIG are thoroughly reconsidered. If it is to be truly non-mandatory, terminology shall be revised in large parts. In addition, the guidance shall more clearly express that this is one way to do or understand things, not the only way. Further, to underline the NMIGs character as non-mandatory, it should not be adopted as a Commission Notice. The Basis for Conclusions very useful for interpretation and should be considered elaborated and eventually updated with any changes made by the Commission.			
Survey	FSR – Danish Auditors	Auditor	Denmark	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I would like to skip this question and provide my feedback in Part 3				
Survey	FSR – Danish Auditors	Auditor	Denmark	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	We prefer alignment of language between ISSB Standards and ESRS as far as possible to achieve simplification, which should be possible given the high degree of interoperability already achieved. Even though alignment have been accomplished to some degree, we encourage further amendments made to enhance interoperability, especially on fair presentation, "undue cost or effort" . For example for "undue cost or effort", D24 of IFRS S1 should be considered, and for fair presentation, the language in ESRS Chapter 2 should be cosidered. Also, on other areas there remain differences in language, and there is lack of alignment in areas, where, in some cases, the ED introduces additional differences in requirements/application.			
Survey	FSR – Danish Auditors	Auditor	Denmark	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We welcome the clarification that ESRS is a fair presentation framework, which should support a more effective application of materiality and more relevant, concise reporting. Fair presentation, along with qualitative characteristics of information, is at the heart of the IASB's standards including the ISSB Standards. Clarity that ESRS is a fair presentation framework brings certainty on a concept that is widely used by preparers (e.g. for financial reporting) and is therefore familiar in application. However, while clearly derived from the IASB and the ISSB Standards, the words and their order in ESRS 1 are different allowing for adaptation necessary for ESRS, such as reference to 'material IROs'. It is important that it is considered in ESRS to use the same words as the IASB/ISSB subject to necessary deviations such as reference to IROs and to clarify the relationship between the fair presentation concept and the entity specific information requirements.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	We appreciate the clarification that companies are not required to conduct excessively complex or overly formal materiality assessments. The updated changes should help organizations generate insights that better reflect their specific business models and value chains. In particular, Section 3.5 provides practical guidance for organisations and helps prevent unnecessary complexity in materiality assessments. This enhances double materiality as a core principle for identifying key priorities. In turn, it supports the adoption of more focused and effective sustainability practices and facilitates clearer, more aligned reporting under the CSRD.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	No opinion offered			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We welcome the removal of duplications between cross-cutting and topical standards, and the stronger emphasis on removing general disclosure requirements. Many of the PAT provisions in the topical standards appeared to be illustrative rather than mandatory datapoints. However, we have one key concern: The original disclosure requirement on site screening in the environmental standards has been replaced by a general application requirement under ESRS 2 IRO-1, making transparency on this point optional. Local context is critical to an effective materiality assessment on environmental topics and IRO's. This should be clearly addressed in Chapter 3 of ESRS 1 and reflected in ESRS 2 IRO-1 through a specific datapoint on how locations and value chains are screened. We also welcome the improved reference to disaggregation in the E standards, but note this depends on robust location screening to be meaningful.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We support removing the 'may disclose' elements, as their unclear status has caused confusion. However, some of the elements that provided useful examples of actions and disclosures have been lost through the simplification. This is especially true for topics where reporting practices are still developing, such as biodiversity and ecosystems, as well as circular economy related activities. For example, ESRS E1 has removed examples of removal and storage approaches from land-use change, previously covered under AR 57 (e.g., afforestaloon, reforestaloon, forest restoraloon, urban tree planing, agroforestry, building soil carbon, etc.), technological (e.g., direct air capture), or hybrid (e.g., bioenergy with CO2 capture and storage), and technological details about the removal. These types of examples and guidance make it easier for first-time preparers to understand what kind of information is likely to be relevant and provide a basis for the standardization of metrics. In addition, they can incentivize companies to adopt practices that reduce emissions, such as regenerative production practices in agriculture. Regenerative food production can significantly reduce greenhouse gas emissions from food production by reducing reliance on synthetic inputs and by building healthy soils with high levels of organic matter and richer microbial biodiversity. https://www.ellenmacarthurfoundation.org/regenerative-food-production			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The guidance plays a valuable role in offering businesses guidance on supplementary content they may consider publishing or are already creating. Although it may not be necessary to reference the guidance more than once per disclosure requirement, providing brief statements on its intended purpose—particularly where it adds significant value—could be helpful. This would make the disclosure requirements easier for preparers to understand and apply.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The standards lack clarity on how reliefs interact and their combined impact. Applying them independently risks misuse, omission of material information, and inconsistent reporting. Metric disclosures are subject to both "undue cost or effort" and "data quality" reliefs, but the standards neither explain their use nor require improvements over time—weakening accountability. This is worsened by the blanket relief for excluding joint operations. If metrics from such operations are material, then the standards should incentivise their eventual disclosure. The undue cost and effort and lack of data quality reliefs already provide sufficient flexibility. Reliefs related to financial effects are also inconsistent. For example, the limitation tied to announced investment plans aims to focus disclosures on effects that are easier to assess and quantify, yet the standards also allow reliefs that permit omitting quantitative information. We support the ESRS 1 paragraph 90 relief for excluding activities that are not significant drivers of the IROs, but its application to standardised environmental metrics needs clarification. The GHG Protocol cautions against using materiality to inappropriately exclude emissions data.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	As noted in our response above, metric reporting is subject to both undue cost and effort and data quality reliefs, but the standards do not contextualise their use or require companies to improve data coverage and quality over time. This weakens accountability. For metrics related to organisations own operations or those standardised in the ESRS, a clear time limit should apply. For other metrics, gradual improvement over time should be explicitly required, subject to the undue cost and effort relief. To incentivise accountability and encourage companies to improve data coverage over time, ESRS could align with updates being considered to the GHG Protocol scope 1-3 standards. For example, the scope 3 technical working group have discussed requirements and recommendations for companies to grade data quality and improve data quality over time. We recommend engaging with the GHG Protocol to align with data quality requirements and developments.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Estimating financial effects is vital for integrating sustainability into strategy, planning, and risk management, and for accurately determining financial materiality. Dropping this ambition undermines the goal of aligning sustainability and financial reporting, and addressing long-term risks and opportunities. Option 1 is broad and lacks a time limit but is generally acceptable. We disagree with the claim that ESRS offers less flexibility than IFRS; the undue cost and effort relief already covers resource limitations. Option 2 goes beyond the IFRS relief without justification. Aligning ESRS with IFRS—unless EU law requires otherwise—is essential for building a global baseline and ensuring a level playing field for EU companies.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Reliefs should not exceed those set under IFRS. Doing so would weaken efforts to establish a global baseline for ESG reporting—essential for ensuring a level playing field for EU companies in the global market.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	While the number of datapoints has been significantly reduced, this standard still preserve the core integrity needed to meet CSRD requirements and support key EU objectives, including climate neutrality by 2050 and the Clean Industrial Deal. However, further legislative rollbacks (e.g. through the Omnibus process) would undermine the EU's credibility and jeopardise these essential goals.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	We are concerned about the cumulative impact of multiple relief measures. Additionally, the explanation of the relationship between impacts, risks, and opportunities, and sustainability topics lacks clarity and may lead to unintended confusion.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	22.E2.	Comments on deleted datapoints in ESRS E2	I partially agree and partially disagree	While the number of datapoints has been significantly reduced, this standard still preserve the core integrity needed to meet CSRD requirements and support key EU objectives, including climate neutrality by 2050 and the Clean Industrial Deal. However, further legislative rollbacks (e.g. through the Omnibus process) would undermine the EU's credibility and jeopardise these essential goals.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	22.E3.	Comments on deleted datapoints in ESRS E3	I partially agree and partially disagree	While the number of datapoints has been significantly reduced, this standard still preserve the core integrity needed to meet CSRD requirements and support key EU objectives, including climate neutrality by 2050 and the Clean Industrial Deal. However, further legislative rollbacks (e.g. through the Omnibus process) would undermine the EU's credibility and jeopardise these essential goals.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	22.E4.	Comments on deleted datapoints in ESRS E4	I partially agree and partially disagree	While the number of datapoints has been significantly reduced, this standard still preserve the core integrity needed to meet CSRD requirements and support key EU objectives, including climate neutrality by 2050 and the Clean Industrial Deal. However, further legislative rollbacks (e.g. through the Omnibus process) would undermine the EU's credibility and jeopardise these essential goals.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	22.E5.	Comments on deleted datapoints in ESRS E5	I partially agree and partially disagree	The amendments to the disclosure requirements (DRs) for resource outflows do not align with the objective of the DRs. Paragraph 16 of the [Draft] Amended ESRS E5 states that "The objective of this DR is to provide an understanding of how the undertaking implements circular economy by designing, manufacturing and providing goods and services in accordance with circular economy principles." However the data points required under Paragraph 17 (a-d) are focused on products and not services. We recommend to either Adapt / reinstate the deleted disclosure requirement under paragraph 35 [ESRS E5 - July 2023] that requires undertakings to "...provide a description of the key products and materials [related to] the undertaking's production process, including .... circular business models"; or Add a new DR in [Draft] ESRS E5 to require organisations to provide information about their E5-related service activities. For example, the requirement could ask for details of circular economy business models adopted by organisations e.g. rental, product as a service (PAAS) based models etc.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	22.S1	Comments on deleted datapoints in ESRS S1	I partially agree and partially disagree	No opinion offered.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	22.S2	Comments on deleted datapoints in ESRS S2	I partially agree and partially disagree	No opinion offered.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	22.S3	Comments on deleted datapoints in ESRS S3	I partially agree and partially disagree	No opinion offered.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	22.S4	Comments on deleted datapoints in ESRS S4	I partially agree and partially disagree	No opinion offered.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	22.G1	Comments on deleted datapoints in ESRS G1	I partially agree and partially disagree	No opinion offered.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We support the proposed changes, noting they do not introduce additional reporting burdens—particularly for water metrics. Calculating withdrawals and discharges is already required and subject to assurance. Making these implicit data points explicit enhances clarity compared to the previous ESRS, where they were optional ("may" disclosures). Disclosure should remain subject to the undertaking's materiality assessment. We propose that disclosure of a biodiversity and ecosystems transition plan be triggered by the identification of material impacts, dependencies, risks, or opportunities—rather than the prior existence of a plan. Otherwise, shifting from "may" to "shall" would have little practical effect, as most companies currently do not have a biodiversity transition plan and would thus have nothing to report. We also recommend clarifying that, when a biodiversity transition plan is disclosed, it should naturally reflect and reference the links to material topics addressed under other environmental and social standards. Biodiversity loss and recovery are often driven by local issues such as pollution (E2), water use and marine resource exploitation (E3), and resource extraction (E5). In particular, organisations that implement circular economy strategies, such as regenerative agriculture, benefit both nature and people. For example, by enhancing soil's ability to store carbon, regenerative agricultural practices mitigate climate change and increases farming's resilience to weather events and improves food security. https://www.ellenmacarthurfoundation.org/articles/regenerative-agriculture#:~:text=Regenerative%20agriculture%20describes%20a%20broad,to%20establishing%20cycles%20of%20regeneration. Making these interconnections explicit would not impose additional reporting obligations but would improve coherence, foster a more holistic view of environmental impacts and responses, and help avoid a siloed or overly narrow interpretation of what a biodiversity transition plan should include.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We welcome these changes, and agree that the suggested changes do not add new burdens.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	The ESRS has already operated under a fair presentation regime, given its basis in materiality through the CSRD, and the Accounting Directive. Making this explicit clarifies the discretion, judgment, and safeguards companies are expected to apply.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We acknowledge the challenges financial institutions face in calculating absolute emissions, but since the global carbon budget is absolute, such targets are essential for assessing alignment with net-zero goals. Intensity metrics alone can obscure rising emissions in growing portfolios, while absolute targets offer a clearer picture of real-world impact. Both metrics use similar data, and estimation challenges aren't unique to finance. Exempting financial institutions would undermine comparability and fairness, and contradict existing standards like SBTi, UNEP FI/NZBA, and the EU SFDR. It would also reduce the usefulness of disclosures for stakeholders, including asset owners.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Wording should align with and/or reference guidance and examples given by relevant global frameworks, such as SBTN, TNFD, World Economic Forum Nature-Positive Transitions and Nature Positive Initiative . We also note that the basis for conclusions document says that further guidance on sustainable sourced of biological materials is complex and will be issued over time. We would be grateful if EFRAG or the European Commission can provide any more information on this/ timelines on when further guidance will be issued.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	In general, we agree with the overall balance that has been achieved. However, we still have concerns regarding certain specific issues within individual standards. Our most significant concerns relate to ESRS 1 and ESRS E5, which are the only standards where we only partially agree with the balance achieved. ESRS 1: We are concerned about the cumulative impact of multiple relief measures. Additionally, the explanation of the relationship between impacts, risks, and opportunities, and sustainability topics lacks clarity and may lead to unintended confusion.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	ESRS 2: We disagree with the reduced transparency resulting from the reclassification of site, asset, and activity-level screening—from specific datapoints in the topical standards to an Application Requirement in ESRS 2.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Maintaining alignment with the 1.5°C target must remain the non-negotiable standard for climate commitments. Allowing companies to instead rely on the EU Climate Law risks undermining scientific integrity and opens the door to interpretation. In addition [Draft] ESRS E1 does not recognise that the sub-topics climate mitigation and adaptation are closely linked to [Draft] ESRS E5 topics: E5 links to climate mitigation: To reach net zero and tackle the approximately half of global emissions associated with material extraction and processing, we need to rethink the way we make, use, and dispose of products and materials. This is where the transition to a circular economy has a critical role to play. https://www.ellenmacarthurfoundation.org/topics/climate/overview Adopting circularity is also recognised as core to the EU's decarbonisation strategy in the EU Clean Industrial deal. E5 links to climate adaptation: Applying circular economy principles can also enable adaptation benefits. For example, switching to regenerative production practices can help food and textiles farmers (e.g. cotton) to adapt to hotter, wetter, more extreme growing conditions, at the same time as sequestering carbon in the ground. https://www.ellenmacarthurfoundation.org/articles/bridging-the-adaptation-gap-can-the-circular-economy-help It follows ESRS E1 should, as a minimum, ensure a true and fair representation of the mitigation and adaptation potential associated with circular activities through the following revisions (as a minimum): Amend para. 12 b to recognise the sub-topics climate change mitigation and adaptation also closely relate to topics addressed in [Draft] Amended ESRS E5. Reinstate the examples on emissions removal and storage that are biogenic or from land-use previously included in AR 57 (e.g., afforestation.. building soil carbon, etc.) into AR 28 for para. 35, or as a minimum the NMIG. Revise the definition for decarbonisation levers included in Annex II to add circular economy solutions that reduce emissions. For inspiration, see page 11 of the following paper https://www.ellenmacarthurfoundation.org/ghg-emissions-accounting			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Additional guidance on setting metrics and using frameworks like the TNFD and Nature Positive Initiative would be valuable. Disclosure should also cover all sites in or near biodiversity-sensitive areas, not just those linked to material impacts. See our response to question 30 for more information.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Resource outflows The amendments to the DRs for resource outflows do not align with the objective of this DRs. Paragraph 16 of the [Draft] ESRS E5 states DR's relate to "...goods and services." However the DRs do not relate to services. We recommend to either Adapt / reinstate the deleted disclosure requirement under paragraph 35 [ESRS E5 - July 2023] that requires undertakings to "...provide a description of the key products and materials [related to] the undertaking's production process, including .... circular business models"; or Add a new DR in [Draft] ESRS E5 to require organisations to provide information about their E5-related service activities. For example, the requirement could ask for details of circular economy business models adopted by organisations e.g. rental, product as a service (PAAS) based models etc. interaction with other ESRS We recommend the following revisions are made to the 'interaction with other ESRS' section to strengthen connectivity with other ESRS sub-topics. Paragraph 9a: Strengthen connectivity between circular activities and climate mitigation and climate adaptation sub-topics similar to our comments on ESRS E1. In addition, clarify the following sentence "Collecting energy efficiency .... can lead to reduction in carbon footprint", as circular activities go beyond energy efficiency in operations. Paragraph 9b. We recommend not only linking resource activities to pollution-related impacts but also including examples of E5-related activities that help mitigate these impacts — for example, designing products using safe, biodegradable materials. Paragraph 9d. We recommend the paragraph also recognise that applying circular principles can go beyond alleviating pressures on nature to help to regenerate nature (similar to our comments questions 15 and 23). Links to ESRS S2: We recommend adding in ESRS E5 interactions with ESRS S2 topics, as E5 related activities can increase resilience and job security beyond companies operations to their supply chain.			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See specific comments related to definitions and terms related to resource inflows in section 3 of this survey			
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Definitions The following terms and definitions should be revised to align with the core principles of the circular economy - The term 'waste hierarchy' is included in the [Draft] Non Mandatory Implementation Guidance (NMIG), but the definition has been removed from the [Draft] Amended Annex II. We recommend that the definition is reinstated to provide clarity for data preparers and users. - We welcome the addition of the terms 'key products' and 'key materials' to the [Draft] Amended ESRS E5, the [Draft] Annex II and [Draft] NMIG. The definitions will improve clarity to organisations on what should be disclosed under ESRS E5. However, the flexible approach for organisations to determine which materials to disclose based on either volume, cost, criticality for the operations, or strategic importance could lead to significant differences in disclosures between organisations within the same industry. This could in turn hinder comparability of sustainability information for data users. We recommend that the Commission develop separate sector specific guidance on how to determine key products/ materials to address this issue. Additional comments In the future, it would be helpful for the Global Circularity Protocol for Business (GCP) and EFRAG to publish an interoperability index to help entities understand the commonalities between the two frameworks, once the GCP has been published. https://www.wbcsd.org/actions/global-circularity-protocol/			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ellen MacArthur Foundation	NGO	United Kingdom	35.ESS-4.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	The following terms and definitions should be revised to align with circular economy principles: Dematerialisation: focuses on reducing the material intensity of products or services only, and not decoupling economic activity from the absolute consumption of finite resources and does not distinguish between primary and secondary materials. We recommend the definition is revised to provide clarity on these areas. For example, the definition could make it explicit whether dematerialization relates to Relative Dematerilization or Absolute Dematerialization. 'Biological materials': does not require materials to be safely returned to the biosphere as part of the biological cycle. In addition, the basis for conclusions document and [Draft] E5 states that a definition for technical materials has been added to Annex II. However, we are unable to locate this. In addition, the [Draft]E5, [Draft] Annex II and [Draft] NMIG do not describe how the technical and biological cycles relate to each other. Although these two cycles are conceptually separate, they often intersect in practice. Successfully applying circular economy principles requires organisations to recognise and account for the roles of both technical and biological cycles, optimizing material flows within each cycle, and designing products with circularity in mind from the beginning. For example, in the Fashion sector, products with a mixture of technical and biological materials can be designed for disassembly so that biological materials (e.g. natural rubber, cotton) and technical (e.g. nylon) materials can be separated appropriately. We recommend the definition for biological materials is revised in Annex II, and a definition for technical materials is included in Annex II, with both definitions recognising how each other are related. This will provide clarity to data providers and users, and align with circular economy principles. For inspiration, see the following sources https://www.ellenmacarthurfoundation.org/resources/circulytics/resources https://www.ellenmacarthurfoundation.org/material-selection https://www.ellenmacarthurfoundation.org/topics/circular-economy-introduction/glossary	ES	Disclosure Requirement ES-4 - Resource Inflows	
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	EuropeanIssuers acknowledges the important progress in the effort to simplify the DMA, particularly through the introduction of a top-down approach, allowing undertakings to limit themselves to information that is available without undue cost or effort, thereby allowing for a pragmatic approach. These steps represent a meaningful advancement towards ensuring the clarity of the Standards. Nevertheless, European companies have raised significant concerns regarding the definition of impact materiality as outlined in paragraph 21(b) of ESRS 1. Specifically, the description of "general purpose" in AR 3 is seen as too vague, creating the risk of divergent interpretations and potentially leading to a high volume of requests for information from multiple stakeholders. Therefore, EuropeanIssuers would ask for the deletion of paragraph 21(b) in ESRS 1. Alternatively, a deletion of AR 3 alongside a reference to stakeholder engagement in paragraph 21(b) would also be welcome. A further point requiring clarification is whether the DMA must be reviewed on an annual basis. From the perspective of EuropeanIssuers, requiring a complete reassessment each year would create unnecessary administrative burden, particularly in cases where circumstances have not materially changed. To address this, EuropeanIssuers suggests the following rewording of ESRS 1 paragraph 29: "The undertaking shall update the conclusions of the materiality assessments only where material changes in circumstances and/or assumptions have occurred. Because of changes in its individual circumstances or in the external environment, some types of information included in its ESRS sustainability statement for prior periods might no longer be material; conversely, some types of information not previously disclosed might become material."			
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	EuropeanIssuers is concerned that ESRS 1 Appendix C, rather than providing clarity, introduces additional uncertainty into the application of the DMA. The drafting of Appendix C remains not clear and open to multiple interpretations, which could lead to inconsistent practices among preparers and divergent views by auditors. For this reason, in order to avoid difficulties related to diverging interpretations, EuropeanIssuers proposes for Appendix C to be removed. To ensure proportionality and flexibility in reporting, EuropeanIssuers believes that companies should be allowed to decide whether to disclose impacts on a gross or net basis. This is particularly important given that the previous set of standards did not include such guidance. Introducing new requirements would effectively penalise wave 1 companies, many of which have already undertaken a comprehensive materiality assessment process, established methodologies and governance, and submitted these to review of their auditors. EuropeanIssuers therefore believes that the choice should remain with the reporting entity, allowing it to reflect its own specific circumstances and judgment, rather than being constrained by a single prescriptive principle. This approach would better ensure consistency and comparability of the data, similarly to the current direction taken by the ISSB's IFRS S1 and S2 standards.			
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	EuropeanIssuers is supportive of the proposed changes, as they improve readability of the sustainability statement. However we would like to acknowledge that while this is an improvement, it does not substantially reduce reporting burdens or costs for companies.			
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	EuropeanIssuers is supportive of the restructuring of architecture and interaction between ESRS 2 and topical Standards as it improves readability and usability.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	EuropeanIssuers welcomes the decision to place the ARs directly after the Disclosure Requirements (DRs). This structure makes the standards significantly easier to read and apply in practice. We also welcome the deletion of voluntary datapoints, which contributes to greater clarity. However, we note that certain inconsistencies remain within the text of the topical standards. Specifically, we believe it is necessary to align the language across the standards. Terms such as "shall consider," "may present," "may implement," "may include," and other similar formulations should be streamlined. EuropeanIssuers calls on EFRAG to adopt harmonised terminology throughout the standards, ensuring that preparers can apply them consistently and without uncertainty.			
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	EuropeanIssuers considers that NMIG can be acceptable, provided it remains strictly non-binding. Guidance cannot create indirect obligations for companies. It is therefore important for EFRAG to clarify that undertakings should not be required to justify to their auditors why they haven't disclosed NMIG content. As non-binding material, it should be made clear that it must remain optional, and its use should be at the discretion of the reporting entity. Preparers' experience from other regulatory frameworks, such as the EU Taxonomy, demonstrates the risks of relying too heavily on guidance. While intended to clarify, guidance often arises in response to problems that should have been resolved in the standards themselves. The result is a growing volume of FAQs and supplementary documents, which make it difficult for preparers to keep up and can sometimes conflict with the content of the standards. For this reason, EuropeanIssuers strongly prefers that NMIG be published by EFRAG on its website, rather than adopted by the European Commission through a delegated act. We believe this approach would preserve the objective of simplification and avoid the risk of creating additional reporting burdens or disputes with auditors.			
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	EuropeanIssuers welcomes the introduction of reliefs, recognising them as an important step towards reducing unnecessary reporting burdens. In particular, the "undue cost and effort" relief represents a practical and essential safeguard, which provides preparers a sound basis for justifying omissions or limitations, especially in discussions with auditors. However, EuropeanIssuers would like to express the following concerns: •On the relief for acquisitions and disposals, we believe that the current timeframe provided is too short. Integrating newly acquired entities or reflecting disposals often requires a longer period to ensure accurate and consistent reporting. EuropeanIssuers therefore proposes that EFRAG adopt a more flexible timeframe that better reflects practical realities. •When establishing climate objectives (E1-8), the relief provided under ESRS 1 §91 for "undue cost and effort" should equally extend to scope 3 targets. These objectives are often extremely difficult to quantify, as they involve actors throughout the entire value chain and lack certainty regarding the effective implementation of action plans. •Lastly, the relationship between these reliefs and the fair presentation principle remains unclear. EuropeanIssuers is concerned that, without further clarification, there is a risk that auditors may interpret the fair presentation principle in a way that limits the practical application of the reliefs. We therefore encourage EFRAG to provide clearer drafting to ensure that reliefs can be applied consistently and without conflict.			
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	EuropeanIssuers supports the proposed relief as it addresses real challenges in collecting reliable data, avoids weak or misleading reporting, and provides flexibility until stronger methodologies are available. Transparency alone ensures continued progress without the need for time limits. In addition, it would be valuable to permit greenhouse gas emissions to be reported using any threshold defined in the Greenhouse Gas Protocol. This would ensure alignment with the most widely recognised international framework and strengthen consistency with the ISSB's IFRS S1 and S2 Standards.			
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	EuropeanIssuers disagrees with both of the proposed options and believes the disclosure requirement on anticipated financial effects should be removed or left voluntary. The concept is not standardised, ESRS 2 provides no methodology or guidance, and remains unclear on what data or level of granularity should be applied. European companies stress that disclosing anticipated financial effects is highly problematic, as it risks exposing confidential strategy, increases liability due to the uncertainty of projections, and often requires revealing sensitive financial planning not otherwise disclosed in reporting. Since IFRS Standards already govern when future risks must be reflected in financial reporting, sustainability reporting should not extend these principles. Companies should, however, remain free to disclose such information voluntarily.			
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	EuropeanIssuers is concerned with the requirement in ESRS E1 paragraph 41(f). Assessing anticipated financial effects - particularly in relation to stranded assets - inevitably involves a high degree of uncertainty, as the methodologies available produce accurate quantitative figures remain undeveloped and uncertain at this stage. For these reasons, we believe paragraph 41(f) should be removed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	EuropeanIssuers believes that stronger interoperability with ISSB standards is essential and therefore warmly welcomes the efforts made to better align ESRS with the ISSB's IFRS S1 and S2. Such alignment is a crucial step in reducing complexity for companies that are required to report under several frameworks. Many European companies operate globally and are subject to demands from international investors for ISSB-compliant information, while a growing number of jurisdictions are preparing to make the ISSB's IFRS S1 and S2 standards mandatory. In this context, it is important that duplication of reporting requirements or discrepancies in principles are avoided. At the same time, EuropeanIssuers stresses that interoperability must not come at the expense of simplification. The purpose of alignment should be to make reporting more coherent and efficient, not to add further layers of mandatory complexity for European preparers.			
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	22.E2.	Comments on deleted datapoints in ESRS E2	I partially agree and partially disagree	EuropeanIssuers welcomes the reduction of mandatory datapoints, which is a positive step towards streamlining reporting obligations and easing the burden on preparers. At the same time, EuropeanIssuers is strongly concerned by the introduction of new mandatory "shall" datapoints, such as those relating to microplastics (E2-4). Adding additional requirements risks offsetting the benefits of simplification and could create new complexities for companies. EuropeanIssuers therefore encourages EFRAG to reconsider this approach.			
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	EuropeanIssuers would like to reject the move of the following datapoints from 'may' to 'shall': •ESRS E4: EuropeanIssuers has concerns about the obligation to disclose biodiversity and ecosystem transition plans. This area is highly complex and still evolving, with many companies only beginning to build the necessary capacity. While several initiatives exist (SBTN, TNFD, Act4Nautre), metrics are not sufficiently defined and cannot they be regarded as a single, authoritative reference. •ESRS G1-4: EuropeanIssuers believes this datapoint not to be a reliable measure of the effectiveness of a company's anti-corruption policy, as a low number of confirmed incidents may simply indicate under-reporting, while a higher number could reflect the existence of an effective and trusted reporting system. In addition, requiring disclosure of this datapoint poses significant risks for European companies, as it could contradict the fundamental right not to self-incriminate and may expose EU undertakings to investigations by third-country authorities. Such requirements would place European companies at a competitive disadvantage and would be inconsistent with the EU's own commitments under the EU-US joint statement on balanced trade.			
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	EuropeanIssuers does not consider the introduction of the following datapoints as appropriate and justified: •ESRS E5-4: We believe for the requirement to disclose the percentage of critical raw materials to be premature. The definition of these materials is still evolving under the Critical Raw Materials Act, and the Eco-Design Regulation has been adopted but its delegated acts are not yet in place. Until these delegated acts are finalised, companies cannot rely on a stable framework for disclosure. We therefore believe for the disclosure to be transferred into the NMIG and only reintroduced once the regulatory definitions are complete. •ESRS E2-4 The concept of "secondary microplastics" is not yet scientifically defined, and the impacts are not sufficiently understood. EuropeanIssuers believes including this concept in the ESRS to be premature and lead to confusion, hence, it should not be integrated into ESRS until definitions and methodologies are stabilised.			
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	EuropeanIssuers acknowledges the intention behind introducing the principle of fair presentation, but has significant reservations about its inclusion in the ESRS at this stage. Explicitly requiring fair presentation does not necessarily support simplification. On the contrary, it may reduce comparability, increase the evidentiary burden on preparers, and create additional challenges in discussions with auditors. In financial reporting, fair presentation is clearly directed to a primary user, the investor. In sustainability reporting, however, no such primary user has been identified. Addressing "all relevant stakeholders" makes the application of fair presentation far more complex and could increase responsibility for both auditors and preparers, thereby increasing legal risks. This concern is heightened in the absence of an EU-wide limited assurance standard for sustainability information. Without such a standard, there is a real risk that the principle will undermine the very reliefs that were designed to reduce burdens. EuropeanIssuers has observed diverging views on what fair presentation actually means in the context of double materiality, and what its consequences would be. These diverging interpretations make it extremely difficult to assess the practical impact of the requirement. In this respect, many companies believe it is premature to introduce the principle of fair presentation into ESRS. Before doing so, the priority should be to establish clear reliefs, adopt an EU-wide audit standard, define the primary user, and agree on a common understanding of what fair presentation entails in a sustainability context. EuropeanIssuers therefore believes that, while fair presentation could eventually serve as a useful principle for both simplification and to further support alignment with ISSB on this aspect, however in practice the current ecosystem is not ready for its implementation. Without clarity, a defined primary user, and harmonised EU audit standards, the concept risks becoming a source of burden rather than simplification.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	EuropeanIssuers notes that for financial institutions, the vast majority of emissions stem from financed activities. Setting absolute targets in this context is unreliable and potentially misleading, as it depends on numerous assumptions outside the control of the reporting entity. Absolute targets should therefore not be applied broadly to financial institutions. Instead, intensity targets provide a more meaningful and comparable basis for disclosure, reflecting the actual nature of financial sector activities.			
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	EuropeanIssuers considers that the previous threshold (≥50 employees representing ≥10% of workforce) was a more workable and proportionate approach. By contrast, the new requirement (≥50 employees in each of the 10 largest countries) significantly expands the scope. This would oblige companies to report on very small groups of employees across numerous jurisdictions, creating substantial additional effort for preparers while adding little value for users. EuropeanIssuers therefore encourages EFRAG to reconsider this threshold in order to maintain proportionality and avoid unnecessary complexity.			
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	EuropeanIssuers welcomes the reference to ILO standards, which provides a clear and authoritative baseline compared to reliance on private benchmarks. However, we would like to note that should preparers wish to adopt higher benchmarks, they should remain free to do so on a voluntary basis, but these should not be imposed at the ESRS level.			
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	EuropeanIssuers stresses that coherence across legislations is essential. In light of its upcoming review, SFDR should be simplified and aligned with the ESRS.			
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	EuropeanIssuers welcomes EFRAG's intention to provide additional guidance for undertaking to set biodiversity targets, however under the only circumstance that they remain voluntary and under the NMIG.			
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	EuropeanIssuers cautions that relying solely on global, unadjusted figures makes the datapoint misleading. A single average pay gap can distort the realities of a diverse workforce and risk harming companies' reputations without providing decision-useful insights. Adjusted indicators, by contrast, offer a more accurate and meaningful measure of pay equity. For this reason, EuropeanIssuers believes that adjusted indicators should be retained.			
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	EuropeanIssuers remains firmly opposed to the disclosure of this datapoint due to issues on: •Feasibility: Large companies often have tens of thousands of suppliers worldwide, and they do not have, in particular, information regarding the size of their suppliers in their IT systems, thus, collecting and consolidating payment practice data across this volume is not operationally realistic. •Definition issues: The concept of "SME" is not harmonised globally, making the indicator unworkable outside the EU. •Regulatory misalignment: The 2011 EU Directive on Late Payments does not distinguish based on company size, yet the (draft) revised ESRS introduce such a distinction that could lead to inconsistency, thus, legal uncertainty.			
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	E1-13 - Resilience: The notion of "resilience" in relation to climate change is not clearly defined in the standard. As drafted, it is used both for adaptation and for transition, which creates confusion. Resilience should refer only to adaptation , meaning how a company reacts to physical impacts such as rising temperatures, and what adaptive measures it puts in place (e.g. building techniques). It should not be used to cover transition-related aspects. The current lack of precision risks inconsistent reporting and misunderstanding of what companies are expected to disclose.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	•E2 - Substances of Concern: The requirement to report on "substances of concern" should be deleted or moved to NMIG, specially because there is no stable definition of these substances beyond what is already covered by the REACH Regulation. Thus, introducing a separate obligation in ESRS risks creating legal uncertainty and reporting burdens. •E2 - Substances of Very High Concern: The current draft requires undertakings to disclosure of quantities of substances of very high concern above the 0.1% threshold. Under REACH Regulation (Article 33), companies are only obliged to name these substances, not to provide quantities. Hence, the ESRS requirement therefore goes beyond existing EU legislation and therefore should be aligned strictly with REACH. •E2 - Pollution of Air, Water and Soil (E2-4): The current drafting is being interpreted by auditors as requiring disclosure of all emissions, regardless of materiality. This imposes disproportionate reporting obligations, potentially forcing companies to report on hundreds of substances. Companies should only be required to disclose emissions that have a material impact.			
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	E3 - Water Withdrawals and Discharges (§17): The requirement to disclose detailed data on water withdrawals and discharges is impractical for many companies, as they do not have water metering technologies in place. This obligation should be downgraded to guidance (NMIG) until reliable measurement systems are more widely available.			
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	S1 - Non-Employees: The datapoint requiring disclosure of non-employee workforce numbers by country is not feasible. These data are not collected by HR but by procurement or contracting, and companies do not have systems to track them in a consolidated way. Making this datapoint mandatory would create disproportionate burdens for limited added value.			
Survey	EuropeanIssuers	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		•EuropeanIssuers believes the revised ESRS do not fully deliver on the simplification objectives set out in the European Commission's mandate. The materiality assessment process remains overly complex, and the volume of mandatory data is still excessive and disproportionate for effective communication with stakeholders. •With respect to the value chain, it would be more practical for companies to disclose relevant information when significant impacts are identified, rather than being required to provide detailed quantitative assessments.			
Survey	Frank Bold	NGO	Czechia	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	Chapter 3 is clearer and better organised. The improved definition of materiality of information in Section 3.1, namely the replacement of criterion of "significance" with "understanding of impacts" provides better guidance and is aligned with CSRD and international due diligence. This adjustment appropriately narrows the scope of the materiality filter to aspects most relevant from the perspective of public accountability. It also clarifies how the materiality of information interacts with (fundamental) qualitative characteristics of information criteria from Chapter 2, and with the rules concerning aggregation and disaggregation of information (e.g. para 52 on "not obscuring"). Section 3.5. Practical considerations are particularly helpful to avoid unnecessary complexity in materiality assessment. However, Chapter 3 frequently conflates 'topics' with 'impacts, risks and opportunities' ('IROs'). Para 22 is confusing when it says that information may be presented "either at the topical level or at [IRO] level". Such a dichotomy is incorrect. While topics refer to broad thematic areas, IROs are entity specific. The CSRD, as well as IFRS, TCFD, and TNFD consistently focus on the latter. Overemphasising 'topics' risks leading to boilerplate disclosures. Chapter 3 would be clearer if it keeps focus on IROs and explain that depending on nature and context such IROs may be defined at a general level - corresponding to topics - and/or that information on their management may be similarly aggregated. This should be clarified in provisions on entity-specific disclosures in paragraph 23 (and in paragraph 10 in Chapter 1) In Chapter 3.3.2, para 37 fails to mention that the purpose of financial material assessment is to not just to identify materiality information but also determine the material risks and opportunities, as required by the CSRD. In this regard, the risks and opportunities are only mentioned in the middle of para 38, making the text incoherent.			
Survey	Frank Bold	NGO	Czechia	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	It is useful that Chapter 3 addresses the question of how prevention, mitigation and remedy of impacts shall be considered in materiality assessment, but the rules could be expressed in a more simple and understandable way. Para 34 uses a very complicated language to express a simple idea that actual impacts shall be considered as they occurred during the reporting period, and that their ex-post remediation is not relevant. We welcome and stress the importance of the clarification that the potential impacts which require significant ongoing preventative or mitigation efforts shall be considered gross. In this regard, it would be helpful to refer to the materiality of information filters to provide companies with further guidance on how to distinguish such significant efforts from common practice and compliance measures. The table provided in Appendix C provides more detailed information, which it would be helpful to integrate directly into the main body to ensure clarity and consistency.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Frank Bold	NGO	Czechia	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The proposed changes are meaningful. We would like to bring the attention to para 113, which we find hard to understand: "113. If the description of the material impacts, risks and opportunities prepared in accordance with [Draft] Amended ESRS 2 IRO-2 is not presented alongside the respective policies, actions and targets, the undertaking shall make explicit which policies, actions and targets relate to which material impacts, risks, or opportunities, in accordance with paragraph 22." It is not clear to us what the reference to para 22 is meant to imply. Para 22 addresses the issue of appropriate aggregation or disaggregation of information on material impacts, risks and opportunities and their management. But it doesn't set any rules regarding the location of such disclosures depending (or not) on the level of aggregation.			
Survey	Frank Bold	NGO	Czechia	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We welcome the removal of the duplications between the cross-cutting and topical standards. We support the emphasis on general disclosure requirements. Likewise, many PAT provisions in the topical standards had a character of examples or guidances rather than datapoints. Additionally, the preservation of the 5-part and 4-part architecture of the environmental and social standards respectively, as well as topical metrics, is welcome as it provides a structure and language for preparers to navigate the issues and organise their disclosures. However, we disagree with the replacement of the original DR in environmental standards concerning screening of sites in materiality assessment by an application requirement to ESRS 2 IRO-1. The fact thatlocal focus is essential should be recognised in Chapter 3 of ESRS 1 and in ESRS 2 IRO-1, which should retain an explicit datapoint on how the undertaking screened its sites and value chains. We welcome that E standards provide a clearer reference to disaggregation of disclosures, but this can only be done properly if sites are screened. Furthermore, we strongly recommend adding a reference to the disclosure of relevant, entity-specific metrics directly in S standards. The fact that S2, S3 and S4 do not include any metrics, and sectoral standards will not be adopted, shift the expectations for disclosure of metrics for S topics to entity-specific disclosures. As highlighted by the Danish Institute for Human Rights, adding the reference to metrics to disclosure requirements SX-4 on targets would improve consistency between the topical and the cross-cutting standards and acknowledge the common use and disclosure of relevant metrics by preparers.This addition would ensure that preparers better understand the ESRS expectations in this regard, whilst not adding any new obligations or datapoints.			
Survey	Frank Bold	NGO	Czechia	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We support the proposed changes. We agree with the removal of 'may disclose' elements, because their status has been causing confusion. However, they do not need to be all removed to NMIG. Where they provide useful examples of disclosures, they could be included directly in the standards as "examples". This is particularly the case for the topics for which the reporting practice is evolving, such as Biodiversity and ecosystems. This would make it easier for first-time preparers to understand what kind of information is likely to be relevant and provide a basis for the standardization of metrics. Having to consult another document, such as NMIG, is adding an unnecessary hurdle. The language and therefore understandability of the standards have been considerably improved, however in ESRS 1 especially there is still much to be done in this regard.			
Survey	Frank Bold	NGO	Czechia	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The standards lack clarity regarding the combined effect of the reliefs and how they are intended to interact. Interpreting and applying these reliefs in isolation risks misuse, omission of material information, and significant inconsistencies in reporting practices This is exacerbated by the relief which unconditionally allows exclusion of joint operations (para 92). We do not support this relief. If the environmental metrics concerning such operations are material, then the standards should incentivise their eventual disclosure. The undue cost and effort and lack of data quality reliefs already provide sufficient flexibility in this regard. Similarly, there is a lack of coherence among the directions of the reliefs related to financial effects, i.e., information which is essential for understanding of the risks and company's ability to overcome them. The limitation related to the announced investment plans focuses the disclosures on effects which are easier to assess and therefore quantify, yet the standards also propose reliefs that enable omitting quantitative disclosures. Application of exclusion of activities from metrics relief (para 90) must be clarified with respect to key ESRS metrics otherwise it will be misapplied. For example, preparers may misunderstand it as to enable removing entities (e.g. smaller industrial facilities) – rather than activities (non-industrial activities) – from calculations. Furthermore, it is not made clear how this relief interacts with the completeness principle in the GHG protocol, which warns explicitly against misapplication of materiality filter. Similarly, for general S1 workforce metrics, such as characteristics of the employees and non-employees, such exclusions are not appropriate.			
Survey	Frank Bold	NGO	Czechia	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	Reporting of metrics is subject to a combination of undue cost and effort and lack of data quality (para 91) reliefs. But the standards do not put these two reliefs in proper context and do not include any explicit requirement and timeframe for companies to improve the coverage and quality of data. Application of lack of data quality relief should be removed as redundant or limited to specific, well-defined situations to preserve comparability. Being formulated in rather generic terms, it can be abused and lead to omission of material data disclosures. If it is retained, the interaction of this relief with other reliefs needs to be clarified, and the ESRS should clearly require the undertaking to improve the coverage and quality of the data. For the metrics concerning own operations and/or metrics standardised directly in the ESRS, this should be subject to clear time limitation. For other metrics, improvements over the years should be also explicitly required, subject to undue cost and effort relief.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Frank Bold	NGO	Czechia	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ability to estimate financial effects is critical for the undertaking's ability to integrate sustainability into its business strategy considerations, planning and risk management. It is also key for the determination of financial materiality, including in terms of overreporting topics as financially material. Resigning on this ambition is at odds with the objective of putting sustainability reporting on the same level as financial reporting, the integration of both, and ultimately overcoming the tragedy of horizons. We find Option 1 unnecessarily extensive, and lacking time limitation, but broadly acceptable. We disagree with the assertion made in the question that it "[d]ifferent from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources ". In this regard, the new proposed ESRS include the undue cost and effort relief which seems to account for such a situation. With respect to Option 2, we don't find it justifiable to go beyond the IFRS relief. One of the most strongly voiced arguments from stakeholders who called for simplification of ESRS was that, as a matter of principle, ESRS must be aligned with the IFRS except where CSRD or other EU legislation require otherwise. Abandonment of this principle seriously undermines prospects of building a global baseline which both the EU and the ISSB support, and which is an important part of building a level playing field for the EU companies.			
Survey	Frank Bold	NGO	Czechia	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Frank Bold	NGO	Czechia	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Reliefs should not go beyond those set in IFRS. Going further would undermine the objective of setting a global baseline for ESG reporting, which is important for achieving a level playing field for EU companies in a global context. The undue cost and effort relief outlined in ESRS 1, para 87-89, is a powerful relief, which addresses virtually all situations where the undertaking may encounter practical obstacles. Explicit emphasis on fair presentation, combined with the strengthened focus on the use of materiality of information filter, provide companies with an increased flexibility in determining meaningful content of their sustainability statements. It marks a further move away from compliance-based to principle-based approach. However, such changes imply increased responsibility for the undertaking. Implementing further reliefs would undermine this responsibility and open the doors to abuse.			
Survey	Frank Bold	NGO	Czechia	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Frank Bold	NGO	Czechia	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	General comment/unrelated to ESRS 2 only: The number of datapoints in each standard represent the minimum necessary to ensure cohesive disclosure requirements, and consequently basic comparability and quality of the actual disclosures. We have not identified any instance where ESRS would include exorbitant requirements, considered common practice and internationally recognised reporting standards and frameworks such as IFRS, GRI, or TNFD. ESRS are generally more concise and less demanding. Introducing further reductions (while keeping the coverage of all ESG factors as required by the CSRD) would create serious quality gaps between the ESRS disclosures and those based on the standards.			
Survey	Frank Bold	NGO	Czechia	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree with these changes, noting that the suggested changes do not add a new burden. This is particularly the case for the water-related metrics. In order to disclose the water consumption, the undertaking already has to calculate withdrawals and discharges, and such calculation and therefore the underlying data is subject to the assurance. Moving these implicit datapoints to the forefront as explicit data points makes the disclosure requirement clearer, compared to the previous ESRS where some of these datapoints were framed as "may disclosures". Whether or not these individual datapoints are to be disclosed is correctly subject to materiality of the information filter applied by the undertaking.			
Survey	Frank Bold	NGO	Czechia	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We agree with these changes, noting that the suggested changes do not add a new burden. E2-4 on secondary microplastics is not a new datapoint, as correctly pointed out in the Rationale above. We do not understand why it is included in this question, as such.			
Survey	Frank Bold	NGO	Czechia	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	ESRS, being based on the materiality principle, the CSRD requirement to disclose impacts, risks and opportunities and their management, and the general principles of the Accounting Directive, has already been subject to a fair presentation regime. Making it explicit helps to clarify it. It provides companies with clarity on the discretion and judgement, as well as related safeguard, they are expected to exercise when applying the standards.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Frank Bold	NGO	Czechia	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We recognise the complexity of recalculating absolute values and acknowledge that financial institutions often manage GHG performance using intensity-based approaches. However, the global carbon budget is defined in absolute terms. For this reason, it remains essential that even financial institutions disclose absolute targets to assess how their strategies align with the economy-wide transition to net zero. Absolute targets are relevant for users of sustainability statements and for understanding the real-world climate impact of financed activities. While intensity measures provide insights into efficiency, they can mask rising absolute emissions in growing portfolios or sectors. Absolute values, by contrast, give a clear signal of whether institutions are contributing to the necessary 90–95% global reduction in emissions by 2050, with steep cuts by 2030. Both approaches rely on similar underlying data, and estimation challenges are not unique to the financial sector. Granting an exemption would also undermine fairness in a sector-agnostic standard. Other industries could equally argue for exceptions based on their own difficulties, reducing comparability across sectors. Moreover, absolute financed emissions are already recognised in existing standards and regulations: the SBTi financial sector net-zero standard, the UNEP FI/NZBA recommendations, and EU SFDR all require or encourage absolute emissions disclosure. Exempting banks would risk misalignment and reduce the usefulness of reported data for stakeholders, including asset owners who depend on it for their own disclosures.			
Survey	Frank Bold	NGO	Czechia	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The new threshold is simpler and clearer, and therefore easier to apply. It also sets a clear cap. Any potential increase of breakdowns of the disclosed information is negligent in terms of added burden.			
Survey	Frank Bold	NGO	Czechia	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The proposed change is discriminatory, adds unnecessary burden and should be corrected through revisions to paragraph AR 22. Workers have a human right to a living wage - sufficient remuneration to support themselves and their families with basic dignity. EU policy and EU law reflect this definition. ILO offers two sets of principles (i) ILO principles for estimating living wages (the level needed for a decent life; https://www.ilo.org/ilo-principles-estimating-living-wage) and (ii) ILO wage setting principles (how today's legal minimum wages are negotiated; https://www.ilo.org/ilo-wage-setting-principles). Particularly outside the EU, legal minimum wages fall well below living wages. Under S1-9, the methodology requires companies to compare actual wages to "adequate wage" for EU employees but to legal minimum wages for employees outside the EU (if these minimum wages follow ILO wage-setting principles). Only where no minimum wage exists outside the EU may a living-wage benchmark be applied. This creates four problems: a) It undermines the objective by tying non-EU disclosure to the generally much lower legal minimum wage. b) It is discriminatory because it applies a lower standard to employees outside the EU. c) It imposes complexity, forcing companies to assess for each country whether minimum wages or benchmarks align with ILO principles, which most lack capacity to do. d) It undermines comparability because differing workforce distributions, in and outside EU, yield non-comparable disclosures. Two key changes are needed: 1. Methodology for reporting on 'adequate wages' should measure actual wages against an adequate/living wage for all employees. For employees outside the EU, allow comparison only to legal minimum wages or living-wage benchmarks demonstrably set in line with ILO principles for estimating living wages (i.e. not with wage-setting principles). 2. Permit companies to rely on official evidence from authorities or organisations showing alignment with ILO principles for estimating living wages, avoiding company-level assessments.			
Survey	Frank Bold	NGO	Czechia	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	We welcome the fact that multiplication of datapoints was removed. The new, simplified framework makes it easier for companies to report on these SFDR-related matters in a way that corresponds to how their policies are set. For users, this consolidation makes it easier to locate the relevant information.			
Survey	Frank Bold	NGO	Czechia	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Measurable targets related to biodiversity and ecosystems shall be set and disclosed according to the guidance and examples given by relevant global frameworks, such as SBTN (Step 3 - Measure, Set & Disclose Targets), TNFD (component P1 and P2 & Annex 5, sector guidance and guidance on Target Setting) & resources by World Economic Forum Nature-Positive Transitions.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Frank Bold	NGO	Czechia	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	We propose to not include such datapoint, but instead provide a paragraph in the application requirements, explaining that the adjusted pay gap is an important entity-specific information, which is often necessary to contextualise and enable understanding of the information provided by the unadjusted pay gap. Further this AR could remind the undertakings that the unadjusted pay gap needs to be appropriately disaggregated. Unadjusted and adjusted perspectives on pay gap have different purposes. The unadjusted pay gap - appropriately broken down by countries or areas of operations in line with ESRS 1 - provides general context and the information on how the undertaking is affected by systemic drivers of gender inequality. The adjusted pay gap is primarily an entity-specific disclosure. It is particularly relevant for complex companies to better understand where and how the pay gap manifests, and what are the specific drivers of it. There is no one 'standardizable' way to adjust the pay gap calculation. Such adjustments must consider the undertaking's specific context and circumstances and avoid 'overadjusting'. If the calculation controls for every source of difference between males and females in the workforce, then it would obscure the pay gap and its causes. Therefore, including a datapoint - whether mandatory or voluntary - on adjusted pay gap in the standards is problematic, because it is impossible to provide a standardised methodology. On the other hand, for many companies' information on adjusted pay gap is likely to be material, and therefore such information should be provided.			
Survey	Frank Bold	NGO	Czechia	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	The removal of paragraph 14 can be easily compensated by adding a reference to SMEs in the description of the topics in ESRS 1, Appendix A, and in ESRS G1, paragraph 4. The removal of datapoint originally located in para 33(a) concerning average days it takes to pay an invoice, does not seem to be necessary for the reduction of burden. The undertaking would still need to collect this data to be able to meet the other requirements, in particular the calculation of the % of its payment aligned with its standard payment terms (in para 20(a)).			
Survey	Frank Bold	NGO	Czechia	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	In principle we agree with the achieved balance. However, we remain concerned about the following specific issues in individual standards. Our concerns are greatest for ESRS 1, which is the only standard for which we agree with the achieved balance only partially. We are concerned about the concurrent effect of various reliefs. We are also concerned about the unintended confusion caused by a rather confusing explanation of the relationship between impacts, risks and opportunities on one hand, and sustainability topics on the other.			
Survey	Frank Bold	NGO	Czechia	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We disagree with the downgrading of the transparency on site/assets/activities screening from the level of datapoints in the E standards to an Application Requirement in ESRS 2.			
Survey	Frank Bold	NGO	Czechia	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We do not think that streamlining of E1-1 Transition Plan for Climate Change Mitigation added much value. If anything, more rather than less details and clarifications are needed in the standard. In addition, the main body of the standard and the glossary should retain the definition of net-zero targets and related criteria, as use and reporting of such targets is a common practice. Removing it will lead to increase of disclosures of various carbon neutrality claims and hamper comparability between companies, or downright lead to greenwashing.			
Survey	Frank Bold	NGO	Czechia	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	ESRS E2, E3, E5: We welcome the changes made, including the clarification and minor additions to the datapoints in the metrics section. While further refinement might be needed to ensure consistent definitions especially with regards to areas of high-water stress (e.g., use of GRI's definitions might need to be reviewed according to the latest state of art), they provide for greater clarity and do not add further reporting burden.			
Survey	Frank Bold	NGO	Czechia	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	ESRS E2, E3, E5: We welcome the changes made, including the clarification and minor additions to the datapoints in the metrics section. While further refinement might be needed to ensure consistent definitions especially with regards to areas of high-water stress (e.g., use of GRI's definitions might need to be reviewed according to the latest state of art), they provide for greater clarity and do not add further reporting burden.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Frank Bold	NGO	Czechia	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Given the current state of art in this area, it would be helpful to include more guidance on how to set metrics and how to utilise other reporting frameworks and standards such as TNFD and SBTN. The standard should also clearly require the disclosure of sites in/near biodiversity sensitive areas, rather than limiting it to those determined to be connected to material impacts only.			
Survey	Frank Bold	NGO	Czechia	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	ESRS E2, E3, E5: We welcome the changes made, including the clarification and minor additions to the datapoints in the metrics section. While further refinement might be needed to ensure consistent definitions especially with regards to areas of high-water stress (e.g., use of GRI's definitions might need to be reviewed according to the latest state of art), they provide for greater clarity and do not add further reporting burden.			
Survey	Frank Bold	NGO	Czechia	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	ESRS S1, S2, S3, S4: We would recommend adding an explicit reference to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, that is the standards that lack any metrics. In S1, we have strong reservations about the newly suggested methodology for adequate wages outside of the EEA. It would lead to misleading disclosures and add burden for companies.			
Survey	Frank Bold	NGO	Czechia	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	ESRS S1, S2, S3, S4: We would recommend adding an explicit reference to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, that is the standards that lack any metrics. In S1, we have strong reservations about the newly suggested methodology for adequate wages outside of the EEA. It would lead to misleading disclosures and add burden for companies.			
Survey	Frank Bold	NGO	Czechia	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	ESRS S1, S2, S3, S4: We would recommend adding an explicit reference to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, that is the standards that lack any metrics. In S1, we have strong reservations about the newly suggested methodology for adequate wages outside of the EEA. It would lead to misleading disclosures and add burden for companies.			
Survey	Frank Bold	NGO	Czechia	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	ESRS S1, S2, S3, S4: We would recommend adding an explicit reference to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, that is the standards that lack any metrics. In S1, we have strong reservations about the newly suggested methodology for adequate wages outside of the EEA. It would lead to misleading disclosures and add burden for companies.			
Survey	Frank Bold	NGO	Czechia	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We particularly welcome the streamlining and alignment of the structure of this standard with the remainder of the standards			
Survey	Frank Bold	NGO	Czechia	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CEAOB	European supervisory authority	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	CEAOB	European supervisory authority	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	(RefCEAOBletter par20 to 22) The CEAOB underlines that the split in provisions between, on the one hand, requirements set by the revised ESRS, and, on the other hand, non-mandatory implementation guidance (NMIG) will result in preparers not being obliged to implement the NMIG, and likewise assurance providers not being required to assess whether NMIG have been implemented or not, in the case those are outside the requirements of the ESRS. Introducing a "non-mandatory" status will put outside of the scope of scrutiny by assurance providers the implementation of provisions which fall under this status. The CEAOB notes in this regard that the status of NMIG should be reconsidered by EFRAG and the Commission, in case the policy objectives are higher in terms of disclosures and assurance on the implementation on NMIG.			
Survey	CEAOB	European supervisory authority	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		(Ref CEAOB letter par1 to 3) The CEAOB welcomes EFRAG's exposure draft published on 31 July 2025 and the revisions proposed by EFRAG to simplify the ESRS following the European Commission's (EC) request. In its letter dated 29 September 2025, which content has been pasted in the relevant sections of this EFRAG questionnaire, the CEAOB provides several comments on various revisions included in the exposure draft which may induce impacts for assurance engagements. The CEAOB shares the comments with EFRAG for consideration before the finalisation of its advice to the EC. The content of the CEAOB response to this consultation has been prepared by the CEAOB sustainability reporting support team and has been adopted by the CEAOB. The comments raised in this response reflect matters agreed within the CEAOB. The response is not intended, however, to include all comments that might be provided by the individual regulators that are members of the CEAOB and their respective jurisdictions.			
Survey	CEAOB	European supervisory authority	Belgium	35.ESRS1_1.1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	(RefCEAOBletter par18 and 19) To align with the Omnibus proposals, the ED has anticipated the perspective that no sector ESRS will be developed, and consequently, that undertakings will need to prepare entity specific information when the ESRS general or topical disclosure requirements will not allow to reach the objectives aimed at. The CEAOB flags in this regard that the consequential increase in the use of entity specific disclosures will lead to (1) sustainability statements that are less comparable between preparers, and (2) a different approach, for assurance providers, since they will need to assess whether the (general) characteristics of information are met, rather than assess whether the disclosure requirements have been complied with. ESRS1 paragraph 11 mentions that preparers "may use" available best practices, frameworks or standards such as IFRS industry-based guidance or GRI sector standards, which will thus not be for mandatory use. Therefore, should the Omnibus proposals be adopted, the CEAOB advises that sector specific guidance be developed (at a later stage) by EFRAG to prevent individual approaches by preparers and to allow undertakings with the same sectorial challenges to benefit from a collective approach. In particular, this will be useful for undertakings in the financial sector.	ESRS1	1.1 ESRS standards, reporting areas and entity-specific disclosures	
Survey	CEAOB	European supervisory authority	Belgium	35.ESRS1_2.	Do you agree with the amendments of this chapter?	I agree	(RefCEAOBletter par23) The CEAOB welcomes the inclusion regarding "fair presentation" in the ED, which is relevant to avoid inconsistencies in interpretations amongst stakeholders. It will also facilitate the connection with the provisions of the international assurance standards and it will avoid misunderstanding around the categorization of the sustainability reporting framework originated by the ESRS. It will facilitate further consistency in assurance engagements performance and reports issued by assurance providers.	ESRS1	2. Fair presentation and qualitative characteristics of information	
Survey	CEAOB	European supervisory authority	Belgium	35.ESRS1_3.1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	(RefCEAOBletter par4 to 6) The CEAOB stresses that the overall filter of materiality for the provision of information related to Impacts Risks and Opportunities identified under the double materiality lens, with a view to reducing the length of sustainability statements, as it is drafted in the ED, will create some challenges for consistent implementation, and thus for assurance providers. The materiality as defined by the ED will be very judgmental for preparers and assurance providers, in the absence of practical experience and thus, the absence of benchmarks that may be available. The CEAOB stresses that different notions are used (in ESRS1 paragraph 21) to establish this filter and questions the differences between the notions used in (a) and (b). It may be difficult in particular to assess expectations created by this paragraph 21 and, for the preparers and for the assurance providers, to determine what is needed to fulfil the appropriate level of "understanding" for users of general purpose sustainability statements. The CEAOB would thus welcome a reconsideration of the way the filter is established in this paragraph of the ED.	ESRS1	3.1 Materiality of information as a general filter for reported information	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CEAOB	European supervisory authority	Belgium	35.ESRS1_3.5.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	(RefCEAOBletter par7 to 8) The CEAOB welcomes simplifications on the DMA process requirements, but stresses that the introduction of a less prescriptive approach will create a further challenge for assurance providers regarding the DMA process. This will mean that a more outcomes-oriented approach will become relevant for the assurance engagement, with step back and consideration of the business model of the entity, with more value for users. In addition, the revisions in the ED sometimes lack clarity regarding the status (compulsory or not) of the new provision in ESRS1 paragraph 45. EFRAG should use consistent wording like "the undertaking shall ..." or "the undertaking may ..." instead of "the undertaking is expected to ..." to clarify the status of this ESRS provision (i.e. whether it is compulsory or not).	ESRS1	3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	
Survey	CEAOB	European supervisory authority	Belgium	35.ESRS1_8.1.	Do you agree with the amendments of this chapter?	I disagree	(RefCEAOB letter par9 and 10) The CEAOB does not concur with the editorial change in ESRS1 paragraph 103. The wording used creates confusion about the scope of information which belongs to the sustainability statement, under the scope of the independent external assurance engagement mandated by the CSRD. EFRAG should avoid any doubt and make clear that even disclosures located outside the dedicated section of the management report are an integral part of the sustainability statement. Paragraph 103 could e.g. be amended as follows to avoid confusion on the status of information incorporated by reference: "The undertaking shall present all the disclosures required by the ESRS within a dedicated section of the management report identified as the undertaking's sustainability statement. By exception, information incorporated by reference according to the conditions prescribed in Chapter 9.3, may be located outside that dedicated section, provided that the conditions of Chapter 9.3 are met. Information incorporated by reference remains an integral part of the sustainability statement."	ESRS1	8.1 General presentation requirement, structure and content of the sustainability statement	
Survey	CEAOB	European supervisory authority	Belgium	35.ESRS1_8.2.	Do you agree with the amendments of this chapter?	I disagree	(RefCEAOBletter par13 to 16) The CEAOB identifies a conceptual challenge with the introduction of ESRS1 paragraph 108, that allows for the provision of information that would not fall under materiality conditions, in the absence of any other reporting framework requirement It will be difficult to determine in which conditions non-material information will not "obscure" other (i.e. material) information. Furthermore, assurance providers will have no reference in the ESRS framework to assess the information in the absence of any provisions for the disclosures except for faithful representation. Finally, and more importantly, misunderstanding will increase about whether the non-material information will fall into the scope of the assurance engagement, the status and assurance over the information. In contrast, the benefits of locating this type of information in the "sustainability statements" rather than under other documents sent to a specific user or other sections of the management report remains unclear. If this type of information remains allowed by the final ESRS, then the preparers should make clear (1) that this information is outside the scope of ESRS reporting requirements and (2) thus it was not reviewed nor scrutinized in the course of an assurance engagement required by law. The use of a special appendix to locate this information would best allow this clarification	ESRS1	8.2 Presentation of additional information included in the sustainability statement	
Survey	CEAOB	European supervisory authority	Belgium	35.ESRS1_8.3.	Do you agree with the amendments of this chapter?	I disagree	(RefCEAOBletter par17) The CEAOB underlines that the executive summary will be a very challenging part for the assurance engagement, in the absence of indications of what should be considered as "key messages" apart from "material information" about "material IROs". The notion creates another layer of complexity and judgement. Discussions are likely to occur regarding which messages are "key", as this judgement will depend on the users of the information. More indications are needed in the ESRS to allow for a proper understanding of this notion of summary of "key messages", so as to allow an assurance provider to form an opinion on whether this summary complies with the ESRS requirements. (RefCEAOBletter par11) In ESRS1 paragraph 109 the terms "outside its sustainability statement" should be replaced by "outside the dedicated section identified as the undertaking's sustainability statement" to avoid confusion and to remain consistent with other provisions on incorporation by reference in the ESRS.	ESRS1	8.3 Options in presenting information across parts of the sustainability statement	
Survey	CEAOB	European supervisory authority	Belgium	35.ESRS1_9.3.	Do you agree with the amendments of this chapter?	I disagree	(RefCEAOBletter par12) The wording introduced as revision of letter (d) in ESRS1 paragraph 118 remains unclear and confusing. To achieve the objective of allowing incorporation by reference without undermining the quality of the reporting and creating doubts about the scope assurance engagement, the provision should e.g. read: "the information incorporated by reference: ...is subject to the same assurance engagement as the other information that is part of the sustainability statement (i.e. the information incorporated by reference is treated as all other information presented in the sustainability statement with regards to assurance)".	ESRS1	9.3 Incorporation by reference	
Survey	CFA Institute	User Association	United States	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We support the proposals to clarify and simplify the double materiality assessment process. By taking a top-down approach, companies can focus on what is relevant to their business and their industry. This more closely aligns with how investors consider the risks and opportunities (and related impacts, where applicable) of a company.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CFA Institute	User Association	United States	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The additional information provided on how to conduct an impact materiality assessment, in particular with respect to whether and when to include the effects of mitigating actions, is helpful. However, the additional guidance on "gross versus net" relates only to impact materiality assessments and the issue is also relevant to (and a subject of debate for) financial materiality (risk) assessments. Companies and investors typically consider the effectiveness of risk mitigation activities when understanding a company's areas of risk exposure. It is likely that companies will use the guidance on impacts by analogy to risks. Clarity on whether this is appropriate, or explaining why it would be different, will be necessary to avoid differences in interpretation and application. We note that the ISSB's standards don't provide such guidance but use the principle of whether the risk "could reasonably be expected to affect the entity's prospects". There is similar wording in the ESRS standards. We suggest that EFRAG and the ISSB work together to ensure that the concept of financial materiality is understood to mean the same thing – we are concerned that there is a very high likelihood that, without doing so, a company applying the ESRS standards will have a different list of sustainability matters that are financially material than a company applying the ISSB's standards, even though the concepts are meant to be the same. This will have significant implications for global comparability by giving a very different picture of risk exposures (and opportunities) across companies, impeding capital allocation decisions.			
Survey	CFA Institute	User Association	United States	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The sustainability statements published so far mix financially material sustainability issues with information about impacts, making it difficult for different users to identify what is most relevant to them. We believe many of the problems with "interoperability" arising from debates about materiality can be addressed through clearer presentation, allowing each audience to find the information most important and targeted to their needs. Clarity in presentation also benefits investors who want information about impacts, such as those that have the potential to influence future customer or employee behaviour. It also helps other stakeholders who focus on risks and opportunities, for example how an entity monitors and manages exposures or seeks to capitalise on opportunities. Organising information in a way that makes these distinctions explicit is essential for making disclosures easy-to-navigate and decision useful. Decision usefulness is the standard by which information becomes relevant to investors or other stakeholders and drives capital formation or other actions. Without clear structuring, mixing financial materiality and impact materiality undermines the usability of sustainability statements. By improving how disclosures are presented, interoperability concerns tied to materiality can be reduced, as users can more readily locate the data aligned to their specific interests and decision-making needs.			
Survey	CFA Institute	User Association	United States	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	In principle we support the simplification of the ESRS requirements. Reporting standards, regardless of topic, need to be straightforward to implement and easy to navigate so that the preparer understands all the requirements, the assurance provider understands what they are assessing, and the user of the resulting reporting understands what they are reading. The speed with which the original ESRS standards were developed led to challenges and disagreements in interpretation of some of the requirements, resulting in differences in approach and limiting investors' ability to compare information about material topics across companies. The onslaught of implementation guidance on fundamental issues that EFRAG provided after the original ESRS standards were published, along with various FAQs, is further evidence that the "user experience" in applying the standards was inadequate. This naturally has implications for the quality of the information that's then made available to users of sustainability statements. So, while we agree in principle with the simplification objective, we are concerned that the approach taken focuses on eliminating the burden to companies without thinking about what investors need.			
Survey	CFA Institute	User Association	United States	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	While the Consultation acknowledges the importance of clarity for those applying the standards, equal emphasis must be placed on the clarity and accessibility of the information produced for end-users. Therefore, in determining which data points to retain, we believe that greater emphasis should be placed on financial materiality. At a minimum, it is critical that disclosures clearly distinguish between items that are financially material and those that are not. Without this clarity, investors are less easily able to analyse and integrate sustainability-related information into financial decision-making because it is difficult to see what really matters for assessing risk exposure and future investment performance. Perhaps more importantly, companies find such information difficult to integrate into their business processes.			
Survey	CFA Institute	User Association	United States	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We support Option 1, which requires both quantitative and qualitative disclosure of anticipated financial effects. We do not support Option 2, which provides relief from quantitative disclosure. Current and forward-looking financial effects are essential to investors' understanding of how sustainability matters affect a business today and in the future. This information demonstrates the relevance of sustainability disclosures to assessments of financial performance and risk exposure. Because of its importance, and given that companies should already consider these implications in business planning and forecasting, the exemption in Paragraph 23(c) should be noted as rare. Companies are best placed to assess and report on anticipated financial effects relevant to their business. However, quantitative disclosure alone is insufficient. In addition to the amounts required in Paragraph 23(b), investors need explanation and disclosure of assumptions underlying those amounts. This enables them to understand the implications of the amounts and make adjustments if they hold different views about what's driving the effects. Option 2 would reduce the information available to investors in European companies applying ESRS standards, limiting their ability to understand financial implications of sustainability matters. This creates an uneven playing field: investors in companies applying ISSB standards will receive more complete data and may prefer those companies. European firms could face higher costs if peers elsewhere disclose this information. Leaving investors to estimate figures is risky and burdensome, as companies may later need to respond to or correct such assessments. We recommend EFRAG and the ISSB work together to align requirements for quantitative disclosure of anticipated financial effects, ensuring that companies applying either set of standards achieve the same outcome.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CFA Institute	User Association	United States	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	The term "interoperability" is often cited regarding links between the ISSB and the ESRS standards. Yet it is unclear what the term means, as it is used to imply being identical, complementary, or compatible. We have raised concerns about this lack of clarity (see page 15 of our letter to the ISSB's Agenda Consultation https://rpc.cfainstitute.org/sites/default/files/-/media/documents/comment-letter/2020-2024/ISSB-Agenda-Consultation-Comment-Letter_10-18-23.pdf). Many stakeholders assume "interoperability" requires identical disclosure requirements. In our experience, when the words in standards differ, the disclosures are not the same. If the goal is consistent disclosures regardless of whether a company applies ISSB or ESRS standards, then requirements must be phrased identically. Otherwise, interoperability will not serve investors in global markets. Identical requirements would reduce complexity for preparers and users, but we do not believe "interoperability" in this context should mean "identical." Rather, ISSB and ESRS standards should be compatible and complementary. This aligns with ISSB's vision of a "global baseline" and the EU's goal of providing information for civil society beyond investors. Interoperability cannot be determined by one body alone; both must agree which elements form the baseline and which are jurisdiction-specific additions. Currently, neither ISSB nor ESRS standards clearly separate these, complicating comparability for investors. The single vs. double materiality debate adds confusion. We see it as philosophical, not practical. Financially material elements should be identical across both sets of standards, forming the baseline for investors. Impact materiality has value in revealing externalities, but unless these become financially material through penalties, litigation, or costs, they are not relevant to investors. Materiality principles already allow sustainability issues to shift between categories as circumstances evolve. "Interoperability" in practice should therefore allow financial materiality to guide investor-focused disclosures, with impact materiality addressing broader societal concerns. Yet, identical wording remains necessary when requirements use the same label or appear to cover the same point.			
Survey	CFA Institute	User Association	United States	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	CFA Institute	User Association	United States	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	This applies to all the ESRS not just ESRS 2.... There is growing focus on reducing the length of sustainability standards, disclosures, and data points. A shorter report may seem appealing, but brevity is only useful when it results from clear, relevant, and well-structured explanations. If conciseness leaves users needing extra research to interpret what is meant, then the benefit is lost. Length itself is not the problem; poor clarity and navigation are. The original ESRS standards suffered from both, so efforts to streamline them are welcome. However, relevance matters far more than length. Investors consistently say they prefer a limited number of highly material, high-quality data points. Yet, in principle, they are not concerned by volume. Investors are skilled at quickly processing large quantities of information and using technology to support this analysis. The real challenge lies in determining which data points are relevant to decision making. Compounding this issue is the uneven quality of underlying data, which undermines the reliability of sustainability metrics. Without stronger assurance of data accuracy, investors' confidence in reported information will remain limited, regardless of volume. For this reason, reducing data points simply to shrink disclosures is misguided. The key objective should not be cutting length but improving quality, relevance, and meaning. The information provided must allow users to understand which sustainability issues truly matter for a company, how the company is addressing them, and how effective those actions are over time.			
Survey	CFA Institute	User Association	United States	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We agree that ESRS should be a "fair presentation" framework and believe this is an important clarification (not a change in requirements) in the Consultation. This follows the framework used in the IFRS accounting standards (which are used by European companies) and, given the need for connectivity between financial reporting and sustainability reporting, we believe they should be consistent. Anecdotally, the initial feedback we've received from investors about how they have found the first set of sustainability statements is that the data is highly qualitative and the information is not linked to financial results or financial reporting. The statements are also long and it's difficult to identify the information that's relevant for their investment decision making purposes. The result is that the information so far is not necessarily decision useful. Investors advise us they want, or are willing to accept, fewer, but highly financially value-relevant, metrics; they need those metrics to be easy to find; and the metrics need to clearly show their relevance to the business (also see our comments above about presentation more generally). Making ESRS standards explicit that they follow a fair presentation framework centred around the materiality principle, rather than being a compliance exercise, will help this. However, and particularly given the range of sensitive topics covered in the ESRS topical standards, it is important that companies don't use the "fair presentation" framework as an opportunity to omit important detail. Like with financial reporting, it will be important that preparers understand the need to "stand back" and make sure that the information they report about sustainability matters makes sense as a whole. In our view, the materiality principle already covers this and therefore it should not result in additional preparation costs.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	BT4Europe represents the collective voice of companies engaged in business travel across Europe. While reporting companies have actively reshaped market demand by prioritizing sustainable services and transparent data reporting, the concept of double materiality has introduced complexity that has slowed the broader development of sustainable travel solutions. This includes the adoption of Sustainable Aviation Fuel (SAF), cross-border rail travel, and environmentally responsible hospitality options. A significant milestone has been achieved: companies now have access to comprehensive travel-related emissions data, regardless of whether they are formally required to report CO_2 emissions under double materiality assessments. This accessibility empowers organizations to make informed decisions and proactively align their travel practices with sustainability goals. Given the substantial climate impact of business travel, its materiality holds the potential to act as a powerful catalyst. By recognizing travel as a material issue, companies can accelerate demand for sustainable services, thereby fostering innovation and resilience within the travel sector. BT4Europe continues to advocate for harmonized standards, transparent reporting, and scalable solutions that enable businesses to travel responsibly while contributing to Europe's climate objectives.			
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	BT4Europe represents the collective voice of companies engaged in business travel across Europe. While reporting companies have actively reshaped market demand by prioritizing sustainable services and transparent data reporting, the concept of double materiality has introduced complexity that has slowed the broader development of sustainable travel solutions. This includes the adoption of Sustainable Aviation Fuel (SAF), cross-border rail travel, and environmentally responsible hospitality options. A significant milestone has been achieved: companies now have access to comprehensive travel-related emissions data, regardless of whether they are formally required to report CO_2 emissions under double materiality assessments. This accessibility empowers organizations to make informed decisions and proactively align their travel practices with sustainability goals. Given the substantial climate impact of business travel, its materiality holds the potential to act as a powerful catalyst. By recognizing travel as a material issue, companies can accelerate demand for sustainable services, thereby fostering innovation and resilience within the travel sector. BT4Europe continues to advocate for harmonized standards, transparent reporting, and scalable solutions that enable businesses to travel responsibly while contributing to Europe's climate objectives.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	BT4Europe welcomes EFRAG's efforts to enhance interoperability between ESRS and the ISSB's IFRS S1 and S2 standards. As outlined in our 2025 Sustainability Position Paper, harmonized and comparable CO_2 emissions data is essential for enabling effective climate action in the business travel sector. Link: https://bt4europe.com/wp-content/uploads/2025/07/BT4Europe-Sustainability-Position-Paper-2025.pdf We support the alignment of ESRS with IFRS S1's fair presentation framework and the use of materiality as a general filter, which ensures Scope 3 emissions—such as those from business travel—are appropriately considered. The adoption of the financial control boundary for GHG reporting (ESRS E1 AR19) and the permanent reference to SASB and IFRS industry-based guidance are important steps toward global consistency. BT4Europe emphasizes the need for sector-specific standards to support meaningful disclosures. In this context, we highlight the work of the Energy and Environment Alliance (EEA) Taskforce on Hotels & Lodging Sustainability Standards, developed in collaboration with IFRS. The Taskforce is translating IFRS S1 and S2 into hospitality-specific terminology, creating templates for Scope 1–3 reporting and transition plans, embedding metrics such as emissions per occupied room, and conducting global consultations. This initiative will culminate in the launch of a Global Industry Consultation in Q3 2025 and should inform future ESRS sector standards. Link: https://www.eea.international/about-us/taskforce-on-hotels-lodging-sustainability-standards/ While we acknowledge the simplification benefits of certain reliefs, BT4Europe cautions against exemptions that allow omission of Scope 3 emissions or quantitative financial effects. Business travel emissions must be treated as material and measurable, even if estimated. In conclusion, BT4Europe encourages EFRAG to maintain strong alignment with IFRS while ensuring that business travel and hospitality emissions are fully integrated into sustainability reporting. This will support transparency, comparability, and the transition to low-carbon travel across Europe.			
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	BT4Europe - European Network of Business Travel Associations	Business association (other than association of financial institution)	Belgium	35.S3-3.	Do you agree with the amendments of this chapter?	I disagree		S3	Disclosure Requirement S3-3 - Actions and resources related to affected communities	
Survey	Witten/Herdecke University	Academia	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	Chapter 3 is now clearer organised. The improved definition of materiality of information in Section 3.1, especially the replacement of criterion of "significance" with "understandability" of impacts provides better guidance and is aligned with the CSRD and international sustainability due diligence instruments. It also clarifies how the materiality of information interacts with (fundamental) qualitative characteristics of information criteria from Chapter 2, and with the rules concerning aggregation and disaggregation of information (e.g. para 52 on "not obscuring"). Section 3.5. Practical considerations are particularly helpful to avoid unnecessary complexity in materiality assessment. However, Chapter 3 frequently conflates 'topics' with 'impacts, risks and opportunities' ('IROs'). Para 22 is confusing when it says that information may be presented "either at the topical level or at [IRO] level". Such a dichotomy is confusing and incorrect. While topics refer to broad thematic areas, IROs are entity specific. The CSRD, as well as IFRS, TCFD, and TNFD consistently focus on the latter. Overemphasising 'topics' risks leading to generic, boilerplate disclosures that lack relevance and specificity. Chapter 3 would be clearer if it keeps the focus on IROs and plainly explain that depending on their nature and context such IROs may be defined at a general level - often corresponding to topics - and/or that information on their management may be similarly aggregated. This should be clarified also in provisions on entity-specific disclosures in paragraph 23 (and in paragraph 10 in Chapter 1) In Chapter 3.3.2, para 37 fails to mention that the purpose of financial material assessment is to not just to identify materiality information but also determine the material risks and opportunities, as required by the CSRD. In this regard, the risks and opportunities are only mentioned in the middle of para 38, making the text incoherent.			
Survey	Witten/Herdecke University	Academia	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	While it is certainly useful that Chapter 3 addresses the question of how prevention, mitigation and remedy of impacts shall be considered in materiality assessment, the rules could nevertheless be expressed in a more simple and understandable way. Para 34 uses a very complicated language to express a simple idea that actual impacts shall be considered as they occurred during the reporting period, and that their ex-post remediation is not relevant. I welcome and stress the importance of the clarification that the potential impacts which require significant ongoing preventative or mitigation efforts shall be considered gross. Without such clarification, it would be in theory be impossible for companies to report on how they manage such issues. In this regard, it would be helpful to refer to the materiality of information filters to provide companies with further guidance on how to distinguish such significant efforts from common practice and compliance measures. The table provided in Appendix C provides more detailed information, which it would be helpful to integrate directly into the main body to ensure clarity and consistency.			
Survey	Witten/Herdecke University	Academia	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The proposed changes are substantial. However, I would like to bring the attention to para 113, which I find hard to understand: "113. If the description of the material impacts, risks and opportunities prepared in accordance with [Draft] Amended ESRS 2 IRO-2 is not presented alongside the respective policies, actions and targets, the undertaking shall make explicit which policies, actions and targets relate to which material impacts, risks, or opportunities, in accordance with paragraph 22." It is not clear to me what the reference to para 22 is meant to imply. Para 22 addresses the issue of appropriate aggregation or disaggregation of information on material impacts, risks and opportunities and their management. But it doesn't set any rules regarding the location of such disclosures depending (or not) on the level of aggregation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Witten/Herdecke University	Academia	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	I welcome the removal of the duplications between the cross-cutting and topical standards and support the emphasis on general disclosure requirements. However, I have two critical concerns. First, the original DR in environmental standards concerning screening of sites in materiality assessment were replaced by an application requirement to ESRS 2 IRO-1. This in effect makes transparency on this aspect optional. Consideration of local context is a key element of an appropriate materiality assessment. This should be both recognised in Chapter 3 of ESRS 1, and in ESRS 2 IRO-1, which should include an explicit datapoint on how the undertaking screened its locations and value chains. I welcome that E standards provide a clearer reference on the importance of disaggregation of disclosures, but this can only be done well if locations are properly screened. Second, I strongly recommend adding an explicit reference to the disclosure of relevant, entity-specific metrics directly in S standards. The fact that S2, S3 and S4 do not include any metrics and the anticipated sectoral standards which would have provided such metrics will not be adopted, shift the expectations for disclosure of metrics for S topics to entity-specific disclosures. As highlighted by the Danish Institute for Human Rights, a leading National Human Rights Institute on business and human rights and reporting, adding the reference to metrics to disclosure requirements SX-4 on targets would improve consistency between the topical and the cross-cutting standards and acknowledge the common use and disclosure by companies of metrics relevant to their social sustainability impact management and progress. This addition would ensure that preparers better understand the ESRS expectations in this regard, whilst not adding any new obligations or datapoints			
Survey	Witten/Herdecke University	Academia	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	I support the proposed changes and agree with the removal of 'may disclose' elements, because their status has been causing confusion. However, they do not need to be all removed to NMIG. Where they provide useful examples of disclosures, they could be included directly in the standards as "examples". This is particularly the case for the topics for which the reporting practice is evolving, such as Biodiversity and ecosystems. This would make it easier for first-time preparers to understand what kind of information is likely to be relevant and provide a basis for the standardization of metrics. Having to consult another document, such as NMIG, is adding an unnecessary hurdle. The language and therefore understandability of the standards have been considerably improved, however in ESRS 1 especially there is still much to be done in this regard.			
Survey	Witten/Herdecke University	Academia	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	To me, the standards are not clear in terms of what the combined effect of the reliefs is and how the reliefs are meant to interact. Interpreting and applying these reliefs independently of each other open doors to abuse and omitting material information, significant differences in reporting practice. Reporting of metrics is subject to a combination of undue cost and effort and lack of data quality reliefs. But the standards do not put these two reliefs in proper context and do not include any explicit requirement and timeframe for companies to improve the coverage and quality of data. This is exacerbated by the relief which unconditionally allows exclusion of joint operations. If the environmental metrics concerning such operations are material, then the standards should incentivise their eventual disclosure. The undue cost and effort and lack of data quality reliefs already provide sufficient flexibility in this regard. Similarly, there is a lack of coherence among the directions of the reliefs related to financial effects, i.e., information which is essential for understanding of the risks and company's ability to overcome them. The limitation related to the announced investment plans focuses the disclosures on effects which are easier to assess and therefore quantify, yet the standards also propose reliefs that enable omitting quantitative disclosures. We broadly agree with the relief provided in ESRS 1, para 90, which allows for calculation of metrics exclusion of activities that are not significant drivers of the IROs. However, the application of this option must be clarified for specific environmental and social metrics which are standardised in the ESRS. For instance, the GHG Protocol's completeness principle explicitly warns against misapplication of materiality criteria in this regard. Similarly, for S1 workforce metrics, such as characteristics of the employees and non-employees, such exclusions are not appropriate.			
Survey	Witten/Herdecke University	Academia	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	I strongly disagree with this proposition! These combined reliefs should clearly require the undertaking to improve the coverage and quality of the data needed to meet ESRS requirements. For the metrics concerning own operations and/or metrics standardised directly in the ESRS, this should be subject to clear time limitation. For other metrics, improvements over the years should be also explicitly required, subject to undue cost and effort relief.			
Survey	Witten/Herdecke University	Academia	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ability to estimate financial effects is critical for the undertaking's ability to integrate sustainability into its business strategy considerations, planning and risk management. It is also key for the determination of financial materiality, including in terms of overreporting topics as financially material. Resigning on this ambition is at odds with the objective of putting sustainability reporting on the same level as financial reporting, the integration of both, and ultimately overcoming the tragedy of horizons. We find Option 1 unnecessarily extensive, and lacking time limitation, but broadly acceptable. We disagree with the assertion made in the question that it "[d]ifferent from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources ". In this regard, the new proposed ESRS include the undue cost and effort relief which seems to account for such a situation. With respect to Option 2, we don't find it justifiable to go beyond the IFRS relief. One of the most strongly voiced arguments from stakeholders who called for simplification of ESRS was that, as a matter of principle, ESRS must be aligned with the IFRS except where CSRD or other EU legislation require otherwise. Abandonment of this principle seriously undermines prospects of building a global baseline which both the EU and the ISSB support, and which is an important part of building a level playing field for the EU companies.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Witten/Herdecke University	Academia	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Witten/Herdecke University	Academia	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Reliefs should not go beyond those set in IFRS. Going further would undermine the objective of setting a global baseline for ESG reporting, which is important for achieving a level playing field for EU companies in a global context. The undue cost and effort relief outlined in ESRS 1, para 87-89, is a powerful relief, which addresses virtually all situations where the undertaking may encounter practical obstacles. Explicit emphasis on fair presentation, combined with the strengthened focus on the use of materiality of information filter, provide companies with an increased flexibility in determining meaningful content of their sustainability statements. It marks a further move away from compliance-based to principle-based approach. However, such changes imply increased responsibility for the undertaking. Implementing further reliefs would undermine this responsibility and open the doors to abuse.			
Survey	Witten/Herdecke University	Academia	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Witten/Herdecke University	Academia	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	The number of datapoints in each standard represent the minimum necessary to ensure cohesive disclosure requirements, and consequently basic comparability and quality of the actual disclosures. We have not identified any instance where ESRS would include exorbitant requirements, considered common practice and internationally recognised reporting standards and frameworks such as IFRS, GRI, or TNFD. ESRS are generally more concise and less demanding. Introducing further reductions (while keeping the coverage of all ESG factors as required by the CSRD) would create serious quality gaps between the ESRS disclosures and those based on the standards.			
Survey	Witten/Herdecke University	Academia	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	I agree with these changes, agreeing that the suggested changes do not add a new burden. This is particularly the case for the water-related metrics. In order to disclose the water consumption, the undertaking already has to calculate withdrawals and discharges, and such calculation and therefore the underlying data is subject to the assurance. Moving these implicit datapoints to the forefront as explicit data points makes the disclosure requirement clearer, compared to the previous ESRS where some of these datapoints were framed as "may disclosures". Whether or not these individual datapoints are to be disclosed is correctly subject to materiality of the information filter applied by the undertaking.			
Survey	Witten/Herdecke University	Academia	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	I agree with these changes, noting that the suggested changes do not add a new burden. E2-4 on secondary microplastics is not a new datapoint, as correctly pointed out in the Rationale above. We do not understand why it is included in this question, as such.			
Survey	Witten/Herdecke University	Academia	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	ESRS, being based on the materiality principle, the CSRD requirement to disclose impacts, risks and opportunities and their management, and the general principles of the Accounting Directive, has already been subject to a fair presentation regime. Making it explicit helps to clarify it. It provides companies with clarity on the discretion and judgement, as well as related safeguard, they are expected to exercise when applying the standards.			
Survey	Witten/Herdecke University	Academia	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	I do recognise the complexity of recalculating absolute values and acknowledge that financial institutions often manage GHG performance using intensity-based approaches. However, the global carbon budget is defined in absolute terms. For this reason, it remains essential that even financial institutions disclose absolute targets to assess how their strategies align with the economy-wide transition to net zero. Absolute targets are relevant for users of sustainability statements and for understanding the real-world climate impact of financed activities. While intensity measures provide insights into efficiency, they can mask rising absolute emissions in growing portfolios or sectors. Absolute values, by contrast, give a clear signal of whether institutions are contributing to the necessary 90–95% global reduction in emissions by 2050, with steep cuts by 2030. Both approaches rely on similar underlying data, and estimation challenges are not unique to the financial sector. Granting an exemption would also undermine fairness in a sector-agnostic standard. Other industries could equally argue for exceptions based on their own difficulties, reducing comparability across sectors. Moreover, absolute financed emissions are already recognised in existing standards and regulations: the SBTi financial sector net-zero standard, the UNEP FI/NZBA recommendations, and EU SFDR all require or encourage absolute emissions disclosure. Exempting banks would risk misalignment and reduce the usefulness of reported data for stakeholders, including asset owners who depend on it for their own disclosures.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Witten/Herdecke University	Academia	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The new threshold is simpler and clearer, more straightforward and therefore easier to apply. It also sets a clear cap. Any potential increase of breakdowns of the disclosed information is negligent in terms of added burden.			
Survey	Witten/Herdecke University	Academia	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The proposed change is discriminatory and adds unnecessary burden onto companies. This should be addressed through revisions to § AR 22. Workers have a human right to a living wage, meaning sufficient remuneration to support themselves and their families in a life of basic dignity. In its position on living wages, the ILO (2024) reflects this same definition, as do EU policy and law. The ILO position distinguishes between principles for estimating living wages, which determine the level of wages necessary for any worker to have a decent life, and principles for wage-setting processes, which determine the processes through which today's legal minimum wages are negotiated, and which can support progress towards the level of a living wage. In practice, legal minimum wages today fall below a living wage in most countries of the world, and particularly outside of the EU. Under S1-9, the methodology requires companies to compare actual wages to an "adequate wage" standard for their employees in the EU. Two key changes are therefore needed: •The methodology for reporting on 'adequate wages' should measure actual wages against an adequate/living wage for all employees, not only those within the EU. In particular, for employees outside the EU, the methodology should allow employees' actual wages to be measured: oA) against the local legal minimum wage only when this is set in line with the ILO principles on estimating living wages; or oB) against living wage estimates that are set in line with ILO principles on estimating living wages. •Companies should be able to rely on local legal minimum wages or living wage estimates when the authorities or organisations that set them provide public evidence of their alignment with the ILO principles for estimating living wages. This will avoid companies' having to make this assessment themselves.			
Survey	Witten/Herdecke University	Academia	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	I welcome the fact that multiplication of datapoints was removed. The new, simplified framework makes it easier for companies to report on these SFDR-related matters in a way that corresponds to how their policies are set. For users, this consolidation makes it easier to locate the relevant information.			
Survey	Witten/Herdecke University	Academia	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Measurable targets related to biodiversity and ecosystems shall be set and disclosed according to the guidance and examples given by relevant global frameworks, such as SBTN (Step 3 - Measure, Set & Disclose Targets), TNFD (component P1 and P2 & Annex 5, sector guidance and guidance on Target Setting) & resources by World Economic Forum Nature-Positive Transitions.			
Survey	Witten/Herdecke University	Academia	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	My proposal would be to not include such datapoint. Instead, there should be a paragraph in the application requirements, explaining that the adjusted pay gap is an important entity-specific information, which is often necessary to contextualise and enable understanding of the information provided by the unadjusted pay gap. Further this AR could remind the undertakings that the unadjusted pay gap needs to be appropriately disaggregated. Unadjusted and adjusted perspectives on pay gap have different purposes. The unadjusted pay gap - appropriately broken down by countries or areas of operations in line with ESRS 1 - provides general context and the information on how the undertaking is affected by systemic drivers of gender inequality. The adjusted pay gap is primarily an entity-specific disclosure. It is particularly relevant for complex companies to better understand where and how the pay gap manifests, and what are the specific drivers of it. There is no one 'standardizable' way to adjust the pay gap calculation. Such adjustments must consider the undertaking's specific context and circumstances and avoid 'overadjusting'. If the calculation controls for every source of difference between males and females in the workforce, then it would obscure the pay gap and its causes. Therefore, including a datapoint - whether mandatory or voluntary - on adjusted pay gap in the standards is problematic, because it is impossible to provide a standardised methodology. On the other hand, for many companies' information on adjusted pay gap is likely to be material, and therefore such information should be provided.			
Survey	Witten/Herdecke University	Academia	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	The removal of § 14 can be compensated without major efforts by adding a reference to SMEs in the description of the topics in ESRS 1, Appendix A, and in ESRS G1, paragraph 4. The removal of datapoint originally located in para 33(a) concerning average days it takes to pay an invoice, does not seem to be necessary for the reduction of burden. The undertaking would still need to collect this data to be able to meet the other requirements, in particular the calculation of the % of its payment aligned with its standard payment terms (in § 20(a)).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Witten/Herdecke University	Academia	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Witten/Herdecke University	Academia	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Witten/Herdecke University	Academia	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Witten/Herdecke University	Academia	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Witten/Herdecke University	Academia	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Witten/Herdecke University	Academia	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Witten/Herdecke University	Academia	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Witten/Herdecke University	Academia	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Witten/Herdecke University	Academia	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Witten/Herdecke University	Academia	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Witten/Herdecke University	Academia	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Witten/Herdecke University	Academia	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Witten/Herdecke University	Academia	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	It is worth noting that despite welcome simplifications for the double materiality assessment, at least in the short term the reduction of the reporting burden faced by undertakings already reporting based on ESRS will not change significantly in the short term. This is due to implementing any changes at company level and additional coordination efforts with the auditor. Comment 2 (information materiality): Especially requirement to always report on S1-16 if S1 in general is material is counter intuitive to this. S1-16 could be easily mapped to sub-topics such as discrimination/harassment or child/forced labour. Using materiality of information as general filter makes sense if IRO mapping and information materiality can be really used. Comment 7 (list of sub-topics): AR 16 is now very confusing as no clear differentiation between sub-topic and former sub-sub-topic. This makes it hard for companies to really identify the material topics on a detailed level. The sub-topic level should be deleted, and sub-sub-topics should become new sub-topics. No mingling of the two levels.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	The official introduction of the net approach is highly welcome. However, excluding all mitigation actions in the reporting period from the assessment of impacts could result in companies reporting many potential negative impacts that are, in reality, non-material due to low likelihood and severity. Information overload, comparability difficult. Instead, we recommend that mitigating and remediating actions always be factored in to provide useful information to users. Remediation and mitigation actions there were decided and implemented during the reporting period to address actual negative impacts, could already have a mitigating effect on the underlying negative impact. If the company can prove that these actions have already an effect in the reporting year, company should be allowed to consider the actions. Similar to financial reporting, a provision has also to be evaluated including counter measures that influence the provision value at the end of a reporting period. We also disagree with the proposal that significant ongoing mitigation and/or prevention actions needed to contain the severity and/or likelihood of occurrence of a potential impact below a materiality level, should not be taken into account when assessing the impact. This could lead to over-reporting, as many impacts may appear material, when in fact they are under control. If mitigation measure can be taken into account for impacts, they should also be considered for risks.			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We generally welcome the increased flexibility introduced through the proposed amendments to the ESRS Sustainability Statements. The possibility of including an executive summary and the emphasis on using appendices to separate detailed information from key messages are helpful to improve readability and structure. However, we understand these changes primarily as clarifications rather than substantial simplifications. From our perspective, they do not result in significant relief in terms of implementation effort or reporting complexity.			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	The restructuring of the architecture and the clarified interaction between ESRS 2 and the topical standards enhance the overall readability and usability of the standards. The simplification of the General Disclosure Requirements (GDRs), the reduction of mandatory datapoints for policies, actions, and targets (PATs), and the removal of overlapping topical specifications contribute to a clearer and more accessible framework. In particular, the shift towards a more principles-based approach and the ability to report PATs at a higher aggregation level reflect a pragmatic and proportionate response to the challenges identified during the first-time application. This supports more effective and relevant sustainability reporting while maintaining the necessary level of comparability and transparency. These changes reduce complexity and duplication, making it easier for preparers to navigate the requirements and focus on material information.			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We broadly agree that the proposed amendments will improve the clarity and accessibility of the ESRS. The removal of "may disclose" datapoints and the clearer separation between mandatory and non-mandatory content contribute to a more structured and comprehensible standard. These should be avoided in order not to create confusion and avoid misunderstandings with the auditors. The revised layout – particularly the relocation of mandatory Application Requirements, directly under the relevant Disclosure Requirements – makes the legal text easier to follow and reduces the need to navigate back and forth within the document. However, while the structure and readability have improved, the overall reporting requirements remain largely unchanged. As such, the simplification primarily supports better orientation within the standards rather than reducing the reporting burden itself. Moreover, we would like to flag that new mandatory disclosures have been added – clearly against the request of the EU Commission and the aim of the revision to reduce reporting burden. Additional mandatory data points should be avoided.			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We consider the introduction of the Non-Mandatory Illustrative Guidance (NMIG) and its exclusion from the main body of the standards a useful structural change to the ESRS framework. The separation of mandatory and non-mandatory content improves the structure and readability of the standards. NMIG can serve as an orientation tool by illustrating how disclosures might be structured or interpreted in practice. However, it needs to be ensured that the non-binding nature of NMIG is clearly communicated and consistently understood by both preparers and auditors. There should be no implicit expectation that the examples provided must be followed or a justification be given if the examples are not applied. An explicit statement saying that the NMIG cannot be used for audit purposes and the separation of the NMIG from the legislative text would support this. In particular, this affects the mapping proposal between sub-topics and disclosure requirements in the NMIG. So far, a mapping concept under ESRS 1 is still missing leading to different interpretations on preparer and auditor side.			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We generally welcome the proposed burden reliefs as a meaningful step toward reducing the complexity and effort in ESRS reporting. To No. 1: The introduction of the "undue cost or effort" relief is particularly valuable offering preparers a practical way to justify omissions or limitations when data collection would require disproportionate resources. However, it may increase the burden of proof if auditors challenge whether sufficient effort has been made to fulfill reporting requirements. To No. 4: We support the option to exclude activities from the calculation of metrics that are not a significant driver of IROs. This could potentially reduce the burden to collect data for small activities that do not influence IROs. Comment on 17.4: Why can joint operations only be excluded for environmental metrics and not also for social metrics if operational control is not fully given? To No. 6: The amendments made to the anticipated financial effects do not solve the issue of data availability and reliability, as assumptions for this data point will vary so widely that any comparison between companies would be misleading. All datapoints on anticipated financial effects should be deleted. To No. 7: We welcome the proposed relief for acquisitions. However, the one-year timeframe for integrating a subsidiary for sustainability reporting purposes could be insufficient and unrealistic. Greater flexibility should be offered to disclose metrics once the subsidiary is fully integrated.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We consider the proposed relief to be a practical and necessary addition. It acknowledges the real-world limitations many preparers face, especially in complex areas such as value chain reporting. The relief ensures that data collected for reporting is robust and reliable. Forcing the collection of weak data does not contribute to 1) high quality reporting, 2) comparability, 3) avoiding legal risks linked to the disclosure of unreliable metrics and 4) might lead to distorted or misleading representation of the actual information. The relief also helps companies to tackle the current lack of methodologies for calculating some indicators and bridge preparers to the time when methodologies will be available. It is also important to note that many Wave 1 undertakings will benefit only to a limited extent from this relief. In many cases, data collection approaches – often based on workarounds – have already been agreed upon with auditors and implemented. Continuing with these established methodologies may require less effort than reassessing and justifying the application of the new relief.			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	We disagree with both proposed options. The disclosure requirements on anticipated financial effects should be deleted completely. 1. There exists no accepted and generally used method to calculate anticipated financial effects. ESRS 2 does not give any guidance on how to calculate the financial effects. It remains unclear what the basis for the calculation of the financial effects should be (planning data or the data from the last financial year) or which granularity is required regarding the effects on financial position, financial performance and cash flows. There is currently no reliable method to link specific sustainability-related risks or opportunities to financial metrics like assets, liabilities, or revenue. Without this linkage, even qualitative disclosures carry significant legal uncertainty and risk of misinterpretation. 2. Some material risks and opportunities cannot be quantified, for example reputational risks. 3. In many cases the effects of material risks and opportunities cannot be identified separately. E.g. the financial effect of higher competition in a specific market cannot be separated from general economic influences, or the effect of changes in the portfolio or pricing. This results in a very high level of measurement uncertainty, potentially giving users a wrong picture about the issue. 4. Mid-term and long-term financial effects of risks are usually mitigated (completely or at least to some extent) by measures decided and implemented by the preparer during a later point in time and not necessarily during the reporting year. This leads to a situation where the anticipated financial effects must be reported without highlighting measures the preparer would implement to mitigate them. This will give users of the reports a wrong impression regarding the financial effects. 5. Comparability is limited due to unclear guidance on the methods to be used for calculating the effects and the level of detail for such disclosures.			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Disclosing the monetary and percentage exposure to physical risks without considering adaptation measures is problematic. It involves high uncertainty, may overestimate risks, and could discourage proactive resilience efforts. Disclosures should account for adaptation actions to reflect a more accurate risk picture and encourage companies to invest in climate resilience. Adaptation measures often cannot reliably be directly linked to specific assets. Doing so would require enormous effort or result in imprecise data that offers little value. Therefore, a one-to-one attribution is neither practical nor feasible. It is nearly impossible to reliably calculate the monetary amount and percentage of net revenue at risk from physical climate impacts before considering adaptation measures. The complexity arises from the high uncertainty of climate projections, the difficulty in quantifying future physical damages, and the challenge in accurately modeling how risks will evolve over time. Additionally, the lack of standardized methodologies and reliable data further complicates such estimations. Estimating the monetary and percentage impact on net revenue from transitional risks before considering mitigation and adaptation measures is highly challenging. Given the high uncertainty surrounding future policy changes, technological developments, and market shifts, it is more meaningful to incorporate measures into the assessment. Disclosing risks without accounting for planned actions may be misleading and fail to provide an accurate picture of the true risk exposure. Providing a detailed breakdown of the carrying amount of real estate assets used as loan collateral by energy-efficiency classes is challenging and not practical. Detailed classification requires extensive data collection and consistent assessment methods, which are resource-intensive and result in inconsistent/unreliable information. Identifying potential liabilities from climate transition risks that do not meet current recognition criteria is challenging due to inherent uncertainties. Such liabilities depend on future developments and may not be reliably quantifiable or recognizable in the financial statements at this stage.			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Some relief provided, but the wording in the context of disclosure following the operational control approach is very vague and hence might be part of discussions with auditors (e.g., when is it needed for "fair representation"; what is the definition of that in this context etc). We would like to ask EFRAG to clarify this and in particular to emphasize that it is a "may"-disclosure. We support referencing SASB Standards and IFRS Industry-based Guidance as sources of disclosure to enhance transparency and interoperability with ISSB. Provide an interoperability mapping showing, datapoint by datapoint, how ESRS requirements correspond to IFRS S1/S2.			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	We acknowledge and welcome the improved structuring and consolidation of the ESRS requirements. The clearer separation and grouping of datapoints, especially the removal of voluntary datapoints and the streamlining of narrative PAT disclosures, enhances the usability of the standards. However, we would like to emphasize that the reduction in the number of datapoints does not necessarily translate into a proportional reduction in the substantive reporting scope or effort. In our view, the overall scope and complexity of the disclosures remain largely unchanged. Many changes seem to be cosmetic without changing the underlying substance of the disclosure requirements. The deletion of datapoints primarily affects how requirements are presented, not what is required. This means that preparers will still need to collect and disclose a substantial amount of data, and the core reporting obligations are largely preserved. We do not expect a significantly reduced reporting volume under the amended ESRS. Instead, the changes may help reduce effort in documentation and coordination with auditors. For example, the introduced options for burden reliefs may simplify internal discussions and reduce the need to justify the omission of non-material items. It is important that this distinction is clearly communicated: while the number of datapoints has decreased, the underlying disclosure obligations remain intact. This will help manage expectations and avoid misinterpretations regarding the actual simplification impact of the amendments. Moreover, we do have concerns regarding the new mandatory disclosure requirements that have been introduced and would suggest deleting them all to fulfill the purpose of the revision of the ESRS.			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	22.E1.	Comments on deleted datapoints in ESRS E1	I disagree	see comment on deleted datapoints in ESRS 2			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	22.E2.	Comments on deleted datapoints in ESRS E2	I disagree	see comment on deleted datapoints in ESRS 2			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	22.E3.	Comments on deleted datapoints in ESRS E3	I disagree	see comment on deleted datapoints in ESRS 2			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	22.E4.	Comments on deleted datapoints in ESRS E4	I disagree	see comment on deleted datapoints in ESRS 2			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	22.E5.	Comments on deleted datapoints in ESRS E5	I disagree	see comment on deleted datapoints in ESRS 2			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	22.S1	Comments on deleted datapoints in ESRS S1	I disagree	see comment on deleted datapoints in ESRS 2			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	22.S2	Comments on deleted datapoints in ESRS S2	I disagree	see comment on deleted datapoints in ESRS 2			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	22.S3	Comments on deleted datapoints in ESRS S3	I disagree	see comment on deleted datapoints in ESRS 2			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	22.S4	Comments on deleted datapoints in ESRS S4	I disagree	see comment on deleted datapoints in ESRS 2			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	22.G1	Comments on deleted datapoints in ESRS G1	I disagree	see comment on deleted datapoints in ESRS 2			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We strongly disagree with the introduction of new mandatory datapoints as this will result in a significant burden increase. In detail regarding ESRS G1 Business conduct–Training of procurement team (Amended ESRS G1 paragraph 10 (c)): The new wording could be challenging with view to the IRO mapping process, as it fails to clearly indicate which sub-topic G1-2 Paragraph 2 (c) relates to. Therefore, a more distinct division into the sub-topics is necessary. Especially, the disclosure requirement regarding the procurement team should be separated as it refers to the topic management of relationships with suppliers.			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We strongly disagree with the introduction of new mandatory datapoints as this will result in a significant burden increase. In particular: E5-4: Information on the percentage of total weight that are critical and strategic raw material is considered highly sensitive information which should not be part of sustainability reporting disclosure. Further, there are other new (or significantly amended) mandatory datapoints in the context of E5-4 which are not mentioned by EFRAG in this question (E5-4-31a and b) which may cause additional efforts especially since there is no clarification whether a net-approach may be followed here (e.g. omit disclosure on clippings/scraps for manufacturing companies).			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We welcome the explicit inclusion of the fair presentation principle within the ESRS, as it reinforces the standards' purpose of supporting relevant, decision-useful sustainability reporting rather than checklist-driven compliance. This principle should ensure that only material information is reported. By emphasising fair presentation, the ESRS framework encourages preparers to exercise professional judgment, prioritizing disclosures that truly enhance transparency and accountability. This reduces unnecessary reporting efforts, especially when justifying the omission of non-material datapoints. This will also help the auditors to implement a pragmatic approach regarding the assurance of the sustainability statement. However, the "fair presentation" concept needs a precise definition to avoid subjectivity and minimize audit burden. Clearer definition is needed to avoid unnecessary discussions with the auditors.			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	Agreement: Data is usually available when collecting the related data points. Disagreement: Top 10 countries are overdone as not all companies are active in so many countries and information might not lead to information-material insights. Top 5 countries should be sufficient. In general, a 10% threshold is the usual way to approach such reporting. Not mandatory to change this, but possible.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	Alignment with existing ILO declaration does make sense.			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	We should always consider the importance of feasibility and coherence in reporting according to different legislations. Removing some of the SFDR datapoints is clearly appropriate, the ESRS simplification will need to be coordinated with the review of the SFDR.			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Yes, AR 26 could be reviewed. But please make clear that the examples in AR 26 should only be seen as such.			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	Agreement: We think it is correct to delete the voluntary datapoint and to align with the EU Pay Transparency Directive. Disagreement: We are still missing total alignment with the EU PTD with regards to the salary/wage components. This might lead to different calculation approaches, especially when the EU PTD is translated differently in the member states.			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree	We agree: The current replacement/formulation is sufficient to meet the objectives of the CSRD in respect to the protection of SMEs.			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The willingness for practical considerations related to DMA is well perceived, however due to the unclear, adjusted DMA approach (e.g. mixed sub-topic/sub-sub-topic level, impracticable solution for the net evaluation of IROs) and due to the high level of disaggregation required, the resulting reporting would probably not contributing to the core objectives of the European Green Deal.			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The revision of the ESRS 2 is not sufficient to reduce the reporting volume and the reporting burden significantly. Many proposed changes to ESRS 2 disclosure requirements are only cosmetical and do not change the substance of the reporting. Furthermore, merging several datapoints is not a reduction. We object the introduction of new reporting requirements in comparison to the current ESRS Set 1.			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The ESRS revisions are not satisfactory overall. Although some areas have been shortened and disclosure obligations have been eased, some data points have been added or tightened further. We do not see any general simplification of the disclosure requirements. There is currently no balance. The European Green Deal can be better pursued with fewer but more precise requirements.			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The exposure drafts reduce the volume of the S1 significantly, especially redundancies. Unfortunately, the associated efforts are not being reduced proportionally. The change in nomenclature alone is now leading to high implementation efforts. The new structure could lead to confusion with view to the IRO mapping. The categorization into sub-topics is less consistent. They should be fully distinct and clear and not mixed between previous sub-topics and sub-sub-topics. Also S1-16 should be a data point that can be mapped and should not be material of its own. Further comments can be found in the Excel spreadsheet.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The reductions in ESRS G1 are reasonable. However, the new structure could lead to confusion with view to the IRO mapping. The categorization into sub-sub-topics is less consistent, for example, regarding the sub-topic 'corruption and bribery' and the previously more clearly separated sub-sub-topics 'prevention' and 'incidents'. It would be helpful for a granular and effective materiality assessment if the topics were subdivided more distinctly again. Further comments on specific disclosure requirements of ESRS G1 are included in the attached Excel template.			
Survey	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Particularly in the Environmental standards, the standards now increasingly refer to other EU directives and laws. Unfortunately, we could not recognize any convergence in the glossary. Definitions differ greatly from existing definitions from other regulations. This complicates the collection and coordination effort enormously and sometimes leads to extra effort being incurred and the existing definitions cannot be used. It would be desirable to standardize the definitions in the glossary with definitions in existing regulations and laws. E.g., the definition on sustainable sourcing in the glossary should be revised again with a focus on more clarity and auditability of the required information.			
Survey	Schwanhäußer Industrie Holding GmbH & Co KGGroup	Preparer (non-financial preparing a sustainability report)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Wave 2 preparers are still in the midst of gaining experience with the ESRS – both regarding the metrics themselves, the related data collection processes, and the interactions with auditors. Many entities are currently managing the first-time implementation of the initial ESRS set, leaving only limited capacity to simultaneously engage with the proposed revisions. This situation should not be seen as a disadvantage, but rather as an indication that the perspective of these practitioners is essential for ensuring the standards remain practicable and proportionate. We therefore strongly advocate for a continued focus on practical feasibility and for a strong inclusion of practitioner insights in the ongoing standard-setting process. The reinforced role of materiality as a general filter (para. 21(a)) could inadvertently increase compliance burdens and trigger extensive auditor discussions, particularly regarding what information is deemed "necessary for users to understand." We anticipate this may broaden the required disclosures. To preserve relevance and proportionality, the principle of decision usefulness should remain the key reference point, rather than an overly broad interpretation that may lead to extensive listings of information without real relevance for business decisions.			
Survey	Schwanhäußer Industrie Holding GmbH & Co KGGroup	Preparer (non-financial preparing a sustainability report)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We note that the new guidance on how to consider remediation, mitigation and prevention actions ("gross versus net") risks expanding the reporting workload and triggering additional audit debates unless it is made highly operational. The treatment of potential impacts remains a particularly contentious area that may lead to oversteering. It should be recognised that many companies — especially in the Mittelstand — operate in highly regulated environments in the national markets they serve. Therefore, it is important to avoid creating "gross" scenarios and apparent "red flags" where risks are in fact effectively managed through established controls. Stakeholders from mid-sized companies generally favour a simple, proportionate and pragmatic approach that reflects the actual business reality rather than hypothetical extremes.			
Survey	Schwanhäußer Industrie Holding GmbH & Co KGGroup	Preparer (non-financial preparing a sustainability report)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We genenerally welcome flexibility to achieve more relevant and concise reporting and to improve connectivity with corporate reporting. In particular, providing illustrative templates would reduce audit debates, especially for mid-sized companies with limited resources.			
Survey	Schwanhäußer Industrie Holding GmbH & Co KGGroup	Preparer (non-financial preparing a sustainability report)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	The significant reduction of mandatory PAT datapoints and the removal of detailed cross-references are helpful steps that will make reporting more manageable for mid-sized groups. However, to ensure that simplification is achieved in practice, we encourage EFRAG to provide illustrative examples of how principles-based PAT disclosures can meet assurance requirements, particularly for companies with decentralised structures and limited central resources. It is essential that the shift away from detailed prescriptions does not result in new uncertainty or re-interpretation through assurance processes. We therefore strongly welcome this direction but ask for continued emphasis on clarity, proportionality, and practical feasibility in the application of PAT disclosures.			
Survey	Schwanhäußer Industrie Holding GmbH & Co KGGroup	Preparer (non-financial preparing a sustainability report)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We generally welcome the clearer separation of mandatory and non-mandatory disclosure requirements. This structural streamlining will help Wave-2 preparers with limited resources to understand and apply the ESRS more efficiently and to align internal documentation and audit preparation accordingly. Application Requirements should remain concise and strictly limited to "how to disclose" guidance, avoiding a re-introduction of prescriptive elements through interpretive wording.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Schwanhäußer Industrie Holding GmbH & Co KGGroup	Preparer (non-financial preparing a sustainability report)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We welcome the introduction of the "undue cost or effort" relief as an important step toward proportional and practicable reporting. For many mid-sized groups, the main challenge lies not in willingness but in data availability. The relief enables companies to provide transparent, good-faith disclosures without overstretching limited resources. To ensure consistency and avoid uncertainty in assurance, we encourage EFRAG to provide clear interpretive guidance and illustrative examples on how this relief can be applied in practice. It should be emphasised that using partial data is fully compliant when justified by undue cost or effort, and that progress expectations remain reasonable rather than time-bound. We therefore regard this provision as a cornerstone of proportionality for Wave-2 preparers and a prerequisite for meaningful, sustainable implementation of the ESRS. However, financial effects disclosures remain problematic due to the fact that they are not necessarily integrated in business systems. All data points related to the quantification of anticipated financial effects should be deleted to ensure the amendments deliver effective relief.			
Survey	Schwanhäußer Industrie Holding GmbH & Co KGGroup	Preparer (non-financial preparing a sustainability report)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	Yes, we agree. The undue cost or effort relief and the ability to disclose metrics on a partial scope strike the right balance for mid-sized preparers—provided assurance practices explicitly recognise such disclosures as fully compliant. We recommend adding lean safe-harbour guidance (sectoral examples, acceptable proxies) and requiring concise progress updates rather than fixed time limits, to avoid excessive justification effort while ensuring continuous improvement.			
Survey	Schwanhäußer Industrie Holding GmbH & Co KGGroup	Preparer (non-financial preparing a sustainability report)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	We support Option 2, as it provides an appropriate and proportionate approach for mid-sized preparers that are not subject to IFRS reporting. For many such companies, methodologies to quantify the financial effects of sustainability topics are not yet mature, and a forced quantification would risk producing speculative or misleading data.			
Survey	Schwanhäußer Industrie Holding GmbH & Co KGGroup	Preparer (non-financial preparing a sustainability report)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Companies might already habe a CatNat analysis of their assets for insurance purposes. On that basis, we consider the quantitative modelling foreseen in ESRS E1 paragraphs 40 (a)–(d) as redundant and not decision-useful. Deriving global estimates for asset damages or revenue at risk would involve multiple layers of assumptions and high uncertainty, without improving risk management or stakeholder insight. We therefore recommend that companies be allowed to rely on existing, insurance-based or equivalent analyses to meet the disclosure objective, and that qualitative descriptions of exposure and resilience be deemed fully compliant for preparers of our size and structure.			
Survey	Schwanhäußer Industrie Holding GmbH & Co KGGroup	Preparer (non-financial preparing a sustainability report)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Schwanhäußer Industrie Holding GmbH & Co KGGroup	Preparer (non-financial preparing a sustainability report)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	Yes, with conditions. We welcome the substantial reduction in mandatory datapoints, which meaningfully lowers effort for Wave-2 preparers while preserving core objectives. To ensure the intended simplification materialises in practice, we ask EFRAG to: (i) confirm that qualitative, decision-useful disclosures are acceptable where robust quantification is not feasible; (ii) prevent re-prescription via Application Requirements or assurance expectations; (iii) publish a clear mapping from deleted to retained datapoints to avoid "shadow" re-introductions; and (iv) most importantly clearly reaffirm and make it absolutely clear that information materiality is the decisive filter.			
Survey	Schwanhäußer Industrie Holding GmbH & Co KGGroup	Preparer (non-financial preparing a sustainability report)	Germany	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	Yes, with conditions. We welcome the substantial reduction in mandatory datapoints, which meaningfully lowers effort for Wave-2 preparers while preserving core objectives. To ensure the intended simplification materialises in practice, we ask EFRAG to: (i) confirm that qualitative, decision-useful disclosures are acceptable where robust quantification is not feasible; (ii) prevent re-prescription via Application Requirements or assurance expectations; (iii) publish a clear mapping from deleted to retained datapoints to avoid "shadow" re-introductions; and (iv) most importantly clearly reaffirm and make it absolutely clear that information materiality is the decisive filter.			

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Survey	Schwanhäußer Industrie Holding GmbH & Co KGGroup	Preparer (non-financial preparing a sustainability report)	Germany	22.E2.	Comments on deleted datapoints in ESRS E2	I partially agree and partially disagree	Yes, with conditions. We welcome the substantial reduction in mandatory datapoints, which meaningfully lowers effort for Wave-2 preparers while preserving core objectives. To ensure the intended simplification materialises in practice, we ask EFRAG to: (i) confirm that qualitative, decision-useful disclosures are acceptable where robust quantification is not feasible; (ii) prevent re-prescription via Application Requirements or assurance expectations; (iii) publish a clear mapping from deleted to retained datapoints to avoid "shadow" re-introductions; and (iv) most importantly clearly reaffirm and make it absolutely clear that information materiality is the decisive filter.			
Survey	Schwanhäußer Industrie Holding GmbH & Co KGGroup	Preparer (non-financial preparing a sustainability report)	Germany	22.E3.	Comments on deleted datapoints in ESRS E3	I partially agree and partially disagree	Yes, with conditions. We welcome the substantial reduction in mandatory datapoints, which meaningfully lowers effort for Wave-2 preparers while preserving core objectives. To ensure the intended simplification materialises in practice, we ask EFRAG to: (i) confirm that qualitative, decision-useful disclosures are acceptable where robust quantification is not feasible; (ii) prevent re-prescription via Application Requirements or assurance expectations; (iii) publish a clear mapping from deleted to retained datapoints to avoid "shadow" re-introductions; and (iv) most importantly clearly reaffirm and make it absolutely clear that information materiality is the decisive filter.			
Survey	Schwanhäußer Industrie Holding GmbH & Co KGGroup	Preparer (non-financial preparing a sustainability report)	Germany	22.E4.	Comments on deleted datapoints in ESRS E4	I partially agree and partially disagree	Yes, with conditions. We welcome the substantial reduction in mandatory datapoints, which meaningfully lowers effort for Wave-2 preparers while preserving core objectives. To ensure the intended simplification materialises in practice, we ask EFRAG to: (i) confirm that qualitative, decision-useful disclosures are acceptable where robust quantification is not feasible; (ii) prevent re-prescription via Application Requirements or assurance expectations; (iii) publish a clear mapping from deleted to retained datapoints to avoid "shadow" re-introductions; and (iv) most importantly clearly reaffirm and make it absolutely clear that information materiality is the decisive filter.			
Survey	Schwanhäußer Industrie Holding GmbH & Co KGGroup	Preparer (non-financial preparing a sustainability report)	Germany	22.E5.	Comments on deleted datapoints in ESRS E5	I partially agree and partially disagree	Yes, with conditions. We welcome the substantial reduction in mandatory datapoints, which meaningfully lowers effort for Wave-2 preparers while preserving core objectives. To ensure the intended simplification materialises in practice, we ask EFRAG to: (i) confirm that qualitative, decision-useful disclosures are acceptable where robust quantification is not feasible; (ii) prevent re-prescription via Application Requirements or assurance expectations; (iii) publish a clear mapping from deleted to retained datapoints to avoid "shadow" re-introductions; and (iv) most importantly clearly reaffirm and make it absolutely clear that information materiality is the decisive filter.			
Survey	Schwanhäußer Industrie Holding GmbH & Co KGGroup	Preparer (non-financial preparing a sustainability report)	Germany	22.S1	Comments on deleted datapoints in ESRS S1	I partially agree and partially disagree	Yes, with conditions. We welcome the substantial reduction in mandatory datapoints, which meaningfully lowers effort for Wave-2 preparers while preserving core objectives. To ensure the intended simplification materialises in practice, we ask EFRAG to: (i) confirm that qualitative, decision-useful disclosures are acceptable where robust quantification is not feasible; (ii) prevent re-prescription via Application Requirements or assurance expectations; (iii) publish a clear mapping from deleted to retained datapoints to avoid "shadow" re-introductions; and (iv) most importantly clearly reaffirm and make it absolutely clear that information materiality is the decisive filter.			
Survey	Schwanhäußer Industrie Holding GmbH & Co KGGroup	Preparer (non-financial preparing a sustainability report)	Germany	22.S2	Comments on deleted datapoints in ESRS S2	I partially agree and partially disagree	Yes, with conditions. We welcome the substantial reduction in mandatory datapoints, which meaningfully lowers effort for Wave-2 preparers while preserving core objectives. To ensure the intended simplification materialises in practice, we ask EFRAG to: (i) confirm that qualitative, decision-useful disclosures are acceptable where robust quantification is not feasible; (ii) prevent re-prescription via Application Requirements or assurance expectations; (iii) publish a clear mapping from deleted to retained datapoints to avoid "shadow" re-introductions; and (iv) most importantly clearly reaffirm and make it absolutely clear that information materiality is the decisive filter.			
Survey	Schwanhäußer Industrie Holding GmbH & Co KGGroup	Preparer (non-financial preparing a sustainability report)	Germany	22.S3	Comments on deleted datapoints in ESRS S3	I partially agree and partially disagree	Yes, with conditions. We welcome the substantial reduction in mandatory datapoints, which meaningfully lowers effort for Wave-2 preparers while preserving core objectives. To ensure the intended simplification materialises in practice, we ask EFRAG to: (i) confirm that qualitative, decision-useful disclosures are acceptable where robust quantification is not feasible; (ii) prevent re-prescription via Application Requirements or assurance expectations; (iii) publish a clear mapping from deleted to retained datapoints to avoid "shadow" re-introductions; and (iv) most importantly clearly reaffirm and make it absolutely clear that information materiality is the decisive filter.			
Survey	Schwanhäußer Industrie Holding GmbH & Co KGGroup	Preparer (non-financial preparing a sustainability report)	Germany	22.S4	Comments on deleted datapoints in ESRS S4	I partially agree and partially disagree	Yes, with conditions. We welcome the substantial reduction in mandatory datapoints, which meaningfully lowers effort for Wave-2 preparers while preserving core objectives. To ensure the intended simplification materialises in practice, we ask EFRAG to: (i) confirm that qualitative, decision-useful disclosures are acceptable where robust quantification is not feasible; (ii) prevent re-prescription via Application Requirements or assurance expectations; (iii) publish a clear mapping from deleted to retained datapoints to avoid "shadow" re-introductions; and (iv) most importantly clearly reaffirm and make it absolutely clear that information materiality is the decisive filter.			
Survey	Schwanhäußer Industrie Holding GmbH & Co KGGroup	Preparer (non-financial preparing a sustainability report)	Germany	22.G1	Comments on deleted datapoints in ESRS G1	I partially agree and partially disagree	Yes, with conditions. We welcome the substantial reduction in mandatory datapoints, which meaningfully lowers effort for Wave-2 preparers while preserving core objectives. To ensure the intended simplification materialises in practice, we ask EFRAG to: (i) confirm that qualitative, decision-useful disclosures are acceptable where robust quantification is not feasible; (ii) prevent re-prescription via Application Requirements or assurance expectations; (iii) publish a clear mapping from deleted to retained datapoints to avoid "shadow" re-introductions; and (iv) most importantly clearly reaffirm and make it absolutely clear that information materiality is the decisive filter.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ITALIAN FOUNDATION FOR BUSINESS REPORTING (O.I.B.R.)	NGO	Italy	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Despite many commendable specifications and the effort to make the sustainability statements closer to financial statements ("fair presentation principle"), there are still points for consideration. An important general orientation should be that of diminishing the possible friction points between companies and auditors. Another "polar star" should be the consistency with the indicators used by hard scientists to determine the planetary boundaries and their possible trespassing. A further important general element to take into account is the consistency with other indicators and onformation required in other parts of the EU legislation, such as EcoLabel, EcoDesign, and Waste and Circularity. The impression is that sometimes these diverse legislations do not speak to each other, and require disclosures to companies that are not always aligned. Looking more at detailed provisions linked to DMA, the definition of information materiality should be better explained. In particular, the points a) and b) can be more adequately amalgamated to avoid possible confusion. The introduction of decision usefulness is fine (point a), but its relationship with the "understanding" (point b) should be given a better thought. The choice left between top-down or bottom-up approach can be easily a source of disagreement between companies and auditors. If technically both approaches produce the same results (as stated in AR 17/ESRS 1), probably it is worth considering to give prevalence to one of the two. In interoperability terms, we would like to note that, while the concept of non-obscuring is aligned in principle with the ISSB Standards, the ESRS draft introduces additional requirements and ambiguities that may: -Reduce clarity for investors (ESRS draft does not explicitly require that investor-relevant information be distinguished from broader stakeholder disclosures, potentially reducing interoperability), -Increase reporting complexity, and -Create potential conflicts with IFRS Industry-Based Guidance, which is EFRAG recommended for entity-specific disclosures.			
Survey	ITALIAN FOUNDATION FOR BUSINESS REPORTING (O.I.B.R.)	NGO	Italy	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We think that the new Gros vs. Net provision introduces a new layer of complexity which we are not so sure contributes to lower down complexity. Assuming that Gros could be the basic level, companies could be allowed/encouraged to show the amount of the reduction of the various impacts in the different situations.			
Survey	ITALIAN FOUNDATION FOR BUSINESS REPORTING (O.I.B.R.)	NGO	Italy	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	ITALIAN FOUNDATION FOR BUSINESS REPORTING (O.I.B.R.)	NGO	Italy	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	Even though we agree in general terms with the work carried out, we point out that there are still some exceptions which can create confusion and potential conflicts between companies and auditors. These are: - ESRS 1, para. 48, and related application requirements which introduce measures through which "the undertaking may avoid unnecessary complexity"; - AR 17 states that "The undertaking may adopt a top-down or a bottom-up approach to perform its materiality assessment". Also AR 18 provides room for ambiguity "Unless more investigation is necessary...". We would recommend EFRAG a further effort of elaboration to reduce these possible points of ambiguity and conflict.			
Survey	ITALIAN FOUNDATION FOR BUSINESS REPORTING (O.I.B.R.)	NGO	Italy	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ITALIAN FOUNDATION FOR BUSINESS REPORTING (O.I.B.R.)	NGO	Italy	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Despite we believe that has been done a good work in these field, we note that in interoperability terms the simplified ESRS propose introducing additional reliefs beyond those currently available under the ISSB Standards. For example, a new relief is proposed for acquisitions and disposals occurring within the reporting period. The draft also extends existing reliefs, such as the allowance to use "undue cost and effort" for the disclosure of metrics related to an entity's own operations. We observe that, while these measures aim to reduce reporting burden, any additional or extended reliefs create potential complexity for entities that report under both ESRS and ISSB Standards. In particular, the proposed relief for acquisitions and disposals introduces differences in the organisational reporting boundary compared with the financial statements. This divergence may make it more challenging for entities to maintain consistency and connectivity between sustainability disclosures and financial statements when applying ESRS alongside ISSB Standards. Overall, the introduction of new or expanded reliefs in ESRS, while beneficial in reducing immediate reporting burden, increases the risk of misalignment with ISSB Standards and could imply dual reporting efforts for companies.			
Survey	ITALIAN FOUNDATION FOR BUSINESS REPORTING (O.I.B.R.)	NGO	Italy	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	ITALIAN FOUNDATION FOR BUSINESS REPORTING (O.I.B.R.)	NGO	Italy	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Even if we agree with Option 1, we can't avoid to observe that in interoperability terms both Options presents some issues. Indeed, in both options there are aspects that could hinder interoperability with IFRS Sustainability Standards. Option 1: unlike IFRS S2, the exemption relating to the availability of skills, resources, and capabilities is not included. In addition, the relief available under the ISSB Standards allowing entities to omit information on anticipated financial opportunities considered commercially sensitive (as set out in IFRS S1) has not been carried forward in the draft simplified ESRS. Option 2: Companies would not be required to provide quantitative information on anticipated financial effects. This would significantly weaken interoperability with the ISSB Standards and would make information important to investors non-mandatory. It would also create an additional burden for companies needing to comply with both ESRS and ISSB Standards, as the absence of quantitative disclosures in the ESRS would result in omissions relative to the global baseline established by the ISSB. The suggestion is here to take Option 1 and make an effort to preserve interoperability with IFRS S2 by further changing the ESRS.			
Survey	ITALIAN FOUNDATION FOR BUSINESS REPORTING (O.I.B.R.)	NGO	Italy	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	In the previous responses, we have already provided detailed examples of potential lack of interoperability with IFRS SUstainability standards, and namely in responses # 11, 17, and 19. We would like to point out another technical issue in interoperability terms which should be considered. As to GHG emissions, the draft simplified ESRS goes further by mandating the financial control boundary for GHG measurement. In addition, it introduces a secondary requirement: if the financial control approach does not provide a fair presentation, Scope 1 and 2 emissions should also be disclosed on an operational control basis, as defined in the GHG Protocol. This dual requirement does not align with the GHG Protocol (required by IFRS S2), which stipulates that entities should adopt a single approach (equity share, operational control, or financial control). As a result, entities applying both ISSB Standards and ESRS may face unnecessary complexity and duplicative work, having to reconcile different approaches to emissions measurement. Aligning ESRS with the IFRS S2 approach - by simply referencing the GHG Protocol and allowing entities to choose among the established methods - would reduce the risk of inconsistency across the GHG Protocol, ESRS, and IFRS S2, while also easing the compliance burden for companies.			
Survey	ITALIAN FOUNDATION FOR BUSINESS REPORTING (O.I.B.R.)	NGO	Italy	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	ITALIAN FOUNDATION FOR BUSINESS REPORTING (O.I.B.R.)	NGO	Italy	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	ITALIAN FOUNDATION FOR BUSINESS REPORTING (O.I.B.R.)	NGO	Italy	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	The "fair presentation", which is in our view identical to the "true and fair view", is a principle that usefully helps connect the logic of financial and sustainability reporting. However, being a general criterion, it is unlikely that it can support a more effective concrete functioning of the materiality filter. It can help if it is clearly stated that companies have the unique responsibility in judging on the following aspects: a) Value chain areas where material IROs are likely to arise. b) The number of IROs identified and assessed. c) What constitutes "reasonable and supportable information available without undue cost or effort" In any case, the last concept under c) should be better substantiated with guidance and examples.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	ITALIAN FOUNDATION FOR BUSINESS REPORTING (O.I.B.R.)	NGO	Italy	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We believe that similar types of arguments, once admitted, can be easily extended to other sectors. In this respect, the prospected financial institutions' privilege would be difficult to sustain vis-à-vis other industries.			
Survey	ITALIAN FOUNDATION FOR BUSINESS REPORTING (O.I.B.R.)	NGO	Italy	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	ITALIAN FOUNDATION FOR BUSINESS REPORTING (O.I.B.R.)	NGO	Italy	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		A comment on the Executive Summary proposed by EFRAG. Indeed, companies shall include an executive summary within their management report. To ensure comparability across entities and in the contents of the Summaries, we would like to strongly recommend that the Integrated Reporting Framework be referenced as primary guidance for preparing these summaries, providing a consistent approach to content and presentation. It is well known that the IR Framework is already used by +3,000 organisations around the world to provide this type of integrated summary information, and then it would represent a useful and handy reference point for EU companies (>500 groups already adopts voluntarily this Framework)			
Survey	CCOO	Trade union	Spain	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Double materiality is essential and must remain at the heart of the ESRS framework and European Union sustainability regime for corporate reporting to be credible and useful. The principle of "materiality of information" is concerning since it introduces a further filter for companies to not report information. For example, it represents a step backwards from ID-177, which says that most S1 metrics must be reported if S1 Own Workforce is material. It is essential to maintain the principle of fair presentation in the reporting standards. It is positive that the revision of the AR 16 list of topics has maintained all of the sub-subtopics for S1 + S2. These are based on the list of social topics in the CSRD and should all be maintained. The emphasis on aggregation (as opposed to disaggregation) is concerning, as disaggregated information (both site-specific and country-specific) is key to understanding the distribution of IROs.			
Survey	CCOO	Trade union	Spain	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	It is important that companies report not just their net impact – the gross impact should be reported, and the recommended text preserves this principle.			
Survey	CCOO	Trade union	Spain	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The proposed changes are helpful. However, para 113 is difficult to understand: "113. If the description of the material impacts, risks and opportunities prepared in accordance with [Draft] Amended ESRS 2 IRO-2 is not presented alongside the respective policies, actions and targets, the undertaking shall make explicit which policies, actions and targets relate to which material impacts, risks, or opportunities, in accordance with paragraph 22." Para 22 addresses the issue of appropriate aggregation or disaggregation of information on material impacts, risks and opportunities and their management, without setting any rules regarding the location of such disclosures depending (or not) on the level of aggregation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CCOO	Trade union	Spain	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The Exposure Draft removes duplications between the cross-cutting and topical standards. The preservation of the 4-part architecture in the social standards is important to respect the distinctiveness of different affected stakeholder groups. However, we have two critical concerns. First, the original DR in environmental standards concerning screening of sites in materiality assessment were replaced by an application requirement to ESRS 2 IRO-1. This in effect makes transparency on this aspect optional. Consideration of local context is a key element of an appropriate materiality assessment. This should be both recognised in Chapter 3 of ESRS 1, and in ESRS 2 IRO-1, which should include an explicit datapoint on how the undertaking screened its locations and value chains. We welcome that E standards provide a clearer reference on the importance of disaggregation of disclosures, but this can only be done well if locations are properly screened. Second, we strongly recommend adding an explicit reference to the disclosure of relevant, entity-specific metrics directly in S standards. The fact that S2, S3 and S4 do not include any metrics should not imply that entity-specific metrics for S topics should not be disclosed.			
Survey	CCOO	Trade union	Spain	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The "may" (voluntary) data points should not be eliminated. In many cases they are "shall" in GRI standards, so it is important to keep them to align with GRI standards. Also, many of them were originally proposed as mandatory by EFRAG to the EC. The first wave of reports show that many companies have reported some "may" data points. Retaining them would help ensure standardization/comparability between company reports. Almost all of the datapoints for non-employee workers are voluntary, thus most datapoints for this vulnerable group of workers has been lost. Also, important datapoints on full time versus part time workers has been eliminated.			
Survey	CCOO	Trade union	Spain	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	It is concerning that mandatory guidance in the Set 1 ESRS has been downgraded to "non-mandatory". Mandatory guidance is key to ensuring comparability and completeness of sustainability reporting. At a minimum, Non-mandatory Implementation Guidance (NMIG) should be included in the Delegated Act, and ideally called Mandatory Implementation Guidance. A major point of concern is that ID-177, which provided guidance that most S1 metrics should be reported if S1 Own Workforce is material, has now been downgraded into NMIG. Instead, EFRAG should preserve and promote the guidance that most S1 metrics shall be reported.			
Survey	CCOO	Trade union	Spain	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	As a whole the reliefs go too far, overshooting the balance between cost/effort and transparency. There is a danger of enabling green/social washing. The relief for "undue cost or effort" is too vague thus leaving too much room for interpretation. The relief for direct data for value chain reporting is too extensive, as direct data is key for transparency. The relief for reporting on operations which are not "significant drivers of IROs" also opens up too much leeway for interpretation.			
Survey	CCOO	Trade union	Spain	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	These combined reliefs overshoot the balance between transparency and cost/effort and risk enabling green/social washing. At a minimum, there should be a time limit introduced for these reliefs on value chain metrics			
Survey	CCOO	Trade union	Spain	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ability to estimate financial effects is critical for the undertaking's ability to integrate sustainability into its business strategy considerations, planning and risk management. It is also key for the determination of financial materiality, including in terms of overreporting topics as financially material. Reporting on financial effects is crucial to achieving the objective of putting sustainability reporting on the same level as financial reporting and integrating both. The European Union has recognised the value of a double materiality approach to corporate reporting which requires disclosure of both material environmental and social impacts, risks and opportunities as well financially material data, It is important to keep the requirement on businesses to analyse and understand the financial effects of their business model. This will ensure investors have access to credible data as well as providing the underpinning for future business planning.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CCOO	Trade union	Spain	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	ESRS reliefs should not go beyond those set in IFRS. The principle of fair presentation needs to be protected to provide transparency on all material IROs. As noted in the response to question 15, it is also important to consider interoperability with GRI when considering changes to the ESRS, rather than only considering ISSB's standards.			
Survey	CCOO	Trade union	Spain	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	CCOO	Trade union	Spain	22.ESRS2	Comments on deleted datapoints in ESRS 2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The reduction in the number of mandatory and voluntary datapoints goes far beyond striking an acceptable balance. As mentioned above, the voluntary datapoints should be maintained to provide alignment with GRI, which is currently in the process of strengthening its labor standards, as well as guidance and standardization for companies reporting more than just the mandatory datapoints. An explicit quantitative goal of 50%+ reductions was never set by the European Commission for EFRAG. A number of S1 datapoint metrics have been eliminated which should be reinstated: S1-5 Employees: gender breakdown for zero-hour employees S1-8 Diversity: age distribution; S1-10 Social protection: reinstatement of retirement S1-12: Training and development: gender breakdowns, S1-13 Health and safety: fatalities from ill-health for non-employees and other workers on site; S1-14 Work-life balance: employees that took family related leave;			
Survey	CCOO	Trade union	Spain	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Adding a datapoint on training of the procurement team is needed to support the implementation of human rights in the supply chain. The addition of a datapoint on confirmed incidents of bribery is needed to improve transparency on the effectiveness of bribery/corruption policies and measures.			
Survey	CCOO	Trade union	Spain	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Agree that the following mandatory datapoint should be added: ESRS 2 General disclosures – BP 1 the undertaking shall state that the general requirements of ESRS 1 have been applied for the preparation of its sustainability statement			
Survey	CCOO	Trade union	Spain	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	The "fair presentation" principle is essential to reduce the risk of green/social washing, as it emphasizes the full disclosure of all material impacts, risks and opportunities and their management. It is not understandable why this principle is under attack, as it is included as one of the general principles of the Accounting Directive.			
Survey	CCOO	Trade union	Spain	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	It is essential that financial institutions disclose absolute targets to assess how their strategies align with the economy-wide transition to net zero. Absolute targets are relevant for users of sustainability statements and for understanding the real-world climate impact of financed activities. While intensity measures provide insights into efficiency, they can mask rising absolute emissions in growing portfolios or sectors. Granting an exemption would also undermine fairness in a sector-agnostic standard. Other industries could equally argue for exceptions based on their own difficulties, reducing comparability across sectors. Moreover, absolute financed emissions are already recognised in existing standards and regulations: the SBTi financial sector net-zero standard, the UNEP FI/NZBA recommendations, and EU SFDR all require or encourage absolute emissions disclosure. Exempting banks would risk misalignment and reduce the usefulness of reported data for stakeholders, including asset owners who depend on it for their own disclosures.			
Survey	CCOO	Trade union	Spain	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	The "top 10" threshold for reporting country-level data on employment, collective bargaining and social dialogue is a major improvement over the current 10% employment threshold. An analysis of the first sustainability statements from Wave 1 companies shows that the current 10% threshold results in country-level disclosures on as little as 21% of total employees. More country-level information is needed to understand the distribution of impacts across countries, as well as whether employment thresholds for specific labour rights have been exceeded. The new threshold does not require additional effort/cost by companies, since they must gather country-level data anyways to calculate the global figures. Furthermore, it does not result in extra datapoints, since the information currently is (and can be under the revised ESRS) reported as one table.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CCOO	Trade union	Spain	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	An analysis of the first year ESRS reports shows that most companies are simply reporting that they pay minimum wages, whereas the intention (as outlined in the ESRS Basis for Conclusions) is that companies should be enabled to disclose commitments to paying a wage "sufficient to support themselves and their families in dignity" as well as the extent to which they do this. This shows that the methodology for non-EU countries needs to be changed. Furthermore, the new ILO agreement on a methodology for living wages needs to be taken into account. While the proposed new methodology takes a step forward in both regards, two key changes are needed: The methodology for reporting on 'adequate wages' should measure actual wages against an adequate/living wage for all employees, not only those within the EU. In particular, for employees outside the EU, the methodology should allow employees' actual wages to be measured: A) against the local legal minimum wage only when this is set in line with the ILO principles on estimating living wages; or B) against living wage estimates that are set in line with ILO principles on estimating living wages. Companies should be able to rely on local legal minimum wages or living wage estimates when the authorities or organisations that set them provide public evidence of their alignment with the ILO principles for estimating living wages. Furthermore, the transitional provision for the EU needs to be reinstated, as not all Member States have transposed the Adequate Minimum Wage Directive.			
Survey	CCOO	Trade union	Spain	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	The new, simplified framework makes it easier for companies to report on these SFDR-related matters in a way that corresponds to how their policies are set. For users, this consolidation makes it easier to locate the relevant information. However, the SFDR datapoints are very helpful and should only selectively be amended.			
Survey	CCOO	Trade union	Spain	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	The unadjusted gender pay gap should be kept as mandatory, since the methodology for calculating it is clear. The adjusted pay gap figure as voluntary. In practice many companies are reporting both figures, which is useful for improved transparency. However, since the methodology for calculating the adjusted figure is not standardized, the unadjusted should be kept mandatory.			
Survey	CCOO	Trade union	Spain	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	From a trade union perspective, the deletion of former ESRS G1 provisions on "payment practices" represents a setback. Fair and timely payment to suppliers – particularly SMEs – is a core aspect of responsible business conduct and of the social dimension of sustainability. Replacing these datapoints only with general PAT provisions and a SME specification is not sufficient to ensure visibility and accountability. Delayed or unfair payment practices have a direct impact on SMEs' financial sustainability, their ability to maintain decent jobs, and the stability of working conditions across value chains. This issue is particularly relevant in Spain and other EU Member States where late payment remains widespread and has been repeatedly highlighted by social partners as a major obstacle for SMEs. The CSRD objective of protecting SMEs requires robust and specific disclosure on payment practices, including average payment times, compliance with national and EU payment deadlines, and measures to ensure fair treatment of suppliers. Without this, companies may obscure poor practices under aggregated disclosures, undermining comparability and accountability.			
Survey	CCOO	Trade union	Spain	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Impact of the various reliefs is concerning.			
Survey	CCOO	Trade union	Spain	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The improved language on DMA is welcomed, including on the engagement with workers' representatives.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	CCOO	Trade union	Spain	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The proposed "top 10" threshold for the reporting of country-level information for employee headcount, collective bargaining and social dialogue is a significant improvement over the current 10% employment threshold. Country-level information needs to be reported in more detail, and on other metrics as well, in order to have more transparency on the distribution of impacts across countries. In the metrics, voluntary datapoints need to be reinstated as well as the datapoints on gender breakdowns, workforce age distribution, etc. detailed above need to be reinstated. The proposed new methodology for adequate wages outside of the EU also needs attention, and the transition language for EU member states needs to be reinstated, since the Adequate Minimum Wage Directive has not been implemented in some Member States. We would also like to reiterate our longstanding demand for including franchise workers in the S1 definition of own workers, as well as the need for sector-specific standards to supplement the Set 1 sector-agnostic standards.			
Survey	CCOO	Trade union	Spain	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We are concerned that the loss of many specific datapoints related to workers in the value chain will mean that disclosures about material impacts, risks and opportunities become more generic and have less information about the specific stakeholder groups because specifications about the level of granularity have been deleted. Many of the points that are being deleted from ESRS S2 had originally been included because they reflected effective practice in relation to improving supply chain labour rights, for example, AR 6 awareness of the impacts on value chain workers from an undertaking's strategy or business model, AR 20 illustrating how the perspectives of value chain workers have informed specific decisions or activities of the undertaking and AR 25 which looks at retaliation and whether workers can use grievance mechanisms confidentially.			
Survey	CCOO	Trade union	Spain	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	CCOO	Trade union	Spain	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	CCOO	Trade union	Spain	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		n explicit reference needs to be added to GDR-M (metrics) in the Disclosure Requirements concerning targets, in S2, S3 and S4, to clarify that metrics need to be reported in the case of entity-specific impacts- The definition of own workforce should be expanded to include franchise workers. The term "non-employees" should be supplemented with the phrase "non-employee workers" or "non-employee workers in own workforce".			
Survey	The Institute of Chartered Accountants of Scotland (ICAS)	Auditor	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	We agree with the proposal to give more prominence to the materiality of information as a general filter that drives the prioritisation of sustainability matters to be reported (and otherwise managed). This approach facilitates the better allocation of resources and ensures important matters are not obscured. We believe that reporting per double materiality gives a more comprehensive account to more investors as well as other stakeholders of a reporter's progress and plans. We have heard that some reporters have found the double materiality assessment (DMA) process to be useful and beneficial. The DMA should provide guidance and not be prescriptive, so that reporters can interpret and apply the process to their specific business operations.			
Survey	The Institute of Chartered Accountants of Scotland (ICAS)	Auditor	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We encourage strong connectivity between financial and sustainability disclosures, so that users of reports can get a comprehensive sense of the reporting entity. To achieve the goals of more readable and concise disclosures, it may be appropriate for the content of the ESRS Sustainability Statement to be assimilated in other disclosures, like the front half of the annual report. We support a principles-based rather than prescriptive approach so that reporters have the ability to report in a logical way that suits their business, and with minimum duplication. Reporting should be proportionate to and not onerous for the reporting entity.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	The Institute of Chartered Accountants of Scotland (ICAS)	Auditor	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We strongly encourage interoperability of ESRS with major reporting standards like GRI and IFRS S so that reporting is efficient and equivalence can be achieved for the reporter. Also, this will enable stakeholders to make ready comparisons across jurisdictions. We support a principles-based approach.			
Survey	The Institute of Chartered Accountants of Scotland (ICAS)	Auditor	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	We support the emphasis of ESRS being a fair presentation reporting framework, as we believe it will enable more relevant and useful reporting, as it facilitates the presentation of 'substance over form'. We acknowledge the arguments shared by others who are in favour of the fair presentation framework, including: •This would make ESRS on a par with many other reporting frameworks including ISSB sustainability standards that are fair presentation frameworks. •Fair presentation reduces the risk of over-burdening reporting driven by compliance. •The EC considers there are more elements in the CSRD that conclude on fair presentation than on compliance.			
Survey	The Institute of Chartered Accountants of Scotland (ICAS)	Auditor	United Kingdom	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		•We warmly encourage the EC to continue its ambition to make Europe climate neutral by 2050, by delivering the European Green Deal. The Omnibus simplification measures cannot be a backpedalling on commitments and targets. The scale of sustainability issues and urgency for action is growing thereby enhancing the need for right-sized, quality sustainability disclosures. •We acknowledge that sustainability reporting is a dynamic topic that concerns judgement, perspective, specific contexts and more. We encourage the EC to continue to take an agile approach, listen to the market and evolve the ESRS accordingly. •We acknowledge that other elements of the Omnibus measures are at different stages of development and approval, e.g. CSDDD, and encourage for all elements of the current and forthcoming developments to evolve in a cohesive and consistent way that are readily applied and enforced, and work together to support the delivery of the EU Green Deal. •Sustainability matters are often global and borderless, so we urge the EC to continue to work with global bodies like the GSSB and ISSB to ensure reporting frameworks are relevant, aligned and developed in an efficient way that serve global issues. •We encourage the EC to continue to give special consideration to SMEs, being a significant segment of many markets. While their progress on sustainability matters and reporting of related data is vital (to achieve the EU Green Deal), reporting requirements, including to supply chain partners, must be proportionate so that the reporter is not overly burdened. •We hope that the EC will learn from the need to simplify the ESRS when it develops the planned NESRS. Launching with a simple first version may be well-received by both report preparers and users and would allow time for related skills to be developed in sufficient capacity.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	EFRAG's commitment to enhancing the DMA framework is positive, as are the constructive steps toward simplification. The proposed amendments offer some valuable improvements, particularly the flexibility between top-down and bottom-up approaches and the option to disclose at topic level rather than individual independent review organisation (IRO) level. The clarification that companies are not required to assess every possible IRO across their operations represents a positive development in making reporting more focused and meaningful. However, the current amendments, while well-intentioned, are not simplified enough to ensure efficient and decision-useful sustainability reporting. The modifications primarily restructure existing requirements rather than implement substantive simplifications to reduce resource intensity. Where prescriptive datapoints have been removed, new qualitative requirements and expanded narrative obligations have been introduced, effectively maintaining the overall reporting burden on preparers. Further refinements are necessary. The role of auditors should emphasise methodology assessment over challenging outcomes, as the current approach risks creating unnecessary documentation without improving report quality. The Impact Materiality Scoring framework requires additional streamlining to prevent excessive resource allocation on scoring details rather than meaningful analysis. Stakeholder engagement parameters should be more clearly defined as flexible rather than prescriptive to allow companies to tailor their approach to their specific contexts and capabilities. The framework would benefit from making positive impact and opportunities disclosures voluntary, given the inherent complexity and uncertainty in projecting future benefits. Of particular importance is reinforcing the distinction between mandatory standards and non-mandatory guidance. The current framework's structure still encourages over-disclosure and excessive documentation, potentially undermining the effectiveness of materiality assessments and creating reports that obscure rather than illuminate decision-useful information.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Overall we welcome the gross vs net approach. Existing remediation, mitigation, an prevention measures are a part of the materiality assessment and reporting determination and should not require extensive new evidence. Furthermore, the question of gross vs net impact remains dependent on the individual company. Despite EFRAG's efforts to clarify the treatment of remediation, mitigation, and prevention actions in the DMA, the current guidance is overly complex and needs substantial revision to avoid an excessive reporting burden. For actual impacts, a gross approach is appropriate, as stakeholders need to understand both the original impact and subsequent remediation measures. However, for potential impacts, the current framework requires significant revision. For example the guidance's treatment of 'significant ongoing mitigation actions' and the ambiguous requirement for 'supportable evidence' risks inconsistent interpretation by auditors and could lead to excessive documentation requirements. Instead, the guidance should distinguish between 'measures' (existing safeguards) and 'actions' (new initiatives) to clarify reporting obligations. Existing prevention and mitigation measures should be considered part of the baseline assessment without requiring extensive new evidence gathering. The current guidance also creates confusion through apparent contradictions between Appendix C and the main text, particularly regarding the treatment of ongoing mitigation actions. EFRAG should remove Appendix C or at least substantially simplify it to provide clear, flexible and practical guidance. Finally, sustainability reporting should align with financial reporting principles regarding materiality assessment and granularity of information. This would ensure consistency while reducing unnecessary reporting burden.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The executive summary could help reporters tell their story and help users understand key information, the flexibility to introduce it or not is key as it could add administrative and reporting burden by introducing another disclosure. However, the PAT simplification can prevent multiple redundant or fragmented disclosures, streamline reporting and drive efficiency. In addition, the explicit ability to move the EU Taxonomy tables to an appendix is positive, as it would improve a report's readability. The proposed ESRS 2 amendments could strike a more optimal balance between prescriptiveness and preparation effort versus the need for relevant and comparable information. While the Exposure Draft introduces some streamlining - such as consolidating disclosures, reducing certain datapoints, and allowing qualitative options for financial effects - the overall compliance burden remains high. Further simplification is needed, especially in supply chain, stakeholder and target-setting disclosures, to ensure that reporting obligations are proportionate to the value of the information provided. In addition, EFRAG should include better descriptions of connectivity with corporate reporting/ financial statements reporting. For example, any immediate climate related risks and financial impact that are disclosed in the notes of the financial statement as contingency should be reference to ESRS 1 or E1 in basis of preparation. EFRAG should also consider providing further flexibility, including permitting cross-referencing to other relevant sustainability reports by embedding links within the Sustainability Statement to further improve the overall readability for stakeholders.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The reduction of PAT disclosures and the alignment of disclosures with IROs, versus subtopics is a helpful proposal. However, despite efforts to simplify PATs data points by reducing redundant disclosures across ESRS 2 and topical standards, further simplification is needed. The current PAT disclosures remain overly complex and granular, hindering effective implementation and clear communication. For a more principles-based ESRS framework, revisions should enhance consistency and interoperability with existing frameworks like the International Sustainability Standards Board (ISSB), reducing prescriptive requirements. This would offer companies greater flexibility to disclose decision-useful information on governance, strategy, risk management and targets/metrics in a way that aligns with their operational realities, leading to more meaningful and material disclosures For greater simplification EFRAG should remove the paragraph in GDR-A related to resources allocated to key actions (ESRS 2, paragraph 38 a–c), as this requirement demands detailed financial data that is typically tracked on a project basis rather than through the IRO lens. Additionally, the reconciliation with financial statements significant preparation and should be eliminated. EFRAG should remove GDR-M paragraph 41 b to avoid duplication and simplify disclosures This datapoint requires disclosure of specific environmental conditions and characteristics of impacted areas. However, this is already addressed under GDR-M paragraph 41 d, which covers contextual information. Lastly, ESRS 1, paragraph 40 should explicitly state that the disclosure of metrics required by topical ESRS is subject to materiality.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	While the amendments are an improvement, EFRAG could do more to provide further clarity and accessibility. Clearer and less prescriptive requirements would reduce the need for costly interpretation and specialist resources, thereby limiting reporting obligations burden. Many Application Requirements (ARs) still lack actionable, mandatory content and instead contain definitions, examples, or repetitive guidance. To reduce complexity and improve focus, EFRAG should streamline ARs by: eliminating duplication by relocating definitions to the Annex II Glossary and illustrative examples to the Non-Binding Implementation Guidance (NMIG); defining key terms in the Annex II Glossary rather than within ARs (e.g., ESRS 1, AR 3 for paragraph 21, using bold/italics to indicate that the term is defined in the Annex II Glossary); embeding presentation guidance directly within datapoints, removing optional ARs, and integrating guidance on General Disclosures Requirements (GDR) directly into the GDR section to avoid layering.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The NMIG is a useful resource for reporting companies, when applied voluntarily. This information should not be considered in the Delegated Act. Maintaining this additional information as supporting guidance is helpful, but it should not be shared in a prescriptive capacity. NMIG should remain clearly outside the mandatory framework even if influencing market practice, as auditors would use it to inform their assurance procedures. This ensures examples are available for reference without adding de facto reporting obligations. It is crucial that such materials remain clearly non-authoritative and distinct from the core standards, to preserve the flexibility and application of judgement central to the DMA process. However, more examples should be added that relate to firms that provide services, including professional services, to show how they can apply the guidance and structure their disclosures. For example, NMIG for subchapter 3.4 is focused on automotive suppliers and either a goods manufacturer or retailer. It would be useful to see how low-emitting firms such as those with a largely professional office-based workforce can think about material impacts. Another example is NMIG 12 for paragraph 41(d) (Potential liability), which provides useful guidance but is exclusively geared to firms with regulatory obligations around emissions (e.g. those that are subject to ETS or those within regulated emissions schemes). For a company not subject to these pending regulations,the potential liabilities should be considered non-material.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	While EFRAG's seeks to provide relief through the 'undue cost or effort' provision and qualitative information flexibility, stronger alignment with ISSB relief measures is needed to ensure fair competition between EU and other jurisdictions, particularly regarding commercially sensitive opportunity disclosures. Current proposals remain overly burdensome without providing proportional value to stakeholders. A major concern is the excessive granularity of required information, particularly where data is not readily available without undue effort. The framework should focus on decision-useful information rather than exhaustive reporting that becomes merely a compliance exercise. Management should have explicit authority to determine what constitutes 'undue cost and effort' for their organization, and entities need flexibility in choosing appropriate data aggregation levels (company, EU, or global) for each disclosure. Regarding Scope 3 emissions, calculations are subject to significant estimations and measurement uncertainty, reducing comparability across companies. Furthermore, there are significant challenges related to data collection from complex value chains and the timely acquisition of accurate information from suppliers and customers who are themselves grappling with their own emissions calculations. EFRAG needs for a more flexible approach. There are diverse views among the AmCham EU's membership on reporting solutions, such as: including the ISSB relief that allows to omit Scope 3 greenhouse gas (GHG) emissions when impracticable, creating a more level playing field between the EU and other jurisdictions that require reporting under ISSB; clarifying that companies have the flexibility to report Scope 3 emissions from only the sources for which they can obtain data without undue cost or effort; applying phase-in relief in the first year of reporting as per IFRS provisions; allowing companies to conduct screening level evaluations of Scope 3 categories and report out only on 'material' categories, aligning with the concept of materiality used throughout; accepting internationally recognised estimation methodologies.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	Despite EFRAG's introduction of flexibility regarding data quality and the allowance for proxies and estimates, which aligns with IFRS 1 and 2 and reduces administrative burden, several concerns remain about the proposed relief framework. The proposed provision should apply indefinitely, with no time limit. Setting an arbitrary deadline when the data landscape's evolution remains uncertain would create undue pressure and costs, particularly for undertakings in larger companies' value chains. The current relief framework remains overly constrained by requirements to justify exclusions and commit to ongoing improvement. The need for detailed documentation of data gaps and demonstration of continuous progress creates uncertainty and may inadvertently encourage over-disclosure, as preparers invest disproportionate resources to avoid perceived regulatory or assurance risks. While transparency is important, the framework lacks clear thresholds or safe harbours that would enable confident exclusion of immaterial data. EFRAG should strengthen the relief by including a provision making it clear that a company should be able to only report datapoints on the relevant business segment where they found such material risk. For example, to be able to focus food waste calculations on grocery operations where significant, rather than requiring corporate-wide measurement. Furthermore, ensuring full alignment with ISSB/IFRS relief provisions, particularly regarding proportionality, would enhance consistency and reduce reporting burdens. Establishing clearer criteria for exclusions, more robust safe harbours and reducing documentation requirements for immaterial data exclusions would provide preparers with greater confidence in their reporting decisions. Additionally, addressing specific challenges faced by financial services regarding value chain assessment reporting obligations is crucial for sector-specific applicability. The relief should better balance flexibility with proportionality while maintaining meaningful disclosure. A more nuanced framework would support both the integrity of reported metrics and the practical realities of data collection and reporting.			

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Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	The current approach to financial effect disclosures presents significant challenges that warrant careful consideration. The proposed options each offer distinct advantages but also face notable limitations. Option 1's alignment with IFRS standards supports global interoperability, while Option 2 provides practical benefits and reduces reporting burden. However, both options fall short of addressing fundamental concerns, as ESRS requirements for quantitative financial effects continue to exceed ISSB standards, creating an uneven global reporting landscape. A critical consideration is the inherently speculative nature of anticipated financial effects, which may provide a false sense of precision and potentially mislead users. The absence of standardised methodologies raises concerns about data comparability and potential bias, while compliance costs could increase significantly, particularly for companies with complex operations or limited resources. Current disclosure requirements may also compel companies to reveal commercially sensitive information or create inconsistencies between financial and sustainability reporting. The approach particularly challenges service-oriented and financial firms, whose business models may not align well with the proposed framework. Private subsidiaries, especially those of foreign multinationals, face substantial burdens without clear benefits to stakeholders or markets. Additionally, private subsidiaries should be exempted from anticipated financial effect disclosures to maintain proportionality and effectiveness in reporting requirements.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	Despite EFRAG's efforts to reduce disclosure requirements for anticipated financial effects, the remaining requirements in Amended ESRS E1 (Paragraphs 40, 41, 42) continue to pose significant feasibility challenges and potential risks for reporting companies. The granularity of required disclosures, such as monetary amounts and percentages of assets at material physical or transition risk, locations of key assets, and revenue from business activities at material physical risk, often exceeds the level of detail currently provided in financial statements. This discrepancy creates potential inconsistencies between financial and sustainability reporting, which could lead to confusion among stakeholders and complicate the assurance process. These requirements are subject to high estimation uncertainty, lack clear accounting guidance, and may reveal business-sensitive information. For global companies, allocating revenue by physical asset location may not align with how the business is managed or measured. Moreover, the disclosure of such detailed information raises competitive concerns and may require significant changes to existing data collection and reporting systems. We caution against mandatory disclosures based on climate scenario analysis, as scenario planning is a stress-testing tool, not a forecast. Treating these scenarios as predictions could mislead stakeholders and expose companies to reputational or legal risks. Given these concerns, we recommend aligning the ESRS E1 requirements more closely with ISSB standards and existing financial reporting practices. We support a less prescriptive approach that allows companies to focus on material information relevant to their specific business model and industry. Furthermore, we recommend that EFRAG adds language to acknowledge the non-predictive nature of scenario analysis and provide safeguards against misinterpretation. The standards should also explicitly allow companies to protect commercially sensitive information while still demonstrating robust risk management practices.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Despite EFRAG's efforts to enhance interoperability with IFRS S1 and S2, particularly through the introduction of fair presentation principles, several critical adjustments are needed to achieve meaningful alignment and practical implementation. Regarding GHG emission boundaries, mandating the financial consolidation approach is not workable. Companies should have the flexibility to choose either operational or financial control boundaries, not both. Approximately 70% of companies currently report using operational control, and requiring financial control would impose significant burden without clear benefits. This mandate contradicts both ISSB and GHG Protocol approaches, which offer flexibility in boundary selection. We advocate for true 'equivalence' rather than mere technical alignment with ISSB standards. A company's ISSB-compliant reporting should be considered sufficient for meeting ESRS requirements for financially material risks and opportunities. Additionally, EFRAG should maintain all ISSB reliefs, including those for commercially sensitive information and challenging quantitative calculations . Most critically, EFRAG must adopt a comprehensive phase-in approach: Years 1 and 2 should focus on mandatory reporting limited to overarching requirements (ESRS 1, ESRS 2), Climate reporting (E1 aligned with IFRS), core workforce content (S1 characteristics, health & safety, human rights incidents), and governance (G1). All other standards should remain voluntary. First-year limited assurance should apply only to Scope 1 and 2 emissions, with other quantitative disclosures remaining voluntary and qualitative data points subject to consistency checks. Years 3 and beyond would then be the target for a full implementation of all 12 standards, with value chain data assurance delayed for at least five years due to data availability and reliability challenges. This graduated approach would enable better quality reporting while allowing companies and their value chains to develop robust data collection and verification processes. Furthermore, assurance methodologies should align globally to strengthen interoperability and ensure consistent outcomes across jurisdictions.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				

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Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	Despite EFRAG's efforts to reduce mandatory datapoints and the increased clarity and simplified structure of the standards, the amendments do not go far enough in meaningfully reducing companies' the reporting burden.The practical improvements, such as extending the materiality filter to ESRS 2 topics and allowing disclosures at IRO level, are positive steps. However, many of the reductions appear to be more editorial in nature or focused on improved readability rather than substantive decreases in reporting requirements. For instance, the removal of sub-sub-topics, while enhancing clarity, may not significantly reduce the actual reporting burden as the underlying disclosure requirements largely remain. The simplified standards seems to primarily have removed duplicative and voluntary datapoints that companies' initial pragmatic, materiality-focused approach had already scoped out. The significant number of required disclosures still covers the same reporting areas and topics, albeit with a less prescriptive approach. This means companies' level of effort is likely to remain largely unaffected. EFRAG needs to delete of any areas that go beyond the 12 core ESRS topics. Company-specific IROs should be removed to maintain focus on material sustainability matters. Additionally, certain requirements, such as ESRS 2, 38(b) and 38(c) on financial resource allocations, remain overly burdensome and should be simplified to align with more qualitative disclosure approaches. To achieve a better balance between burden reduction and meeting Green Deal objectives, EFRAG should focus on eliminating requirements that don't directly support decision-useful information while maintaining those that genuinely advance sustainability reporting objectives. This would ensure that companies can focus their resources on meaningful disclosures that serve stakeholder needs rather than compliance exercises.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	22.E1.	Comments on deleted datapoints in ESRS E1	I disagree	As stated elsewhere in this feedback form and in Part 3, this section can be further simplified, for example by removing the electricity mix data point and by making the disclosure of financial effects from climate change a voluntary disclosure not a mandatory one.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	22.S1	Comments on deleted datapoints in ESRS S1	I disagree	This ESRS could be further streamlined by requiring those data points deemed most decision-useful. As currently drafted, the disclosures are very granular and are unlikely to support key stakeholders' decision-making due to their granularity. More specifically, there are concerns about the revised ESRS S1-5, disclosing the breakdown of employees by country might be sensitive for large multinationals. The requirement should be optional and become a 'may' disclosure. The breakdown of head count by non-guaranteed hours employees might not be tracked in case non-guaranteed hours contracts are not common. Instead, the requirement should make the breakdown mandatory only when the impact of this type of contracts is material to the undertaking. Under ESRS S1-6, non-employees might not be considered part of an undertaking's workforce so the required information might not be tracked. Instead, if material, undertakings should report qualitatively and add datapoints on a voluntary basis. Under ESRS S1-15, family-related leave rights might vary amongst countries making the reporting of quantitative information for multinationals operating in many countries inconsistent. Instead, if material, undertakings should report qualitatively and add datapoints on a voluntary basis. Under ESRS S1-16, undertakings might not use the unadjusted pay gap to measure pay equity. Instead, if material, undertakings should disclose qualitatively how pay equity is managed and measured. The disclosure of a quantitative ratio should be voluntary. Under ESRS S1-17, quantitative datapoints regarding incidents of discrimination, complaints, fines, human rights incidents, etc. might be sensitive and reporting might have adverse impacts for undertakings. Instead, if material, disclosure requirements should be limited to qualitative information. Undertakings may add datapoints on a voluntary basis.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We believe no additional data points should be added/ moved from 'may' to 'shall'. Each new mandatory requirement increases reporting obligations. Their inclusion should be reviewed carefully, and implementation timelines should allow sufficient flexibility particularly given that business conduct confirmed incidents is viewed as sensitive by stakeholders. In particular, mandating biodiversity transition plans, even if conditional, can add complexity and ambiguity due to a lack of well-defined procedures. As proposed under question 21, EFRAG should adopt a comprehensive phase-in approach (Years 1 and 2: ESRS 1, ESRS 2, E1, S1, G1. Years 3 and beyond: Full implementation of all 12 standards).			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	These new datapoints entail a significant increase in reporting burden and conflict with the European Commission's simplification mandate. In general, no additional data points should be added. More specifically, the data point secondary microplastics should be removed. Any reporting requirements should focus on what companies can control and measure. Secondary microplastics would substantially depend on how it was managed down the value chain including end of life. Besides, analytical techniques used to determine the quantity and characteristics of secondary microplastics are still in development, are not harmonized or widely available across the industry.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	EFRAG's intention to align with IFRS sustainability standards through the incorporation of 'fair presentation' principles is positive. However, Amcham EU members have mixed views about this mandatory principle. The concept of fair presentation could help guide companies toward stakeholder-relevant information and mitigate excessive reporting by reducing the risk of a compliance checklist approach. However, its implementation in sustainability reporting raises also concerns, particularly regarding impact materiality, where established reporting practices are still evolving and presents unique challenges not found in financial reporting. Sustainability data is often forward-looking, qualitative, and judgment-based, lacking the evidentiary rigor of financial data. This creates uncertainty about what constitutes a 'complete and faithful' representation, especially in impact materiality assessments. Companies have mixed opinions about this being a principle that applies broadly. Making fair presentation a legal requirement may inadvertently increase regulatory enforcement complexity and audit costs without demonstrably improving reporting quality. The absence of clear thresholds, safe harbours, or practical examples may lead companies to over-disclose to mitigate perceived regulatory or assurance risks. If EFRAG proceeds with mandatory fair presentation, provide detailed guidance on its application in the context of impact materiality, while establishing clear parameters for what constitutes adequate disclosure. The framework should be aligned with the ISSB Standards' approach, where fair presentation builds upon compliance requirements, and specific safeguards should be developed to prevent excessive disclosure requirements. Alternatively, companies could be allowed to voluntarily adopt fair presentation standards while maintaining mandatory disclosure of the assurance standard used. This approach would preserve the benefits of fair presentation while avoiding potential complications in implementation and assurance, particularly during this evolving phase of sustainability reporting.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Financial institutions should be exempt from disclosing absolute GHG emission value targets when they have set intensity targets. This consideration should be extended to high growth industries where absolute reductions face similar complexity challenges. For financial institutions, requiring absolute targets alongside intensity targets would not lead to meaningful disclosures or real-world emissions reductions. The calculation of absolute targets would require multiple assumptions about portfolio composition, production capacity, market shares, and emission intensities, making results potentially unreliable and not decision-useful. Moreover, such requirements might incentivize institutions to divest from high-emitting sectors rather than support their transition through financing. Financial institutions already provide transparency through disclosure of absolute financed emissions, and their targets are typically set at the sectoral level for Scope 3 Category 15 emissions, which constitute the majority of their GHG inventory. Adding another layer of absolute targets would not provide additional meaningful insights. However, this issue extends beyond financial institutions. Hard-to-abate industries, whose absolute reductions are constrained by technological readiness and long product lifecycles, face similar challenges. In these sectors, intensity-based targets (such as emissions per unit of output) provide a more accurate and actionable view of emissions performance. EFRAG should confirm the exemption for financial institutions and consider extending similar flexibility to hard-to-abate sectors. EFRAG should recognise intensity-based metrics as a valid standalone approach where they provide more decision-useful information. For meaningful climate disclosures the focus of emissions targeting should be on the sector-specific realities of decarbonisation rather than a one-size-fits-all approach.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	The proposed changes to the threshold for country-by-country disclosure in DRs ESRS S1-5 and S1-7 are concerning. The new requirement to report on the top 10 largest countries by employee headcount creates significant potential burdens. The disclosure of detailed employee breakdowns by country can be commercially sensitive for multinational companies, potentially revealing strategic information about operations and market presence. The current proposal lacks adequate provisions for companies to omit such sensitive information. In addition, the updated definition appears to have minimal added value compared to the previous 10% threshold. Under the new rules, countries with relatively few employees must be disclosed even if they represent an insignificant percentage of total workforce. Furthermore, the new threshold may increase reporting requirements for many companies without providing proportionate value to stakeholders. The updated definition appears to have minimal added value compared to the previous threshold. Under the new rules, countries with relatively few employees (but above 50) must be disclosed even if they represent an insignificant percentage of total workforce, while the original 10% threshold better reflected material operations. For example, one member company reports that this change would increase their reporting from two countries to ten, creating substantial additional administrative burden. The original 10% threshold should be maintained because it illustrates the materiality of operations. If country-level reporting is deemed necessary, the employee threshold should be significantly increased from 50 reflect materially significant operations. Additionally, the aggregation level should align with the rest of the sustainability statement - if the statement is consolidated at the EU level, the workforce data should follow suit. Finally, clear provisions should be included to allow companies to omit commercially sensitive information while still providing meaningful workforce insights at appropriate levels of aggregation. Commercially sensitive information isn't useful for stakeholders and often taken out of context.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	Despite EFRAG's efforts to improve the methodology for calculating non-EU adequate wages and the important inclusion of the ILO framework as a globally recognised standard, several significant concerns remain about the proposed approach. The revised methodology appears more practical by reducing reliance on unavailable or unreliable local data sources. However, it places an unreasonable burden on individual companies to determine whether minimum wages in non-EU countries are 'adequate' according to ILO principles. Without a harmonised approach, this company-specific interpretation would inevitably lead to inconsistent results across organisations, undermining comparability and reliability of reported information. Furthermore, the current hierarchy requires companies to assess relevant living wage datasets only as a last resort, and the disclosure requirements do not specify which methodology component is being used. This lack of transparency further compromises data comparability and usefulness for stakeholders. The proposed methodology also raises practical implementation challenges. Companies may struggle to access reliable data in certain jurisdictions, and the assessment process could become unnecessarily complex and resource intensive. This is particularly challenging for organisations operating across multiple non-EU countries with varying wage structures and economic conditions. EFRAG should develop a more standardized approach to determining adequate wages and provide clear guidance on acceptable data sources and calculation methodologies. A framework that ensures consistency while acknowledging regional variations should also have explicit requirements for disclosing which methodology components are used. Because ensuring adequate wages globally is important, the methodology must strike a better balance between practicality and meaningful disclosure. A more structured, harmonised approach would better serve both reporting companies and stakeholders while maintaining the integrity of the disclosure requirements.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	Partially agree. While consolidating SFDR datapoints in ESRS 2 improves traceability, it still imposes additional requirements linked to other EU frameworks. Simplification should focus on limiting duplication and only requiring datapoints that are material, to avoid unnecessary reporting. In addition, all voluntary PAIs should be removed from ESRS reporting requirements.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	Although the intention to provide methodological guidance for biodiversity and ecosystem-related targets is positive, reviewing AR 26 should not lead to more prescriptive requirements or mandatory alignment with specific frameworks. The biodiversity metrics landscape remains methodologically immature, with no single, globally accepted framework comparable to climate reporting. Unlike greenhouse gas emissions, biodiversity impacts and dependencies are highly context specific and cannot be readily reduced to standardised metrics. Mandating alignment with specific frameworks like SBTN, which is still under development, would be premature and could lock companies into methodologies that may quickly become outdated. Instead, EFRAG should provide maximum flexibility in fulfilling these requirements. AR 26 should be replaced with simpler, principles-based guidance that empowers companies to set targets relevant to their specific material impacts. This would allow organisations to adapt their approach as methodologies evolve and better data becomes available, while avoiding the creation of a rigid compliance checklist that could undermine the effectiveness of the Double Materiality Assessment. The suggested revision for AR 26 should simply state that undertakings may, where relevant, describe biodiversity and ecosystem targets, including their scope, baseline, and timeframe. This principles-based approach would maintain the spirit of transparency while providing companies the necessary flexibility to implement meaningful biodiversity reporting aligned with their specific circumstances and materiality assessments. Furthermore, given the complexity of biodiversity reporting and the current state of methodological development, EFRAG adopt a comprehensive phase-in approach. Biodiversity metrics reporting should begin three years after the first mandatory CSRD reporting, allowing time for methodologies to mature and companies to develop appropriate measurement and reporting capabilities (see question 21).			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	EFRAG's decision to delete the voluntary datapoint on adjusted gender pay gap is positive. This simplification reduces unnecessary reporting burden while retaining the unadjusted metric, which ensures comparability across entities without additional complex calculations. EFRAG should make all gender pay gap reporting voluntary, along with other social metrics such as employee turnover, family-related leave, and incidents of discrimination and human rights violations. This less granular approach would provide companies greater flexibility in determining which metrics are most decision-useful and material to their operations, aligning with our general preference for less granular reporting requirements. This proposed change would maintain the possibility of meaningful disclosure while significantly reducing the mandatory reporting burden on companies, allowing them to focus on the most relevant and impactful social metrics for their specific contexts.			

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Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	The current replacement and formulation regarding payment practices in ESRS G1 is partially sufficient. While the changes help protect SMEs by reducing cascading data requests and avoiding disproportionate obligations on smaller companies, several concerns remain. The current formulation should allow companies to use the fair presentation principle to disclose material information pertinent to identified topics and IROs. This would provide more flexibility while ensuring reported information remains relevant and decision-useful. The requirement to disclose legal proceedings data is problematic. Tracking proceedings filed in local courts across various jurisdictions imposes an undue burden and cost on reporting companies, while providing questionable value to of the sustainability statement end users. These requirements should be replaced with a more targeted approach. When a firm reports on-time payments below a certain threshold (e.g., 75%), it should disclose its plan to improve payment practices. This would focus reporting on material issues while encouraging better payment behaviour. The payment practices disclosure requirement should be eliminated rather than amending G1-6 as proposed, and the legal proceedings data requirement should be removed entirely. These changes would better balance SME protection with practical reporting requirements while maintaining meaningful disclosure.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The current definitions of classified and sensitive information are overly narrow and should be expanded to explicitly include trade secrets as defined in EU Directive 2016/943. While 'secret information' is addressed in paragraph 99, this only applies to strategy and action plans. Companies should be protected from disclosing any trade secrets, even if deemed material. Additionally, the value chain scope for impact materiality assessments should be limited to entities with direct contractual relationships. Large multinational organizations face significant practical challenges in tracking and assessing impacts beyond direct relationships, particularly given inconsistent data availability and limited influence over extended value chain entities. The current requirement to assess impacts across the entire value chain creates unrealistic expectations and potential inaccuracies in reporting.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Paragraph 38 should be entirely deleted as already discussed in question 22 of this survey. ESRS 2 GDR-P for S1-S4: The UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises are not legally binding for business. When referring to an undertaking's overarching human rights policy, EFRAG should replace 'committing to implement' the referenced human rights frameworks with 'committing to respect for human rights aligned with' these frameworks.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	EFRAG should allow companies flexibility in choosing either operational or financial control boundaries for GHG emissions reporting, aligning with IFRS and GHG Protocol standards. The mandatory financial control approach would impose significant burden on companies currently using operational control. Current and Anticipated Financial Effects requirements should be eliminated due to lack of guidance, high compliance costs, and limited comparability. The removal of high climate impact sector specifications has created confusion and unnecessary reporting burden for lower-emitting sectors. Financial liabilities disclosure requirements are redundant with existing financial statement obligations and should be removed or simplified			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Disclosure on sites located in areas of water risk not covered by water policies" is too granular and prescriptive. Disclosing these sites may also require companies to disclose sensitive information and trade secrets.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Remuneration reporting requirements should align with existing EU Pay Directive, country directives, and U.S. SEC requirements to avoid complexity and confusion. The S1 7 Collective Bargaining metrics should focus only on national and sectorial CBAs, with local CBAs remaining optional. Several datapoints need simplification, including employee turnover rates, adequate wages methodology, gender pay gap calculations, and discrimination incident reporting. The requirement to disaggregate employees by contract type should be removed as it creates significant complexity without providing proportionate value. Non-employees should be excluded from S1 Own workforce reporting to avoid legal implications and reduce reporting burden.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	S2: The reduction in narrative disclosure could reduce the quality and effectiveness of companies' due diligence processes, especially in sensitive areas within human rights. This would then hinder efforts to improve the robustness of human rights risk management across the industry and through other regulatory pressure. S2: Across sustainability, and especially for human rights, there is a heavy weighting of qualitative indicators that can be used to evidence metrics, actions etc. However, more thought is needed around how to use these as effectiveness measure. For this reason, companies need further guidance around how effectiveness can be evidenced. S2-3: The disclosure requirement in paragraph 19, whilst an improvement on the previous version, would still be challenging to disclose. An undertaking would need to define what constituted an incident being 'reported' and the what threshold is to avoid reporting spurious 'incidents'. S2-3: Companies need more guidance on how the undertaking can confirm if an incident that is reported is genuine if it relates to undertakings in its value chain			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	The payment practices disclosure requirement should be eliminated rather than amended. Recently upgraded mandatory datapoints, including procurement team training and business conduct incidents, should remain optional and be reclassified as non-mandatory guidance. The current corruption reporting requirements are too broad and could result in misleading disclosures without proper context. These requirements could also conflict with non-EU legal frameworks and potentially compromise legal strategy or defense. A more targeted approach focusing on material incidents with clear regulatory determinations would better serve transparency while protecting legitimate business interests.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	Several key definitions require refinement for clarity and practicality. Circular economy principles should align with ISO 59004:2024 and EN 4555X series, explicitly including both post-industrial and post-consumer recycled materials. The durability definition should remove subjective terms like 'relevant' unless measurable criteria are provided. The longevity concept should be removed or significantly simplified to avoid overlap with other circular economy definitions. Reparability should explicitly reference EN45554 measurement standards. The corruption definition requires narrowing to focus on material incidents with clear regulatory determinations rather than including all potential incidents.			
Survey	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Some overarching comments: •Provide flexibility for global targets and data - when programmes are managed globally and EU disaggregation is only for reporting purposes •Remove mandatory topic-based disclosures not subject to materiality - no issues should be required to be reported by all •Make CapEx/OpEx disclosures optional - spend is burdensome to calculate, so instead ,focus on impact. •Reduce duplication with existing EU regulations – for example that ask for the same information as the CSRD (i.e. gender pay) •For any place where it says the entity 'shall consider' an external standard (SASB, GHGP, etc.), it should instead say 'may consider an external standard' without providing a list of examples that further limits companies.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UHY ECA Audyt Sp. z o.o.	Auditor	Poland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	UHY ECA Audyt Sp. z o.o.	Auditor	Poland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	UHY ECA Audyt Sp. z o.o.	Auditor	Poland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I disagree	We view the possibility of adding an executive summary negatively. The rules for the assessment of executive summaries by auditors are unclear. The executive summary may be placed at the beginning of the sustainability statement or in another part of the Management Board Report. Should the auditor also verify the scope of such a summary (there are no regulations in the ESRS) and assess whether, for example, only positive information about the entity is presented in the executive summary? In our opinion, entities should move towards reducing the number of pages in their sustainability statements (with the support of auditors), which will result in sustainability statements being read in their totality.			
Survey	UHY ECA Audyt Sp. z o.o.	Auditor	Poland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	I welcome the transfer of IRO, SBM, and PAT requirements to ESRS 2 from thematic ESRS. Unfortunately, not all entities have familiarized themselves with Annex C to ESRS 2 and, accordingly, with the wording of point 2 of ESRS 2, which resulted in the reporting of IRO and SBM in thematic ESRS. I view the failure to transfer the information resulting from point 2 in conjunction with Annex C to ESRS 2 negatively. At present, it is unclear whether entities should describe the DMA process for all thematic ESRS or only those that have become material. This is very important for auditing and the completeness of disclosures.			
Survey	UHY ECA Audyt Sp. z o.o.	Auditor	Poland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	I would positivity assess the clear division between mandatory disclosures and voluntary disclosures. In its explanations, EFRAG states that APPLICATION REQUIREMENTS (AR) are mandatory and explains that "May disclose" datapoints have been all eliminated. At the same time, many ARs contain the word "may," e.g., AR 19, AR 24, AR 25 ESRS 2. How should entities apply ARs with "may" and how should the auditor verify this? This is still unclear.			
Survey	UHY ECA Audyt Sp. z o.o.	Auditor	Poland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	NMIG will certainly be a very useful and necessary tool. It is worth noting that auditors will not be able to require compliance with these non-mandatory guidelines, so the market must take into account that comparability between companies applying NMIG and those that do not will not be maintained. At the same time, it is worrying that too much necessary information has been transferred to NMIG (such as Classification of climate-related hazards and Examples of climate-related transition events for ESRS E1, calculation formulas for disclosing on potential liabilities from material transition risks; presenting the information for Substances of concern and substances of very high concern). There has also been a failure to transfer and collect interpretations that emerged during the Q&A on the EFRAG Q&A Platform. The failure to include EFRAG explanations in the NMIG creates another source of information without clear guidelines on how to apply it (what is the relationship between the NMIG and the EFRAG Explanations Q&A Platform?			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UHY ECA Audyt Sp. z o.o.	Auditor	Poland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	I welcome the introduction of the "excessive cost or effort" principle. However, from an audit perspective, this results in far-reaching incomparability between the reported data and a lack of confidence in the final data reported by stakeholders. In their opinions, auditors will qualify data that has been reported using estimates as uncertain. Facilitations for reporting entities become, at the same time, obstacles for entities that are to use this data.			
Survey	UHY ECA Audyt Sp. z o.o.	Auditor	Poland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	From an audit perspective, this results in far-reaching incomparability between reported data and a lack of trust in the final data reported by stakeholders. In their opinions, auditors will qualify data that has been reported using estimates as uncertain. Facilitations for reporting entities become, at the same time, obstacles for entities that are to use this data.			
Survey	UHY ECA Audyt Sp. z o.o.	Auditor	Poland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Over-simplification can undermine the quality of reporting. We understand that some companies may find it difficult to estimate the financial impact at the outset, but the possibility of limiting oneself to qualitative descriptions alone is too broad and risky. ESG reporting without figures becomes too general and detached from the realities of management. Companies, and especially owners and management boards, make decisions based on financial data. If they do not see the costs associated with environmental penalties, energy losses, resource waste, or climate risks, they will not take these areas seriously. The relief should only apply to companies that demonstrate real difficulties in obtaining numerical data, and only temporarily. There should be an obligation to indicate a plan for obtaining complete data, e.g., within 1–2 years. Non-financial reporting must cease to be "soft"—if it is to support management, it must be based on hard facts, not just declarations.			
Survey	UHY ECA Audyt Sp. z o.o.	Auditor	Poland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	Paragraphs 40, 41, and 42 of ESRS E1 require management boards to focus on climate change issues. Unfortunately, management boards are not interested in reporting on sustainable development because they do not see the financial revenues and costs. The need to provide this data may require the use of solutions for collecting and recording accounting data, which will certainly have an impact on the quality of the reported data and its importance in management board decision-making.			
Survey	UHY ECA Audyt Sp. z o.o.	Auditor	Poland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	In order to ensure comparability of reports between entities from different parts of the world, it is necessary to fully harmonize ESRS requirements with IFRS S1/S2. If other entities reporting under IFRS S1/S2 do not lose their competitiveness, European companies can also report data while maintaining their competitiveness.			
Survey	UHY ECA Audyt Sp. z o.o.	Auditor	Poland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	UHY ECA Audyt Sp. z o.o.	Auditor	Poland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	UHY ECA Audyt Sp. z o.o.	Auditor	Poland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	The division of plastic microbeads into primary and secondary – a valid simplification that will allow for better visualization of information on microbeads. A clear distinction between primary and secondary microplastics and a more precise definition will greatly facilitate the work of entities that are required to assess microplastic emissions from products or packaging. However, the ESRS still does not specify a methodology for estimating the level of plastic microbead emissions. This may result in the use of estimates that are difficult to compare.			
Survey	UHY ECA Audyt Sp. z o.o.	Auditor	Poland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	I see no justification for applying the fair presentation principle. I agree with EFRAG members that this role should be fulfilled by the DMA process (only reporting on what is material). If the "fair presentation" principle is to remain, the rules for its application in relation to the DMA process should be clearly defined (if, within the DMA process, a material issue has arisen and the entity does not present it, hiding behind the "fair presentation" principle?).			
Survey	UHY ECA Audyt Sp. z o.o.	Auditor	Poland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	The revised threshold based on the top 10 countries by employee headcount provides more meaningful country-level information, improves comparability between undertakings, and relies on data that companies generally already have available. The additional reporting burden is therefore limited.			
Survey	UHY ECA Audyt Sp. z o.o.	Auditor	Poland	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The amended AR 73 introduces a hierarchy where statutory minimum wages are the starting point, provided they are periodically reviewed and take into account ILO wage-setting principles. However, the draft does not clarify who determines whether these conditions are met. In practice, this places the burden on companies to assess whether minimum wages in each country comply with ILO standards and whether living wage estimates follow ILO methodology. Most companies lack the resources to perform such assessments consistently across jurisdictions, which will likely lead to divergent interpretations and a lack of comparability. We therefore recommend that the final standard (i) require disclosure of which prong of the hierarchy has been applied, and (ii) allow reliance on statutory minima only where public evidence confirms alignment with ILO principles, while (iii) retaining recognised international living wage benchmarks as valid reference points to ensure comparability.			
Survey	UHY ECA Audyt Sp. z o.o.	Auditor	Poland	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	I agree with the proposed changes to SFDR reporting. Although the changes are not as dramatic as in other parts of the ESRS, we welcome the avoidance of duplication of the same information in the ESRS S regarding "human rights policy."			
Survey	UHY ECA Audyt Sp. z o.o.	Auditor	Poland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	We believe that companies should also be able to show the adjusted gender pay gap as contextual information explaining the differences between individual positions or countries. This is very important for users of sustainability statements other than SFDR.			
Survey	UHY ECA Audyt Sp. z o.o.	Auditor	Poland	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	As auditors, including financial auditors, we believe that financial accounting systems enable the calculation of data necessary for reporting under the old point 33 (a) ESRS G1: the average time the undertaking takes to pay an invoice from the date when the contractual or statutory term of payment starts to be calculated, in number of days. In our opinion, this information is important for SMEs and motivates entities to settle their liabilities within the contractual or statutory deadlines.			
Survey	UHY ECA Audyt Sp. z o.o.	Auditor	Poland	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	We take a negative view of the removal of all Appendices to ESRS S1. We believe that they provided invaluable assistance with DMA and other disclosures and served as a good basis for dialogue between the auditor and the entity. We recommend reinstating the Appendices to ESRS S1 as AR. We highly value Appendix A1 (as support for the DMA process) and A3 (as an example list of positive and negative actions of the entity).			
Survey	UHY ECA Audyt Sp. z o.o.	Auditor	Poland	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We take a negative view of the abandonment of sector-specific standards. The lack of sector-specific standards results in overly general reporting that fails to take into account the specific nature of the industry. The implementation of EFRAG sector standards (or the requirement to apply IFRS S2 sector standards) reduces the burden on entities (entities do not have to carry out DMA in this regard, as most of the data is already collected by entities) and will benefit users of sustainability statements.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Association of Ethical Shareholders Germany	NGO	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	The proposed amendments should provide sufficient assistance to ensure that truly relevant aspects and data are collected by the respective company where the most relevant impacts, whether negative or positive, are to be found. When it comes to evironmental and human rights due diligence, many companies already use a risk-based approach to effectively analyse the risks in their own value chains – rather than taking a blanket and completely ineffective approach of only auditing direct suppliers when the relevant environmental and/or human rights risks lie further down the supply or value chain. The same should apply to the Double Materiality Assessment.			
Survey	Association of Ethical Shareholders Germany	NGO	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	The new guidelines help clarify what is at stake. In practice, it remains to be seen which actions and procedures are effective for true remediation, mitigation and/or prevention. There should also be sufficient scope for critical self-reflection on which methods have proven to be ineffective, less effective or more effective. For me, this is where the difference between pure advertising or marketing and serious, honest and effective reporting on sustainability performance will become apparent.			
Survey	Association of Ethical Shareholders Germany	NGO	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	Yes, these proposed Amendments should provide more flexibility while maintaining relevant reporting. In the few CSRD reports I have read so far, there is too much repetition and a great deal of text on general processes, without specifying exactly how these are applied in practice and what the results are.			
Survey	Association of Ethical Shareholders Germany	NGO	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	In general, I agree there has to be a balance between narrative reporting and relevant and comparable information. There will always be some disagreement on which data and data points are relevant. From the perspective of civil society, the media and academia, but also from the point of view of investors, it is important to be able to understand exactly how different companies behave with regard to specific issues. If many companies do not report on many issues because they consider them irrelevant, this can look very different from the perspective of the communities affected, but also from that of the general public. It is more difficult when one company provides specific figures for a data point, while another does not, instead reporting only in narrative form. Particularly with regard to social aspects, a minimum of figures needs to be reported in a uniform manner, such as the number of identified human rights violations in the value chain and whether these have been remedied.			
Survey	Association of Ethical Shareholders Germany	NGO	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	Yes, as stated before: A minimum of figures needs to be reported in a uniform manner. There should be no question of interpretation as to whether a company has failed to comply, partly complies or complies with its minimum reporting obligations.			
Survey	Association of Ethical Shareholders Germany	NGO	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	I see a general risk that companies will make excessive use of the exceptions and reliefs, and perhaps rely on the excuse of poor data availability instead of actively contributing to improving it. However, this should only happen in the relevant areas with the most significant IRO. Here, I continue to see a risk that companies will simply ignore relevant IRO because they are particularly difficult to grasp or because positive changes are very difficult to achieve. Everything depends on a comprehensive and honest DMA.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Association of Ethical Shareholders Germany	NGO	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	It is important that companies actively contribute to improve availability of reliable data, and not use poor data as an excuse for poor reporting.			
Survey	Association of Ethical Shareholders Germany	NGO	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Even or especially for financial effects, a minimum of quantiative figures needs to be reported in a uniform manner. In the future, certain aspects will prove to be relevant and useful, and without a certain amount of pressure in this direction, the financial impact would remain rather unclear.			
Survey	Association of Ethical Shareholders Germany	NGO	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	It is very important that a specific minimum of quantiative figures needs to be reported in a uniform manner across companies and sectors.			
Survey	Association of Ethical Shareholders Germany	NGO	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Limit reliefs to IFRS standards should be the limit; exceeding IFRS standards jeopardizes a global ESG reporting baseline and a level playing field for EU companies.			
Survey	Association of Ethical Shareholders Germany	NGO	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Association of Ethical Shareholders Germany	NGO	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	If a minimum of relevant and useful mandatory datapoints is kept in this way, voluntary datapoints could and should be used to illustrate and report certain relevant aspects of mandatory datapoints in a meaningful way. Again, it all depends on a comprehensive and honest DMA which transparently separates important IROs from unimportant ones.			
Survey	Association of Ethical Shareholders Germany	NGO	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	This does not represent an additional burden, but rather helps to focus attention on the relevant aspects. Companies should treat voluntary disclosures in a similar manner in other thematic contexts and report on relevant IROs in a comprehensible manner in accordance with their DMA.			
Survey	Association of Ethical Shareholders Germany	NGO	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Rather than exceptions to the rule, these are helpful and useful explanations/additions and ensure that requirements that apply anyway are observed, see Critical Raw Materials Act.			
Survey	Association of Ethical Shareholders Germany	NGO	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	Fair presentation should support companies to have the courage to critical self-reflection on which methods have proven to be ineffective, less effective or more effective. For me, this is where the difference between pure advertising or marketing and serious, honest and effective reporting on sustainability performance will become apparent, but also if check list mentality can be avoided.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Association of Ethical Shareholders Germany	NGO	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Exactly: High-emission sectors are those in need of transition financing, but without clear incentives and also real divestment risks, it is hard to believe high-emission sectors will follow the requirements of the Paris Climate Accord. There sure is a need for a just transition and also special support for those fossil companies that try to change as quickly as possible, the focus should be the overall reduction of emissions.			
Survey	Association of Ethical Shareholders Germany	NGO	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	In some cases, there are also corresponding efforts at national level to introduce transparency requirements, so overall it helps to achieve standardisation rather than a patchwork of different requirements.			
Survey	Association of Ethical Shareholders Germany	NGO	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	Exploitative wages must also be made transparent as such. 'Adequate wages' reporting should compare actual wages to a living wage for all global employees, not just EU ones. Companies can use local minimum/living wage estimates if the setting bodies publicly verify their alignment with ILO living wage principles.			
Survey	Association of Ethical Shareholders Germany	NGO	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	It should help to avoid unnecessary duplication and ensure compatibility with SFDR.			
Survey	Association of Ethical Shareholders Germany	NGO	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	It makes sense to check and be open for improving measurable biodiversity and ecosystem targets, guided by current and upcoming relevant global frameworks.			
Survey	Association of Ethical Shareholders Germany	NGO	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	Information on the adjusted pay gap by employee ratio is likely material for many companies and should therefore be provided. There is a risk that since it is not mandatory, companies will avoid this even if they consider it material. This is a general problem for each voluntary ("may") datapoint, and it comes down to a comprehensive and honest DMA.			
Survey	Association of Ethical Shareholders Germany	NGO	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	There is some risk that deleting this may obscure how companies engage with and support SMEs, but it should be an overall objective to show this, not only in payment practises. More importantly, It should be made clear that large companies do not outsource their responsibilities to SMEs.			
Survey	Association of Ethical Shareholders Germany	NGO	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Association of Ethical Shareholders Germany	NGO	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Association of Ethical Shareholders Germany	NGO	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Association of Ethical Shareholders Germany	NGO	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Association of Ethical Shareholders Germany	NGO	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Association of Ethical Shareholders Germany	NGO	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Association of Ethical Shareholders Germany	NGO	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Association of Ethical Shareholders Germany	NGO	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Association of Ethical Shareholders Germany	NGO	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Association of Ethical Shareholders Germany	NGO	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Association of Ethical Shareholders Germany	NGO	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Association of Ethical Shareholders Germany	NGO	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	eftec	Preparer (non-financial preparing a sustainability report)	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	There is not sufficient emphasis on dependencies. The reporting should encourage companies to think about their dependencies, directly or through their value chain, on all of nature's services (not just as input to production). Thinking about dependencies encourages businesses to understand in what ways their financial sustainability depends on nature. This understanding incentivises businesses to invest in nature to secure financial returns. Focusing on impacts only leave nature in the regulatory box - with the result of lesser engagement by Boards and wanting to resolve impacts at the least cost possible, i.e. ESRS will not change the status quo. Also leaving out dependencies means ESRS will be out of sync with TNFD and ISO14054			
Survey	eftec	Preparer (non-financial preparing a sustainability report)	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	It is correct to treat actual and potential impacts differently. ISO14054 mentions an 'impact horizon' and a 'dependency horizon'...noting that impact horizon can be very much longer than the operations of the company or the reporting period. This applies to both negative (or adverse) impacts (e.g. long term impacts of pollutants in the air or bioaccumulation) and positive (or beneficial) impacts (e.g. returns to regeneration of nature which could continue well after the regneration project is over)			
Survey	eftec	Preparer (non-financial preparing a sustainability report)	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Less is more. But the information should be targeted. All information in any non-financial reporting covering impacts, dependencies, risks and opportunities related to nature should link to one or both of two things: economic importance to the business and the rest of the society, and the biophysical importance to nature.			
Survey	eftec	Preparer (non-financial preparing a sustainability report)	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Achieving a balance between pragmatism and detail is crucial. however, the criteria by which pragmatism is chosen need to be very clear. Materiality assessment is important because of this. And double materiality must not be ignored.			
Survey	eftec	Preparer (non-financial preparing a sustainability report)	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	0			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	eftec	Preparer (non-financial preparing a sustainability report)	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Data availability can be a big challenge. And relief for data gaps should be granted. However, limiting risks or any other part of the analysis and reporting to qualitative only is damaging. Qualitative assessment of environmental impacts, dependencies, risks and opportunities condemn these issues to isolation. We want ESRS reporting to bring nature to the heart of business and at the heart of business, qualitative assessment has no presence other than lip service. This is a major problem of the revisions and severs the link between financial and non-financial reporting (including natural capital accounting).			
Survey	eftec	Preparer (non-financial preparing a sustainability report)	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	"Lack of mature methodologies" is a flawed excuse. There is plenty of scientific and economic evidence of the impact and dependency of economic activity on nature. This is especially the case with the reliefs granted and softened 'shalls'. Commercial sensitivity is a genuine concern. However, Option 2 is tentamount to no reporting and a waste of all the effort in reporting to date and will miss opportunities of learning.			
Survey	eftec	Preparer (non-financial preparing a sustainability report)	United Kingdom	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	eftec	Preparer (non-financial preparing a sustainability report)	United Kingdom	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	eftec	Preparer (non-financial preparing a sustainability report)	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	eftec	Preparer (non-financial preparing a sustainability report)	United Kingdom	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	I support the reasons for disagreement presented above			
Survey	eftec	Preparer (non-financial preparing a sustainability report)	United Kingdom	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	eftec	Preparer (non-financial preparing a sustainability report)	United Kingdom	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?		I don't have a firm opinion on 'targets'. It is more important that (a) both impacts and dependencies on biodiversity and ecosystems are covered and (b) qualitative, quantitative and monetary metrics are used in analysis even if targets are not set / reported.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Euromines	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The simplified approach provides more flexibility, in particular the possibility of an top-down approach.			
Survey	Euromines	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The simplification is appreciated, yet we would have a preference for a net approach to reduce complexity and avoid additional levels of assurance and interpretation differences between jurisdictions and companies.			
Survey	Euromines	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Euromines	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Euromines	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We appreciate the substantial improvement that had been undertaken. On data-point level, there are certain issues that still need to be clarified - either as a legal or standing definition is absent and certain qualifying words that can lead to differences in interpretation.			
Survey	Euromines	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	NMIG is an important structural change that is highly appreciated to ensure clarity and conciseness. However, we recommend that NMIGs stay outside the Commission Delegated Act to avoid situations in which auditors interpret the non-binding nature of NMIG as mandatory guidance.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Euromines	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	financial effects requires further reliefs covering CAPEX, OPEX related to PATs and commercially sensitive information regardless of whether it is announced or not; point g) the time period of one year is too short to include an acquisition fully in a new report; for certain disclosure requirements, e.g. water, the simplification meant a compilation of hitherto separate datapoints or DRs into one, going counter the targeted simplification.			
Survey	Euromines	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	"Undue cost effort" requires a definition - we do hope it is part of the assurance standard.			
Survey	Euromines	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Anticipated financial effects as such are speculative as such - and thus not providing added value. Future-oriented statements that cannot be substantiated are not in the remit of responsible investor-relations and will lead to uncertainty as well as difficulties to audit. Rather than portraying a realistic image, it may create misleading impressions. Investors do have already access to risk-related disclosures so that we strongly recommend to remove the public disclosure of anticipated financial effects.			
Survey	Euromines	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Please see above. Including anticipated financial effects is speculative and forward-oriented statements that cannot be audited or substantiated in a robust way that goes beyond the preparers' assumptions. It will create audit-risks, will not lead to better comparability and will not guide decisions in a better way than existing risk-disclosures do. THese figures are of a different quality than the other disclosure requirements, and it is unclear how these can be audited in a consistent manner.			
Survey	Euromines	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Euromines	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I disagree				
Survey	Euromines	Business association (other than association of financial institution)	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I disagree	The standard has substantially improved in structure, readibility and clarity. While from a preparers' perspective the structural improvements reduce overall complexity, the overall reporting effort to gather and publish the data requested still remains substantial.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Euromines	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Water consumption cannot be easily compared across companies and requires more flexibility.			
Survey	Euromines	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree				
Survey	Euromines	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	this will depend on the interpretation and application by the assurance providers and auditors; in absence of an assurance standard. Asking for it may not lead to the effect of a uniform and comparable interpretation of the requirements.			
Survey	Euromines	Business association (other than association of financial institution)	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	If the disclosure of targets shall guide investment decisions, we believe they should also apply to investors in a similar way.			
Survey	Euromines	Business association (other than association of financial institution)	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree				
Survey	Euromines	Business association (other than association of financial institution)	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Euromines	Business association (other than association of financial institution)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Euromines	Business association (other than association of financial institution)	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree				
Survey	Euromines	Business association (other than association of financial institution)	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Euromines	Business association (other than association of financial institution)	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Euromines	Business association (other than association of financial institution)	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Euromines	Business association (other than association of financial institution)	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Euromines	Business association (other than association of financial institution)	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Euromines	Business association (other than association of financial institution)	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Euromines	Business association (other than association of financial institution)	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Euromines	Business association (other than association of financial institution)	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Euromines	Business association (other than association of financial institution)	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Euromines	Business association (other than association of financial institution)	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
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Survey	Euromines	Business association (other than association of financial institution)	Belgium	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	AMICE	Insurance	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Insurance companies play a pivotal role in sustainability reporting, acting both as preparers and users. As preparers, they are increasingly required to disclose ESG-related data in line with evolving regulatory frameworks, to demonstrate their impact, risk exposure, and strategic alignment with sustainability goals. As users, insurers rely on sustainability disclosures from investee companies to assess long-term risks and opportunities, inform underwriting decisions, and guide responsible investment strategies. In both roles, the quality, comparability, and reliability of sustainability data are essential to support informed decision-making and to foster a more resilient financial system. This being said, overall, we welcome the amendments proposed to the DMA aimed at emphasising the role of materiality as a guiding filter and enhancing decision-useful disclosures for investors, but we have concerns that the revised DMA framework does not sufficiently balance simplification with robustness. While we understand that the proposed changes would allow companies to implement a focused, top-down approach and to leverage existing systems/processes, additional efforts are needed to ensure that a greater degree of flexibility does not result in critical data gaps, impeding comparability and auditability. A focus on decision-usefulness of information should, on the one hand, ensure that materiality assessments are strategic and adaptable, reflecting the specific context of each undertaking, whilst on the other hand preserve the reliability of information, without hindering investors' ability to assess and compare efficiently undertakings' material information. To conclude, we support EFRAG's efforts to move away from a prescriptive, rules-based approach in favour of a simpler, principles-based DMA framework that better aligns with business realities. The required disclosures should not result in an excessive documentation burden. At the same time, it is important to avoid the risk of fragmenting the ESG data landscape and weakening investor confidence in the comparability of disclosures across sectors.			
Survey	AMICE	Insurance	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	AMICE welcomes the flexibility and the effort made to provide more guidance and clarification on how to consider remediation, mitigation and prevention actions within the DMA. However, the new guidelines, although well-intentioned, risk being overly complex and prescriptive, and inadvertently constrain firms from applying sound judgment in adapting the DMA to their operational realities. A more balanced clear approach would empower preparers to select the most appropriate methodology for both actual and potential negative impacts, provided they can justify their decisions and ensure consistency with the materiality principle. In principle, depending on the characteristics of a given sector and the regulatory framework governing it, we believe that certain sustainability topics should appropriately be addressed on a net basis. This would reduce implementation burdens and avoid unintended disincentives for effective risk management practices, while reinforcing the accountability of firms in how they report and address sustainability impacts. The principle outlined in paragraph 35 in ESRS 1 —namely, that mitigation/prevention actions may be considered in assessing the materiality of potential negative impacts only when they do not require significant ongoing efforts to keep the impact below the materiality threshold—represents a meaningful interpretative key. If the company must continuously apply significant mitigation/prevention measures just to keep the impact below the materiality threshold, then the impact should be assessed without considering those actions. Future remediation plans or policies should not be included in the materiality assessment of potential impacts. In cases where continuous mitigation investments are driven by regulatory requirements (e.g. GDPR), this approach would allow undertakings to provide a concise disclosure that references compliance with applicable legislation. This should not exempt the undertaking from reporting any actual negative impacts that have occurred (e.g. a realised data breach), nor from disclosing any reinforcement measures taken when the standard compliance efforts have proven insufficient.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AMICE	Insurance	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We welcome the increased flexibility introduced by the amendments to the organization of the sustainability reporting, particularly the inclusion of an 'executive summary', the option to incorporate appendices, also to include EU Taxonomy tables, and the emphasis on non-duplicative reporting. This flexibility enhances the ability of organizations to structure their reports in a more efficient and tailored manner, aligning with the diverse needs of stakeholders. Additionally, we recognize and appreciate the clarification of the 'connected information' concept in ESRS 1. This clarification is instrumental in reducing fragmentation and repetition between sustainability disclosures and broader corporate reporting. By fostering better connectivity, it ensures a more coherent and integrated approach to reporting, which will undoubtedly enhance the usefulness and comprehensibility of the information presented to stakeholders.			
Survey	AMICE	Insurance	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We welcome the efforts made to improve the architecture of the standards, which is now are more readable and better structured.			
Survey	AMICE	Insurance	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Overall, we welcome the elimination of "may disclose" datapoints and the relocation of all mandatory disclosure requirements into the main body of the standards, along with the placement of Application Requirements directly below each relevant Disclosure Requirement. However, we would like to highlight that a reduction in data points does not inherently translate into a decreased administrative burden. Counting data points is not a meaningful or accurate measure of how demanding a reporting standard is. For instance, while both Scope 1 GHG emissions and the number of employees constitute individual data points, the associated reporting effort differs considerably. Employee figures are generally readily accessible through existing internal systems and can be extracted with minimal effort. In contrast, the disclosure of Scope 1 GHG emissions typically necessitates complex calculations and the consolidation of data from various sources, thereby imposing a substantially greater administrative burden. We therefore encourage EFRAG to place greater emphasis on alleviating the overall administrative workload by adding flexibility, a more efficient use of materiality and the introduction of the "undue cost and effort" principle rather than focusing solely on the quantitative reduction of data points. It would also be useful to have a clearly defined list of the final standards, with the updated data points. This would practically ease the implementation of the standards. In addition, we encourage to elaborate assurance guidelines to support statutory auditors and other assurance providers as soon as possible and to involve key stakeholders, such as insurers, in this process. This would reduce the risk of potential divergent interpretations regarding the reduction of information that companies are now required to report and ensure robustness and consistency in the application of the changes introduced.			
Survey	AMICE	Insurance	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We welcome the removal of voluntary data points from the NMIG and we agree with EFRAG's recommendation to the European Commission not to include the related content in the Delegated Act. It is indeed important to make extremely clear that the NMIG is voluntary and it is aimed at providing illustrative guidance whilst not being a checklist. An explicit statement should also be included to clarify that the NMIG cannot be used for auditory purposes, to avoid that it could trigger additional efforts of analysis and/or have an ambiguous role by requiring additional disclosures.			
Survey	AMICE	Insurance	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	AMICE supports the horizontal reliefs (including "undue cost or effort" and "reasonable and supportable information") and the permission to use proxies/estimates where appropriate. However, we do not agree with the exclusion of the GHG emissions (ESRS E1-6) from the relief for "undue cost or effort" partial scope reporting and we call on EFRAG to instead extend the relief also to GHG emissions (at least Scope 3). Conversely, reporting entities would be obliged to calculate and disclose poor quality GHG emissions data (especially Scope 3 GHG data) that would fail to meet the qualitative characteristics of information. Financial institutions in particular face ongoing challenges in accessing high-quality Scope 3 emissions data. They calculate their own GHG emissions based on their clients' data and do not always have sufficient data or sufficiently high-quality data to achieve a reliable calculation (especially on the upstream and downstream value chain in Scope 3). Hence, they often rely on external vendors, public disclosures, private reports, and estimates, encountering significant data gaps and time lags. Flexibility to use the best available data, proxies, and assumptions is essential for maintaining data quality and effective reporting.			
Survey	AMICE	Insurance	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We welcome the introduction of the 'undue cost and effort' relief provision to help mitigate the burden on companies, particularly smaller organizations, by providing flexibility in meeting reporting requirements without undue financial or operational strain. However, to effectively reduce the reporting burden, we reiterate the request to amend the drafting of ESRS 1, Section 7.4, Paragraph 91, as it creates some confusion for firms as well as concerns that it would require low-quality disclosures of GHG emissions. In addition, guidance to auditors would be helpful to make the principle of "undue cost or effort" useful.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AMICE	Insurance	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	As a matter of priority, considering the complexity and uncertainty both in the calculation and in the reputational impact in the reporting, we ask EFRAG to delete disclosure requirements on anticipated financial effects from the ESRS. Data that relies heavily on estimates and is subject to significant uncertainty does not offer reliable insights for investors or other users, due to its potential variability. Premature disclosure of such information may not only mislead stakeholders but also expose companies to reputational and legal risks stemming from misinterpretation. Hence, should the disclosure requirement relating to anticipated financial effects be maintained in ESRS, AMICE is of the opinion that Option 2 (qualitative information) is the preferred option. Option 1 entails significant uncertainties due to numerous interactions with other elements, which may result in the dissemination of inaccurate information to the public and end users. The information remains valid for a maximum of five years; however, years four and five are particularly difficult to assess with accuracy. Moreover, requesting an assessment based on a two-year timeframe is highly limited and would fail to account for all global factors that could influence the outcomes.			
Survey	AMICE	Insurance	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	See our comments to question 19.			
Survey	AMICE	Insurance	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	We believe that EFRAG's proposal enhances interoperability by aligning its language with that of the ISSB, by incorporating the concept of fair presentation and terminology that is consistent with ISSB standards. Additionally, EFRAG's proposal places increased emphasis on the materiality of information. The introduction of the 'undue cost and effort' relief provision, in line with ISSB practices, is another noteworthy aspect of the proposal.			
Survey	AMICE	Insurance	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	AMICE	Insurance	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	AMICE welcomes the simplification efforts made by EFRAG. In particular, we welcome the reduction in the number of Disclosure Requirements, particularly within the Policy, Actions, and Targets (PATs) sections, and acknowledge the structural improvements introduced in the revised ESRS, which contribute to more focused and manageable reporting. However, we believe that a true simplification effort must go beyond a mere quantitative reduction of data points. A more substantial commitment is needed to alleviate the overall reporting burden, addressing the complexity of processes, the interpretability of key concepts (such as materiality, fair representation, and undue cost or burden), and the actual decision-usefulness of the remaining mandatory requirements. Only through such a comprehensive approach can the framework support meaningful disclosures without placing excessive strain on companies' resources.			
Survey	AMICE	Insurance	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We believe they are not. EFRAG´s proposal is inconsistent with the European Commission's mandate to reduce reporting burdens.			
Survey	AMICE	Insurance	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We reject the EFRAG´s proposal to introduce new mandatory data points as this contradicts the objective of simplification that should guide the revision of the ESRS. Introducing additional mandatory requirements is inconsistent with the European Commission's mandate to reduce reporting burdens.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AMICE	Insurance	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	In principle and in line with the indications provided by the European Commission in its mandate to EFRAG, AMICE supports a simplification effort that aims at ensuring that the sustainability reporting focuses on strategically important information. The final objective is to move from a perception of sustainability reporting as a compliance exercise to a tool for business innovation, transparency, and long-term value creation. Hence, we support the integration of the fair presentation principle into the ESRS framework, as it represents a step in the right direction as long as it reinforces the materiality concept and enhances the decision-usefulness of reported information. Fair presentation requires a flexible, principles-based framework rather than a rigid compliance-oriented approach. It enables each undertaking to report information in a manner that reflects its specific strategy, business model, and activities. However, at this stage, its practical application remains uncertain and should be clarified. Unlike financial reporting, there is no established, standardized benchmark for what constitutes fair presentation of sustainability information. This lack of clarity creates a risk that auditors may impose inappropriate requirements, asking for broader or more detailed disclosures than those actually intended by the standards. In our view, if the required data points have been reported in accordance with the DMA process—along with any additional sustainability information relevant to the specific characteristics of the entity—then senior management should be responsible for asserting that the overall disclosure represents a fair presentation.			
Survey	AMICE	Insurance	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	We agree that financial institutions should be exempted from disclosing absolute GHG emissions targets when only intensity-based targets have been established. Insurer´s emissions are predominantly indirect and stem from investment and underwriting activities rather than direct operations. In such cases, estimating absolute emissions targets necessitates extensive assumptions and complex modelling across diverse portfolios, resulting in outputs with limited reliability, auditability, comparability and minimal added value for users.			
Survey	AMICE	Insurance	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	Currently, most preparers—particularly insurers classified as Wave 1 companies—are already complying fully with the requirements related to ESRS S1 on own workforce, as they were not eligible for the phasing-in provisions. As a result, any proposed amendments would still need to be implemented in full and would not provide any meaningful relief, given that the reporting processes are already in place.			
Survey	AMICE	Insurance	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	N/A			
Survey	AMICE	Insurance	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	AMICE agrees that the consolidation of datapoints and the removal of overlaps can improve readability and reduce duplication for reporting entities. As investors, insurers rely on sustainability disclosures to fulfill their regulatory obligations (including SFDR disclosure requirements), to develop sustainable investment products, and evaluate investee companies' environmental and social risk exposure. In light of the upcoming SFDR revision, AMICE stresses the importance to ensure consistency and make sure that available reported data by undertakings under the CSRD adequately support sustainability-related disclosures under the SFDR. In the meantime, EFRAG should ensure that it retains within the ESRS all datapoints corresponding to the 14 mandatory PAIs. These indicators are essential for the functioning of the SFDR and must remain fully available to users of sustainability disclosures.			
Survey	AMICE	Insurance	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	N/A			
Survey	AMICE	Insurance	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	In its State of play report 2025, EFRAG has revealed that while many preparers still disclose remuneration and DE&I policies in general terms, some are starting to link them through standardised metrics and clear methodologies. This enables more transparent, measurable, and comparable reporting. Hence, with respect to EFRAG's proposal to delete voluntary datapoint on adjusted gender pay gap, we recommend EFRAG to re-examine its decision and to see adjusted and unadjusted metrics as complementary. While the unadjusted gender pay gap provides a consolidated view of pay disparities and enables comparisons across companies and sectors using a standardized metric, the adjusted metric reflects a refined perspective by considering pay differences among comparable groups—such as employees in similar categories, levels or geographies. Therefore, we ask EFRAG to (re)insert the datapoint on adjusted gender pay gap as a "shall disclose" datapoint.			
Survey	AMICE	Insurance	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	N/A			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AMICE	Insurance	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See our general comments.			
Survey	AMICE	Insurance	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See our general comments.			
Survey	AMICE	Insurance	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See our general comments.			
Survey	AMICE	Insurance	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See our general comments.			
Survey	AMICE	Insurance	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See our general comments.			
Survey	AMICE	Insurance	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See our general comments.			
Survey	AMICE	Insurance	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See our general comments.			
Survey	AMICE	Insurance	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See our general comments.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	AMICE	Insurance	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See our general comments.			
Survey	AMICE	Insurance	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See our general comments.			
Survey	AMICE	Insurance	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See our general comments.			
Survey	AMICE	Insurance	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	See our general comments.			
Survey	AMICE	Insurance	Belgium	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	No comments.			
Survey	AMICE	Insurance	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We welcome the retention of the overall structure of the CSRD, comprising the ten topical standards and the four disclosure areas — governance, strategy and business model, impact/risk/opportunity management, and metrics and targets. Furthermore, we appreciate that EFRAG's proposals seek to enhance the clarity and usability of the reporting framework, notably through the reduction in the number of data points and the streamlining of narrative disclosures. However, we would like to highlight that a reduction in data points does not inherently translate into a decreased administrative burden. We therefore encourage EFRAG to place greater emphasis on alleviating the overall administrative workload, rather than focusing solely on the quantitative reduction of data points.			
Survey	Die Bürokratiemonster	NGO	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	This applies to all questions that follow. The pressure to simplify the ESRS was completely exaggerated by scaremongering on the burden of reporting. All the while reporting against the ESRS is still much less of a burden than doing financial reporting. The questionnaire is hence biased as the option that there was too much of a simplification is not provided. 4. Must be reverted, as it non-material serves no apparent purpose except to distract from what matters. 5. We commend the focus on fair presentation framework and strongly recommend for EFRAG to maintain this focus in upcoming debates. 6. Is unacceptable. There is no obvious history of overreporting against the ESRS. The ESRS cover a much wider range of topics than financial reporting, yet sections of management reports on non-financial information are still shorter than those with financial information. 7. Reinstate the granularity, as they serve as helpful guidance. 8. Companies must not be allowed to aggregate to the extent that it obscures information.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Die Bürokratiemonster	NGO	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	Complexity is relative. The complexity of financial reporting is much higher. Complexity must not be an excuse to obscure information on either the negative impacts or the associated mitigation actions taken corporation.			
Survey	Die Bürokratiemonster	NGO	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	There are tools available that already now provide a very easy way into the DMA. Complexity must not be an excuse to obscure information. Many companies already do well with the current requirements. Fears on complexity are overblown.			
Survey	Die Bürokratiemonster	NGO	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	1. Yes, remain as shall. 2. Not acceptable. All shall datapoints must be reinstated. 3. Reinstate topical specifications to GOV, SBM and IRO. They provide useful guidance to corporations. 4. Yes, maintain. The requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline shall be reinstated.			
Survey	Die Bürokratiemonster	NGO	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Die Bürokratiemonster	NGO	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	1. Remove, as undue cost or effort is too imprecise and a loophole to just leave out material information. 2. Remove, as another loophole to leave out material information. 4. Revert this change, as environmental impacts in joint operations can be significant even without operational control: "may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate". This would only incentive more complex structures to get negative impacts off the books.			
Survey	Die Bürokratiemonster	NGO	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	Remove additional flexibility, because it is a loophole to not report material information.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Die Bürokratiemonster	NGO	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Requiring quantitative disclosures, if feasible, helps propel the market forward. It is otherwise a chicken and egg problem.			
Survey	Die Bürokratiemonster	NGO	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Die Bürokratiemonster	NGO	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Way too much emphasis is put on simplification. SFDR datapoints must be mandatory. Also ESRS E1 in general, because climate is material by default. If the economy as a whole aims for net-zero, then even residual emissions matter. 3. Retract. The IFRS standards are too lax. The original ESRS E1 was widely hailed as a good standard in survey. No reason to weaken the standard. 4. ESRS must not go below the level of information required by IFRS S1 and S2. 5. Alignment with EU law is a priority. Not standards of a private initiative.			
Survey	Die Bürokratiemonster	NGO	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	Die Bürokratiemonster	NGO	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The scaremongering on the number of datapoints is simply ridiculous. Voluntary datapoints may be removed, but previously mandatory datapoints shall be reinstated, especially those concerning biodiversity. Across all topical standards datapoints related to the SFDR shall be reintroduced and made mandatory.			
Survey	Die Bürokratiemonster	NGO	Germany	22.E4.	Comments on deleted datapoints in ESRS E4	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	The loss of biodiversity and collapse of ecosystems is a completely underappreciated threat to, well, all of humanity. The threat is so grave and big that the cost of disclosing against already weak datapoints in the current ESRS E4 pale in comparison.			
Survey	Die Bürokratiemonster	NGO	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Strongly agree in particular vis-a-vis ESRS E4 transition plans, because of the aforementioned point.			
Survey	Die Bürokratiemonster	NGO	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Strongly agree. If it makes sense for reporting, then it serves a purpose and is in the spirit of the law. The evangelical cries of the business lobbies vis-a-vis very, very few additional datapoints, led by national standard setters, are ridiculous. All the while hundreds are being cut. This is an absolutely sensible move.			
Survey	Die Bürokratiemonster	NGO	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	Fair presentation needs to be defended at all costs. Top priority.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Die Bürokratiemonster	NGO	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	Die Bürokratiemonster	NGO	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	Die Bürokratiemonster	NGO	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree				
Survey	Die Bürokratiemonster	NGO	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	SFDR PAIs should be reinstated and made mandatory. This is not an undue burden, but provides valuable information to financial sector firms at the portfolio level. Making them subject to materiality just turns this information worthless, because it cannot be aggregated anymore as the materiality assessment process is not standardized.			
Survey	Die Bürokratiemonster	NGO	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Across all topical standards a reference to ecological budgets needs to be maintained, so that it is clear whether the targets are context-based or based on hot air. Agreed: "While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN."			
Survey	Die Bürokratiemonster	NGO	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree				
Survey	Die Bürokratiemonster	NGO	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree				
Survey	Die Bürokratiemonster	NGO	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Maintain the option to treat nature as a silent stakeholder. Ensure that stakeholder engagement is not only done via AI.			
Survey	Die Bürokratiemonster	NGO	Germany	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Die Bürokratiemonster	NGO	Germany	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Die Bürokratiemonster	NGO	Germany	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Die Bürokratiemonster	NGO	Germany	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Die Bürokratiemonster	NGO	Germany	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Die Bürokratiemonster	NGO	Germany	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Die Bürokratiemonster	NGO	Germany	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Die Bürokratiemonster	NGO	Germany	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Die Bürokratiemonster	NGO	Germany	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Die Bürokratiemonster	NGO	Germany	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Die Bürokratiemonster	NGO	Germany	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Die Bürokratiemonster	NGO	Germany	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Die Bürokratiemonster	NGO	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Way too much has been cut. Sustainability reporting needs to be context-based. Otherwise it is ESG and full of hot air. The direction taken by the European Union and EFRAG is utterly wrong. Instead of significantly diluting the ESRS the context-based approach that already existed should be strengthened across all standards.			
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree				
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Status of NMIG to be clarified			
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree				
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	We disagree with the two options proposed as they are essentially interchangeable. If option 2 were to be adopted, companies would not provide quantitative information to the market, thereby limiting transparency. If option 1 were to be adopted, many companies would tend to omit information through predetermined cases, thereby failing to guarantee transparency and comparability between information.			
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree				
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree				
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree				
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree				
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree				
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	TIM s.p.a.	Preparer (non-financial preparing a sustainability report)	Italy	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I would like to skip this question and provide my feedback in Part 3				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	Executive summary' is the best one to include given the kind of benefits it would bring to a report, especially for a report like ESRS as it has gone through some of the structural changes (but not affecting the oveall purpose of it).			
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	Term like "General Disclosure Requirements" really makes the reader comfortable about reading the report. Reduction in "shall" datapoints PAT is a good one given the nature of data involved, ARs "application requirements" looks very simple and interesting term. Removal of unnecessary/not-serving specifications good idea. And familiar terms like "resilience" still existing makes sense. connectivity between the disclosure of PAT and the description of IROs is a good scenario. Improving the ability to disclose information at a higher aggregation level than the material IROs can be appreciated given the purpose in mind.			
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	Its a good idea to remove "May disclose" datapoints as its always a confusing space. Making all the "shall disclose" datapoints part of the main body of the standard, and relocating mandatory application requirements below the DR to which they belong, and same time making sure "how to disclose" aspect getting covered looks appreciated for the kind of benefit it will bring in. Appreciated of improving language around understandability, conciseness and consistency of ESRS.			
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree	Reliefs on things like "undue cost or effort", Calculation of metrics, and on lack of data quality for metrics still keeping coverage in focus is a good plan to carry on. Removal of direct data related to the value chain metrics may serve the purpose, keeping the option of undertakings still being able to use direct data on need basis look an ideal plan. Resilience related disclosure limited to only qualitative information good. Keeping limitation on financial related details always a better idea. Introduction of relief for acquisitions of subsidiaries, sometime giving freedom to starting from the subsequent period good.			
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I would like to skip this question and provide my feedback in Part 3				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I would like to skip this question and provide my feedback in Part 3				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I would like to skip this question and provide my feedback in Part 3				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Former - Capgemini Technology Services Pvt Ltd	Other - please specify (required)	India	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	DIGITALEUROPE acknowledges the improvements made to simplify the Double Materiality Assessment process, particularly welcoming the flexibility to choose between top-down and bottom-up approaches. The clarification that companies need not assess every possible impact, risk, and opportunity (IRO) across their entire value chain represents a positive step toward more focused and decision-useful reporting. However, several critical concerns remain. The simplification efforts, while appreciated, do not go far enough. The standards maintain numerous data points that are not subject to the DMA assessment, i.e. data points that must be reported on even if they are not material for companies. A minimum of three years is necessary for companies to prepare their reports and assurance, and EU guidelines should clearly define reasonable limits on auditors' documentation demands. The Impact Materiality Scoring remains overly prescriptive. Despite helpful clarifications, the detailed documentation requirements may lead to excessive auditor demands, particularly as some DMA assessments are based on long-term, forward-looking estimations and assumptions. The current proposal sets documentation requirements at an unreasonably high level, and we recommend removing explicit documentation requirements from the standards to prevent increased burden from auditors. Even if the intention is to reduce workload, defining and requiring such level of documentation could lead to even increased burden, as taking into account all situations, conditions, and information available when defining reasonable/ supportable evidence is impractical. While the proposed aggregation and disaggregation guidance is welcomed, it requires revision. Although companies' discretion in determining appropriate levels is appreciated, the provided examples could be interpreted as mandatory requirements. We strongly recommend further alignment with ISSB standards, making disclosures and assessments for positive impacts and opportunities voluntary, and eliminating examples for aggregation/disaggregation to prevent misinterpretation as requirements.			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	DIGITALEUROPE strongly believes that prevention, mitigation, and remediation actions should be taken into account when determining materiality of IROs and should not require extensive new evidence gathering. The current effort to provide guidance on these considerations, while welcome, has resulted in an approach that our members find overly complex and burdensome to implement. There is strong consensus that the current framework needs significant simplification to ensure practical implementation while maintaining meaningful disclosure of material risks. Several approaches could address these challenges. A consistent net approach could enhance reporting comparability, though care must be taken to avoid creating additional burden through annual reassessments of materiality in light of remediation initiatives. Alternatively, allowing companies an initial choice between gross and net approaches, with consistent application across all impacts, could provide necessary flexibility while maintaining reporting integrity. The framework could also consider a balanced approach that applies net calculations for risks and opportunities while maintaining specific considerations for impacts. Most critically, there is shared concern about the ambiguous nature of "supportable evidence" required, with a clear preference to rephrase this as "reasonable evidence" to provide more clarity and practicality in implementation. DIGITALEUROPE recommends simplifying or removing Appendix C of ESRS 1 to reduce complexity while ensuring transparent disclosure of material risks.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	While we agree with this, we are of the opinion that harmonized guidance still needs to be provided in determining data/information that is required in the body of the statement and what needs to move to the appendix. Overall, the current proposal – although promising – is a mere clarification of the requirements but not leading to significant relief in terms of implementation effort. Many eliminated datapoints were either consolidated, moved to non-mandatory guidance, or represented simple qualitative disclosures. The remaining requirements still demand complex data collection, documentation, and assurance efforts that maintain or potentially increase the operational burden on companies.			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We welcome the reduced prescriptiveness and the changes to Policies, Actions, and Targets (PATs), as it lowers preparation effort. However, this should not be counteracted by future interpretative guidance that reintroduces complexity. In addition, we support further simplification of PATs disclosures. While appreciating the efforts to simplify PATs data points by reducing redundant disclosures across ESRS 2 and topical standards, we believe further simplification is needed. The current PAT disclosures remain overly complex and granular, hindering effective implementation and clear communication. To align with a more principle-based ESRS framework, we encourage revisions that enhance consistency and interoperability with existing frameworks like ISSB, reducing prescriptive requirements. This would offer companies greater flexibility to disclose decision-useful information on governance, strategy, risk management, and targets/metrics in a way that aligns with their operational realities, leading to more meaningful and material disclosures. Some changes extend beyond restructuring and introduce behavioural requirements (e.g. ESRS 1, paragraph 84(C), E1-2 AR5 for para 18) or were changed from "may" to "shall" datapoints without being flagged (e.g. S1-3 new para 19 (b) "approach in which situations where tension arise"). Overall, we support the revised structure as it reduces complexity and duplications, but in many cases this does not reduce the volume of reporting substantially.			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Yes. The amendments help to improve clarity and accessibility. Clearer and less prescriptive requirements reduce the need for costly interpretation and specialist resources, thereby limiting reporting obligations. However, while the structure and readability have improved, the overall reporting requirements remain largely unchanged. As such, the simplification primarily supports better orientation within the standards rather than reducing the reporting burden itself. Moreover, we recommend to remove all new mandatory disclosures that have been added – these go against the Commission's mandate which is to simplify the existing ESRS rather than introducing new disclosure requirements and data points.			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	NMIG is useful when applied voluntarily, but it should remain clearly outside the mandatory framework even if influencing market practice as auditors may use it to inform their assurance procedures. This ensures examples are available for reference without adding de facto reporting obligations.			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	DIGITALEUROPE welcomes EFRAG's efforts to provide reporting burden relief and focus on decision-useful reporting, particularly the clarification that reasonable and supportable information available without undue cost or effort shall be used, and that qualitative information may suffice for the materiality assessment of IROs. However, we strongly advocate for further alignment with ISSB standards to create a level playing field between the EU and other jurisdictions, especially regarding on ISSB relief for disclosures of information on opportunities that are commercially sensitive. Scope 3 calculations face significant challenges in data collection and measurement uncertainty across complex value chains. We strongly support that in the first year of reporting, companies may take advantage of relief on scope 3 reporting in line with ISSB provisions. We also advocate maintaining flexibility in establishing organizational boundaries and calculation methodologies. Companies should retain the ability to exclude certain Scope 3 categories based on data availability or inability to influence emission sources, while being explicitly permitted to use estimations and modelling in line with international standards. DIGITALEUROPE also emphasizes the need for flexibility in data aggregation reporting under ESRS on a disclosure-by-disclosure basis. Companies should have the discretion to report at company, EU, or global parent company level, based on their assessment of the most meaningful and decision-useful information for each disclosure requirement. This is particularly crucial for EU subsidiaries of non-EU groups that may have limited operational control over certain policies and data. While we appreciate the removal of systematic preference for direct data in value chain metrics, concerns remain about financial effects disclosures and resilience reporting requirements. These create overlaps with existing disclosures and may not meet the objective of simplification. EFRAG and the Commission should prioritize further simplification of standards rather than pre-empting changes to the CSRD.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	DIGITALEUROPE welcomes EFRAG's efforts to provide reporting burden relief and focus on decision-useful reporting, particularly regarding reasonable and supportable information without undue cost and the use of qualitative information for materiality assessment of IROs. However, we strongly advocate for further alignment with ISSB standards to create a level playing field between the EU and other jurisdictions, especially regarding the relief for disclosures of information on opportunities that are commercially sensitive. For Scope 3, calculations involve significant estimations and measurement uncertainty, significantly reducing comparability across companies. Major challenges exist in collecting data from complex value chains and obtaining timely, accurate information from suppliers and customers who are themselves grappling with emissions calculations. We strongly support first-year relief from Scope 3 reporting and advocate maintaining flexibility in organizational boundaries and calculation methodologies. Companies should be able to exclude certain Scope 3 categories based on data availability or inability to influence emission sources, while being explicitly permitted to use estimations and modeling aligned with international standards. A key concern remains the excessive granularity of required information, particularly where data isn't readily available without undue effort. The framework must prioritize decision-useful data points over exhaustive reporting that risks becoming a mere compliance exercise. Reporting entities need greater flexibility in selecting appropriate data aggregation levels (company, EU, or global) on a disclosure-by-disclosure basis to ensure meaningful reporting. This is particularly crucial for EU subsidiaries of non-EU groups with limited operational control over certain policies and data. While we appreciate removing systematic preference for direct data in value chain metrics, concerns persist about financial effects disclosures and resilience reporting requirements. These create overlaps with existing disclosures and may not meet simplification objectives. EFRAG and the Commission should prioritize further standards simplification rather than pre-empting CSRD changes.			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	DIGITALEUROPE supports maintaining flexibility in the disclosure of anticipated financial effects and recommends leaving quantification as a voluntary option. Qualitative disclosures on anticipated financial effects significantly reduce the burden compared to mandatory quantitative assessments, which are highly resource-intensive and speculative. The relief should remain in place, as due to insufficient guidance from accounting standard boards, compliance costs could rise significantly, and the comparability of disclosures might decrease, inadvertently reducing their decision usefulness. We note that estimating the financial implications of impacts, risks, and opportunities is highly uncertain and challenging due to additional net costs beyond normal business operations and the sensitivity of information that relies on non-public business growth projections. While companies may face fundamental challenges in providing qualitative statements as these still require quantitative assessments, DIGITALEUROPE notes that qualitative disclosures on anticipated financial effects significantly reduce burden. Therefore, DIGITALEUROPE proposes the indefinite removal of all phased-in disclosures related to anticipated financial effects. If requirements are maintained, we recommend allowing companies to provide qualitative information instead of quantitative data for current financial effects, as this would better balance the needs of stakeholders with the practical challenges faced by reporting companies.			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	While we welcome the removal of requirements to disclose effects across short, medium, and long-term time horizons, the remaining requirements still pose significant feasibility challenges. We identify three key concerns with the current requirements. First, the disclosure of monetary amounts and percentages of assets at material physical/transition risk before considering climate change adaptation actions is problematic due to estimation uncertainty and lack of accounting guidance. This is particularly challenging when considering assets with insurance policies or assessing income statement impacts, where multiple factors such as policy changes, business growth, and infrastructure development create significant variability. Second, requiring disclosure of key assets' locations at material physical risks raises business sensitivity concerns. Third, the requirement to report monetary amounts and percentages of revenue from business activities at material physical risk is impractical for global companies that don't track revenue by physical asset location. Furthermore, we note that material financial impacts are already covered under IFRS accounting standards. As most companies apply the IFRS accounting standards, the proposed requirements not only create potential redundancy but also go beyond ISSB requirements, potentially undermining international alignment efforts. It should be noted that EFRAG explicitly states that cross-referencing to other parts of the management report including the financial statement should be increased. We recommend that commercially sensitive information should not be required, and when sustainability-related financial effects cannot be separately identified from business activities, companies should have the option to omit metrics with appropriate explanatory disclosures.			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	While we appreciate efforts to align with IFRS S1/S2 and other international standards, the changes fall short of true equivalence, which should be the ultimate goal. We vehemently oppose the requirement to use the financial consolidation approach for GHG emissions reporting. This deviates from both ISSB standards and the GHG Protocol, and contradicts the practices of most companies (~70%) that currently use the operational control method. This change will necessitate substantial effort to re-estimate carbon footprints, resulting in a high-effort compliance exercise that contradicts EFRAG's simplification objectives. DIGITALEUROPE demands that companies be permitted to report using either operational or financial control boundaries, aligning with established global practices. Furthermore, we urge EFRAG to consider proportionality and the sequencing of requirements, particularly for EU subsidiaries of non-EU groups. Reporting obligations should be meaningful, practicable, and aligned with where sustainability impacts, risks, and opportunities are actually managed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	While we welcome the significant decrease in reporting requirements as a step towards reducing unnecessary burden, and appreciate the simplified standards' emphasis on "fair presentation" and materiality as an overarching filter for sustainability disclosures, several concerns remain. Despite the reduction in datapoints, the ESRS exposure drafts still cover the same reporting areas and topics. The less prescriptive approach may not significantly reduce companies' level of effort as initially intended, as the simplified standards primarily removed duplicative and voluntary datapoints that companies often already scoped out in their materiality-focused approaches. We strongly recommend removing requirements for company-specific IROs beyond the 12 ESRS areas to further reduce reporting burden. The determination of these additional entity-specific sustainability topics also imposes huge legal uncertainty for companies as it is not clear which topics may even qualify as sustainability topics. DIGITALEUROPE urges EFRAG to ensure that all disclosure requirements relying on removed voluntary datapoints are also eliminated to maintain consistency. Of particular concern is the introduction of new mandatory disclosure requirements, which contradicts the simplification objective. We strongly suggest deleting all newly introduced mandatory disclosures to fulfill the purpose of the ESRS revision. While the current reduction represents an improvement, DIGITALEUROPE recommends that EFRAG consider further reductions in the future if uptake shows immaterial information is still being reported. The goal should be to maintain a practical balance between comprehensive reporting and feasible implementation.			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	DIGITALEUROPE strongly disagrees with moving six datapoints from "may" to "shall" status, as this fundamentally contradicts the Commission's mandate to EFRAG for simplification. Of particular concern is the timing impact on sustainability statement preparation. We urgently call for clarification on the applicability date of the simplified ESRS to ensure no negative impact on 2025 sustainability statements, including addressing national implementation timelines to ensure a level playing field. Alignment with the "stop the clock" directive could provide a pragmatic solution. Specific concerns include the overly broad definition of "corruption" in Annex II, which could require disclosure of isolated incidents unrelated to business operations, potentially duplicating existing disclosure obligations. The mandatory biodiversity transition plans add unnecessary complexity given the lack of well-defined procedures. Regarding G1 datapoints, we recommend maintaining them as optional and reclassifying them as non-mandatory guidance. Clarification is needed on the scope of procurement team training requirements, particularly whether they cover both compliance-related topics and broader sustainability aspects.			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We recommend that all data points should be subject to materiality. Making some mandatory is misaligned with the CSRD's/ESRS's emphasis on materiality, leading to unnecessary reporting burdens and diluted focus on relevant issues. The four new mandatory datapoints add to reporting burden going against the Commission's mandate to EFRAG. Overall, no new data points should be introduced. In particular, information on materials with unknown final destinations may be impractical to collect but also be sensitive. These should be deleted.			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	While DIGITALEUROPE generally welcomes this alignment with statutory financial reporting and ISSB standards, viewing it as beneficial for overall disclosure and assurance readiness, we have concerns about its practical implications. Our members acknowledge that fair presentation could help reduce excessive reporting and minimize a compliance checklist approach. However, there are varying perspectives on its implementation in particular as adding the concept of fair representation would expand reporting obligations beyond CSRD bounds and it may raise concerns about potential scope expansion and interpretation challenges. A key issue is the lack of clear definition regarding the "users" of sustainability information, particularly in the context of materiality assessment. The inclusion of both primary users and "users of general purpose" creates uncertainty about what constitutes material information under the fair presentation principle. Practical application concerns center on impact information, which often relies on estimates and assumptions that can vary significantly depending on methodologies and data sources. This variability could affect both comparability and neutrality. To address these challenges, DIGITALEUROPE recommends developing more robust frameworks and clearer methodologies while ensuring that implementation does not lead to increased audit costs or reporting burdens.			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	DIGITALEUROPE is neutral. The positive answer above has been submitted for the sake of providing our written neutrality to the issue at stake.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	DIGITALEUROPE strongly disagrees with the proposed change to the threshold for country-by-country disclosure in ESRS S1-5 and S1-7. The new requirement to disaggregate metrics for the top 10 largest countries by employee headcount would significantly increase reporting burdens, particularly concerning social dialogue data where necessary IT systems and data collection processes may not be in place. The impact of this threshold change remains unclear, and we urge that any modifications potentially increasing reporting scope should be approached with extreme caution. The removal of the word "estimated" for coverage reporting outside the EEA further compounds these concerns, potentially requiring more precise data gathering in regions where this may be challenging. Our members emphasize that mandatory reporting should focus on core metrics (employee status, safety, diversity) with other metrics remaining voluntary. We strongly advocate for group-level reporting as the default approach, with country-level reporting limited to high-risk regions. This would better align with existing regulations while avoiding unnecessary duplication of efforts. The current list of social data points already requires extensive metric disclosure, potentially compromising readability for users. Rather than expanding the scope, DIGITALEUROPE recommends maintaining the existing threshold and allowing companies to apply materiality assessments to select relevant metrics that provide meaningful insights into identified or potential IROs.			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	DIGITALEUROPE partially agrees with the proposed methodology for calculating non-EU adequate wages. While we acknowledge that the revised approach reduces reliance on unavailable or unreliable local data sources and improves feasibility, significant concerns remain regarding its practical implementation. The current proposal places an unreasonable burden on companies to determine whether minimum wages in non-EU countries are "adequate" according to ILO principles, rather than providing a harmonized approach. This individual interpretation could lead to inconsistent results across companies and often requires purchasing external services, creating additional financial burden. We suggest the following modifications. First, replace the concept of "adequate wage" with "minimum wage set by collective agreement or by law" to provide companies with a clear, actionable definition. Second, limit disclosure requirements to countries with significant workforce (50 or more employees representing at least 10% of total employees) to avoid unnecessary investment in small operational sites. Third, allow companies flexibility to define and disclose their specific methodology for assessing wages within their operational context. DIGITALEUROPE believes these changes would maintain transparency while acknowledging the diverse nature of business models and geographical variations, enabling more practical and meaningful reporting without compromising the standard's objectives.			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	Partially agree. While consolidating SFDR datapoints in ESRS 2 improves traceability, it still imposes additional requirements linked to other EU frameworks.			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	DIGITALEUROPE advocates for maximum flexibility in the review of AR 26 in Amended ESRS E4 and strongly recommends against further alignment with frameworks that are still under development. We suggest simplifying AR 26 to avoid overly prescriptive disclosures on biodiversity targets, with revised wording stating: "Undertakings may, where relevant, describe biodiversity and ecosystem targets, including scope, baseline, and timeframe." Additionally, for emerging areas such as secondary microplastics and critical raw materials reporting, we recommend starting with qualitative disclosures and expanding to quantitative metrics over time.			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	DIGITALEUROPE supports the deletion of the voluntary adjusted gender pay gap datapoint as it aligns with the objective of reducing reporting burden while maintaining the mandatory unadjusted metric for basic comparability across entities. However, we note that the adjusted gender pay gap often provides more meaningful insights, as it compares gender pay differences based on the same job type, better reflecting the principle of equal pay for equal work. The current unadjusted pay gap, which only compares men and women overall, may present a distorted picture, particularly in certain industries. This distortion is further amplified when benefits are included in the calculation, as these are typically managed at country level independently of gender. While supporting the simplification effort, DIGITALEUROPE recommends that companies retain the flexibility to report adjusted gender pay gap data voluntarily when it provides more relevant information for their specific context.			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	DIGITALEUROPE supports the deletion of payment practices provisions as it helps reduce cascading data requests and avoids imposing disproportionate obligations on smaller companies in the value chain. This approach better supports proportionality and lowers overall reporting costs. However, we have significant concerns about the proposed replacement formulation. For multinational companies with thousands of suppliers globally, categorizing suppliers into SMEs and non-SMEs is not feasible. Furthermore, standard payment terms generally do not differentiate between supplier types. Rather than amending G1-6 as proposed, DIGITALEUROPE recommends eliminating the payment practices disclosure requirement entirely and allowing companies to utilize the fair presentation principle to disclose material information pertinent to identified topics and IROs.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	[See detailed comments in excel file] Confidentiality of information: Under "ESRS 1 - 7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation - ESRS 1 - 98." The definitions of classified and sensitive information are very narrow and cover only a limited subset of information. We urge EFRAG to take into account that companies also possess other types of information, namely trade secrets, which cannot be disclosed freely. Therefore, in paragraph 98, we recommend including an explicit reference to trade secrets as defined in Article 2, point (1), of Directive (EU) 2016/943. This supports the proposal made by the European Parliament's Special Rapporteur, who has also called for such an addition in the context of the CSRD. While we acknowledge that "secret information" is addressed in para 99 ESRS 1, we do not consider this to be sufficient as para 99 only applies to information on strategy and action plans. However, companies should not be obliged to disclose any "secret information" / trade secrets. The amendment to para 98 should read as follows: "The undertaking is not required to disclose classified information, sensitive information, information on intellectual capital, intellectual property or know how, proprietary information or technological information, including information which constitutes trade secrets as defined in Article 2, point (1), of Directive (EU) 2016/943, even if such information is considered material."			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	[See detailed comments in excel file]			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	[See detailed comments in excel file] DIGITALEUROPE welcomes the structural changes in ESRS E1 that reduce complexity and documentation effort. However, several critical concerns require urgent attention. We strongly oppose the proposed changes in reporting on financial resources related to the transition plan. The requirement to disclose complete financial and investment planning, including ranges of short, medium, and long-term CapEx/OpEx, represents an expansion rather than reduction of reporting requirements, exceeding financial reporting standards and creating unreasonable burden. Most critically, as stated under question 21, we vehemently oppose the requirement to use the financial consolidation approach for GHG emissions reporting. This deviates from both ISSB standards and the GHG Protocol, contradicting the practices of most companies (~70%) that currently use the operational control method. This change will necessitate substantial effort to re-estimate carbon footprints, resulting in a high-effort compliance exercise that contradicts EFRAG's simplification objectives. DIGITALEUROPE demands that companies be permitted to report using either operational or financial control boundaries, aligning with established global practices.			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	[See detailed comments in excel file]			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	[See detailed comments in excel file] Disclosure on sites located in areas of water risk not covered by water policies" is too granular and prescriptive. The KPI "Water intensity" was removed without specific reason. As the "intensity KPIs" are frequently asked in Ratings & Rankings, we would suggest keeping the KPI as there is no real reduction in reporting effort (water consumption and net revenue data is needed anyway).			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	[See detailed comments in excel file]			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	[E5-31, E5-36 and E5-37 references] DIGITALEUROPE recommends that all new disclosure requirements introduced through this revision to be deleted as they contradict the simplification spirit of this exercise. For instance, disclosure requirements E5-31, E5-36 and E5-37 are unclear or sometimes even problematic. For instance, E5-37e seems problematic should the estimation of the waste breakdown is no longer be allowed and will likely lead to various interpretations and reporting practices, especially as less companies would be in scope of the CSRD and have less rights on requesting data to companies outside of scope. [E5-4] Not only is the information on total weight based on individual materials difficult to obtain but disclosing key strategic and critical material is sensitive information.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	[See detailed comments in excel file] DIGITALEUROPE expresses significant concerns regarding the proposed amendments to ESRS S1. The removal of the term "severe" from human rights incident disclosures risks mandating reporting of minor incidents, undermining materiality and contradicting simplification objectives. We strongly recommend maintaining a focus on severe incidents to ensure meaningful and proportionate reporting. Regarding remuneration disclosures, we advocate for alignment with existing EU Pay Directive, country-specific directives, and U.S. SEC requirements to avoid complexity and confusion. For collective bargaining agreements, we suggest limiting required metrics to national and sectorial CBAs, making local CBA reporting optional. We urge the elimination or reduction in granularity of several datapoints, including employee turnover rates, adequate wages methodology, gender pay gap calculations, and overly detailed collective bargaining metrics. These requirements deviate from the principle-based approach and may not provide decision-useful information. Furthermore, we recommend clarifying that human rights incident reporting should be limited to formally reported judicial or non-judicial proceedings. Social protection disclosures should focus on company-specific measures beyond public policy frameworks. Lastly, we highlight the complexity of reporting on non-employee characteristics, which may lead to data access issues and potential double reporting within the CSRD scope.			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	[See detailed comments in excel file]			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	[See detailed comments in excel file]			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	[See detailed comments in excel file]			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree	[See detailed comments in excel file] DIGITALEUROPE recommends significant revisions to ESRS G1 to align with simplification objectives and fair presentation principles. We strongly advocate for eliminating the payment practices disclosure requirement rather than amending G1-6. Companies should be allowed to apply fair presentation principles to disclose material information related to identified topics and IROs. We express concern over the shift of certain datapoints from "may" to "shall" status, particularly regarding business conduct training for procurement teams and incident reporting. This seems to be in contradiction with the main simplification objectives. These should remain optional and be reclassified as non-mandatory guidance. In any case, there are concerns about the lack of clarity in the requirements as the current wording does not specify whether companies need to disclose if such training occurred or provide detailed information on target audience, frequency, and depth of coverage. Additionally, we ask that any new mandatory disclosures be carefully evaluated to ensure they align with the overall goal of reducing reporting burden and enhancing decision-useful information.			
Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	[See detailed comments in excel file] DIGITALEUROPE proposes several refinements to the Glossary to enhance clarity and alignment with industry standards. For water-related definitions, we recommend limiting "water withdrawal" to freshwater to avoid masking the positive impact of recycled water usage. The definition of recycled or reused water should include third-party sources and clarify the treatment of municipal recycled water. We suggest differentiating between various types of water recycling and reuse to better reflect industry practices and conservation efforts. For circular economy principles, we advocate for alignment with ISO 59004:2024 and EN 4555X series, explicitly including both post-industrial and post-consumer recycled materials. The eco-design definition should also align with EN 4555X series. We propose refining the durability definition by removing "and relevant" unless measurable, and including "update" in the software context. We recommend removing the longevity definition due to overlap with other circular economy concepts and measurement challenges. Reparability should be measured per EN45554, and the secondary resources definition should explicitly include both post-consumer and pre-consumer materials per EN45557. Lastly, we suggest narrowing the corruption definition to exclude isolated incidents unrelated to business operations, ensuring more targeted and relevant reporting.			

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Survey	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		•Flexibility for global targets and data - when programs are managed globally and EU disaggregation is only for reporting purposes •Remove mandatory topic-based disclosures not subject to materiality - no topics issues should be required to be reported by all •Also no comply-or-explain mechanism e.g. with regard to climate change or targets etc that are not existing. •Make CapEx/OpEx disclosures optional - burdensome to calculate, focus on impact rather than spend •Reduce duplication with existing EU regulations that ask for the same info as CSRD (i.e. gender pay) and that apply to most companies.			
Survey	Finance Watch	NGO	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Finance Watch supports EFRAG's proposal for the ESRS to be a fair presentation framework. This approach would prevent the emphasis on irrelevant information that could mislead sustainability reporting users and could turn the preparation of sustainability reports into a pure compliance exercise. However, Finance Watch expresses concerns over the proposed relief in the identification of impacts, risks and opportunities (IROs) in case such identification will deemed by the reporting entity to present undue costs of effort. This point is further elaborated below.			
Survey	Finance Watch	NGO	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Finance Watch welcomes EFRAG's effort to reduce the number of datapoints while preserving key information that is necessary for sustainability reporting users. In particular, Finance Watch welcomes the preservation of a large part of quantitative datapoints and the reduction of qualitative datapoints which, in some cases, tend to unnecessarily increase the length of certain sustainability reports without providing an informational value added.			
Survey	Finance Watch	NGO	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	Finance Watch recognizes that reporting companies should adopt a proportionate approach in the identification of material topics to be reported. This principle is already reflected in the EFRAG implementation guidance 1 on materiality assessment. However, Finance Watch expresses concerns about the "undue cost or effort" relief introduced in the general requirements for the identification of impacts, risks and opportunities (IROs) and the use of information to identify these IROs. On the one hand, this exemption does not take into account the size and the complexity of the reporting companies' activities and business model. On the other hand, the notion of "undue cost or effort" remains unclear, despite the details provided in Chapter 7.3, and will lead to more uncertainty and diverging practices and interpretations, including from assurance providers. As a result, Finance Watch warns that the IROs identification could become an exercise where companies rely on standardised IROs for a specific sector without adequately tailoring the assessment to their own activities. This risks creating legislative loopholes for large companies not to report important (material) information. Alternatively, Finance Watch notes that the ESRS should rather refer to the application of proportionality principle, which would avoid an outright opt out for certain topics, and ensure that a certain level of flexibility in the execution of the materiality assessment is accepted, taking into account the size and complexity of the reporting undertaking. This approach would also allow leveraging the existing proportionality reference included in the European Banking Authority (EBA) guidelines on the management of environmental, social and governance (ESG) risks to avoid legislative inconsistencies for credit institutions. Finally, Finance Watch agrees with ECB's position stating that reliefs for lack of sufficient data quality should be limited in time, and more generally reliefs should be exceptional.			
Survey	Finance Watch	NGO	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Finance Watch welcomes interoperability efforts between the ESRS and the ISSB Standards, but highlights the importance to defend the principle of double materiality and the reporting approach adopted under CSRD. Finance Watch has continuously warned against the limit of the ISSB (International Sustainability Standards Board) approach to address the overlap between the notion of impact materiality and financial materiality. The ISSB already acknowledged the financial risks that may arise for companies with high GHG emissions, highlighting that impact can also be a driver of financial risk. In fact, all negative impacts of the companies' activities may result in a financial risk and positive impacts may generate value for the investors. It creates the challenge to determine how the notion of financial materiality should integrate the impact of companies' activities and which time horizon should apply to consider a topic as being financially material. Arguably, the longer the time horizon under consideration, the more environmental impacts translate into the risks at systemic level and for every company individually. As a result, drawing the line between topics that solely belong to impact materiality and topics that belong to both impact and financial materiality is a complex exercise which would not help reduce the workload for reporting companies. Moreover, solely focusing on financial materiality within the traditional time horizons of business planning and risk management will inevitably ignore the ESG impacts of companies, which lock in long-term financial risks not only for any given reporting company, but for the economy at large. This will jeopardise the ESG risk management across the economy, which eventually defies the purpose of the reporting standards.			
Survey	Finance Watch	NGO	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	Finance Watch supports EFRAG's proposal for the ESRS to be a fair presentation framework. This approach would prevent the emphasis on irrelevant information that could mislead sustainability reporting users and could turn the preparation of sustainability reports into a pure compliance exercise. However, Finance Watch still expresses concerns over the proposed relief in the identification of impacts, risks and opportunities (IROs) in case such identification will deemed by the reporting entity to present undue costs of effort. This point is further elaborated above.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Finance Watch	NGO	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Finance Watch highlights that companies initially subject to NFRD have already performed their first materiality assessment and published first assured sustainability report. This observation is also valid for many companies in countries that have not yet transposed CSRD. For example, Finance Watch noted that, based on a sample of 64 EU/EEA banks representing 75% of the total banking assets, 91% of the companies have prepared their non-financial reports based on the CSRD standards, while only 62% were located in transposing Member States (the results of Finance Watch study will be published in October 2025). Introducing the concept of undue cost or effort will therefore have very little impact of the actual reporting cost.			
Survey	Finance Watch	NGO	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Finance Watch highlights that climate transition plans are a key element of the CSRD reports. The preservation of most datapoints under ESRS E1-1 (Transition plan for climate change mitigation) and ESRS E1-4 (Targets related to climate change mitigation and adaptation) is therefore welcome. However, Finance Watch highlights the complexity to compare transition plans reported under CSRD and, in some cases, to understand whether the reporting company considers that it has a CSRD-relevant transition plan . In that regard, Finance Watch welcomes the EFRAG proposition to keep the disclosure requirement for the undertaking to indicate whether and, if so, when it will adopt a transition plan for climate change mitigation, if it does not have one in place. Yet, additional details on the target setting methodologies, the baseline year and the granularity should be considered to support comparability. The limited comparability of transition plans is also explained by the absence of clear format for reporting companies to disclose their transition plan. Based on Finance Watch study (as referenced above), some companies only disclose their transition plan and GHG emission reduction targets in a free text format, which makes it difficult for users (banks/finance providers, investors, researchers and civil society actors) to read the report and for institutional investors to reuse the information. Some undertakings disclose their targets in more retail-friendly illustrative representation. Finally, some undertakings disclose their targets in a table format, which can be more easily processed by institutional investors. As a result, it is still difficult to compare companies' transition plans to identify more ambitious actors, compare and assess progress. Finance Watch therefore recommends the EFRAG to complement the transition plan disclosure requirements with a required illustrative representation of GHG emission reduction targets and a mandatory tabular representation.			
Survey	Finance Watch	NGO	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Moreover, Finance Watch noted that, in its CSRD report analysis for 64 banks (representing 75% of the total assets), only 59% of the reporting companies reported their transition plan while 84% disclosed GHG emission reduction targets. Finance Watch shares concerns over the credibility of the emission reduction targets for companies stating that they did not adopt a CSRD transition plan. To prevent greenwashing, Finance Watch recommends that the ESRS require the publication of the transition plan disclosures as soon as the company discloses GHG emission reduction targets. Finally, Finance Watch highlights that setting targets at the group level leads to an uneven level playing field between EU and non-EU credit institutions. Certain undertakings assessed by Finance Watch have indeed reported having a transition plan but not disclosed GHG emission reduction targets under the justification that their targets are defined at the group level while the parent company is located outside the EU. Finance Watch recommends the EFRAG to require reporting subsidiaries of non-EU groups disclosing a transition plan to set and disclose GHG emission reduction targets at local level. A mere statement that targets are set at group level should not be allowed.			
Survey	Revisorforeningen	Other - please specify (required)	Norway	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We generally agree that the Exposure Draft strikes reasonable balance between simplification and robustness -We support the clear allowance of a top-down approach and welcome the new guidance in Section 3.5 on how the DMA may be conducted. -We consider that the DMA process will still require significant effort, especially in assessing impacts considering severity and significance from stakeholders' perspectives, and further non-binding guidance on how to identify affected stakeholders and assess impacts would be helpful -We support defining material information for a broader range of stakeholders beyond investors. -We are concerned that inconsistencies in wording between §4, §21, AR 3 and the glossary might lead to confusion regarding the terms "users", "sustainability statement" and "general purpose sustainability statement". These terms should be harmonised and clarified across the different paragraphs relating to materiality and fair presentation assessments. In particular ESRS 1 should either consistently use the term "sustainability statement" or clearly explain what the difference with general purpose sustainability statement is and how this impact the materiality and fair presentation assessment" -Clarification of the link between IROs and topics is helpful, but more clarification is needed -We request a clearer practical explanation of what 'reporting at the level IROs are managed' or 'groups of IROs' mean.			
Survey	Revisorforeningen	Other - please specify (required)	Norway	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	-Overall agreement with ESRS 1.34-36 as helpful clarifying principles. -AR 12 in relation to §§ 34-35 – it is unclear whether implementation of policies can be understood as a mitigating action. We do not support this and request clarification to avoid misunderstandings -There seems to be some inconsistencies between paragraph 34 and 35 and appendix C. Appendix C seems to require a net perspective for all potential impacts in the current reporting year ("Report the potential impact after prevention or mitigation actions if it remains material..."), while paragraph 35 suggests a gross approach (§35 "..the impact shall be assessed without considering the mitigating and/or prevention actions") -We are concerned that "significant ongoing actions" would give rise to interpretative challenges. We suggest to remove the word "significant".			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Revisorforeningen	Other - please specify (required)	Norway	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	-Additional flexibility is welcome. -We welcome deletion of "may" disclosures and moving of "shall"-disclosures to the main body of the standard -We welcome clarification on the use of appendices in sustainability statements, including for EU Taxonomy disclosures -The option to include an executive summary is useful for better storytelling, however we urge EFRAG to further clarify if the executive summary should provide a fair presentation of all material IROs or if it could follow a management approach. -Executive summaries should adhere to materiality, qualitative characteristics, and be supportable within the overall sustainability statement -We disagree with the changes regarding connectivity (ESRS1 paragraph 125, replaced by ESRS ED paragraph 115). Connectivity between sustainability statements and financial reports is relevant for the primary users of the reports			
Survey	Revisorforeningen	Other - please specify (required)	Norway	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	-Support for the introduction of General Disclosure Requirements (GDR). -GDR aims to discourage overly granular information. -Recommendation to further clarify what is intended by reporting policy, action and targets (PATs) on IROs at the level they are managed or for groups of IROs. -We also welcome the clarification to avoid boilerplate reporting on PATs and the clear reference to the specific PATs addressing material IROs.			
Survey	Revisorforeningen	Other - please specify (required)	Norway	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	-Extensive changes have been made to structure, disclosure requirements, and guidance across 12 standards in a short timeframe. -Clarity is improved, but there is insufficient time to fully assess implications of revisions. -Revisions may raise unforeseen implementation questions, especially due to new EFRAG language not clearly derived from existing standards like ISSB. -Support for the principle that Application Requirements (ARs) contains only 'shall' requirements to fulfil and support disclosure objectives without adding extra requirements . -Recommendation for EFRAG to validate consistent adoption of the 'hierarchy' across standards: -ARs should be 'shall' requirements supporting related Disclosure Requirements (DRs). NMIG should be genuinely illustrative and not introduce additional disclosure requirements beyond DRs			
Survey	Revisorforeningen	Other - please specify (required)	Norway	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	-We support including mandatory Application Requirements (ARs) in the standard body and illustrative content in Non-Mandatory Implementation Guidance (NMIG). -More time is needed to refine and validate NMIG content, which currently may extend beyond illustration into additional requirements. -NMIG must not introduce new requirements or options, especially regarding metric measurement, which belong in Disclosure Requirements (DRs) or ARs. -NMIG should remain flexible to update based on practical implementation experiences. -A clear due process for future NMIG revisions is essential, including public consultation and stakeholder feedback consideration.			
Survey	Revisorforeningen	Other - please specify (required)	Norway	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We welcome the relief for undue cost or effort mechanism, but believe further clarification is necessary to ensure consistent application and avoid loss of relevant information.			
Survey	Revisorforeningen	Other - please specify (required)	Norway	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We welcome the inclusion of the 'undue cost or effort' proportionality mechanisms. It should be made clearer that the partial scope relief only applies when neither direct nor estimated data can be obtained without incurring "undue cost or effort" (UCE). This provision should not be interpreted as a justification for omitting information altogether or for avoiding the use of reasonable estimates.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Revisorforeningen	Other - please specify (required)	Norway	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	We agree with Option 1. Information about financial effects is highly relevant to users. We acknowledge that there may be high estimation uncertainty but think the "undue cost or effort relief" and the exception for providing quantitative information if the information is not useful, is sufficient to address this concern			
Survey	Revisorforeningen	Other - please specify (required)	Norway	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				
Survey	Revisorforeningen	Other - please specify (required)	Norway	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We welcome amendments made to enhance interoperability. However, in some areas the ED introduces additional differences in requirements/application. It is not clear on what basis EFRAG has concluded it has 'considered all opportunities to align the provisions and avoid unnecessary differences between the ESRS and the ISSB Standards.' Many differences in language remains. Some disclosure requirements and reliefs/proportionality mechanisms have partially been brought into the proposals, but not fully or without the complete accompanying application guidance.			
Survey	Revisorforeningen	Other - please specify (required)	Norway	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	The rationale for moving these "may" to "shall" data points is that 'they do not add new obligations, as they refer to an already existing disclosure objective'. While we do not disagree, this approach does not seem to have been applied consistently to all DRs. The approach taken for these additional data points seems to clarify implicitly the status of the DR objectives and that the overarching principle is that they must be met. On the other hand, for other DRs the opposite approach seems to have been taken. On the specific proposal to require mandatory disclosure of a transition plan for biodiversity and ecosystems if such a plan exists, we are concerned with difficulties in assessing whether an undertaking's plan would be considered a transition plan (as opposed to an extension of strategic policies, actions and targets). If mandating disclosure, we think it is important that the standards include characteristics necessary to determine what constitutes a biodiversity transition plan.			
Survey	Revisorforeningen	Other - please specify (required)	Norway	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	As stated in the EFRAG accompanying FAQs, the rationale for addition of the other new data points is to 'make explicit a separate element of required information' as to 'clarify the reporting requirements' to meet 'the disclosure objective'. Whilst we do not disagree, this approach does not seem to have been applied consistently to all DRs. The approach taken for these additional DPs seems implicitly to clarify the status of the DR objectives and that the overarching principle is that they must be met. On the other hand, for other DRs the opposite approach seems to have been taken. For example, in S1-9 adequate wage the requirements outside the EU have been modified and the hierarchy now seems to focus primarily on minimum wage and on living wage. On the other hand, the DR objective is still "to enable an understanding of whether or not the undertaking's employees are paid an adequate wage." It is consequently unclear whether this DP requirement prevails on the objective of the DR requirements. It hence raises the more general question of the status of the DR objectives and whether they must be complied with and if complying with the required DPs would be considered sufficient to meet the DR objectives. We think that clarity on this matter and consistency in the approach taken by EFRAG (additions vs deletions vs moving to NMIG) is key. The proposed additional disclosure requirement on a statement of compliance in BP 1 is essential in the context of a fair presentation framework.			
Survey	Revisorforeningen	Other - please specify (required)	Norway	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	The fair presentation framework brings certainty on a concept that is widely used by preparers (e.g. for financial reporting) and is therefore familiar. If it is included as a requirement, it is essential for ESRS to use the same words as the IASB/ISSB, subject to necessary deviations such as reference to IROs. The "fair presentation" principle is not well known for those without financial reporting experience, and the "fair presentation" principle is undefined and unclear in relation to CSRD-reporting. As such, it should be explained in greater detail, either in an AR or in the Basis for conclusion. Additionally, a key aspect of achieving fair presentation is management's responsibility for ensuring the information presented is fairly stated. We therefore recommend including a specific requirement in ESRS 2 BP-1, to disclose that the statement has been prepared on a fair presentation basis			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Revisorforeningen	Other - please specify (required)	Norway	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	The financial sector often sets intensity targets rather than absolute emission targets because their exposure is volatile and influenced by external factors (such as interest rates, investment decisions, portfolio composition, etc.). This is also in line with Pillar III requirements, which allow for intensity targets. However, The European Banking Association (EBA), in its latest guidance from earlier this year, has encouraged banks to set absolute targets where relevant, but continues to recommend intensity targets. Until further guidance is provided on the calculation of absolute emissions for the sector, we agree that intensity targets are acceptable.			
Survey	Revisorforeningen	Other - please specify (required)	Norway	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	We find the additional guidance in AR22(b) helpful. However, AR22(b)(iii) is unclear about what 'which takes into account the ILO principles on estimating a living wage' means. Specifically, it is not clear what 'take into account' requires an entity to do, to comply with the requirement. We recommend more detailed guidance is provided in an AR paragraph on this point.			
Survey	Revisorforeningen	Other - please specify (required)	Norway	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	We agree with the principle of not retaining voluntary data points in ESRS unless there is a specific reason. If an undertaking uses an adjusted metric, it would be possible to disclose this as entity-specific information.			
Survey	Revisorforeningen	Other - please specify (required)	Norway	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS 1 section 8.2: For additional disclosures not related to a material topic, there is no requirement that the information is verifiable. We believe such disclosures should meet the requirements for qualitative characteristics of information specified in Chapter 2 and Appendix B. ESRS 1 paragraph 108 should be clarified by adding "sustainability" in the first sentence: "The undertaking may include in its sustainability statement additional sustainability disclosures that do not....." to prevent other, non-sustainability related information in the report. Partial disclosures: In ESRS 1.91, the standard allows partial reporting of a metric "the undertaking shall specify, when relevant, that it has identified material IROs in its own operations or value chain, but the corresponding metric can currently only be partially estimated." We believe this can lead to difficulties in assuring the sustainability statements. Partial reporting increases risk of greenwashing/cherry-picking of information to disclose			
Survey	Revisorforeningen	Other - please specify (required)	Norway	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Due process While the timeframe was not set by EFRAG, the timeline runs the risk of undermining the foundational pillars of due process in standard setting: transparency, full and fair consultation and accountability. The response period paired with the significant number of amendments and the limited field-testing. We believe high-quality standards developed following a thorough due process have the highest potential to gain acceptance.. It is a feature of high-quality standard-setting that this process takes time. Additional information: This contradicts the overarching materiality principle.. If an undertaking wishes to disclose non-material information, this should primarily be outside the sust.report. If retaining this provision, we recommend undertakings are required to ensure that the information is not unduly prominent and the rationale for its inclusion is disclosed (avoid the risk of cherry picking and green washing). We ask EFRAG to clarify which revisions in the Exposure Drafts represent actual changes (such as new reliefs) and which revisions represent clarifications of ESRS Set 1 requirements which could therefore be reasonably applied by companies and auditors in the FY2025 reports.			
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	Overall, there has been some simplification to the DMA process. However, some revisions have not simplified the process and may even lead to increased complexity. This is particularly true of the gross vs net approach and the introduction of Appendix C, further described in our response to question 12). For financial materiality, it is important that any requirements for the identification and assessment of material matters are fully aligned and consistent with internationally recognised financial reporting standards such as IFRS. We therefore recommend removing or fully aligning any financial reporting requirements with IFRS. In addition, we see an opportunity to further align the process for determining financial materiality and anticipated financial effects with the ISSB standards. For example, the text in ESRS 1 AR15(a) stating "in assessing risks and opportunities for materiality, the undertaking shall consider their contribution to financial effects in the short, medium and long term based on scenarios/forecasts that are deemed likely to materialise" is not aligned with IFRS S2 15-21 and could be revised or removed to improve interoperability. It is important to note that scenarios are a process for identifying and assessing a potential range of outcomes of future events under conditions of uncertainty and they are not intended to be forecasts or predictions of likely future events or outcomes.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	While we see value in considering remediation, mitigation and prevention actions in assessing impact materiality, the gross vs net approach proposed included the accompanying Appendix C table explaining how to assess and what to report reduces flexibility of and may further complicate the impact materiality assessment. We recommend that the standards adopt a more flexible, principles-based approach, including the removal of the new and more prescriptive Appendix C requirements. We believe the intent of Appendix C can be substantially achieved by adopting two principles: firstly, that negative impacts cannot be offset by positive impacts; and secondly, that while the assessment of impacts and risks may take into consideration preventive measures and reactive or remediation measures, undertakings may also consider the potential for residual impacts or risks when assessing whether a topic is material for reporting. These principles are not only easier to understand and apply but align more closely with actual corporate practice.			
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We welcome the increased flexibility to structure the Sustainability Statements in a way that improves readability for users. For example, the option of including an executive summary and the emphasis on using appendices to separate key messages from more detailed information will support improved clarity and decision-usefulness of this information. However, we view these amendments more as clarifications rather than substantial simplifications, and we do not believe they will result in significant relief in terms of burden or complexity.			
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We support the simplification and removal of several qualitative requirements, for example removing several "Disclosure Requirements related to ESRS 2" from the topical standards. For remaining PAT disclosure requirements, we support revisions that shift toward a more principles-based approach and grant more flexibility to preparers (e.g., reporting at a higher level of aggregation). We believe that these amendments will reduce complexity and duplication in preparers' application of the standards and contribute to a clearer and more accessible framework. However, we view these amendments as more structural simplifications which will result in only minimal reporting burden and volume reductions. In addition, ESRS 2 AR28 in reference to paragraph 29 under "General Disclosure Requirements for policies, actions and targets" introduces a new requirement to "avoid information that is boilerplate… for example when policies and actions have been implemented to comply with law and regulation" that could potentially limit the disclosure of decision-useful information. We consider the existing and revised text in ESRS 1 QC17 is sufficient on the avoidance of boilerplate information, and no further elaboration on this is needed for the GDRs (i.e., we recommend the revised AR28 be removed). Finally, in GDR-Targets paragraphs 42 and 43, revisions have removed "whether and" before "how the undertaking sets targets" from the objective and removed "material" before "impacts, risks and opportunities" (IROs) from the disclosure requirement. The intent of the ESRS is to limit disclosures to material information, and information disclosed on targets a company has set should only be those related to its material IROs. The term "whether" is also useful for companies to provide sufficient context whether they have established a target or not. We therefore recommend reinstating these terms in the standard.			
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	In general, the proposed amendments improve understandability of the standards by eliminating "may disclose" datapoints, streamlining the structure by placing all "shall disclose" datapoints within disclosure requirements only (as opposed to in both disclosure and application requirements) and clarifying certain language and terminology. However, challenges remain throughout the standards (including in the Glossary in Annex II), and we believe that these changes will not significantly reduce complexity, reporting volume or burden. For example, we consider the phrase "shall consider" and several "may" statements throughout the standards unclear and potentially interpreted as voluntary, and we recommend these be removed (if voluntary) or clarified (if mandatory). In addition, several definitions and requirements remain overly prescriptive and/or are lacking clarity. In general, as is the case with other more structural changes to the standards, we believe these amendments will not result in a significant reporting burden reduction.			
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Where robust, principles-based standards are developed with high standards of due process, we see limited need for the creation of or reference to additional guidance. We believe clear and consistent principles-based standards are the best way to ensure adherence to disclosure requirements and provide clarity to preparers and assurance providers. As such, we believe that the EU should limit references to and use of guidance materials as much as possible. When guidance materials are used, they should be clearly labelled as non-mandatory and non-authoritative. Guidance has the potential to be misconstrued as mandatory requirements and/or to be misaligned with the standards themselves. Further, we believe that content should be developed for inclusion directly within standards as opposed to being incorporated by cross-reference to external standards or guidelines. Many issues can arise when cross-referenced materials are used that are not developed using the same conceptual framework, leading to confusing and sometimes conflicting requirements. As these external standards and guidelines change over time, this may lead to further misalignment.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	In general, we welcome the reliefs and clarifications proposed as a meaningful step toward reducing complexity and reporting burden. The reliefs for "undue cost or effort" and others related to data scope, availability or quality in reporting metrics are helpful. However, the reliefs do not go far enough in reducing burden and risk associated with commercially sensitive, confidential or highly uncertain data, nor for 3rd party data outside the control of the reporting entity. Although there is an attempt to address commercially sensitive information in the level 1 regulation, we consider that the revision of the ESRS presents an opportunity to further strengthen these safeguards considering the importance of the matter.			
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	As above, we welcome the additional reliefs proposed, including the extension of the proposed "undue cost or effort" relief to all metrics and the relief allowing reporting entities to report metrics with a partial scope where direct or estimated data is unavailable or unreliable. We also support that no time limit is imposed for the use of this relief, as it is uncertain when or if data availability or reliability will improve in certain circumstances. We believe this relief will improve overall data quality by allowing reporting entities to omit unreliable data.			
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	We recommend that all disclosure requirements for anticipated financial effects be fully aligned with IFRS S1 paragraphs 34-40 and IFRS S2 paragraphs 15-21. We believe that, including climate change (see our response to question 20) and especially for other environmental topics, there may be difficulty in preparing and disclosing information about anticipated (and current) financial effects, as well as connecting sustainability-related information to the financial statements. This is because sustainability-related information involves judgement and higher degrees of uncertainty, especially about future outcomes; sustainability-related financial effects are not always separately identifiable from other financial effects; and understanding the financial effects and connectivity of sustainability matters is an area in development, including methodologies for how to assess these effects. Requirements for "anticipated financial effects" are especially challenging given their inherent uncertainty increasing over time, a lack of clarity on the time frames to be reported, and the lack of accepted standards and methodologies for analysing and disclosing such information. We recognise that both ESRS and ISSB requirements provide some relief for quantitative information where effects are not separately identifiable or the level of measurement uncertainty is very high. We believe these reliefs should be strengthened and extended to include where methodologies for assessing these effects are still in development, while clarifying the use of such reliefs for regulators, preparers and assurance providers.			
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	We recognise that the disclosure requirements for climate-related anticipated financial effects have been reduced, but the remaining requirements are still challenging for reasons including and in addition to those outlined in our response to question 19. As such, recommend that all disclosure requirements for climate-related anticipated financial effects be fully aligned with IFRS S2 paragraphs 15-21. Remaining quantitative disclosure requirements are excessively granular, making them difficult to calculate without established methodologies, and creating inconsistency with financial reporting standards. In addition, requiring disclosure "before considering adaptation/mitigation actions" does not recognise the effects of a business strategy and therefore adds little value for users. Mitigation measures are typically embedded within corporate strategy, structural in nature, and linked to multiple risks. As a result, the required disclosure could lead to confusion and could potentially prevent companies from making a decision-useful disclosure.			
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	Despite claims of a "very high degree of interoperability" and revisions aimed at improving this further, there continue to be fundamental differences between ESRS and ISSB requirements. We consider that the most impactful simplification would be the full alignment of ESRS with ISSB standards. We believe that the revisions proposed in these standards have not significantly reduced the differences identified in the ESRS-ISSB Standards Interoperability Guidance. For example, EFRAG presents two disclosure requirement options related to "anticipated financial effects" for consideration in this consultation, neither of which are fully aligned with ISSB standards on the subject. In addition, while we recognise the substantial improvements made to GHG emissions reporting boundaries in EFRAG's proposed amendments, these are still not fully aligned with the ISSB standards and GHG Protocol. ISSB follows the GHG Protocol allowing for flexibility in the boundary chosen by reporting entities, while the revised ESRS requires reporting under the financial control boundary, in addition to Scope 1 and 2 GHG emissions based on the operational control boundary in certain circumstances. In addition, the concept of fair presentation in ISSB applies only to financial materiality, and the introduction of this concept in double materiality could present challenges when the needs of users are in conflict as indicated in our response to question 25.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	We support of the removal of several qualitative requirements granting more flexibility for preparers on those remaining. However, we note several instances in which datapoint reductions are more superficial than real (e.g., bundling several previously separate datapoints into one datapoint or converting datapoints into application requirements), which results in little if any actual simplification or burden reduction for preparers.			
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	New requirements, including those moved from "may" to "shall", run counter to the objective of simplification and burden reduction. We therefore recommend removing all proposed new disclosure requirements and datapoints, including those "exceptionally moved from 'may' to 'shall', proposing only to revise existing requirements with the aim of clarity, simplification and reporting burden reduction. Other new or altered requirements are introduced in the revised ESRS, beyond the ten datapoints referenced in questions 23 and 24. Such revisions may further complicate the standards, have unintended consequences, and ultimately not achieve reporting burden reduction. New or altered metrics have been added for substances of concern, microplastics, water, resource inflows and outflows, and adequate wages, among others. The justification for altered disclosure requirements should meet a high bar, have a clear rationale with a demonstrable burden reduction, and be proportionate and not unduly burdensome while maintaining or enhancing harmony with EU regulations and interoperability with global frameworks. In addition, the revised ESRS 1 confirm in paragraph 5 that the ESRS do not mandate behaviour but set disclosure requirements, a principle which should be considered when making revisions. If revisions do not meet these criteria, they should be removed or revised.			
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	As indicated in our response to question 23, we believe that no new datapoints should be added to the ESRS by exception or otherwise, as this runs counter to the objectives of this simplification effort.			
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We support revisions introducing and enhancing principles of fair presentation and the use of reasonable and supportable information available without undue cost or effort, which we believe will help preparers in identifying, assessing and reporting material sustainability-related information. We also support the extension of these principles to determining the scope of the value chain and related information, gathering and reporting data on metrics, and assessing anticipated financial effects. However, while the revised ESRS strengthen requirements for financial users, the concept of fair presentation may have unintended consequences in a context where companies must apply a double materiality principle while seeking to meet the needs of both financial and non-financial users. The ESRS should consider how to address when such conflicts may arise in the application of these standards. The standards should provide further clarity and reliefs in consideration of these issues.			
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Neither agree nor disagree. Not applicable.			
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	The introduction of a revised threshold for significant employment, applicable to both S1-5 and S1-7, potentially increases datapoints and reporting burden including the identification of labor agreements, the manual calculation of data, and establishing/revising internal processes for the scope of reporting.			
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	We believe the current approach in the ESRS allowing for information based on minimum wage is sufficient, as well as being less of a reporting burden and simpler to gather than that of living wage. In addition, we consider the proposed revised approach is not a simplification in line with the objectives of this exercise. We therefore recommend reverting to the original text.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	While we agree with the removal and consolidation of certain SFDR PAIs in consideration of harmonisation across various reporting regulations, we believe there was no need to make changes to the ESRS human rights related policies and metrics based on or to align with the SFDR's PAIs. More importantly, the proposed changes could create misalignment and confusion by deviating from SFDR language. The proposed changes also contradict the objective of simplification. We therefor recommend reverting to the original language.			
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	We support the removal of more detailed disclosure and application requirements for policies, actions and targets from topical standards, as these are adequately covered in the more principles-based general disclosure requirements in ESRS 2. As mentioned in the consultation questionnaire, the methodological landscape related to biodiversity is evolving rapidly, and any guidance on the topic is likely to become quickly outdated. As such, we consider that additional guidance on target-setting methodologies is not needed and could potentially inhibit innovation by the market.			
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	We believe that adjusted pay gap is a potentially challenging datapoint for preparers, with increased reporting burden and complexity in comparison with unadjusted pay gap information. In addition, EU regulations are not always aligned with those in other jurisdictions and/or applicable to all business models, presenting further challenges for multinational companies and entities with lower numbers of employees in certain countries. We support reporting unadjusted pay gap information together with a narrative explanation of the datapoint.			
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	We support the removal of the disclosure requirement for the description of a company's policy to prevent late payments, specifically to SMEs, and the datapoint on average time to pay an invoice. These disclosures are overly burdensome and provide limited insights as they are difficult to interpret in a decision-useful way, and the revision to rely on more principles-based general disclosure requirements for policies is appropriate. We question the relevance and practicality of the revised datapoint on standard payment terms. For large undertakings, standard payment terms may vary from country to country for commercial or regulatory reasons. We note that the UK has proposed new disclosure requirements on payment practices. We encourage EFRAG to consider the opportunities for interoperability.			
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	In addition to our responses related to ESRS 1 above, we agree that the updated reporting boundaries for datapoints in the environmental standards as indicated in ESRS 1, Chapter 5 and the topical standards are an improvement. However, we recognise further work may be needed on reporting boundaries to enhance interoperability with ISSB, as indicated in our response to question 21, correct issues with the definition of "operational control", and to align with the GHG Protocol as they progress through updates to their standards and guidelines. Regarding ESRS 1 7.1 Presenting comparative information, paragraph 84(c) on the presentation of metrics and monetary amounts, the requirement to "adjust the base year and the comparative information provided following major acquisitions or disposals" is unclear and not fully aligned with the GHG Protocol. Specifically, it is unclear whether "adjust the base year" is referring to adjusting the base year or the value associated with that base year and should be revised to state "adjust the base year value". We also consider that this requirement may not be aligned with the revised ESRS 1 paragraph 5 confirming that the ESRS do not mandate behaviour but set disclosure requirements.			
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We support many of the simplifications and datapoint reductions within ESRS 2. However, for the reasons indicated in our responses related to ESRS 2 above, we believe many of the proposed revisions will ultimately have minimal effect on reporting burden, and in some cases may be either more complicated, more burdensome, or both in their application. The ESRS often create bespoke sustainability-related financial reporting obligations, rather than leveraging existing financial reporting standards. We believe all financial disclosures should be governed by the IASB and IFRS and limited to those that are truly financially material. As such, we consider that requirements for financial information already disclosed in accordance with existing financial accounting and reporting standards should be removed from the ESRS in their entirety. For example, under SBM-1, DR17(b) and AR7 requiring disclosure of a list of the reporting entity's significant sectors, and AR10 providing criteria that shall be applied to assess significance of products, services or sectors are both duplicative and potentially in conflict with IFRS and should be removed.			
Survey	Shell	Preparer (non-financial preparing a sustainability report)	United Kingdom	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We are supportive of the proposed revisions to simplify ESRS application and reduce reporting burden. However, despite that the volume of text has been reduced and the structure of the standards simplified, we believe that the proposed revisions will lead to only minimal reductions in actual complexity and reporting burden for preparers. Most importantly these simplification efforts still fall significantly short in critical areas and have not addressed fundamental issues such as full alignment and interoperability with ISSB standards. The complexity of the content remains, and, in some cases, proposed changes may lead to less clarity and increased burden for preparers and less decision-useful information for users. In addition, the ESRS often create bespoke sustainability-related financial reporting obligations, rather than leveraging existing financial reporting standards, and we believe all financial disclosures should be governed by the IASB and IFRS. Furthermore, the revision of the ESRS prior to the completion of the EU's efforts to simplify and harmonise CSRD and CSDDD has the potential to lead to additional issues of policy coherence, such as a lack of alignment on the scope of the value chain. We therefore recommend that EFRAG consider further and more effective measures to reduce complexity and the reporting burden for preparers and we would be happy to engage further on this topic. The most impactful simplification would be full alignment of ESRS with ISSB, prioritising climate first. Other non-climate topical ESRS should be made voluntary until ISSB standards are developed. EU Transparency Register: 05032108616-26			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	EDF welcomes EFRAG's effort to introduce meaningful simplifications to the double materiality assessment process without leading to structural deregulation. In particular, EDF welcomes: •the possibility of adopting a top-down approach rather than a bottom-up one; •the shift in focus from the IRO-level to the topic-level; and •the simplification of AR 16 (Appendix A). However, EDF considers that further structural and editorial simplifications should be undertaken to ensure consistency with the top-down approach: 1.Streamline references to materiality assessment in ESRS 2, in particular IRO-1 (§26), which currently requires eight data points to describe the DMA process, as this conflicts with the simplified approach proposed in ESRS 1; 2.Relocate methodological or illustrative elements specific to the bottom-up approach to the Application Requirements, including factors on severity, precedence of severity over likelihood, criteria for positive impacts, methodological elements on dependencies (§31-32, §41-44); 3.Address remaining ambiguity between top-down and bottom-up approaches, including the formulations overly focused on individual IROs and clarify terms such as "relevant information" (§22) and "appropriate level of aggregation" (ESRS 2 AR 23); 4.Clarify that thresholds serve to determine and prioritise material topics, without implying the need for separate scoring of each criterion or severity characteristic (§28, AR 5c, AR 7); and 5.Simplify update requirement by specifying that the DMA process and its conclusions shall be updated only in case of significant events or material changes in circumstances (§29). EDF is concerned by the definition of impact materiality laid down in paragraph 21 (b) of ESRS 1. In particular, the definition of 'general purpose' according to AR3 is too vague and could result in multiple requests from a variety of stakeholders.			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	EDF does not support the new guidance on gross versus net approach, for the following reasons: (1) the proposed rules are overly complex and introduce significant judgement; (2) they would impose burden on companies by changing the methodology, and (3) information on gross impact is key to understand the context of mitigation measures. In particular, Annex C creates confusion by mixing reporting for the current and subsequent year, which is conceptually inconsistent. EDF therefore recommends deleting it. The ESRS should focus on a general principle: potential impacts shall be assessed before prevention or mitigation measures (i.e., expected effects of ongoing or future actions). The terms gross and net should be avoided, since they cause confusion, especially relative to logic of business risk assessment. A distinction could be made between: •Actual impacts: to be assessed at the reporting date. In practice, whether impacts have occurred or not at the reporting date independently from the past mitigation actions. •Potential impacts: to be assessed before considering prevention or mitigation actions. This reflects that sustainability actions are typically implemented over a multi-year horizon (e.g., carbon trajectory) and that some impacts may never be fully eliminated (e.g., health and safety).			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	EDF is supportive of the changes (possibility to better organize the report in a meaningful way, to put some granular datapoints in appendix…) as they deem very important to have a concise report, focused on material subjects, enabling the reader to better understand their strategy, politic and actions.			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	EDF supports the removal of the topical requirements from ESRS 2, as they create redundancies in sustainability statements in most cases.			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	EDF welcomes the improved presentation of the Standards, including: •the reduction of the length of the text, notably through the removal of paragraphs related to general principles and the simplification of narrative paragraphs deemed overly technical or detailed; •the positioning of AR directly after the disclosure requirements, focusing only on essential methodological elements and key presentation points. This significantly improves readability and understanding of the standards. Nevertheless, the overall length of ESRS 1 could be further reduced, including by simplifying Chapter 3 on double materiality assessment (similar length as in Set 1 and simplified ESRS, 34 pages, 25 without annexes). Regarding the datapoints which are kept from the set 1, EFRAG should confirm that the wording changes brought to improve conciseness of the standards shouldn't lead to additional burden for the first application due to a "fresh interpretation" by the auditors or regulator.			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The NMIG, while useful as an illustration, should remain outside of the standards. Our experience, shared with other first wave companies shows that EFRAG Q&As and Implementation Guidance can be used by auditors as a binding reference, with preparers expected to comply. Despite being issued by EFRAG for illustrative purposes only, the NMIG could be considered by stakeholders as having the same authority than the reporting standards. To avoid any ambiguity, EDFsuggests adding an explicit statement clarifying that the NMIG are purely indicative and non-prescriptive, and consequently cannot be enforced for audit or supervisory purposes. EDF also wishes to clarify what will be the status of the existing Q&A and Implementation Guidance relating to Set 1.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	EDF generally welcomes the proposed reliefs which should lead to a more cost-effective reporting without compromising its quality: –the clarification that the starting point for reporting is the scope of consolidated financial statements; –the concept of "undue cost or effort" consistent with financial reporting practice; –the clarification that non-material activities may be excluded from the calculation of certain metrics. Concerning joint operations, ESRS 1 §92 seems to increase the burden, implying that undertakings must include data from the joint operation over which they have operational control, whereas our interpretation of the current standards (E1 apart) was that only own operations were concerned (except in the specific case of entity-specific indicators if this scope was deemed relevant by the company). In any case, ESRS S1 should also be targeted as it may be very delicate to obtain data on the joint operations' workforce.			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	EDF supports a hybrid approach between Options 1 and 2. Option 1 could apply only to anticipated financial effects of material climate risks (ESRS 2 and E1), reflecting financial materiality and ensuring interoperability with ISSB, given the maturity of climate reporting. Option 2 could apply to other environmental topics.			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	EDF proposes to apply Option 1 to E1 and to reduce the level of information required by E1-11 as EDF thinks it too granular and specific. As such, EDF would propose to match E1-11 to Option 1 only. At least certain datapoints should be deleted (or made voluntary), in particular: •§40(b): location (granular); •§40(c): adaptation actions (secondary); •§41(b): mitigation actions (secondary); •§41(e), revenue is not the financial metric which is relevant in utilities' sector (for example revenue is highly volatile with respect to commodity prices and does not enable to evaluate the performance of the activity). •§40(f): potential stranded assets (redundant with §40a); •§42: climate opportunities (entity-specific).			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Convergence efforts undertaken jointly by EFRAG and the IFRS should be continued. Nevertheless, it is important to recognise that maintaining certain differences between the two frameworks remains acceptable, beyond the well-known divergence on materiality, particularly where the ESRS already incorporate lessons learned from implementation.			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	EFRAG has clearly engaged in a simplification effort, reflected in the reduced overall volume of the standards, improved readability, and a clearer distinction between may and shall provisions. Importantly, the key information required by investors to conduct ESG analyses remains available. EDF notes that some alleviations listed in the French proposals for a simplification have not been considered by EFRAG - notably the deletion of some difficult DPs - which, cumulatively, could enable a more significant decrease in the reporting burden. Therefore EDF believes that further alleviation is feasible and necessary. In particular, every reduction of the number of datapoints which can be obtained for example by gathering datapoints in a single one is an important simplification for the future digital tagging.			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	22.E1.	Comments on deleted datapoints in ESRS E1	I partially agree and partially disagree	EFRAG has clearly engaged in a simplification effort, reflected in the reduced overall volume of the standards, improved readability, and a clearer distinction between may and shall provisions. Importantly, the key information required by investors to conduct ESG analyses remains available. EDF notes that some alleviations listed in the French proposals for a simplification have not been considered by EFRAG - notably the deletion of some difficult DPs - which, cumulatively, could enable a more significant decrease in the reporting burden. Therefore EDF believes that further alleviation is feasible and necessary. In particular, every reduction of the number of datapoints which can be obtained for example by gathering datapoints in a single one is an important simplification for the future digital tagging.			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	22.E2.	Comments on deleted datapoints in ESRS E2	I partially agree and partially disagree	EFRAG has clearly engaged in a simplification effort, reflected in the reduced overall volume of the standards, improved readability, and a clearer distinction between may and shall provisions. Importantly, the key information required by investors to conduct ESG analyses remains available. EDF notes that some alleviations listed in the French proposals for a simplification have not been considered by EFRAG - notably the deletion of some difficult DPs - which, cumulatively, could enable a more significant decrease in the reporting burden. Therefore EDF believes that further alleviation is feasible and necessary. In particular, every reduction of the number of datapoints which can be obtained for example by gathering datapoints in a single one is an important simplification for the future digital tagging.			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	22.E3.	Comments on deleted datapoints in ESRS E3	I partially agree and partially disagree	EFRAG has clearly engaged in a simplification effort, reflected in the reduced overall volume of the standards, improved readability, and a clearer distinction between may and shall provisions. Importantly, the key information required by investors to conduct ESG analyses remains available. EDF notes that some alleviations listed in the French proposals for a simplification have not been considered by EFRAG - notably the deletion of some difficult DPs - which, cumulatively, could enable a more significant decrease in the reporting burden. Therefore EDF believes that further alleviation is feasible and necessary. In particular, every reduction of the number of datapoints which can be obtained for example by gathering datapoints in a single one is an important simplification for the future digital tagging.			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	22.E4.	Comments on deleted datapoints in ESRS E4	I partially agree and partially disagree	EFRAG has clearly engaged in a simplification effort, reflected in the reduced overall volume of the standards, improved readability, and a clearer distinction between may and shall provisions. Importantly, the key information required by investors to conduct ESG analyses remains available. EDF notes that some alleviations listed in the French proposals for a simplification have not been considered by EFRAG - notably the deletion of some difficult DPs - which, cumulatively, could enable a more significant decrease in the reporting burden. Therefore EDF believes that further alleviation is feasible and necessary. In particular, every reduction of the number of datapoints which can be obtained for example by gathering datapoints in a single one is an important simplification for the future digital tagging.			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	22.E5.	Comments on deleted datapoints in ESRS E5	I partially agree and partially disagree	EFRAG has clearly engaged in a simplification effort, reflected in the reduced overall volume of the standards, improved readability, and a clearer distinction between may and shall provisions. Importantly, the key information required by investors to conduct ESG analyses remains available. EDF notes that some alleviations listed in the French proposals for a simplification have not been considered by EFRAG - notably the deletion of some difficult DPs - which, cumulatively, could enable a more significant decrease in the reporting burden. Therefore EDF believes that further alleviation is feasible and necessary. In particular, every reduction of the number of datapoints which can be obtained for example by gathering datapoints in a single one is an important simplification for the future digital tagging.			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	22.S1	Comments on deleted datapoints in ESRS S1	I partially agree and partially disagree	EFRAG has clearly engaged in a simplification effort, reflected in the reduced overall volume of the standards, improved readability, and a clearer distinction between may and shall provisions. Importantly, the key information required by investors to conduct ESG analyses remains available. EDF notes that some alleviations listed in the French proposals for a simplification have not been considered by EFRAG - notably the deletion of some difficult DPs - which, cumulatively, could enable a more significant decrease in the reporting burden. Therefore EDF believes that further alleviation is feasible and necessary. In particular, every reduction of the number of datapoints which can be obtained for example by gathering datapoints in a single one is an important simplification for the future digital tagging.			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	22.S2	Comments on deleted datapoints in ESRS S2	I partially agree and partially disagree	EFRAG has clearly engaged in a simplification effort, reflected in the reduced overall volume of the standards, improved readability, and a clearer distinction between may and shall provisions. Importantly, the key information required by investors to conduct ESG analyses remains available. EDF notes that some alleviations listed in the French proposals for a simplification have not been considered by EFRAG - notably the deletion of some difficult DPs - which, cumulatively, could enable a more significant decrease in the reporting burden. Therefore EDF believes that further alleviation is feasible and necessary. In particular, every reduction of the number of datapoints which can be obtained for example by gathering datapoints in a single one is an important simplification for the future digital tagging.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	22.S3	Comments on deleted datapoints in ESRS S3	I partially agree and partially disagree	EFRAG has clearly engaged in a simplification effort, reflected in the reduced overall volume of the standards, improved readability, and a clearer distinction between may and shall provisions. Importantly, the key information required by investors to conduct ESG analyses remains available. EDF notes that some alleviations listed in the French proposals for a simplification have not been considered by EFRAG - notably the deletion of some difficult DPs - which, cumulatively, could enable a more significant decrease in the reporting burden. Therefore EDF believes that further alleviation is feasible and necessary. In particular, every reduction of the number of datapoints which can be obtained for example by gathering datapoints in a single one is an important simplification for the future digital tagging.			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	22.S4	Comments on deleted datapoints in ESRS S4	I partially agree and partially disagree	EFRAG has clearly engaged in a simplification effort, reflected in the reduced overall volume of the standards, improved readability, and a clearer distinction between may and shall provisions. Importantly, the key information required by investors to conduct ESG analyses remains available. EDF notes that some alleviations listed in the French proposals for a simplification have not been considered by EFRAG - notably the deletion of some difficult DPs - which, cumulatively, could enable a more significant decrease in the reporting burden. Therefore EDF believes that further alleviation is feasible and necessary. In particular, every reduction of the number of datapoints which can be obtained for example by gathering datapoints in a single one is an important simplification for the future digital tagging.			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	22.G1	Comments on deleted datapoints in ESRS G1	I partially agree and partially disagree	EFRAG has clearly engaged in a simplification effort, reflected in the reduced overall volume of the standards, improved readability, and a clearer distinction between may and shall provisions. Importantly, the key information required by investors to conduct ESG analyses remains available. EDF notes that some alleviations listed in the French proposals for a simplification have not been considered by EFRAG - notably the deletion of some difficult DPs - which, cumulatively, could enable a more significant decrease in the reporting burden. Therefore EDF believes that further alleviation is feasible and necessary. In particular, every reduction of the number of datapoints which can be obtained for example by gathering datapoints in a single one is an important simplification for the future digital tagging.			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	23.	Six datapoints exceptionally moved from “may” to “shall” In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, “may disclose” datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	E3 - EDF do have water meters installed at each point. Moreover, EDF calculates its water consumption partly through estimations and modelling rather than by using the water balance approach. Consequently, these new datapoints contradict the principle of simplification create greater complexity, and increase the audit costs. G1 confirmed incidents: EDF is not in favor to change these datapoints on confirmed incidents from "may" to "shall," as they are highly sensitive and of limited relevance. Introducing mandatory reporting of confirmed incidents risks creating an unlevel playing field, as US companies may be exempted from comparable constraints. Moreover, reporting confirmed incidents is not a reliable metric of anti-corruption policy effectiveness. A low number of incidents could reflect strong preventive measures, while a high number may indicate a trusted reporting system, particularly through whistleblowing channels. A simple numerical count or brief description of an incident's "nature" cannot capture its context, resolution, or remedial actions. E4 : The notion of "transition plan" is not yet clearly defined. Companies explore the best ways to develop action plans on this highly complex subject, whether through national or international initiatives, but no official certification of such analyses and plans exists to date. The plan should be made public by the company itself, not by a third party and the term "publicly available" should be clearly define. •A distinction should be made between a biodiversity action plan and a biodiversity transition plan.			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	ES-4 EDF does not support the introduction (or amendment) of datapoints in §15 (a), (b), (c) and (e), as they would create burden and investment for preparers, even with the proposed reliefs. Firstly, there is no clear or stable definition of "key," "strategic," "critical" materials", and "key biological sustainably sourced". The scope of critical materials may change over time with the evolution of the CRMA, and the Delegated Acts deriving from the ESPR are not yet approved. Companies therefore expect this information to be difficult to access and disclose. However, EFRAG could reference these regulations (e.g., CRMA annexes) and provide pedagogical resources and data (e.g., JRC) in the NMIG to support qualitative disclosures on resource inflows. Secondly, the data would be technically complex to obtain. These materials are often mixed, transformed, or embedded in products, making it very difficult to determine their exact weight without reverse engineering. Companies stress that they may not know the precise quantities of raw materials used, which could result in unreliable or even zero reporting.			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	25.	Emphasis on ESRS being a “fair presentation” reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	Fair presentation is a new concept not used in the Accounting Directive which only refers to "true and fair view" regarding financial statements. From its experience, EDF thinks this will have impacts and consequences and will mean the addition of supplementary datapoints in the report and it increases liability for both preparers and auditors to reach completeness. This will consequently increase the reporting burden. French auditors consider that they will have to perform more due diligences and that the audit burden will be increased. If the concept of fair presentation is kept, it shall be further clarified, to avoid divergent interpretations by preparers and auditors. Guidance is needed on how this principle will be applied by assurance providers and whether its inclusion may have implications for the simplification efforts. EDFwould recommend clarifying: •The definition of fair presentation as a filter to taking into consideration the strategic specificities of the business model and activities of the undertaking; •The hierarchy between the use of reliefs and the requirement of fair presentation: Confirm that applying a relief does not contradict the principle of fair presentation in general. In particular, the absence of quantified anticipated financial effects does not undermine fair presentation. For example, an undertaking should be able to use the relief on commercially sensitive information without being required by auditors to disclose them under the fair presentation clause. •The audit procedures expected to ensure compliance with this principle.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	The new threshold will increase the number of information to be disclosed and the reporting work (as an example under the current ESRS threshold EDFreported on 2 countries). This new threshold is not a simplification but a complexification in its case.			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	EDF sees limitations in the current benchmark hierarchy proposed under ESRS S1 AR 22, particularly for countries outside the EEA. Reliance on statutory minimum wages may result in benchmarks that are socially inadequate. EDF therefore recommends placing recognised adequate wage estimates before statutory minimum wages. As regulation cannot mandate the use of proprietary tools, the most effective solution would be the development of an accessible, open-source standard. Comparability could be enhanced through collaboration between EFRAG and the ILO to develop a public, country-by-country benchmark. Undertakings should be allowed to use either statutory wages or recognised adequate wage estimates, provided they disclose the methodology and country-level context. Given the novelty of this concept, companies should retain flexibility to select the most appropriate reference, while avoiding premature lock-in to a rigid framework. The ILO's work, although not yet fully comprehensive, could serve as a useful starting point.			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	EDF welcomes the intention to provide guidance for companies in setting biodiversity targets, provided that the future application guidance remains voluntary and is integrated into the NMIG.			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	EDF recommends that the gender pay gap be reported on an adjusted basis, with a breakdown by employee category. Employee category is the main driver of the pay gap, and EDF views this breakdown as critical to ensure the metric's relevance and decision-usefulness. For this reason, EDF does not support the deletion of the voluntary datapoint on adjusted pay gap. On the contrary, EDF recommends the opposite approach: the adjusted gender pay gap should be the mandatory datapoint, while the unadjusted gap should remain voluntary (or be deleted).			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	This disclosure requirement raises the question of how to identify SMEs around the world: what definition should be applied in non-EU jurisdictions?			
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	ESRS E2: Requiring undertakings to disclose information on substances of concern goes beyond the obligations set by REACH and creates a significant additional burden. The same remark applies to the 0.1% threshold mentioned for disclosures relating to the quantities of SVHC which are part of procured/sold components or articles. Indeed, REACH only requires companies to share the name of those substances. Therefore, reporting on substances of concern should be suppressed, as proposed by the French Accounting Standards Authority, and datapoints 20(a) and 20(b) amended accordingly			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	EDF	Preparer (non-financial preparing a sustainability report)	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Taxonomy consistency : EDF calls for harmonisation between the Environmental Taxonomy and the ESRS. As the ESRS are simplified, the Taxonomy should also be streamlined to ensure coherence and complementary of sustainability information. EDF supports applying the materiality principle in the Taxonomy, as in the ESRS and IFRS, relying on qualitative and, where appropriate, quantitative criteria consistent with current practice. Given that DNSH criteria and minimum safeguards are often complex and inconsistently interpreted, EDF recommends aligning them with information on ESG PAT, metrics, and due diligence already reported under the ESRS. The Taxonomy's main value lies in ratio calculations, which users can interpret alongside ESRS disclosures. Audit: the usefulness of a standard compared to guidelines The audit has posed significant challenges in the first year of ESRS implementation. While clarifications help, further issues will arise as audit practice develops and new concepts (e.g., fair presentation) are introduced. To ensure a consistent and comparable level of audit diligence across all EU jurisdictions, a binding audit standard applicable to all auditors is needed, which would provide a more robust framework than guidelines.			
Survey	European Construction Industry Federation (FIEC)	Business association (other than association of financial institution)	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The sections containing the Application Requirements (ARs) are not always placed under the relevant paragraphs (e.g. par. 30 and following), which makes reading less straightforward. Moreover, the information provided in the ARs is sometimes redundant and could be further simplified, where possible.			
Survey	European Construction Industry Federation (FIEC)	Business association (other than association of financial institution)	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	The "gross versus net" issue remains to be explicitly clarified.			
Survey	European Construction Industry Federation (FIEC)	Business association (other than association of financial institution)	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The structure could be further simplified by eliminating, where possible, or streamlining the sections containing the Application Requirements (ARs), which in some cases are particularly detailed and complex (e.g. ESRS S1).			
Survey	European Construction Industry Federation (FIEC)	Business association (other than association of financial institution)	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	It is essential, particularly during this transitional phase of the application of the ESRS standards, that no time limit be established for the exemption allowing the reporting of a calculation within the metrics that includes only a partial scope, where no reliable direct or estimated data are available for use in the calculation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Construction Industry Federation (FIEC)	Business association (other than association of financial institution)	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	It is considered essential to further strengthen the interoperability between the ESRS and the IFRS S1/S2 standards, which has already been significantly improved. In particular, for energy data (DR E1-7) and emissions data (DR E1-8), the definitions, reporting boundaries and units of measurement should be fully aligned with the GHG Protocol and the IFRS S2 metrics. Only in this way will companies be able to prepare a single dataset usable both at the European level and in global markets, avoiding duplication of calculations and data collection systems. This aspect is particularly critical for the construction sector, where energy consumption is spread across numerous sites and suppliers: any misalignment between standards, even one that appears limited in scope, would multiply costs and reduce data quality.			
Survey	European Construction Industry Federation (FIEC)	Business association (other than association of financial institution)	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	The inclusion of new mandatory datapoints is not consistent with the stated simplification objectives underlying the ESRS revision mandate.			
Survey	European Construction Industry Federation (FIEC)	Business association (other than association of financial institution)	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	In some cases (e.g. ESRS S1/S2), the absence of sector-specific standards does not allow for a representation that realistically reflects the specific features of the construction sector.			
Survey	European Construction Industry Federation (FIEC)	Business association (other than association of financial institution)	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	Although the new calculation criterion is simpler to apply and provides for the same maximum limit of 10 countries as the current criterion, it may in many cases result in a de facto expansion of the number of countries for which the undertaking is required to prepare sustainability reporting, thereby leading to an increased administrative burden.			
Survey	European Construction Industry Federation (FIEC)	Business association (other than association of financial institution)	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	With regard both to information on the gender pay gap and to other workforce-related information, it is important to maintain and/or introduce within the scope of the Standard the possibility for undertakings to provide disaggregated data as well as qualitative information capable of contextualising the quantitative data. This is also in order to take into account any specific characteristics of the undertaking's sector, thereby enabling users of the sustainability reporting to correctly read and interpret the information relating to the undertaking itself.			
Survey	European Construction Industry Federation (FIEC)	Business association (other than association of financial institution)	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	While Scope 3 emissions accounting is important for holistic climate responsibility, its mandatory inclusion in infrastructure project assessments, especially for "Category 11: Use of sold products", is neither technically robust nor strategically effective. Given the limited influence of contractors over long-term usage patterns, high uncertainty in estimations, and the critical role of infrastructure in enabling climate action, a more balanced approach is needed. This should include simplified methodologies, shared responsibility across stakeholders, and a focus on material categories where infrastructure firms can drive real emission reductions.			
Survey	European Construction Industry Federation (FIEC)	Business association (other than association of financial institution)	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Without addressing the substance of the amendments to individual contents, the simplification introduced in the structure of the Standard is welcomed. However, it should be noted that, with general reference to workforce data, the communication of quantitative data alone may provide a misleading representation of the undertaking. Therefore, undertakings should always be allowed to contextualise such data with qualitative information, including any specific characteristics of the sector in which they operate (e.g. percentage of women in the workforce, percentage of workers with disabilities in the workforce). This is partly possible insofar as the proposed amendment allows undertakings to provide certain data in 'narrative format' as an alternative to completing a table (an option not currently provided). Such an option should always be envisaged. Finally, with specific reference to the draft 'DR S1-13 – Health and Safety metrics', 'AR 29 for para. 40(d) (Cases of work-related ill health)', it is necessary to provide that, with regard to the data to be reported on occupational diseases, reference must be made to the definition of 'occupational disease' established under the legislation of the individual State in which the undertaking operates, as is already provided for other workforce-related items (e.g. contractual types, non-employee workers, persons with disabilities).			
Survey	European Construction Industry Federation (FIEC)	Business association (other than association of financial institution)	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Without delving into the modification of individual contents, it is agreed with the simplification made to the structure of the standard. However, we have concerns regarding the requirement to disclose the working conditions of all subcontractors, temporary workers, and posted workers throughout the value chain. This obligation represents a significant administrative burden for companies. In most cases, working conditions, including health and safety, are already strictly regulated by national legislation. Since companies are legally required to comply with these regulations, we believe that this additional reporting requirement is excessive and does not provide meaningful added value to ESG disclosures.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Construction Industry Federation (FIEC)	Business association (other than association of financial institution)	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We welcome the updated version of the ESRS as presented in the draft submitted for consultation by EFRAG. Reporting obligations should focus solely on the most essential criteria. The ESRS framework includes two types of data points, quantitative and qualitative, and the emphasis should be placed on clearly defined quantitative metrics. These enable meaningful comparability between enterprises. By contrast, qualitative or informative disclosures should remain optional, as they are less standardised and often context-specific, limiting their usefulness for comparison.			
Survey	Technical University of Munich	Academia	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	From a machine-readability and data quality perspective lists of sites in the sustainability statements should be maintained. They are valuable, as they decrease the risk of Large Language Models (LLMs) to miss or misinterpret information, lists can be used as training data for LLMs and enable comparison between the list of sites and (narrative) data points.			
Survey	Technical University of Munich	Academia	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	From a research and data quality perspective, it is important to report the direct impacts of an event before the remediation action. Conflating these very different events would undermine research on environmental impacts of corporate actions and attempts to validate and differentiate the success of prevention, mitigation and remedy activities.			
Survey	Technical University of Munich	Academia	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	Improvement of style and readability is welcomed and increases human as well as machine readability. In line with articles on readability like "Peeking into Corporate Greenwashing through the Readability of ESG Disclosures" by Hu et al. 2024, readability is negatively associated with greenwashing and thereby an improvement.			
Survey	Technical University of Munich	Academia	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The removal of publications is welcomed. Yet, ambiguity in the definition of (double) materiality could have negative consequences for comparability of information.			
Survey	Technical University of Munich	Academia	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Technical University of Munich	Academia	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	The proposed reliefs will lead to a detrimental loss of useful, meaningful, correct, complete and unambigous information for all stakeholders. The only possibility to maintain data quality despite a partial scope of metrics can only be maintained if (1) complete, disaggregated, location-specific information on every asset excluded from the metric exists and (2) concrete guidelines on assessing thresholds for "costs and efforts" exist. Allowing the exclusion or inclusion of acquisitions in a reporting period will result in the risk, that assets with high-negative impact could be excluded by the untertakings that dispose of them as well as the one, acquiring them, allowing grave information losses. Without the systematic preference for direct data, worse than average companies will want to use estimated data, leading to systematic underreporting.			
Survey	Technical University of Munich	Academia	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	Incomplete reporting and discretion of companies to define ‚undue cost and effort' means that comparability between organizations using different methodologies becomes hard if not impossible. The missing values cannot be estimated or replaced by proxies if there is no information on what is missing. Therefore, the complete list of assets (location-specific and disaggregated) for which information is missing is absolutely necessary in case this relief is introduced. Otherwise companies might use this relief for greenwashing purposes which would lead to systematic underreporting undermining the use of information for policy, civil society, and research.			
Survey	Technical University of Munich	Academia	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Information on anticipated financial effects can help to close research gaps. Disclosures enable assessments on whether and how adaptation and mitigation actions influence the pricing of financial instruments. Critical research could scrutinize the methods, assumptions and inequalities related to the calculations			
Survey	Technical University of Munich	Academia	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Technical University of Munich	Academia	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (iii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Technical University of Munich	Academia	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	The new datapoints increase consistency and comparability. Especially adding biodiversity to transition plans is valuable, because asset level disclosures transition plans can be used to contextualize and assess the credibility of claims as done by research projects of the European Union (JRC). Especially biodiversity is a location specific sustainability aspect, as stressed in the paper written by Wassénius et al. 2024: "Essential environmental impact variables: A means for transparent corporate sustainability reporting aligned with planetary boundaries" and other papers of the authors as well as Sánchez-García et al. 2025 "Climate change, nature degradation, and financial stability: a review of domino-effects between finance, climate, and the biosphere". The relevance of transition plans and the role of biodiversity is also stressed by the working group ATP-Col.			
Survey	Technical University of Munich	Academia	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	More granular information on high-impact environmental aspects is very welcomed, especially as disclosures on microplastics (under E2) were severely underreported. Now there is greater clarity enabling research with regard to micro plastics (see Corella-Puertas et al. 2022 "Transport mechanisms and fate of microplastics in estuarine compartments: A review") by distinguishing categories that are very different in their real world effects despite similarity of wording (end of life secondary plastics and produced primary plastics) from each other.			
Survey	Technical University of Munich	Academia	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	The definition of fair is vague and should be defined by more than just by adhering to the ESRS.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Technical University of Munich	Academia	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets				
Survey	Technical University of Munich	Academia	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	This development is very positive. The ESRS and the resulting sustainability reports generally implement a consolidated, transnational or cross-border approach. But many policy measures are still executed at the national level. Hence, country-specific evaluations by public authorities are essential. Having data on employee numbers by country would be an attribute for assessing the national significance of different European groups, independent where the main office is located. This is especially helpful for national statistics and research focusing on country-level corporate sustainability. Furthermore, large numbers of employees could have been omitted, especially if workforce is distributed over many countries.			
Survey	Technical University of Munich	Academia	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	There is the danger that providers-proponents of aggregate metrics like "Mean Species Abundance*ha*year" or "potentially disappeared fraction of species per hectare per year" push for the inclusion of these variables in the standards. Scientists caution against those aggregates and prefer disclosures on pressures in base units.			
Survey	Technical University of Munich	Academia	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Technical University of Munich	Academia	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree				
Survey	Technical University of Munich	Academia	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The recent amendments, particularly the top-down measures, significantly compromise data quality and severely hinder machine-readability. While these changes may reduce the reporting burden for data producers, they simultaneously diminish the utility and value of the data for users and stakeholders. It is essential that EFRAG does not overlook the importance of ensuring that corporate sustainability information systems maintain high standards of accuracy, completeness, clarity, and unambiguity. Even advanced technologies such as artificial intelligence cannot compensate for fundamentally flawed input—underscoring the enduring relevance of the principle: 'garbage in, garbage out.'			
Survey	Ernst & Young	Auditor	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	Ernst & Young	Auditor	United Kingdom	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We support the inclusion of guidance. However, we are concerned that the complexity and seeming inconsistencies of the proposal will create interpretative challenges. The core principles in §34 and 35 should be completed so that Appendix C is just an illustration. §34 (actual negative impacts) should clearly address the effects of ongoing remediation actions as well as the effects of remediation actions completed in prior years. It should be clarified that indirect impacts from an actual event still need to be considered when an immediate negative impact has been remediated. There seems to be inconsistencies between §34-35 and Appendix C regarding the effects of significant ongoing actions. The former suggests a gross approach (§35 "the impact shall be assessed without considering the (…) actions"), while the latter suggests a net approach ("Report the potential impact after (…) actions if it remains material"). We are also concerned that "significant ongoing actions" will create interpretative challenges and suggest removing "significant". Reporting on IROs before the effects of ongoing actions is consistent with the definition of material information ("understand the material IRO's and how it identifies and manages them"). To limit the risk that material information is omitted when reporting IROs 'net' of mitigation or prevention activities, it should be stressed that caution is needed based on clear criteria. The same principles should apply to financial materiality. The assessments are not distinct and consistency is needed. We suggest considering the criteria and examples discussed by the IFRS TIG (e.g. evolving nature of potential risk/impact, potential magnitude/likelihood, uncertainty on effectiveness of mitigation activities, specific efforts to mitigate being an indicator that information about the risk and the mitigation activities is material). This will improve the clarity of the guidance and increase the interoperability. Finally, transparent disclosures on the applied approach should be required.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ernst & Young	Auditor	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We welcome the proposed amendments on the structure of sustainability statements, with some points of attention. Allowing undertakings to include an executive summary and appendices improves the readability of sustainability statements and better reflect preparers' practices. The 'connected information' clarification enables undertakings to avoid fragmentation and duplication of information. However, we ask EFRAG to: - Clarify whether the executive summary should provide a faithful representation of all material IROs (§4) or if it could follow a management approach. For example, may it include only those IROs currently monitored by management or should it include a summary of all material IROs that are relevant to stakeholders, including those that are not yet managed or embedded in strategy? - Specify that appendices should also meet the requirements for qualitative characteristics of information. - Clarify that information disclosed in appendices should not be presented or interpreted as "not material" or "less relevant" than information disclosed in the main body of the sustainability statement (except for additional disclosures that do not relate to a topic identified as material as referred in §108), - Non-material Information covered by § 108 is more appropriately placed in appendices for clear identification. Such additional disclosures should also clearly be identified in the IRO-2 table. Notwithstanding the general principle on connectivity in ESRS 1, we disagree with the removal of mandatory reconciliation of amounts between the sustainability statement and the financial statements, both for "direct connectivity" (same amounts in both statements) and "indirect connectivity" (aggregated amounts or parts of an amount). This change bears negative implications for users on overall connectivity, consistency and readability and it contradicts stakeholders' and supervisors' (notably ESMA) increasing attention to the integration and consistency of sustainability and financial reporting in recent years.			
Survey	Ernst & Young	Auditor	United Kingdom	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We welcome the revised overall architecture of the standards, with reduced volumes making them more user-friendly and easier to navigate. A more principle-based and streamlined approach to the cross-cutting MDRs related to PATs (renamed as GDRs), further improves the interaction between ESRS 2 and topical standards. We also welcome the clarification to avoid boilerplate reporting on PATs and the clear reference to the specific PATs addressing material IROs. Regarding the proposed amendment allowing disclosure at a higher aggregation level than material individual IROs, we are concerned that the meaning of reporting "at the appropriate level of aggregation (...) depending on the nature of the IROs and reflecting the level at which the undertaking manages them" (AR 23) or "depending (...) on differences in the undertaking's current approach to their management" (AR 28) could be interpreted in different ways: - one interpretation is that disclosures should reflect the level where policies and actions are defined and implemented i.e., the operational level at which IROs are actively managed. We would support this approach for the PATs disclosures related to material IROs. However, it should be clarified how to report on IROs not (yet) managed. - another broader interpretation could allow reporting at a high aggregation level (e.g. environmental or social level), even if IROs differ significantly in nature, location, or business/management context. To avoid inconsistent reporting, EFRAG should clarify these concepts. We also recommend clarifying that the description of material IROs (§28) should reflect their underlying characteristics and the undertaking's specific facts and circumstances (as implied by the requirement for a "concise description of IRO"). Considerations relating to the management of IROs are more relevant when disclosing the related PATs which can be aggregated accordingly. A clear mapping between individual IROs from DMA and aggregated disclosures would enhance transparency.			
Survey	Ernst & Young	Auditor	United Kingdom	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We welcome the reorganization of DR in the Exposure Drafts compared with ESRS Set 1. In particular, combining mandatory datapoints and mandatory guidance (application requirements or "ARs") in the same location within the main body of the standard paves the way for shorter standards and clearer requirements, with all elements more accessible for preparers. Nonetheless we have raised some concerns detailed in Part 3 of the questionnaire, in relation to certain datapoints or key concepts (e.g. "net zero" in E1). Also, we suggest including some definitions and/or clarifications in the standards regarding new introduced concepts (e.g. "sustainably sourced", "lack of social protection"). Absent clear definitions, these new concepts may lead to more generic and less comparable information. Please refer to part 3 for more detailed comments.			
Survey	Ernst & Young	Auditor	United Kingdom	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We broadly support the availability of illustrative content in NMIG to support preparers in their implementation of ESRS. We agree with the non-binding nature of the current content. We ask EFRAG to clarify the role of NMIG and its future trajectory in relation to interpretative support. Is NMIG designed to include illustrative content only? Or is it expected to evolve into a tool that more broadly addresses practical interpretation and implementation questions - similar to the current EFRAG Implementation Guidance 1 and 2 on Materiality Assessment and Value Chain and the multiple Q&A addressing questions from EFRAG platform? The existing guidance materials are widely used in practice and their application is encouraged by regulators. Nevertheless, their status and the due process in their elaboration introduce uncertainty. We therefore ask EFRAG to clarify the legal status of NMIG and the due process which will be put in place to update it. In practice, applying the ESRS inevitably raises interpretation and application challenges. Hence, we support a concept of the NMIG as a "living" document that will be regularly updated to reflect evolving practices and address emerging questions. As such we agree with EFRAG recommendation to the EC to not include the NMIG in the Delegated Act as this will limit the possibility of continuing to update it. We support EFRAG as the appropriate authority to issue application and interpretative content on ESRS going forward. To ensure such material remains consistent and high quality, EFRAG's responsibility should be formally recognized by the European Commission, and a transparent, robust and well-defined due process needs to be developed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ernst & Young	Auditor	United Kingdom	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We welcome the inclusion of the "undue cost or effort" (UCE) concept but believe further clarification is essential to ensure consistent application and avoid loss of relevant information. As the concept comes from IFRS standards, we recommend that it is used in a similar way. Clarifications are needed on: - How to assess UCE. Under IFRS, UCE is a proportionality principle on the level of sophistication of data and models used to report the information – not a justification to omit information. We therefore recommend clarifying that the use of UCE to "prepare information on metrics" (§87-d) affects "how the information is prepared" rather than "whether it is reported on". The broader use of the UCE concept in sustainability reporting, a less mature field, requires guidance. EFRAG should strive to align with the ISSB guidance to avoid confusion. EFRAG should also clarify how UCE compares with the criteria provided by the Commission's July 2024 FAQ on "reasonable efforts" for value chain data. - When to apply UCE. UCE relief may accommodate first years of application, with decreasing use over time as practices evolve. This dynamic assessment should be further clarified. - Interaction with other flexibilities. The relief for acquisitions and disposals is not conditional upon UCE . This might lead to information not being reported even when available. We suggest making reporting on acquisitions and disposals conditional upon UCE. This will contribute to reduce a new difference with ISSB standards. We recommend separate presentation of material "disposed activities" from continuing operations, inspired by IFRS 5. We also suggest reminding some impacts/risks might remain relevant post disposal. Instead of disclosures on "significant events occurring between acquisition or disposal date and the end or beginning of the reporting period", we suggest requiring summarized information on the related business and its material topics.			
Survey	Ernst & Young	Auditor	United Kingdom	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	In principle, we agree that the proposed relief in ESRS 1 §91 strikes an acceptable balance between flexibility for preparers and avoiding undue loss of information, especially where forcing full-scope estimates would reduce relevance, provided companies remain transparent when using it. However, we have the following concerns: - It should be made clearer that the partial scope relief only applies when neither direct nor estimated data can be obtained without incurring "undue cost or effort" (UCE). This provision should not be interpreted as a justification for omitting information altogether or for avoiding the use of reasonable estimates. - We have concerns regarding the interplay between §91 and §87 on "undue costs or efforts". §87 applies when preparing information on all metrics (including GHG emissions). Unless it is clarified that §87 affects "how the information is prepared" rather than "whether it is reported on", it may be misinterpreted as a possibility to already partially report on a metric. EFRAG should clarify in an AR that UCE (§87) is a proportionality mechanism applicable when preparing the data, while the possibility to report on a partial scope (§91) is an additional relief. Please refer to Q17 for our comments on the relief "undue cost or effort". - We recommend to remove the "reliable data" criteria in §91 as it will create confusion compared to "reasonable and supportable information" and the other qualitative characteristics of information. - The current transparency requirements might not provide sufficient incentive to improve the coverage of calculation in future periods. We propose to require disclosure of quantitative indicators, such as the percentage of scope covered and the change from prior year, alongside narrative disclosures on actions taken. Reflecting measurable progress would enhance comparability and provide the right incentive to improve the coverage.			
Survey	Ernst & Young	Auditor	United Kingdom	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	We support a modified Option 1 with additional reliefs to fully align with ISSB standards. Quantitative information on anticipated financial effects (AFE) is essential to connect sustainability-related risks with financial information, especially regarding climate-related risks. Option 1 with further proportionality mechanisms and reliefs would preserve the quantitative information while addressing the challenges raised by such disclosures. We recommend the following adjustments to Option 1: (i)remove from AR17(b) (relating to measurement uncertainty) the reference to "such as when there is no reasonable and supportable information derived from its business plans". This relief is inconsistent with AR 15 which requires the use of "reasonable and supportable information (…) without undue cost or effort" and ESRS 1 §47 which states that the information "used by the undertaking in preparing its financial statements, operating its business model, setting its strategy, conducting its sustainability due diligence, and managing its impacts, risks and opportunities is considered available to the undertaking without undue cost or effort." This relief is also inconsistent with IFRS S1 §89. If it is maintained, EFRAG should clarify how it interacts with AR15. (ii)include, within ESRS 2 AR17, the IFRS proportionality mechanism requiring an approach commensurate with the skills, capabilities and resources available to the entity. The expectations for disclosures on AFE differ between large-listed entities and those just meeting the size criteria. The additional related relief provided in IFRS S2 §20 for climate-related AFE (§20) should also be included to recognise that some AFE may require modelling capabilities that are not available yet. (iii)provide NMIG illustrations - further guidance and examples such similar to the recent education materials from the ISSB are essential to clarify that not all anticipated financial effects are expected to be quantified and show how the reliefs efficiently address the estimate challenges.			
Survey	Ernst & Young	Auditor	United Kingdom	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I would like to skip this question and provide my feedback in Part 3				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ernst & Young	Auditor	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	Interoperability is essential for users and critical to reduce the reporting burden of reporting entities. We commend EFRAG's efforts to improve interoperability, but we are concerned that some revisions will introduce new differences. We strongly recommend that EFRAG works with the ISSB when finalising ESRS to further improve interoperability. We also stress the importance of updating the interoperability guidance. Regarding point 1, please refer to Q.25. Regarding point 2, we disagree with the proposed approach. We recommend leaving the choice open based on the consolidation approaches of the GHG Protocol, as required in most GHG related standards, including IFRS S2. Imposing a double reporting for companies that have historically had targets and communication based on operational control works against simplification and interoperability. For points 3 and 4, please refer to Q.17 and 19 and comments in Part 3. While both ISSB standards and ESRS now include the relief related to "undue cost or effort", full alignment is not achieved due to differences in scope where this concept applies. EFRAG should work with the ISSB to assess the impact of these differences and explore ways to address it. The other ESRS reliefs which create new differences to be assessed with the IASB before finalizing ESRS. Any remaining difference should be identified in the interoperability guidance to clarify which reliefs should not be applied for dual compliance purposes. The resilience-related disclosure now requires only qualitative information (§24). We recommend retaining the current wording in §48(f), aligned with IFRS, and leave the wording in E1-3 unchanged. On point 8, although some wording differences remain (e.g. financed emissions), we do not see major hurdles (apart from those indicated in Part 3). The results are comparable and it is understood that EU legislation need to be reflected in ESRS.			
Survey	Ernst & Young	Auditor	United Kingdom	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Ernst & Young	Auditor	United Kingdom	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	In principle, we support the substantial reduction of datapoints that was achieved during the simplification process. We believe that, despite the substantial decrease in the number of required disclosures, the same reporting areas and topics are covered. We would caution against equating a 68% decrease in datapoints with a 68% reduction in reporting burden. There is a risk that the narrative around burden reduction could create expectations - among stakeholders or external parties - that the effort required from companies and their auditors will decrease by the same proportion. Much of the simplifications relate to narrative disclosures and the removal of redundancies, which will not translate directly into a proportional decrease in the actual workload and resources required to elaborate the sustainability statement. In practice, the true impact will become clear only through effective implementation from preparers. The cost-benefit analysis is also essential to inform the level of burden reduction.			
Survey	Ernst & Young	Auditor	United Kingdom	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	In principle we agree with the fair presentation concept. However, we see challenges due to the lack of well-defined boundaries for relevant users relating to impact materiality and due to the lesser maturity of sustainability reporting compared to financial reporting. Several crucial clarifications are needed: - Given the link with materiality of information, our comments in Part 3 relating to "users of the (general) purpose sustainability reports" are critical to address. - Fair presentation does not mean "less than compliance". Although fair presentation in IFRS Accounting Standards implies departing from the standards if these do not convey a true and fair view, we do not consider that such "true and fair view override" (rarely applied in practice) is applicable in disclosure standards and can be used to avoid compliance with a disclosure requirement. It is also not mentioned in IFRS S1. We are concerned that fair presentation is presented as a lever for reducing reporting burden without any clarification on how it would impact the materiality principle already enshrined in the standards. To avoid the risk of inconsistent interpretations, we ask EFRAG to provide guidance on how the fair presentation concept may impact sustainability reporting. - Fair presentation may require additional information to allow users to understand the material IROs. This should be clearly stated, in alignment with IFRS S1, especially in a context of reduced mandatory datapoints and lack of sector standards. - The basis of preparation should include an "explicit and unreserved statement of compliance with ESRS". This will clarify the roles and responsibilities of the stakeholders involved in the reporting process. This will also align with IFRS standards. - The reference to fair presentation should be aligned with the CSRD. We suggest EFRAG to engage with the EC to amend the CSRD to prevent further discussions.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ernst & Young	Auditor	United Kingdom	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	The financial sector commonly sets intensity targets rather than absolute emissions targets as the outstanding exposure is volatile and significantly affected by external factors (interest rates, divestment / investment decisions, portfolio composition, etc.). This approach aligns with current Pillar III ESG risk disclosure requirements, which permit intensity-based reporting and remains standard practice across European banking institutions. However, regulatory expectations are evolving. The EBA Climate Risk Guidelines (January 2025) do not mandate absolute targets but recommend that banks start setting them where relevant, alongside intensity targets. This reflects a regulatory trend, not a prescriptive requirement. Some financial institutions have already started setting absolute targets for specific sectors, as seen in recent CSRD reports. Although these remain exceptions to market practice, they signal progress in target-setting maturity. Since the requirement to disclose the associated absolute value relates to a conversion of an intensity target set, this relief for financial institutions is considered temporary. It allows sustainability reporting to mature as more value chain information becomes available over time. Such conversion requires multiple assumptions (e.g. composition of the portfolios, production capacity, market shares and level of emission intensity). As there is no common methodology for this conversion, comparability between entities would vary, reducing the usefulness of this disclosure. Useful disclosure may be to require entities to disclose whether a target set is an absolute or an intensity target (similar to the requirements in IFRS S2.33). Should EFRAG decide to require disclosure of absolute associated values, guidance on conversion methodologies would be useful to promote comparability and decision usefulness of the information. Finally, SFDR requirements apply only to financial products and not to the entire reporting entity and therefore not to all investments within a financial institution. They do not dictate how financial institutions set their own targets or action its strategy.			
Survey	Ernst & Young	Auditor	United Kingdom	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	The amendment of the threshold will increase comparability between undertakings as it is based on a defined figure and not on the size of the undertaking. This will provide a more transparent view on geographies where employees are based, allowing a better understanding of the undertaking's operations and facilitated benchmarks on labor practices. However, we note this change can lead to an increase in disclosed information (e.g. on countries with more than 50 employees but representing less than 10% of the total number of employees). Also, the new threshold will have an impact on data collection for social dialogue country-by-country disclosures (S1-7 28a) since no aggregated datapoint is required in Set 1. While maintaining a defined threshold, a suggestion could be to adapt it based on the final threshold of employees which will be retained by EU in "Content Directive" for applying CSRD. For instance, if the EU sets the threshold at 500, 1000 or 3000 employees instead of the current 250, the proposed "> 50 employees" could be reconsidered to reflect the increased size and characteristics of companies subject to CSRD. This would ensure proportionality and relevance in disclosures.			
Survey	Ernst & Young	Auditor	United Kingdom	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The current hierarchy for non-EU wage disclosures lacks clarity and consistency. It references different ILO principles, specifically, "ILO wage setting principles" in the first tier, and "ILO principles on estimating a living wage" in the second and third tiers. This distinction is critical: the former considers local wage-setting practices (minimum wage) but does not guarantee a living wage, while the latter aims to define and uphold a living wage standard. This inconsistency risks undermining the objective of the DR, which is to ensure insight on whether the company pays its employees an "adequate wage." The consideration of minimum wage for non-EU countries also creates a discrepancy with the approach prescribed for EU countries in ESRS S1 AR 22 which only mentions adequate wage references. ESRS S1 AR 22 new hierarchy maintains the risk of an undertaking misrepresenting its adequate wage payment practices. Companies might need access to key data, or guidance in estimating an existing living wage complying with ILO principles on estimating a living wage. The deletion of Sustainable Trade Initiative references including available databases will increase workload for undertakings in the situation of assessing a living wage In non-EU countries where reliable external sources are lacking, undertakings may calculate living wages manually, which imposes a significant risk and burden. S1-9.AR 20 currently allows companies to state that all employees are paid an adequate wage without further disclosure. This contradicts ESRS 2 and ESRS 2 GDR-M's emphasis on transparency. This could lead to inconsistent interpretations, a lack of transparency on the applied methodology and limited comparability of disclosures. We recommend removing this clause to ensure methodological clarity and comparability. In conclusion, EFRAG should address the complexities and provide clearer explanations of the ILO principles to ensure consistent and meaningful implementation of this standard.			
Survey	Ernst & Young	Auditor	United Kingdom	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	Biodiversity target setting practices are still emerging. We suggest EFRAG to provide some clarifications or examples in NMIG to support consistent reporting across undertakings, enhancing comparability of the disclosed information. Better alignment with latest science-based frameworks, drawing where appropriate from TNFD and SBTN - which provide guidance for elaborating various nature-related targets and examples – would enhance relevance, comparability, comprehensibility.			
Survey	Ernst & Young	Auditor	United Kingdom	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	The indicator of adjusted gender pay gap has been one of the most applied voluntary datapoints by many companies which considered it as a more suitable indicator for the understanding of gender pay gap within businesses and categories of employees. In principle, we agree with the suppression of the voluntary datapoint as this is in line with the overall intention of the simplification of the standards and systematic removal of "may" datapoints. Companies are still authorized to disaggregate metrics when needed according to ESRS 1 and 2 and NMIG 35 (stemming from AR 102) suggests how companies can provide additional explanation of data on gender pay gap. The difference between the definitions of "pay" and "remuneration" is unclear, resulting in a risk of varying interpretations. We suggest an alignment of the definitions of "pay" and "remuneration" or an explicit clarification on the differences between the scope of compensation elements included in one remuneration metric but not in the other one.			

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Survey	Ernst & Young	Auditor	United Kingdom	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	G1-6 §12(a) requires (a) 'description of the undertaking's standard payment terms in number of days by main category of suppliers, including SMEs, and the percentage of its payments aligned with these standard terms". There is uncertainty on whether SME information is required "in any case" irrespective of the materiality of this category of suppliers from the perspective of the undertaking. This is considering the objective of CSRD as indicated in Q.32 (Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SMEs), the objective of DR ("especially with regard to late payments to SMEs") and the wording of the requirement itself (disclose "payment terms in number of days by main category of suppliers, including SME's...". We note in ESRS 1 §21 (a) that information is material when 'it is necessary for users of general-purpose sustainability statements to understand the undertaking's material IROs and how it identifies and manages them". SMEs may not fall within the main category of suppliers as they may not be considered material in the context of Tier 1 suppliers for preparers and thus the specific information on SMEs may be justifiably omitted on materiality grounds. If it is the intention is to require preparers to disclose payment practice to SME's to address specific users' needs, we recommend that EFRAG clearly states so and provide for a separate standalone requirement within G1-6 §12(a) that sets out SME specific payment practice disclosure requirements – distinct from other suppliers. We also recommend that EFRAG defines "SME" or clarify that it should align with the criteria set out in the accounting directive.			
Survey	Ernst & Young	Auditor	United Kingdom	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We partially agree with the proposed revisions to ESRS 1. We recognize EFRAG's achievements in simplifying ESRS 1. In principle, we support the introduction of 'fair presentation', however we see some challenges and recommend some key clarifications as set out in our response to Q25. We draw EFRAG's attention to our comments on the "gross versus net" guidance (Q.12). We consider that the principles should be clarified and better articulated with the definition of material information which refers to material IROs and how they are managed, suggesting a gross approach is more relevant for users. We emphasize the need for clarifications on "undue costs or efforts" and its articulation with other reliefs, in particular the partial scope metrics and the acquisition/disposal reliefs as set out in Q17. We also stress the importance of clarifying the definition of value chain for financial institutions, while acknowledging the ongoing developments on level 1 regulation. We have provided targeted comments on specific ESRS 1 disclosures in Part 3 of the EFRAG survey. In particular, we stress the need to further clarify the concept of materiality of information and avoid inconsistencies in wording around the terms "users", "sustainability statement" or "general purpose sustainability statement" which create confusion. We ask EFRAG to align the wording of these paragraphs and clarify how different terms impact the materiality and fair presentation assessments. We also suggest making clearer that a bottom-up approach is needed when a top-down approach may fail to reflect the undertaking's specific situation and characteristics, possibly resulting in overlooking less obvious but material IROs. On reporting boundaries, we request some clarifications on whether the rationale provided by EFRAG on the treatment of leased assets could be extended to other similar contractual relationships. Please also refer to our more detailed comments in Part 3.			
Survey	Ernst & Young	Auditor	United Kingdom	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Overall, we agree with EFRAG's effort to streamline and reduce ESRS 2-related disclosure requirements. The additional flexibility introduced for the presentation of PATs as well as the presentation of the description of material IROs are welcome developments. However, the references in ESRS 2 (AR23 and AR28) to a level of aggregation reflecting the level at which IROs are managed should be clarified to ensure appropriate and consistent aggregations of disclosures. Also, it should be clear that the description of material IROs needs to reflect their underlying characteristics in the context of the undertaking's specific facts and circumstances. The overall streamlining of datapoints related to PATs within ESRS 2 will reduce the burden faced by preparers and auditors during the first year of ESRS reporting. However, much of the simplifications relate to narrative disclosures and the removal of redundancies, which will not translate directly into a proportional decrease in the actual workload and resources required to elaborate the sustainability statement. The cost-benefit analysis is essential to inform the level of burden reduction. Regarding the basis of preparation, in relation to the introduction of the fair presentation principle, ESRS 2 should include a clear requirement for an "explicit and unreserved statement of compliance with ESRS" by the undertaking. We emphasize our suggestion to require undertakings to indicate in IRO-2 what additional (non-material) information was included in the sustainability statement, noting such disclosures are best placed in appendices to ensure clear distinction from material content. Finally, we draw EFRAG's attention to our comments on the disclosure related to anticipated financial effects (Part 2, Q.19). We support a modified Option 1 with further reliefs aligned with ISSB standards. Please also refer to our more detailed comments in Part 3.			
Survey	Ernst & Young	Auditor	United Kingdom	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We commend EFRAG on making some useful amendments to ESRS E1. We appreciate that ESRS 2 related DRs have been removed from all standards but have been kept as specific DRs in ESRS E1, as climate risk and resilience analysis are key to climate change adaptation disclosures. The simplifications on disclosures related to policies, actions and targets should also provide relief for preparers. Two other notable reliefs are the removal of the concept of high climate impact sectors and the inclusion of third-party approval of targets to demonstrate compatibility as part of the transition plan (please refer to our attention points in part 3). Nonetheless, we do not support some of the key changes proposed by EFRAG. Firstly, we do not support the proposal to request a financial control approach on GHG emissions reporting with a double reporting when operational control is required for fair presentation. Such double reporting is not a relief for preparers. We recommend leaving the choice open based on the consolidation approaches of the GHG Protocol, in alignment with IFRS S2. Secondly, we see the removal of the concept of net zero target as detrimental to the transparency of disclosures. Having no safeguards on this key concept is a step back creating a risk of greenwashing. Lastly, we support an adjusted Option 1 for quantitative disclosures on anticipated financial effects with additional reliefs aligned with ISSB standards. Quantitative information on anticipated financial effects (AFE) is essential to connect climate-related risks with financial information. Option 1 with further proportionality mechanisms and reliefs would preserve the quantitative information while addressing the challenges raised by such disclosures. Please see also our more detailed comments in Part 3.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ernst & Young	Auditor	United Kingdom	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We appreciate the efforts to streamline and merge data points within the updated reporting standards, as these changes contribute to greater clarity and consistency. The alignment of approaches across different standards is highly valuable. To further enhance usability and ensure consistent implementation, we recommend to add guidance and clear definitions in the standard with respect to key concepts such as secondary microplastics, material pollutants emissions, importer and user of substances. Concerns have been raised by Wave 1 undertakings regarding effort and cost associated with producing KPIs related to as Substances of Concern (SOC) and Substances of Very High Concern (SVHC) for users of substances (as opposed to manufacturers), which might not be routinely tracked or monitored within internal systems. We encourage EFRAG to refine the terminology and boundaries for SOC and SVHC, in particular how the substances need to be reported when a company is a manufacturer/importer and a user. Finally, considering that E1 and E2-E5 comprehend all environmental matrices, consistency should be fostered on reporting boundaries/approach – e.g. operational/financial control approach –, enhancing reporting coherency towards stakeholders.			
Survey	Ernst & Young	Auditor	United Kingdom	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Overall, we welcome the simplifications. As detailed in our comments below in Part 3, we ask some clarification on recycled or reused water, and water storage calculation methodology, to reflect the complexity of water flows and support consistent reporting for entities. Finally, considering that E1 and E2-E5 comprehend all environmental matrices, consistency should be fostered on reporting boundaries/approach – e.g. operational/financial control approach –, enhancing reporting coherency towards stakeholders.			
Survey	Ernst & Young	Auditor	United Kingdom	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Overall, we welcome the streamlining of the standard. As biodiversity resilience has distinct drivers compared to other environmental topics, we recommend to retain dedicated disclosures on resilience analysis specific to biodiversity risks. Regarding biodiversity transition plans, we acknowledge they remain an emerging practice. If the proposed disclosure requirement on biodiversity transition plan is maintained, the standard should include a clear definition of biodiversity transition plans (distinct from strategies or action plans). Also, clarification on what constitutes public disclosure of the transition plan should be included, as well as practical guidance on "compatibility with global goals" like the Kunming-Montreal Global Biodiversity Framework (GBF). The standard should also specify terms such as "sustainable land/agricultural practices" and "sustainable oceans/seas practices" to enhance clarity and consistency in reporting. Finally, considering that E1 and E2-E5 comprehend all environmental matrices, consistency should be fostered on reporting boundaries/approach – e.g. operational/financial control approach –, enhancing reporting coherency towards stakeholders.			
Survey	Ernst & Young	Auditor	United Kingdom	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Overall, we welcome the streamlining of the standard. The proposed changes contribute to greater clarity and consistency. The alignment of approaches across different standards is also highly valued. However, the inclusion of critical and strategic materials is not aligned with the simplification objective. Resource inflows, by nature, are complex to report and require a great level of effort by undertakings. We are concerned that companies not operating in key sectors that use these raw materials will need to estimate these data, leading to an increase in the reporting burden. While progress has been made in defining certain terms, some key terms may still raise interpretation issues, i.e., "sustainability sourced". Some clarifications would further support effective and consistent implementation. Furthermore, some of the new terms and terminologies might already exist in local laws and regulations (e.g., Extended Producer Responsibility and waste management regulations). Consideration should be taken on what extent the ESRS should authorize undertakings to apply existing local definitions and methodologies (e.g. recyclability) where appropriate, and how the articulation with the proposed definitions can be transparently addressed for comparability purposes (e.g. clear explanation provided in the methodology notes). Finally, considering that E1 and E2-E5 comprehend all environmental matrices, consistency should be fostered on reporting boundaries/approach – e.g. operational/financial control approach –, enhancing reporting coherency towards stakeholders.			
Survey	Ernst & Young	Auditor	United Kingdom	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We partially agree with the simplifications. The work performed by EFRAG on ESRS S1 strategically simplifies and refines the standard to enhance clarity and accessibility while ensuring most key elements are preserved. Also, the revised structure of the standard and the simplified presentation of the ARs promote easier interpretation and implementation of ESRS S1. However, we have some concerns on some of the proposed changes. •Refer to our detailed comment in Q28 for adequate wages. •New concepts and methodologies were introduced (e.g., "lack of social protection" in S1-10) without clear guidance. •Some key clarifications are still needed, mainly on metrics for example on S1-5 on turnover, S1-10 on loss of income, S1-14 on family-related leave, and on ESRS 2 on double materiality assessment regarding human rights related IROs. Clarifications are also needed for S1-15 regarding alignment of components of remuneration to be considered in remuneration metrics (gender pay gap and annual total remuneration ratio). Such clarifications would limit inconsistencies in reporting and improve comparability. See also our comments on gender pay gap in Part II question 31, as well as comments in response to Part III related.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ernst & Young	Auditor	United Kingdom	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	Consistency across social standards has been reinforced. We agree with the overall alignment between S2 with S1 since many issues (e.g. labor rights, safe working conditions) extend beyond an entity's employees to its contractors and suppliers' workers. It underscores alignment with international instruments (UNGP, ILO conventions) as an overall objective. Clarity increased with merger or removal of duplicative or overlapping data points in S2, e.g human rights policy commitments eliminated from S2 and merged into ESRS 2 GDR-P. This allows companies to disclose one comprehensive human rights policy covering all stakeholder groups, rather than separate policies per standard, potentially aligning with existing management of those issues. However, we have some recommendations to improve clarity: ED clarifies that only substantiated human rights incidents involving value chain workers need to be reported (in S2-3). Clarification is needed on what "substantiated" means for HR incidents: does it refer to ongoing legal proceedings, cases confirmed by a court or authority, or could it be simply supported by internal investigation? Clear criteria would ensure consistent reporting and avoid interpretation differences. Clarification is needed in the AR regarding the minimum expectations for supply chain depth to adequately cover the requirements. This includes considerations for suppliers beyond tier 1 and downstream players; 2024 publications were very heterogeneous. As reporting practices mature, we suggest that NMIG proposes illustrations of entity-specific metrics for S2, S3, S4 – using S1 established practices. e.g. "If available, may disclose an estimate of the number of workers in Tier 1 upstream value chain to contextualize the scale of impact". To support auditability, practical application and data-driven reporting, we suggest adding references to supplier tools for human rights due diligence in NMIG. In the amendments log, the word 'severe' human rights incidents is maintained, and should be removed to align with the ED itself.			
Survey	Ernst & Young	Auditor	United Kingdom	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	General observation: The ED ESRS S3 has been refined to focus on key reporting requirements and promote coherence and flexibility. The centralization of human rights policy descriptions into ESRS 2 enhances readability and integration. Overall, these changes aim to avoid siloed reporting and ensure comprehensive community engagement. Remaining Challenges & Recommendations: •Community vs Environmental Interactions: Disclosure Requirement S3-1 mandates that undertakings describe their policies for managing material impacts, risks, and opportunities related to affected communities, specifying whether these policies apply to all or specific groups. To enhance coherence, we suggest to add in NMIG some examples of policies' disclosures that consider value chain impacts (upstream and downstream) and link community impacts to relevant environmental standards (E1–E5) to avoid fragmented reporting - e.g. policies related to water management impacting the (preservation of) local communities' access to clean water. •Donations / Community Investment: Disclosure Requirement S3-4 references to 'Investments in communities' have been partially deleted or moved to NMIG. ESRS 1 § 36 introduces a new definition of positive impact, restricting it to impacts deriving from business activities, products and services – excluding "philanthropy" as confirmed by the log of amendments. Many stakeholders view community investments (e.g., donations to schools, hospitals) as integral to community engagement. The NMIG 13 for § 13 of S3 refer to "positive impacts" illustrated by "social investment and development programme" – which seems contradictory with the new definition. We ask EFRAG to clarify the boundaries of the concept in ESRS 1 and its interaction with NMIG 13 for S3. Including guidance in the NMIG on reporting such activities, as entity-specific information, would help undertakings with significant community programs position these activities within the ESRS framework.			
Survey	Ernst & Young	Auditor	United Kingdom	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We welcome Exposure Draft ESRS S4 – Consumers and End-users for its streamlined alignment with other standards (ESRS 2, S2, S3) and the integration of consumer-related policy disclosures into a unified framework. However, we recommend further improvements in the following areas: •B2B vs B2C Applicability: A frequent question is how S4 applies to companies that do not have direct consumers (B2B companies). The ED acknowledges end-users, which helps, but we recommend adding guidance or examples for B2B contexts. For instance, NMIG could illustrate how a B2B company can understand "consumers". •Boundaries of "end user" remain unclear, particularly in circular economy contexts where products may be reused or resold. Illustrations in NMIG would be helpful for some activities. •Engagement Channels with Consumers: The current wording in § 11 emphasizes direct engagements (like surveys, focus groups) and/or through representatives. We believe the standard should explicitly allow indirect channels as well (e.g. third-party consumer studies). Also, many consumer issues surface via grievance mechanisms or customer service hotlines. We recommend EFRAG to acknowledge all these legitimate channels in AR 2 for § 11. •Temporal Scope – Ongoing Consumer Engagement: § 11 refers to "during the reporting year". We suggest clarifying in AR or though examples in NMIG that ongoing consumer engagement programs (spanning multiple years) can be discussed if relevant. For instance, if a company has a long-running customer satisfaction tracking system, it should be able to mention long-term trends or actions from prior years carried into the reporting year. •Vulnerable Consumers Examples: The ED includes examples of vulnerable consumers. As examples are – by definition- not an exhaustive list, we suggest complementing NMIG with other instances such as "first-time internet users" or "non-English speaking customers" that a company might identify as vulnerable in their specific context and circumstances.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Ernst & Young	Auditor	United Kingdom	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We welcome the harmonization of the structure of ED ESRS G1 with other topical standards, through a clear Policies-Actions-Targets-Metrics architecture as well as the clarifications added regarding new definitions or concepts (eg, fines and convictions, with clear prescription on administrative or regulatory authorities sanctions). The deletion of mandatory datapoints notably based on local practices, such as the average time the undertaking takes to pay an invoice, will significantly reduce the undertakings efforts for collecting data. Some concepts still need clarifications, as detailed in our Part III responses, for example: o"(unfair) payment practices, as ESRS G1 sub-topic oTraining "depth of coverage", o"SME" which needs to be defined and clarified whether disclosures are expected even if transactions with SMEs are not material for ESRS G1 - 20. (a) We also recommend EFRAG to clarify some methodological aspects to compute metrics, such as othe scope of "legal proceedings outstanding for late payments" as far as final decisions cases and investigations of government authorities are concerned, (G1 - 20. (b)) othe scope of "incidents of corruption or bribery" as far as individuals or employees or own workers are concerned (G1 – AR 3) omethodology to determine the percentage of payments aligned with standard terms, (G1 – AR 3).			
Survey	Ernst & Young	Auditor	United Kingdom	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We suggest EFRAG to clarify in the Basis for Conclusions which revisions in the Exposure Drafts represent actual changes (such as new reliefs) and which revisions represent clarifications of ESRS Set 1 requirements which could therefore be reasonably considered by companies and auditors in the FY2025 reports. In addition, we highlight the need to ensure consistency between the ESRS and other EU regulations so that preparers and users benefit from a clear framework, homogeneous and harmonized with other existing regulatory requirements. It is of the utmost importance for financial institutions, for which interaction and consistency with reporting requirements should be reached, including with EBA guidelines on ESG risks and transition plans as well as standards on Pillar 3 disclosures is essential. We also strongly recommend to retain in ESRS 1 the principle included in ESRS 1 Set 1 §115, according to which disclosures pursuant to Article 8 of the Taxonomy Regulation "are not subject to the provisions of ESRS".			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We welcome the proposed amendments to the ESRS which represent a positive step forward. However, we suggest to consider a more flexible approach as regards the double materiality assessment by clarifying that companies should only carry out a full DMA periodically or when there are significant changes in their strategy or business model, and not necessarily on a yearly basis. In our view, the current drafting leaves the process overly complex and resource-intensive, especially for large industrial companies with diversified operations. For companies with a stable business, without changes of profile, big expansions or large new projects, the DMA should be valid for at least three years. Companies could instead review internally their DMA every year to determine wheather such a reassessment is necessary. The DMA should therefore only be audited when updated periodically. It would also be beneficial to clearly define what constitutes a reassessment to avoid divergent interpretations of this concept by preparers and auditors. We also support the use of reasonable and supportable information available without undue cost or effort (ESRS 2 paragraph 47 & chapter 7.3), as well as ESRS 1 paragraph 48 on materiality based on the business model and AR 17 on the top-down approach. It is important to grant undertakings discretion to define the appropriate level of disaggregation whether by topic, business or another relevant area. We recommend deleting references to sub-sub-topics such as in Appendix A E4 ("Drivers of biodiversity and ecosystem change (terrestrial and marine habitat change, invasive species)"). We would like to avoid unnecessary burden and audit pressure.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We agree with adopting a net approach to assessing potential negative impacts within the Double Materiality Assessment (DMA). This reflects real business practices, where impacts are evaluated after accounting for credible, systematic, and effective prevention and mitigation measures. Industrial companies already invest heavily in regulatory compliance, site-level controls, advanced monitoring systems, and global frameworks (e.g., ISO, OGMP 2.0). These measures are audited, budgeted and continuously improved to reduce risk exposure. A gross-only assessment would inflate disclosures with hypothetical risks that are already effectively managed, creating excessive burden and misrepresenting actual exposure. A net approach ensures disclosures remain decision-useful, rewarding companies for proactive and data-backed mitigation efforts. However, on the other hand, we caution against the rigidity introduced by the gross vs. net approach in Appendix C. Framing materiality around gross impacts risks turning the exercise into a theoretical checklist, disconnected from sustainability reporting's purpose of accountability, comparability, and faithful representation. Safety topics, for instance, would be reported regardless, as they are business priorities even without annual incidents. By treating all impacts as material, the gross approach risks over-reporting and obscuring meaningful disclosures.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We believe the proposed changes give companies more flexibility when preparing their sustainability reports and allow them to focus on the most important information. It is useful that very detailed data or EU Taxonomy-related information can be placed in separate sections or appendices, as described in [DRAFT] ESRS 1 section 8.2. At the same time, we suggest removing or moving (amended) ESRS 1, AR 36. This requirement says that companies may present detailed GHG emission calculations in a separate appendix or section. Since it is not mandatory and only relates to ESRS E1, including it in ESRS 1 could create confusion. It would be clearer either to delete it or to place it under ESRS E1 (Climate Change).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	We support the changes proposed since they provide more clarity on how to report the disclosure requirements related to Policies, Actions and Targets. However, we reiterate that EFRAG should explore the possibility of merging disclosure requirements on PATs in the topical standards as these are often implemented together. Also some companies raised concerns about: 1. ESRS 2, paragraph 38 (a–c) – resources allocated to key actions Some companies report that detailed data on resources allocated to ESG actions are monitored mainly at the level of specific projects (e.g. modernization of smelting installations, water recovery systems), not through the IRO structure. Reconciling them with financial statements would be highly time-consuming and disproportionate to their value. A short narrative description should be sufficient instead of numerical data. 2. ESRS 2 GDR-M, paragraph 41(b) – environmental conditions and characteristics of areas Some companies point out that this requirement duplicates paragraph 41(d), creating additional administrative burden without improving reporting quality. Both provisions should be merged and streamlined. 3. ESRS 1, paragraph 40 – application of the materiality principle Some companies note that disclosure of metrics under topical standards should be explicitly subject to the principle of double materiality. For large enterprises with broad operations, some metrics are not practically relevant. Clearer application of materiality would reduce information overload and allow focus on key issues such as emissions, energy and water management.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We fully support the changes introduced as regards the distinction between mandatory from voluntary datapoints, as it was flagged as one of the main sources of confusion during the preparation of the sustainability statements, also presenting challenges with auditors. However, further simplification and precision are needed to improve usability and avoid confusion, particularly with auditors. -Unclear and contradictory terminology should be eliminated. For instance, terms such as "shall consider" create ambiguity: "shall" implies mandatory action, while "consider" suggests discretion. This phrasing leaves room for interpretation and could result in inconsistent application or auditor disputes. -Application requirements (ARs) that use "may" should be removed, as "may" implies voluntary action, which contradicts the stated objective of eliminating voluntary disclosures. Clear, mandatory language is essential to ensure consistency and enforceability across undertakings. -In addition, the term "significant" is unclear. ESRS should explain that companies should assess significance in their own context, so that disclosures remain relevant and material. -To make the ESRS even simpler, EFRAG could move definitions to the Annex II glossary, place illustrative examples in the NMIG, include presentation guidance directly in the datapoints, and remove optional ARs			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We strongly support excluding the NMIG from the Delegated Act to ensure it is clearly interpreted as non-mandatory, in order to prevent an unintended increase in reporting burden. The NMIG should remain a helpful reference tool for preparers, not a regulatory requirement. This connects with the need of moving all voluntary and non-mandatory data points into a separate document to improve the clarity of the standards.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We support that disclosure about resilience is now limited to risks and to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). We fully support other relief measures introduced by EFRAG included in ESRS 1 section 5.4 as regards acquisitions and disposal and paragraph 92 allowing reporting undertakings to exclude joint operations over which they don't have operational control for the calculation of certain environmental metrics. However, additional alignment with financial reporting (i.e. IFRS 11-Joint arrangements) could be achieved. Following the financial consolidation method would improve the consistency of the information reported by companies. There are some unclarities on reporting confidential information, especially justifying its omission to auditors. We see particular risk in the disclosure of highly detailed environmental data, in ESRS E5 (Resource use and circular economy), covering mass balance, material flows, resource consumption, waste and recycling, as well as in selected requirements of ESRS E2 (Pollution) and ESRS E3 (Water and marine resources), which may reveal technologically sensitive and strategic information. Therefore, the scope of these requirements should be limited by allowing reporting at a higher level of aggregation and by adopting an approach similar to the GRI Standards, where "confidentiality constraints" are a valid reason for omission. We are concerned that the notion of "undue cost or effort for the undertaking" (Basis for Conclusions, Lever 5 §70) lacks a clear definition. There is a risk that preparers and auditors will interpret this term differently, which may lead to inconsistent application in practice. Further clarification is needed. Some companies report that calculation methodologies lack sufficient precision, which undermines comparability. For GHG emissions, companies stress the need for EU-wide standardised tools such as calculators, examples and shared databases of factors. Present, undertakings rely on multiple sources (e.g. DEFRA), making calculations time-consuming and inconsistent.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We fully support the relief measures as regards the use of reasonable and supportable information that is available without undue cost or effort as it will significantly reduce the administrative burden on reporting undertakings. We believe this provision should be permanent and not subject to a time limit as proposed by some EFRAG SRB members (as mentioned in paragraph 76 of the [DRAFT] Basis for Conclusions. In the case of large Capital Groups, some information may not be available for a long time, not just a year or two, because it requires a complete remodeling of the current method of data collection. We particularly support ESRS 1, paragraph 92, which acknowledges the practical limitations of data availability in joint operations where the undertaking lacks operational control. Allowing the exclusion of such operations from environmental metrics is a pragmatic solution that enhances reporting feasibility and avoids duplicative or misleading disclosures. Similarly, we endorse ESRS 1, paragraph 91, which permits the use of metrics based on a partial scope of calculation. This flexibility is vital in the early years of reporting, when data systems are still evolving. Importantly, the requirement for companies to disclose the scope limitations and outline plans to improve data coverage ensures transparency and demonstrates continuous progress. Clarification is needed on the sources of data to be used. For instance, when applying spend-based methods to calculate carbon footprint, it is not clear whether to use annual average exchange rates, year-end rates, or rates set by national banks. Such inconsistencies lead to diverging results across companies.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	We recommend the wording included in OPTION 2, since it better addresses companies concerns on the sensitivity of the information disclosed and on the excessive burden in calculating quantitative disclosures. The issue of anticipated financial impacts is extremely difficult. Advisors themselves don't yet know how to approach the topic, and preparing for the disclosure of such data can take years for large capital groups. We do not agree that the current requirements for disclosing anticipated financial effects can be implemented in a proportional and practical manner. For companies operating internationally, a major challenge is the lack of official and authoritative databases that would allow comprehensive and reliable forecasting of environmental and climate-related risks. The available sources focus mainly on current risks, while consistent projections for a medium- or long-term horizon are missing. We support the solution that limits mandatory reporting to qualitative information, while keeping the possibility to disclose quantitative information on a voluntary basis when a company has sufficient tools and reliable data (Option 2). Such an approach helps to avoid reporting uncertain or potentially misleading information, while at the same time encouraging companies to further develop methodologies and practices in this area.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	It is crucial not to require disclosure 'before considering adaptation/mitigation actions', as this does not reflect how business strategy is defined and adds little value for users. Mitigation measures are typically embedded within corporate strategy, structural in nature, and linked to multiple risks. Attempting to calculate hypothetical monetary amounts before mitigation is both overly complex and unreliable, producing figures that are neither estimable nor dependable. For less technical readers, such disclosures could be misleading, especially since they are not recognized in the financial statements. We therefore strongly recommend limiting anticipated financial effect disclosures to qualitative information only. As a suggestion, the IFRS S1 reliefs in § 38 and § 39 should be integrated in the ESRS: 38. An entity need not provide quantitative information about the current or anticipated financial effects of a sustainability-related risk or opportunity if the entity determines that: (a) those effects are not separately identifiable; or (b) the level of measurement uncertainty involved in estimating those effects is so high that the resulting quantitative information would not be useful (see paragraphs 77–82). 39. In addition, an entity need not provide quantitative information about the anticipated financial effects of a sustainability-related risk or opportunity if the entity does not have the skills, capabilities or resources to provide that quantitative information.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	We fully support the change that the datapoint reduction resulted in the elimination of 7 "shall" datapoints described in Basis for Conclusions (BfC) (Chapter 4, Lever 6). Also, we support the changes introduced to enhance interoperability with the ISSB standards, especially the harmonization of the reporting boundary for GHG emissions.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	22.ESRS2	Comments on deleted datapoints in ESRS 2	I agree	We support the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	22.E1.	Comments on deleted datapoints in ESRS E1	I agree	We support the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	22.E2.	Comments on deleted datapoints in ESRS E2	I agree	We support the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	22.E3.	Comments on deleted datapoints in ESRS E3	I agree	We support the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	22.E4.	Comments on deleted datapoints in ESRS E4	I agree	We support the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	22.E5.	Comments on deleted datapoints in ESRS E5	I agree	We support the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	22.S1	Comments on deleted datapoints in ESRS S1	I agree	We support the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	22.S2	Comments on deleted datapoints in ESRS S2	I agree	We support the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	22.S3	Comments on deleted datapoints in ESRS S3	I agree	We support the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	22.S4	Comments on deleted datapoints in ESRS S4	I agree	We support the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	22.G1	Comments on deleted datapoints in ESRS G1	I agree	We support the deletion of mandatory datapoints as proposed by EFRAG as it will reduce the administrative burden on reporting undertakings and will enhance the effectiveness of sustainability reporting under the ESRS.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We do not agree on adding new datapoints, especially when these datapoints were assessed as voluntary after a thorough drafting process of the ESRS and should remain as such since their content, and therefore their relevance, have not changed.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	The introduction of new mandatory datapoints contradicts the stated objective of simplifying the standards. Organizations are already facing significant challenges in collecting and reporting the extensive information required under ESRS. Adding further datapoints - such as on microplastics, critical raw materials, or waste - will not only increase the complexity of the process and burden companies, many of which are still in the early stages of building robust reporting systems. This challenge is particularly acute in the downstream value chain, where companies have very limited visibility and control over how products are used after leaving their facilities. Obtaining reliable data from customers, distributors, or end-users is in practice extremely complex, and in many cases simply not feasible. Instead of introducing these requirements as mandatory at this stage, we strongly recommend that such topics are first developed and tested within non-mandatory guidance (NMIG). This would allow companies to experiment and progressively prepare their reporting systems. Imposing new obligations undermines the principle of burden relief and seriously threatens the feasibility of the entire reporting framework, especially for sectors with complex and fragmented value chains.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	We do not support the additional disclosure requirement on secondary microplastics. Although EFRAG presents it as a clarification of existing obligations, it in fact significantly extends the scope of reporting to the downstream value chain, resulting in a substantial increase in the reporting burden and contradicting the objective of simplification. Estimating secondary microplastic emissions is currently not feasible due to the absence of a robust methodology and the limited control companies have over the downstream life cycle of products. Disclosure requirements should focus only on what companies can measure and control – namely emissions leaving their facilities. In addition, the definition of microplastics based on REACH is too broad and not fit-for-purpose in this context. To ensure consistency, the term "synthetic polymer microparticles" should be used instead. We therefore recommend deleting the proposed disclosure requirement on secondary microplastics from ESRS E2, as well as the related definition in Annex II.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	We are concerned that the revised workforce disclosures introduce a level of detail that is not necessarily relevant or decision-useful, particularly for multinational companies. The requirement to disclose employee numbers per country with more than 50 employees may add little value, as in practice these employees may be concentrated in a single region (e.g., Europe) without enhancing the reader's understanding of global workforce distribution. A more representative and meaningful approach would be to return to the previous version of the disclosure, which required companies to report on countries where there are more than 50 employees representing at least 10% of the total workforce. This ensures focus on material geographies while avoiding unnecessary granularity. We also recommend removing the requirement to disaggregate employees by contract type (permanent, temporary, non-guaranteed). While well-intentioned, this requirement offers limited value to users and creates disproportionate complexity for preparers. Contract categories are defined differently across jurisdictions, leading to inconsistencies and undermining comparability. Moreover, workforce composition often fluctuates throughout the year, particularly in industries with seasonal demand or project-based work, which reduces the reliability of such disclosures.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The disclosure requirement on living wage continues to raise practical concerns. The lack of uniform benchmarks in many countries, as well as significant differences in how they are defined and calculated, makes comparability difficult and may lead to fragmented reporting and reputational risks. While the amendments in ESRS S1 bring more clarity and flexibility, the issue of global consistency remains unresolved.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	We understand the need for consistency between EU laws, especially between CSRD and SFDR, and we welcome the proposed simplifications in ESRS. However, many of these data are not currently collected by companies. Other EU regulations should therefore also be simplified so that the benefits of the ESRS changes are not undermined.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	We fully support the need for simplification in DR E4-4. In the area of biodiversity and other nature-related topics, the main challenge is the absence of uniform, clearly defined, and comparable metrics – in contrast to climate, where a widely accepted measure (CO_2 equivalents) already exists. This creates a risk of inconsistency and fragmented reporting. In addition, the LEAP analysis process foreseen in the ESRS as the basis for the biodiversity transition plan is highly complex and, in the case of large companies, may take 6–9 months, requiring significant resources and generating high costs, while still leaving uncertainty as to the comparability and decision-usefulness of the resulting data.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	Companies report that the methodology for calculating the gender pay gap lacks sufficient precision. It is unclear whether calculations should consider actual hours worked (excluding long-term absences such as parental leave or sick leave), overtime, or allowances (e.g. for work in harmful conditions). In practice, large capital groups often calculate the pay gap based on annual remuneration, due to data availability. Without clearer guidance, comparability between companies is not ensured. We receive feedback from some companies that the current indicator classifies miners, workers employed in bottled water production lines, and miners in Canada in the same way, without taking into account purchasing power parity or other macroeconomic factors. As a result, the calculation process is time-consuming, and the results do not provide users with meaningful information. They therefore propose either removing this indicator or modifying it so that it delivers real informational value. We emphasize that [DRAFT] DR S1-15 paragraph 44(a) should be calculated on the basis of comparable profiles and replaced by a "gender pay gap by employee category.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Annex II – Definition of "work-related incident" We suggest distinguishing more clearly between different accidents (such as a fall) versus incidents related to violence. The definition of "accidents" should also clarify whether cases caused by employee fault, commuting accidents or only those counted in TRR indicators are included.			
Survey	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		On value chain reporting, we respectfully request that EFRAG consider limiting the scope of the impact materiality assessment to entities with which an undertaking has a direct contractual relationship. For large multinational organizations, value chains are highly complex and global in scope. Tracking and assessing impacts beyond direct contractual partners presents substantial practical, operational, and methodological challenges, particularly given the absence of consistent data availability and supplier transparency. In many cases, undertakings lack the leverage to influence or collect reliable information from actors further down the chain, resulting in disclosures that are burdensome to produce yet incomplete or inaccurate in practice. We are concerned that the announced 80% reduction in reporting entities will make it even more difficult for companies still in scope to obtain value chain data. EFRAG should carefully assess the feasibility of requiring undertakings to collect reliable information from actors that will no longer be obliged to report. We recommend ensuring alignment of definitions across ESRS and other EU legislation (e.g. environmental law, occupational health and safety). Divergent terminology leads to dual systems in companies and increases the risk of inconsistent data. Translations into Member States' languages should be verified by subject matter experts, as some translated terms are less precise than the original English version. Moreover, the glossary should be alphabetised according to the translation language, not the original English, to ensure usability. We noted that references at the beginning of each ESRS area are made to Chapter 7 of the Basis for Conclusions. They should instead refer to Chapter 8. This inconsistency may cause confusion and should be corrected. ESRS S: The scope of workforce categories to be included in calculations is not clearly defined, which reduces comparability of data. Clarification is needed whether long-term absentees, interns, and trainees should be included.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We welcome proposed updates to ESRS and increased flexibility in the DMA. It's positive that the core principles remain intact while changes simplify the process and remove burdensome intermediate steps. We appreciate the clarification of information materiality as an overarching filter for the inclusion of information in the sustainability statement, reinforcing DMA as a useful tool. The removal of sub-sub-topics and streamlined terminology are further improvements. We welcome that companies retain option to conduct DMA at more detailed level if they choose. This is particularly relevant for those also subject to CSDDD, given the strong similarities between its impact assessment and DMA. Further alignment of the two frameworks – especially on key concepts such as "value chain" and "chain of activities" – would allow companies to conduct a single assessment process, improving consistency, reducing duplication, and lowering administrative burden. In principle, we don't support inclusion of non-material information, as it risks creating additional reporting demands, increasing the burden on companies, and conflicts with the CSRD's initial goal that a CSRD-compliant sustainability statement should serve as a comprehensive and sufficient source of information for all stakeholders. However, in certain cases, reporting non-material information can be useful, as certain stakeholders request it regardless, and reporting it reduces the need for separate surveys. Even if such information is not material under DMA or GRI analysis, it may still be important for specific stakeholders and valuable for comparability. In such cases, reporting structure should support disclosure of non-material information in annexes, rather than in main body of the sustainability report. This approach preserves the clarity of materiality, avoids confusing users, and helps maintain comparability while ensuring flexibility. Clear guidance should be provided for auditors and assurance providers on how to review and assess streamlined reporting requirements, to ensure consistency and predictability in assurance processes.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	We consider the proposed guidelines overly complex and detailed, which risks making the materiality assessment unnecessarily burdensome. A more general, principle-based approach would be more appropriate and effective. We recommend that impacts (and risks) be reported before mitigation or corrective actions, with a subsequent explanation of how these will be addressed. This would provide greater clarity and ensure alignment with established enterprise risk management practices. Moreover, clearer guidance is needed to distinguish between actual and potential impacts, as the current proposal does not sufficiently clarify this important distinction.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We support the proposals to improve the readability, conciseness and connectivity of ESRS Sustainability Statements. The option to include an executive summary is particularly welcome, as well as the possibility to use appendices to separate more detailed information from key messages. The flexibility to choose the most suitable format for disclosures, rather than mandatory reporting table format, supports more relevant and concise reporting while reducing unnecessary burden and strengthening the connectivity with corporate reporting as a whole.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	We welcome the proposed amendments as a clear step in the right direction. Addressing the overlaps between ESRS 2 and the topical standards improves clarity and reduces unnecessary repetition, thereby enhancing the readability of the standards. The current Minimum Disclosure Requirements (MDRs) have been too burdensome and detailed, leading to duplication and difficulties for preparers when applied under each topical disclosure. A simplified and more streamlined structure will make the standards more user-friendly and reduce the need to cross-check requirements across multiple locations. The complete removal of Minimum Disclosure Requirements could also be considered as they do not provide substantial additional value. We also support the reduction of "shall" datapoints and the clearer articulation of PAT requirements. Importantly, the amendments allow narrative information to be disclosed at an aggregated level, rather than strictly at the IRO level, better reflecting how companies manage their impacts, risks and opportunities in practice.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	We support the proposed changes and welcome the clearer distinction of mandatory datapoints.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We welcome the overall direction of reducing mandatory requirements and providing greater flexibility. However, we have strong concerns regarding the introduction of a "Non-Mandatory Illustrative Guidance" (NMIG). The unclear legal status of such a document would create risk of inconsistent application and unnecessary challenges in discussions with auditors. For this reason, we do not support the development of NMIG as part of the standards/Delegated Act.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We welcome the proposed burden reliefs. It is important that the amendments emphasize prioritisation and materiality, which will help focus reporting efforts where they are most relevant. We recognise that some of the reliefs may create challenges for data collection, especially for companies within the mandatory reporting scope, but consider these manageable through contractual and practical arrangements. We note, however, that several definitions, such as "undue cost or effort" or "lack of data quality" remain open to interpretation and should be clarified to ensure consistent application across companies.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We find the proposed relief for lack of data quality beneficial. The current rules for defining and reporting information from a company's value chain are overly complex and risk creating unnecessary burden, especially if the Omnibus proposal limiting larger companies' ability to request information from their value chains is implemented. We also stress the importance of simplifying and better aligning value chain definitions with financial reporting, to ensure consistency and reduce unnecessary reporting obligations.			

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Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	Disclosing quantitative information is particularly challenging for companies and may in some cases involve commercially sensitive data; in this regard, the proposed relief represents a step in the right direction. However, an option that is fully aligned with the IFRS standards would be preferable for companies reporting under both frameworks, as it would enhance consistency, reduce duplication, and lower the administrative burden.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	In our view, the disclosure requirements remain largely unchanged and could therefore be further simplified- for example, by removing the need to split of assets before and after actions. ESRS should be structured so that companies applying them can also fulfil the IFRS reporting requirements.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We appreciate that EFRAG has clearly considered in detail the interoperability between the ESRS and IFRS standards. While numerous adjustments have been made to enhance alignment, notable differences still remain. It would be beneficial for all stakeholders if these remaining gaps were addressed. At least, even if full interoperability would not be reached, the ESRS should be designed in such a way that companies adhering to them would not need to consider additional data points when also reporting under IFRS.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	ESRS should be simplified without introducing new requirements or converting optional ("may") datapoints into mandatory ("shall") ones. Overall, we consider that no additional mandatory disclosures should be added, as they would increase the burden on companies while providing very limited benefits.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Overall, we consider that no additional mandatory disclosures should be added, as they would increase the burden on companies and be against the simplification agenda and the Commission's mandate. E5-4 might be challenging. As a general observation, we would like to point out that not all new terms introduced in the drafts have been defined. For example, in E5-5, the term "thermal disposal" appears as a new concept, but no definition for it can be found in the draft.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	We support the fair-presentation concept. It is important to understand, as stated in the question, that confirming the fair presentation concept should reduce the check list mentality associated to the adoption of a compliance approach, and support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	We don't see the added value of the proposal and find that it would add the reporting burden especially for non-global companies. If there is a need to change the requirements, we propose to keep the current requirement (at least 50 employees by head count representing at least 10% of the total number of employees), but limit the requirement to the top 10 largest countries by employee headcount.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	We agree with the proposed approach.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	We agree with the proposal and support flexibility in the wording, as we do not endorse fixed metrics dictating what targets must include. We would like to emphasize that targets should focus on addressing material impacts rather than adhering to predetermined attributes or metrics, such as the size of areas restored. We would also welcome further review towards a more methodology- and framework-based approach to target setting.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	We support reporting requirements that are in line with the Pay Transparency Directive.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I agree				
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We welcome the emphasis placed on the importance of this section. The clearer distinction between SBM and IRO topics is a positive development, and the changes related to BPt and GOV are useful and enhance the clarity of reporting requirements. However, we have some observations regarding specific provisions: •SBM-1, 17(a) and (b), ARs 7, 8, and 10: The new requirement concerning significant sectors is introduced. It is not clear what exactly is meant by "significant sectors" and how companies are expected to identify or define them. Further clarification would be helpful. •SBM-2, 20(c): we welcome the simplification given by such expressions as "key stakeholders", as long as it grants flexibility to companies, while explicitly excluding extra detailed requests by auditors. •SBM-3, 23(b): without a methodology that ensures comparability without adding overburden and conflicts with the company's commercial interest, we support the possibility to assess impacts in qualitative terms.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We welcome the clarification provided regarding the GHG calculation methodology, as aligning it with the GHG Protocol improves transparency and consistency. The enhanced connection with other standards, particularly the harmonisation of GHG calculations across different reporting requirements, is a positive development. However, we note that certain requirements under RED II/III – for example, the biofuel distribution obligations – are not fully reflected in ESRS E1 GHG methodology. It will be important to ensure that double reporting is avoided and that the ESRS E1 requirements are consistent with other relevant regulatory obligations to minimise unnecessary duplication and administrative burden for companies.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We welcome the changes introduced in ESRS E4. The removal of topic-specific Disclosure Requirements (DRs) helps to streamline the reporting process and reduces unnecessary repetition and overlaps within the standard. This simplification makes it easier for preparers to navigate the requirements and ensures that the focus remains on material information. In addition, the consolidation of site-level information under E4 SMB-3 with other site-related data in section E4-5 is a positive development. This integration not only reduces duplication but also provides a more coherent and structured presentation of site-level disclosures. Companies will benefit from a clearer and more consolidated framework for reporting site information, which supports consistency and comparability across the reporting entity.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	As a general observation, we would like to point out that not all new terms introduced in the drafts have been defined. For example, in E5-5, the term "thermal disposal" appears as a new concept, but no definition for it can be found in the draft.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We welcome the significant reduction of overlaps within ESRS S1. Removing redundancies improves the clarity and usability of the standard, making it easier for companies to prepare sustainability reports and for users to navigate and interpret the disclosed information. This simplification supports a more efficient reporting process and enhances the overall coherence of the sustainability statement.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We welcome the explicit reference to ESRS 2 within ESRS S2, as it reinforces the connection between general disclosure requirements and topical standards, contributing to a more coherent reporting framework. We also note the improved clarity regarding vulnerable stakeholders. This enhancement helps companies better identify and disclose impacts on stakeholders who may be most affected by their activities, supporting more targeted and meaningful reporting.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree	We note that a significant number of disclosure requirements in ESRS G1 have been made non-mandatory and moved to the Non-Mandatory Illustrative Guidance (NMIG). We support the reduction of mandatory disclosure requirements as it provides companies with greater flexibility in how they present governance-related information, allowing them to focus on material issues while maintaining transparency. While this approach can help reduce reporting burden and improve usability, we have strong concerns regarding the introduction of a "Non-Mandatory Illustrative Guidance" (NMIG). The unclear legal status of such a document would create risk of inconsistent application and unnecessary challenges in discussions with auditors.			
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Finnish Energy	Business association (other than association of financial institution)	Finland	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		We question the necessity of mandatory XBRL/digital reporting altogether and find that the XBRL / digital reporting requirement should not be made mandatory. Instead of imposing such a requirement, we suggest exploring the potential of AI-driven solutions for collecting the required data. Eliminating mandatory digital reporting would significantly reduce the administrative burden on companies and simplify reporting processes, thus being aligned with the Commission's competitiveness objectives and the Omnibus initiative. Could EFRAG issue a (electronic) disclosure checklist to aid sustainability statement preparation?			
Survey	Nordic Sustainability	Consultant (including software vendor)	Denmark	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				
Survey	Nordic Sustainability	Consultant (including software vendor)	Denmark	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	DMA – Gross vs net approach: The "gross vs. net" rule in double materiality assessments introduces a real risk of misrepresentation. By allowing companies to discount potential negative impacts once any mitigation action has been applied—even if minimal—critical issues may be overlooked. This creates an uneven playing field: firms making small, symbolic interventions can claim reduced exposure, while those investing in continuous and substantive mitigation must still disclose gross impacts. The result is distorted comparability across disclosures, undermining the consistency and transparency that assessments are meant to ensure. It can also disincentivise ongoing investment in impact reduction, since gross impacts are still fully reported regardless of progress. For investors and stakeholders, this obscures the true risk landscape and hampers decision-making. Ultimately, the rule risks narrowing the scope of reported impacts in ways that do not reflect underlying realities and weakens the integrity of the double materiality process.			
Survey	Nordic Sustainability	Consultant (including software vendor)	Denmark	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree				
Survey	Nordic Sustainability	Consultant (including software vendor)	Denmark	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree				
Survey	Nordic Sustainability	Consultant (including software vendor)	Denmark	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree				
Survey	Nordic Sustainability	Consultant (including software vendor)	Denmark	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	Partial scope of metrics: While it is good that companies can start off by reporting what they have while working towards better data, there is a risk that there is not enough incentive for companies to continue improving their data for a more complete scope. This could have significant implications for transparency and comparability between reports, going against some of the key aspects of CSRD.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Nordic Sustainability	Consultant (including software vendor)	Denmark	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	While quantifying financial effects will always be difficult and uncertain, there is a risk that with this relief, regardless of it being option 1 or 2, companies would not be pushed to integrate sustainability into their risk management and financial planning. This can, in the long run, increase vulnerability to e.g. climate transition risks, reputational risk etc. and lead companies to not work as effectively in addressing key IROs. We believe that the ESRS should emphazie the need for more quantiative data with no relifes.			
Survey	Nordic Sustainability	Consultant (including software vendor)	Denmark	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Whilst we agree that there will be differences in assumptions behind the absolute calculations and therefore may be hard to compare, the new SBTi for FI guidance mandates absolute long-term targets (near-term intensity is ok), therefore we should be encouraging the behaviour of calculation/publishing of absolute GHG emissions for CSRD. The point around incentives is mute for me as we do not believe publishing absolute emissions will ever disincentivise a bank from lending to a transition sector, as sadly, there is still a lot of money in high energy intensive sectors We would also recommend we follow the SBTi guidance even more and add an engagement metric so we can see what % of the FIs book has been engaged with on the topic and therefore we can get more of an idea of their transition progress We would also like to see absolute reduction % reported year on year as an additional metric			
Survey	Nordic Sustainability	Consultant (including software vendor)	Denmark	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	Suggestion for what has to change: For employees outside the EU, allow actual wages to be measured: (A) against the legal minimum wage only where this is set in line with the definition of an adequate minimum wage under EU law, or the ILO principles on estimating living wages; or (B) against living wage estimates that are set in line with ILO principles on estimating living wages. Be clear that companies should apply option A if the authorities that set the minimum wage provide public evidence that it is in line with the EU definition of an adequate minimum wage or the ILO principles on estimating living wages; and that absent such evidence companies may apply estimates in line with option B where the organisations responsible for those estimates provide public evidence that they are in line with the ILO principles on estimating living wages. Background on why this has to change: Minimum wage ≠ adequate wage; most minimums wages fall below living wages. Two-tier system: EU vs non-EU workers assessed differently, discriminatory and misleading. Burden for companies to judge local benchmarks against ILO principles and leading to reduced comparability.			
Survey	Nordic Sustainability	Consultant (including software vendor)	Denmark	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	The ESRS standards need to ensure minimum transparency on key issues. In the first draft of ESRS, E1 and S1 were considered fundamental areas of sustainability that all companies, regardless of their specific industry or size, should report on We believe that these areas cover broad and crucial impacts, such as environmental performance and social aspects (e.g., human rights, working conditions, diversity), which are seen as critical to understanding a company's overall sustainability risk and performance. We believe that making E1, S1 and G1 mandatory would ensure that companies provided baseline information on these topics to give stakeholders a consistent starting point for assessing sustainability. Without mandatory disclosure, there has been inconsistency in the reporting of key issues, leading to a lack of comparability and trust. As a minimum threshold, an omission of E1, S1 and G1 should follow the current requirements for omitting E1, ESRS 1, 32: " If the undertaking concludes that climate change is not material and therefore omits all disclosure requirements in ESRS E1 Climate change, it shall disclose a detailed explanation of the conclusions of its materiality assessment with regard to climate change including a forward-looking analysis of the conditions that could lead the undertaking to conclude that climate change is material in the future."			
Survey	Nordic Sustainability	Consultant (including software vendor)	Denmark	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Companies have taken very different approaches to reporting on SBM-3 and there is currently limited comparability Providing a structured guidance, for how companies should assess the interaction between its IROs and SBM through a 3-step analysis framework: Status Quo Assessment A.Identify material IROs B.Analyse business model & commercial strategy Business Model Dynamics A.Assess key sustainability drivers B.Evaluate strategic leverage points Business Model Resilience A.Model resilience scenarios B.Assess financial effects			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	SVDU	Business association (other than association of financial institution)	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		The proposal by EFRAG to explicitly exclude energy recovery from waste from the ESRS definition of recovery constitutes a major departure from the existing European legal framework. Under the Waste Framework Directive, municipal solid waste incineration with energy recovery is classified as a recovery operation (R1) when efficiency thresholds are met. This recognition, applied consistently across the 27 Member States for over 15 years, has proven effective and is based on a mature technical framework. Excluding waste-to-energy (WtE) plants from recovery in the ESRS would have several detrimental consequences: Regulatory inconsistency: the Waste Framework Directive ranks energy recovery above disposal, acknowledging its strategic role in managing residual waste. Weakened climate and circularity objectives: marginalising WtE ignores its essential contribution to reducing landfilling, achieving the EU target of 10% landfill by 2035, and supporting France's objective of 70% recovery of non-recyclable waste. Barrier to innovation and the energy transition: WtE plants drive decarbonisation of district heating, electricity supply, and innovation such as CCUS and hydrogen production. Negative investment signal: excluding energy recovery undermines recognition of WtE in sustainability reporting, discouraging much-needed investments to upgrade ageing plants and maximise energy efficiency. Energy recovery complements material recycling by treating the non-recyclable fraction of waste and enabling both energy and material recovery (metals, bottom ash), while also ensuring sanitary safety through the destruction of pathogens and pollutants. It is therefore an integral part of the circular economy and European energy security. Excluding WtE from the ESRS definition of recovery would undermine coherence with EU law and weaken the credibility of the standards. It is therefore essential to maintain energy recovery, when fulfilling the R1 efficiency criterion, within the scope of recovery in the ESRS, in order to ensure regulatory consistency and to support Europe's climate and circular economy goals.			
Survey	The Investor Relations Society	Other - please specify (required)	United Kingdom	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The amendments introduce practical considerations for carrying out a DMA, clarify the role of materiality as a general filter, and streamline topic lists. These steps simplify the process and reduce unnecessary documentation. The proposed changes should result in shorter, more decision-useful reporting by eliminating confusion and trimming boilerplate disclosures. It's refreshing to see more clarity around a bottom-up approach being possible, which accommodates different approaches better. There's a noticeable simplification between ESRS 2 and topical standards and a close alignment to IFRS S1/S2 as well as fewer data points overall. However, it would be useful if the standards could be more prescriptive around which thresholds can be used to determine which impacts will be covered in the sustainability statement. Currently this seems a little vague, which may lead to some confusion and/or undue scrutiny from assurance providers. We also note that some complexity remains in the linkage of impacts, risks and opportunities to reporting topics, which may still challenge preparers. In relation to interoperability, it might also be helpful to consider whether guidance could be provided to assist companies in scope for ISSB reporting on how best to extract and apply financially material topics from a DMA to a single materiality assessment required by IFRS S1 and S2 and/or standards on which these will be built such as the UK SRSs.			
Survey	The Investor Relations Society	Other - please specify (required)	United Kingdom	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	The amendments support readability and connectivity by allowing an executive summary, encouraging use of appendices, and clarifying the concept of connected information. These measures are consistent with the stated objective of producing more concise and better-integrated sustainability statements and of addressing the issue raised in EFRAG's Basis for Conclusions July 2025 document described as "The general feeling is that undertakings had difficulties in 'telling their story' with respect to sustainability topics and in sharing their views with their stakeholders." One point of detail; the amendments to 'impact materiality' are rather dense and could benefit from presentational clarity, for example, using bullet points so reporters can more easily identify which factors apply.			
Survey	The Investor Relations Society	Other - please specify (required)	United Kingdom	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	The amendments improve interoperability/alignment with IFRS S1 and S2 by aligning language, adopting the financial control approach for GHG boundaries, incorporating several IFRS reliefs and removing a lot of duplication. However, as EFRAG acknowledges, reliefs extending beyond IFRS provisions create new differences, which means some interoperability gaps remain. We also note that the text has become more technical, which may create a more lengthy/expensive process for preparers.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Bayer	Preparer (non-financial preparing a sustainability report)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We agree that the DMA should remain a principles-led process, enabling contextual judgment and supporting a meaningful connection between an undertaking's strategy and its sustainability reporting. This is essential to maintaining the integrity, usability, and comparability of disclosures. Companies should not be required to disclose detailed methodological descriptions in their CSRD reports, nor should they be asked to provide unnecessary scoring details for topics that are clearly either material or immaterial. The process must remain company-specific and principles-based, avoiding excessive documentation and supporting meaningful, decision-useful disclosures. While expanding the DMA into sector- or industry-specific instructions may appear helpful, it risks undermining its core purpose: empowering undertakings to apply professional judgment within their unique context. The ESRS framework rightly positions materiality as the primary filter for disclosures, promoting a top-down, strategy-driven approach rather than a compliance-oriented checklist. Efforts to pre-empt DMA outcomes—by implying sectoral relevance, suggesting indicative material topics, or embedding assumptions—risk reintroducing the complexity and rigidity that the framework aims to eliminate. Supportive resources, such as the Non-Mandatory Illustrative Guidance (NMIG) can be valuable tools for preparers. However, it is crucial that such materials remain clearly non-authoritative and distinct from the core standards, therefore they should be eliminated from the standards to avoid implicit obligations under a non-mandatory status. Companies should only carry out a full DMA periodically or when there are significant changes in their strategy or business model. The application of the "fair presentation" principle continues to pose challenges for companies on how it can be implemented in practice. Should the principle be retained in EFRAG's final technical advice, ultimate responsibility for the report — and for the assessment of fair presentation — rests with the reporting entity's management.			
Survey	Bayer	Preparer (non-financial preparing a sustainability report)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	Requiring a gross assessment—where impacts are evaluated without considering these controls—risks inflating disclosures with hypothetical risks that are already effectively managed. This not only creates administrative burden but also misrepresents exposure to stakeholders and regulators. Moreover, gross reporting dilutes the clarity and relevance of sustainability statements by obscuring truly material issues. A net approach ensures that disclosures reflect the real-world risk landscape, rewarding companies for proactive and data-backed prevention and mitigation efforts. Moreover, many companies already use robust internal processes for health, safety, and environmental (HSE) risk management. In addition to clarifying the net approach for impacts it would be important to also allow a net approach for risks and opportunities.			
Survey	Bayer	Preparer (non-financial preparing a sustainability report)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	We believe the changes proposed will provide reporting undertakings more flexibility in the preparation of their sustainability statements and will allow them to focus and highlight the more relevant information. However, we recommend removing or relocating (amended) ESRS 1, AR 36. This Application Requirement suggests that undertakings may present detailed GHG emission calculations in a separate appendix or section. As this is not a mandatory requirement and is specifically related to ESRS E1, its inclusion in ESRS 1 may cause confusion. We recommend either removing it or relocating it to ESRS E1 (Climate Change), in which context it would be more appropriate.			
Survey	Bayer	Preparer (non-financial preparing a sustainability report)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The changes provide more clarity on how to report the disclosure requirements related to Policies, Actions and Targets (PATs). We specially support the removal of GOV, SBM, and IRO-1 disclosure requirements from the topical standards. However, we reiterate that EFRAG should explore the possibility of merging disclosure requirements on PATs in the topical standards as these are often implemented together.			
Survey	Bayer	Preparer (non-financial preparing a sustainability report)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Introducing new obligations, concepts, and definitions add unnecessary complexity, such as converting six "may" into "shall" datapoints, adding three entirely new data points, and introducing new definitions across the standards such as "near" in ESRS E-4 or "top 10 countries" in social disclosures. EFRAG should refrain from expanding the scope and granularity of disclosures. For example, the new simplified ESRS emphasize "location-specific considerations" under biodiversity and pollution standards and remove the term "severe" for human rights incidents in the social standards. We call on EFRAG to address these changes, as they may significantly increase data collection and resource requirements—for instance, by requiring companies to report on a wide range of human rights incidents rather than focusing on the most severe cases, or by necessitating detailed location-specific environmental data across multiple sites. The term "significant" is ambiguous. The ESRS should clarify that undertakings determine significance based on their specific context, ensuring disclosures remain relevant and material.			
Survey	Bayer	Preparer (non-financial preparing a sustainability report)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We support moving all voluntary and non-mandatory data points into a separate document to improve the clarity of the standards. The Non-Mandatory Implementation Guidance (NMIG) should be eliminated to avoid implicit obligations under a non-mandatory status.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Bayer	Preparer (non-financial preparing a sustainability report)	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We support i) the relief measure included in [DRAFT] ESRS 1 section 5.4 as regards acquisitions and disposal and ii) the relief measure included in [DRAFT] ESRS 1 paragraph 92 allowing reporting undertakings to exclude joint operations over which they don't have operational control for the calculation of certain environmental metrics. However, on the latter, additional alignment with financial reporting (i.e. IFRS 11-Joint arrangements) could be achieved. Following the financial consolidation method would improve the consistency of the information reported by companies. However, we do not agree with the decision of not including any relief measure for commercially sensitive information for the reasons stated in paragraph 70 of the [DRAFT] Basis for Conclusions (i.e. potential inclusion of a similar provision in the text of the Directive in the context of the Omnibus legislative process). The ongoing legislative process should not pre-empt EFRAG of directly addressing this issue in the standards, especially after acknowledging that it is a "concern frequently expressed by preparers" (paragraph 82 of the Basis for Conclusions). Additionally, the ESRS could provide for more flexibility in this regard, following the approach in the GRI Standards. GRI 1 includes "confidentiality constraints" as a permitted reason for omission, and the reporting undertaking is required to explain the reasons for such omission. It should also be considered that publication of detailed data on sites required (including coordinates and types of processes performed at the sites) could be subject to confidentiality, business competition, or trade secrets.			
Survey	Bayer	Preparer (non-financial preparing a sustainability report)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree	We support the relief measures as regards the use of reasonable and supportable information that is available without undue cost or effort. We believe this provision should be permanent and not subject to a time limit as proposed by some EFRAG SRB members (as mentioned in paragraph 76 of the [DRAFT] Basis for Conclusions. We support the provisions outlined in ESRS 1 paragraph 92, acknowledging the practical limitations of data availability in joint operations where the undertaking lacks operational control. Allowing the exclusion of such operations from the scope of environmental metric calculations is a pragmatic and necessary relief that enhances the feasibility and integrity of sustainability reporting and avoids duplicative reporting. We also welcome the flexibility provided under ESRS 1 paragraph 91, which permits the use of metrics based on a partial scope of calculation. This approach acknowledges the evolving nature of data systems and reporting capabilities. Crucially, it encourages transparency by requiring undertakings to disclose the limitations of their current data coverage and to outline concrete actions aimed at improving completeness in future reporting periods.			
Survey	Bayer	Preparer (non-financial preparing a sustainability report)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I disagree with both Options	These disclosures are neither feasible nor reliable in reflecting a company's financial situation and pose significant risks of legal proceedings if included in financial statements. Notably, there is no requirement in financial reporting regarding "anticipated financial effects" for non-ESG topics. If this obligation is retained, companies should at minimum be allowed to provide qualitative information only, and benefit from a Level 1 relief to protect sensitive business information, including trade secrets.			
Survey	Bayer	Preparer (non-financial preparing a sustainability report)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	See comments on anticipated financial risks above.			
Survey	Bayer	Preparer (non-financial preparing a sustainability report)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	We support the changes introduced to enhance interoperability with the ISSB standards, especially the harmonisation of the reporting boundary for GHG emissions. However that is not sufficient and 100% interoperability would be desirable.			
Survey	Bayer	Preparer (non-financial preparing a sustainability report)	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Bayer	Preparer (non-financial preparing a sustainability report)	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	We support the deletion of mandatory datapoints as proposed by EFRAG. However, EFRAG should refrain from introducing new obligations, concepts, and definitions that add unnecessary complexity, such as converting six "may" into "shall" datapoints, adding three entirely new data points, and introducing new definitions across the standards such as "near" in ESRS E-4 or "top 10 countries" in social disclosures.			
Survey	Bayer	Preparer (non-financial preparing a sustainability report)	Germany	23.	Six datapoints exceptionally moved from “may” to “shall” In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, “may disclose” datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from “may” to “shall” subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	We agree that considering the significant reduction of mandatory datapoints, these do not excessively increase the reporting burden. However, these datapoints were assessed as voluntary after a thorough drafting process of the ESRS and should remain as such since their content, and therefore their relevance, have not changed.			
Survey	Bayer	Preparer (non-financial preparing a sustainability report)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new “shall” datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I disagree	We do not support an additional disclosure requirement on secondary microplastics. EFRAG presents this new datapoint as a clarification of the existing disclosure requirement, however, it significantly extends its scope to downstream value chain. This entails a significant increase in the reporting burden and goes against the goal of burden reduction and simplification. In addition, the datapoint BP-1 could be adding burden if auditors extend their checklist accordingly. Overall, the introduction of new mandatory datapoints contradicts the stated objective of simplifying the standards. Organisations are already facing significant challenges in collecting and reporting the extensive information required under ESRS. Adding further datapoints - such as on microplastics, critical raw materials, or waste - will not only increase the complexity of the process and burden companies. Obtaining reliable data from customers, distributors, or end-users is in practice extremely complex, and in many cases simply not feasible.			
Survey	Bayer	Preparer (non-financial preparing a sustainability report)	Germany	25.	Emphasis on ESRS being a “fair presentation” reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	The introduction of the idea of "fair presentation" presents challenges. It may impose further responsibilities on companies, as they would not only have to adhere to existing standards but also prove that the information they provide fairly represents the interests of all relevant stakeholders. This could also potentially heighten the responsibilities of Board members. The ESRS framework introduces the concept of impact materiality, which includes environmental and social aspects that extend beyond mere financial significance. Implementing a fair presentation standard in this framework could expose preparers to excessive legal, assurance, and reputational risks. Sustainability data typically involves forward-looking, qualitative assessments that rely on judgment, lacking the evidential rigor found in financial data. The lack of established methodologies and experience regarding impact materiality complicates the definition of what a "complete and faithful" representation is, leading to increased uncertainty and inconsistency. Making fair presentation a legal requirement might unintentionally lead to challenges without necessarily enhancing the quality of reporting. Assurance can already be effectively achieved through current standards. Regulatory focus should remain on the qualitative attributes already incorporated in ESRS—such as relevance, comparability, verifiability, and understandability.			
Survey	Bayer	Preparer (non-financial preparing a sustainability report)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking’s employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I disagree	The proposed new threshold risks triggering additional countries for companies to report on.			
Survey	Bayer	Preparer (non-financial preparing a sustainability report)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	The definition and calculation of living wage benchmarks can vary widely from country to country, depending on local institutions, data availability, and socio-economic conditions. Without a standardized framework or clear disclosure requirements on which tier of the hierarchy is used, companies may face challenges in ensuring comparability, transparency, and internal alignment. This could lead to fragmented reporting, misinterpretation of wage adequacy, and reputational risks if stakeholders perceive wage disclosures as insufficient or misleading. The changes proposed seem to partially address these concerns as they give more clarity and flexibility to reporting undertakings.			
Survey	Bayer	Preparer (non-financial preparing a sustainability report)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG’s approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a “human rights policy” in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	We understand the need for consistency between EU legislation, especially between the CSRD and the SFDR and we welcome the simplification changes proposed by EFRAG in this regard. However, these metrics are often not collected or used (at least in the way the datapoint is worded) by reporting undertakings. Legislators and standard-setters should simplify and streamline disclosure requirements in other EU legislation so ESRS simplification is not compromised. In general, these datapoints are not necessary information to understand the group’s impacts on sustainability matters, and information necessary to understand how sustainability matters affect the group’s development, performance and position (which is the wording in Article 19a and 29a).			
Survey	Bayer	Preparer (non-financial preparing a sustainability report)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	While we welcome the simplification proposals for DR E4-4, for biodiversity and other nature related topics (e.g. freshwater) the current challenge is that the impact is not measurable in a single metric that is comparatively easy to measure (e.g. GHG equivalents) but often in a multitude of potential metrics. The potential metrics are often not clearly defined and without clear boundaries, while they should be standardized and must be comparable between different companies and ideally also sectors. Therefore, comparable to the climate agreements and actions, as a first step we need international scientific consensus on meaningful environmental metrics as a basis for setting ambitious and consistent global reporting requirements. AR 26 should therefore be reviewed accordingly. "location-specific considerations" under biodiversity and pollution standards should be removed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Bayer	Preparer (non-financial preparing a sustainability report)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	While we agree with the deletion of that voluntary datapoint, [DRAFT] DR S1-15 still requires the undertaking to disclose the percentage gap in pay between its female and male employees and the ratio between the remuneration of its highest paid individual and the median remuneration for its employees. The undertaking must also disclose the annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees (excluding the highest-paid individual). Depending on the local legislation, it is impossible to apply hourly pay. In addition, disclosing only one gender pay gap disadvantages disproportionately groups that have companies in emerging countries, as the pay in such countries will be compared to those of developed countries. As regards [DRAFT] DR S1-15 paragraph 44(b) on the ratio of highest to median pay, the indicators are too global and not relevant and difficult to prepare. The preparation of these disclosures is significantly challenging for large capital groups with numerous subsidiaries. This would require having data on the annual salary of each employee of the group, which would have to be collected outside the HR and payroll system. Obtaining such data would be also difficult in the context of the EU data protection law, as it is only available to the employer at subsidiary level. [DRAFT] DR S1-15 paragraph 44(a) should be calculated on the basis of comparable profiles. It should be replace by "Gender pay gap by employee category". In [DRAFT] DR S1-15 paragraph 44(b), the ESRS should give the possibility to present only an adjusted ratio or to use the concept defined previously by the EFRAG of "countries with a significant number of employees" and disclose the ratio of such countries, or the 5 biggest countries of the company (e.g. current S1-8).			
Survey	Bayer	Preparer (non-financial preparing a sustainability report)	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		ESRS need to be properly translated into other languages by ESG experts in order to minimise errors and interpretational confusion.			
Survey	BETTER FINANCE	NGO	Belgium	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	EFRAG's amendments to the Double Materiality Assessment (DMA) aim to simplify reporting, but for end-users such as individual investors the changes are only partially acceptable. The option to apply a top-down or bottom-up DMA (Ch. 3.6) recognises different practices, but without clear guardrails on thresholds and evidence, it risks divergence: two firms could reach opposite conclusions on the same issue. A short method note explaining approach, thresholds, and stakeholder inputs would strengthen comparability. Applying materiality as a filter to all requirements reduces box-ticking, but the lack of a baseline of always-on disclosures (governance roles, pay links, climate transition plan status etc.) important investor-relevant data may disappear. The burden shifts to users to detect omissions. Clarifying the link between IROs and topics (ESRS 1, paragraph 2 and 22) improves logic, but without a mapping table of IROs to reported or omitted DRs, companies can still over-aggregate or selectively scope out issues, creating blind spots. Emphasising fair presentation and explicit compliance moves beyond checklists, but increases judgement, legal risk, and audit costs. Consistency could be improved by requiring a short, standardised assertion on exclusions and estimation reliance. Permitting disclosure at topic or IRO level cuts duplication, but mixed levels break data pipelines used by investors and regulators. Tabular anchors for key datapoints are needed to keep information extractable. Finally, streamlining AR 16 into a non-mandatory appendix and loosening site reporting declutter reports, but reduce signposts and can hide local outliers. A coverage checklist and "outlier flag" requirement would preserve comparability. In sum, while readability improves, the changes risk widening discretion and weakening transparency.			
Survey	BETTER FINANCE	NGO	Belgium	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	By distinguishing between actual and potential impacts and by clarifying the timing of assessment, the amendments introduce greater structure. However, this is only partially acceptable for individual investors. A key concern is the loss of time-series visibility. Once impacts are fully remediated, they are excluded from future reports. While this may appear logical from a disclosure burden perspective, it erases evidence of past recurrent problems such as repeated workplace accidents. This lack of continuity makes it difficult for investors to assess whether issues have been permanently resolved or whether they may resurface, undermining the ability to monitor risk trends over time. Another weakness lies in the inconsistent treatment of potential impacts. The requirement to assess such impacts before mitigation, if significant actions are ongoing, is conceptually sound. However, it leaves substantial room for interpretation. Different issuers may adopt varying thresholds for what constitutes "significant ongoing action," which threatens comparability across disclosures. This variability risks undermining the very consistency that the amendments aim to provide. A further challenge is the excessive technical complexity introduced in Appendix C. Preparers and auditors are now required to make highly nuanced judgments, yet the absence of standardised reporting formats, such as gross-to-net tables, means that outputs presented to investors may vary considerably. This complexity not only burdens issuers but also risks confusing end-users who rely on clarity to make decisions. To address these concerns, several investor-focused improvements are necessary. A short methodological note should be required to explain how gross vs. net decisions have been applied, ensuring transparency of approach. A mandated gross-to-net bridge, setting out the gross impact, mitigation actions, and the resulting net effect, would provide much-needed comparability. The definition of "fully remediated" should be clarified, with a requirement to disclose if similar impacts recur, ensuring that time-series visibility is not lost.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BETTER FINANCE	NGO	Belgium	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	The amendments to ESRS sustainability statements – executive summaries, greater use of appendices, and removal repetition – represent progress in readability and accessibility. The option to move technical details into appendices could make statements more user-friendly without eliminating access to the underlying information. However, these changes are only partially acceptable from the perspective of retail/individual investors and associations representing them. First, readability does not automatically equal usability: the introduction of flexibility risks widening the gap in how much information is placed in the "core" versus in appendices. Without minimum requirements, some issuers may under-report decision-critical details (e.g., on governance failures, workforce metrics, or climate transition plan credibility) in the main report, effectively burying material risks. Second, comparability remains a concern. If each company can decide how much content goes into an executive summary versus appendices, investors will face inconsistent formats, which hinders side-by-side analysis. For example, a bank might summarise transition risk metrics up front, while a manufacturer relegates them to appendices, forcing users to look for key disclosures. Third, connectivity with financial reporting is still loosely defined. ESRS 1 (Ch. 8) discourages fragmentation, yet it does not require explicit cross-referencing to audited financial statements or to SFDR/Taxonomy datapoints. For end-users, this weakens the ability to assess the link between sustainability risks and financial performance, a long-standing concern of BETTER FINANCE since the 2022 survey. To ensure these improvements serve investors, ESRS should require a balanced executive summary with a one-page KPI table including positives and negatives with year-on-year change; a "no-bury" rule so material information stays in the core statement; a cross-reference matrix mapping each disclosure requirement to its location and omissions; and digital connectivity through XBRL tagging to maintain machine-readability.			
Survey	BETTER FINANCE	NGO	Belgium	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The restructuring of ESRS 2 and its interaction with topical standards was meant to simplify reporting, but from the perspective of individual investors the balance between simplification and comparability remains only partially achieved. The reduction of prescriptive "shall" datapoints for Policies, Actions and Targets (PAT) and their reformulation as Application Requirements lowers preparer burden, yet it risks eroding consistency across issuers. Investors, especially non-professional ones, rely on a baseline of comparable disclosures to benchmark governance quality, sustainability ambition, and performance over time. Without uniform requirements to disclose whether a company plans to adopt PATs for material issues, and by when, critical signals about management intent are lost. The deletion of topical specifications in governance (GOV), strategy (SBM), and impacts, risks, opportunities (IRO) reporting is another concern. While simplification reduces duplication, it removes guardrails that previously ensured that PAT disclosures were connected to material risks and opportunities. For example, resilience disclosures in ESRS E1 have been retained, but others were dropped; this creates uneven coverage across topics. The result is more discretion for issuers and greater risk of selective reporting, reducing comparability for end-users. In practice, the amended structure could produce reports that are shorter, but harder to interpret across companies. A simplified but still prescriptive minimum baseline e.g., mandatory disclosure of whether PATs exist, coverage gaps, and timelines, would help investors identify which firms are credible in addressing material risks. In short, while readability and flexibility have improved, the amendments tilt too far toward issuer discretion. For individual investors, this undermines the ability to assess corporate preparedness in a holistic way.			
Survey	BETTER FINANCE	NGO	Belgium	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The amendments to the ESRS that eliminate "may disclose" datapoints and clearly separate mandatory "shall" requirements from methodological Application Requirements (ARs) make the standards more readable and structurally consistent. For end-users of sustainability information, this simplification removes guesswork over whether certain datapoints are optional and improves navigation, especially when disclosures are cross-cutting across ESRS 1 and 2. The consolidation of mandatory content in the main body also creates a cleaner framework for assurance. However, for individual investors the improvements are only partially sufficient. While language is clearer, clarity does not automatically ensure comparability or accessibility. Companies still retain wide discretion in how they apply materiality filters, choose aggregation levels, and determine reporting boundaries. Thus, even with more accessible drafting, two issuers may present information that looks coherent but is not directly comparable, leaving investors unable to benchmark risks and performance reliably. Silent omissions also remain possible, as firms can exclude topics deemed "not material," even when they are universally relevant to investor decisions (e.g., board oversight of ESG, sustainability-linked pay, climate transition plans etc.). This undermines the objective of accessibility for non-professional users, who cannot easily detect what is missing. The relocation of ARs under each DR improves flow but still leaves critical datapoints, like disaggregation by geography, workforce category, or value chain segment underspecified. For investors, this means disclosures may be technically compliant yet stripped of decision-useful granularity. Furthermore, some universally relevant datapoints (e.g., country-by-country tax information, grievance mechanisms, quantitative diversity targets) remain absent from the mandatory set. In short, the drafting changes succeed in simplifying form, but without guardrails such as baseline always-on disclosures, tabular KPI anchors, and mandatory cross-referencing matrices, the substance remains uneven.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BETTER FINANCE	NGO	Belgium	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	The introduction of the Non-Mandatory Illustrative Guidance (NMIG) offers some benefits, but from the perspective of retail investors and their representative associations it is only partially acceptable. The NMIG helps preparers and users to understand what has been moved, why it has been moved, and to navigate between the amended standards and supporting material. It also provides practical aids where consistency is most needed by investors, such as the DMA flowchart, examples of connected information, and cross-cutting mappings. In standards like ESRS 2 and G1, NMIG also offers useful cues on governance oversight, due diligence, anti-corruption policies, and training tables which, if consistently applied, could raise disclosure quality. However, the reliance on NMIG as a purely illustrative tool also creates serious drawbacks for comparability and reliability of sustainability disclosures. By design, it is not a checklist, which avoids back-door mandates, but also removes important normative "signposts" that investors previously used to compare companies' approaches to policies, actions, and targets. If the Commission follows EFRAG's recommendation not to include NMIG in the Delegated Act, issuers and auditors may treat it as optional or irrelevant, weakening comparability precisely in areas critical to retail users, such as climate transition plan documentation, governance roles, or incident reporting among others. In addition, several NMIG examples embed flexibility, such as aggregation choices or qualitative methodologies, that may enable selective scoping and over aggregation. To safeguard usability for end-users, NMIG should remain outside the Delegated Act to avoid shadow mandates, but only if companies are required to reference the sections they apply and explain their methodological choices. Where NMIG offers templates, such as governance training tables, issuers should provide them in tabular form. This balance would retain simplification while ensuring traceability, extractability, and comparability for individual investors.			
Survey	BETTER FINANCE	NGO	Belgium	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	The horizontal reliefs do respond to preparers' burden concerns, but as drafted they tilt too far toward issuer discretion and risk eroding the transparency and comparability retail investors rely on. The new "undue cost or effort" and data-quality reliefs may be necessary at first application, yet without a time-bound sunset clause and a clear gap-closure plan they can become open-ended optouts. Allowing partial-scope metrics and removing the preference for direct data invite heavy use of estimates; unless a standard estimation hierarchy, assurance expectations, and coverage percentages are disclosed, users cannot judge reliability. Permitting the exclusion of activities not a significant IRO driver and (for non-climate) certain joint operations creates boundary flex that can suppress unfavourable exposures; investors need a quantified "% of activity excluded and why" statement to keep scope choices visible. Two changes are particularly problematic for end-users. First, limiting resilience disclosures to risks only and to qualitative information removes the quantitative stress-testing signals investors need to assess downside protection and strategic readiness. Second, restricting financial effects to already announced investments/plans strips out pipeline visibility; investors would benefit from at least ranges or directional guidance for planned but unannounced measures. The acquisition/disposal relief is pragmatic, but material deals should still trigger pro-forma indicators and disclosure of timing effects. On interoperability with ISSB S1/S2, some choices (e.g., qualitative-only resilience, weakened data-input discipline) risk divergence just where global alignment matters for retail users who depend on data intermediaries mapping across frameworks. In short, only an acceptable if paired with investor safeguards: (i) sunset dates and year-on-year progress tables for every relief invoked; (ii) mandatory disclosure of estimation methods, coverage, and exclusions (% and rationale); and (iii) a brief method note so users and assurers can compare issuers' approaches.			
Survey	BETTER FINANCE	NGO	Belgium	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	A partial-scope metric without a firm sunset clause, risks becoming a permanent optout, especially when coupled with the removal of the preference for direct data. Issuers can lean on estimates or exclude hard-to-measure areas, producing figures that are not comparable year-to-year or peer-to-peer. The expected incentive mechanism, disclosing actions to improve coverage, will not by itself, deliver the discipline investors need. Users require visibility on what is in and out of scope today. That means stating the percentage of operations and value chain covered, the estimation hierarchy used, the specific data gaps, and a year-on-year progress table. Without these anchors, screens for SFDR principal adverse impacts and stewardship workflows degrade into judgment-heavy, non-comparable exercises. Individual investors are also exposed to the risk that the most material exposures, small suppliers, high-risk geographies, or problematic product lines, sit outside the reported perimeter for multiple cycles. That would materially skew perceived risk. Assurance will struggle in this environment, because auditors must confirm on numbers whose boundary choices are both flexible and insufficiently disclosed. Accordingly, we support the relief only with investor safeguards: a time-bound sunset for each metric where partial scope is used; mandatory disclosure of coverage percentages, exclusions and rationales; a standardised estimation hierarchy; and a concise method note. An additional requirement to flag when excluded portions become covered should be considered, and to explain any reversals. With these conditions the relief could balance flexibility and transparency; without them, it risks entrenching permanent information gaps.			

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Survey	BETTER FINANCE	NGO	Belgium	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	Option 1 preserves the expectation of quantitative disclosure while permitting omission in defined, decision-useful circumstances. That approach is substantially aligned with the IFRS relief and therefore supports global comparability, while making two clarifications that matter in practice: companies may use the relief where there is no reasonable and supportable information from business plans to estimate long-term effects, and they may not claim lack of internal skills or resources as a reason to omit figures. For end-users, this balances feasibility with accountability. Choosing Option 1 should come with safeguards so the relief does not become a soft escape hatch. First, issuers that omit quantitative estimates should provide a concise method note explaining the nature of the IRO, why separate measurement is not possible or why uncertainty renders figures not useful, and which business plan inputs were missing; this can be brief but must be specific. Second, when estimates are possible, ranges should be permitted and encouraged, with clear statements of key assumptions and drivers, consistent with the interoperability goal with IFRS S1/S2. Third, where numbers are omitted, companies should disclose the scope of activities affected and a time-bound plan to reach quantification, with year-on-year progress so users can track when the relief is phased out. Finally, because DR E1-11 remains a critical indicator of exposure to transition and physical risk even after simplification, Option 1's conditions should not be weakened further by other reliefs that already limit forward-looking visibility (for example, the separate constraint that limits "investments and plans" disclosure to items already announced).			
Survey	BETTER FINANCE	NGO	Belgium	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I partially agree and partially disagree	The amended ESRS E1 has clearly trimmed the "anticipated financial effects" package and clustered what matters for users into three sections, physical risks (para 40), transition risks (para 41) and opportunities (para 42). That direction is welcome, but from a retail investor lens the balance between simplification and decision-usefulness is not yet right. For para 40 (physical risk), simplification risks drifting into vagueness when coupled with cross-cutting reliefs (partial scope, undue cost/effort). If companies can report with incomplete boundaries indefinitely, investors will struggle to compare exposure across issuers or to track progress. A minimum method note should be mandatory: hazard set used, assets in scope, time horizons, and any exclusions so users can interpret numbers consistently. For para 41 (transition risk), the NMIG helps by illustrating what 41(d) could look like (e.g., ETS allowance gaps, carbon-price scenarios, monetised emissions) and what 41(e) "revenue at transition risk" should show (activity breakdown, % of revenue, risk drivers, anticipated margin effects). But these are non-mandatory examples; without a small set of required anchors (e.g., monetised Scope 1+2 at three carbon-price cases, ETS allowance deficit/surplus, % revenue at risk by activity), practice will fragment, and comparability will suffer. For para 42 (opportunities), the guidance points to cost-savings and similar items, which can enhance relevance, yet with absent symmetry rules, companies may emphasise the upside while downplaying adjacent risks or necessary capex. Finally, the overall feasibility of 40–42 is entangled with the new financial-effects relief choices. If issuers can omit quantification widely, users lose the core comparatives these paragraphs are meant to deliver. The consultation itself recognises this tension.			
Survey	BETTER FINANCE	NGO	Belgium	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	On the positive side, aligning ESRS to a fair presentation framework and elevating materiality as a general filter mirrors IFRS S1's philosophy and reduces checklist reporting; this should make cross-framework reading easier for retail investors and their representatives. Likewise, changing ESRS E1's GHG boundary to the financial consolidation approach reduces a long-standing divergence with ISSB/GHG Protocol and is explicitly acknowledged in the consultation material; however, the separate disclosure on an operational-control basis is only required for more complex ownership structures, which means many issuers may now disclose only financial-control emissions, weakening comparability for portfolio carbon accounting that relies on operational control as a secondary lens. Where the balance tips the wrong way is in the additional reliefs that go beyond IFRS S1/S2. ESRS now allows partial scope metrics where data quality is lacking, removal of the systematic preference for direct value-chain data, exclusions of activities not deemed significant IRO drivers, qualitative only resilience, and limiting investment/plan disclosures to "already announced", all of which can fragment time-series and reduce cross-issuer comparability exactly where retail users need stable anchors. EFRAG's own materials note these reliefs create new interoperability differences with ISSB, and that seven previously ISSB-aligned "shall" datapoints were eliminated during the datapoint reduction. For users who compare companies side-by-side, these gaps translate into greater burden shifts. Therefore, the direction toward IFRS S1/S2 is welcome, but the degree is uneven. To restore balance without undoing simplification, we would urge (i) requiring an operational-control emissions view for all reporters alongside the financial-control view; (ii) placing guardrails on reliefs (short method note + time-bound plans to close partial scopes); and (iii) reinstating a minimal core of always-on datapoints where ISSB and ESRS overlap (e.g., key governance and climate tables) to protect comparability for retail investors.			
Survey	BETTER FINANCE	NGO	Belgium	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				

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Survey	BETTER FINANCE	NGO	Belgium	22.ESRS2	Comments on deleted datapoints in ESRS 2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	For non-professional investors, fewer but clearer datapoints can indeed make reports easier to navigate. However, the balance is only partially acceptable because important investor safeguards have been thinned alongside these deletions. The removal of narrative PAT requirements reduces forward-looking accountability, as ESRS 2 no longer requires companies to disclose whether they plan to adopt a policy, action or target for a material issue or by when. This erases a crucial signal of management intent and momentum. Similarly, the transfer of content into non-binding NMIG strips away "signposts" that once guided consistent practice. Interoperability is another weak spot. EFRAG acknowledges that seven datapoints aligned with ISSB were eliminated, creating new global gaps. At the same time, new horizontal reliefs, partial scope, no preference for direct value-chain data, compound the risk of uneven comparability. Retail investors, who rely on stable datapoints for screening, are left with less consistent inputs. In the governance standard (G1), several datapoints should be reinstated. These include detailed disclosure of board competence and sustainability oversight (deleted ARs under DR GOV-1), quantification of ESG KPI weight in remuneration schemes (DR GOV-3), country-by-country tax transparency (originally in G3), and quantitative indicators of corruption, bribery, and anti-competitive practices, such as number of staff trained, confirmed incidents, and sanctions. All of these are indispensable for assessing governance integrity. In the social standards, critical signposts were also lost. In S2 (Workers in the Value Chain), AR 41–44 were removed despite providing valuable guidance on risk dependencies, cross-referencing PATs, integration into risk management, and governance functions. Their absence reduces visibility into how companies manage value chain risks. In S1 (Own Workforce), consolidation removed granularity on fatalities (S1-13) and narrowed disclosures on human rights incidents, weakening comparability on workforce safety.			
Survey	BETTER FINANCE	NGO	Belgium	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	From the perspective of retail investors and their associations, these changes are justified, but they represent only a partial solution. In ESRS E1, the new mandatory status of water withdrawal and discharge metrics is a welcome step. Water is a location-specific risk, and without consistent disclosure investors cannot meaningfully compare exposure across issuers, particularly in water-stressed regions. Likewise, requiring disclosure of biodiversity transition plans adds clarity on forward-looking obligations and cost exposures. Both adjustments address material issues where voluntary reporting would have left unacceptable gaps. In governance, the decision to make procurement training disclosure mandatory also makes sense. Third-party integrity risk is a critical concern for retail investors, and optional training metrics would too easily be ignored. However, to be genuinely decision-useful, these disclosures must go beyond boilerplate: they should include coverage ratios (percentage of procurement staff trained, training frequency, and linkage to incident management). While the datapoints chosen are valid, the selection is incomplete. Other deletions or reclassifications into NMIG were at least as material to investors. For example, the loss of fatality disclosures in S1, the removal of Application Requirements 41–44 in S2 (which guided oversight of value-chain risks), and the dilution of G1 datapoints on executive pay links, anti-corruption incidents, and tax transparency reduce comparability on issues central to governance integrity and workforce safety. Accordingly, we emphasise that EFRAG should also reinstate additional datapoints of equal or greater investor relevance to ensure simplification does not come at the cost of accountability and comparability.			
Survey	BETTER FINANCE	NGO	Belgium	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I partially agree and partially disagree	Making four datapoints explicitly mandatory can be justified where they close obvious information gaps without undoing simplification. The ESRS 2 general disclosure (BP1) requiring the undertaking to state that ESRS 1's general principles have been applied and to flag any divergence adds a much needed anchor for users. It supports assurance and helps investors understand when time horizons, boundaries or presentation choices deviate from the norm. However, to avoid this becoming a self-justifying boilerplate, the standard should require a short, specific explanation of each divergence and its quantitative or qualitative effect, and it should be digitally taggable so users can quickly scan and compare issuers. E5-4 helps assess supply-chain vulnerability and transition exposure; it should reference a stable list (e.g., CRM/strategic lists in force), require the basis of calculation, and ideally indicate the main materials involved and associated revenue dependency. E5-5 shines a light on control weaknesses; "unknown destination" is itself a risk signal. It should be disaggregated at least by hazardous vs non-hazardous streams and accompanied by a year-on-year reduction plan, so the category does not persist indefinitely.			
Survey	BETTER FINANCE	NGO	Belgium	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	Explicitly framing ESRS as a fair-presentation framework can, in principle, support a more effective materiality filter. From a retail-investor perspective, fair presentation should curb mechanical box-ticking, reduce repetitive boilerplate, and focus attention on decision-relevant matters. If applied correctly, preparers may feel less pressure to document immaterial datapoints simply to "prove" compliance, which could shorten reports and surface what really matters. Yet the same feature introduces risks that are especially acute for individual investors and the associations representing them. Fair presentation increases managerial judgment. Without guardrails, that judgment can lead to wider dispersion in what gets reported, how it is aggregated, and which boundaries or estimation methods are used. Retail users depend on comparability across issuers and periods; they also lack the time and analytical resources to reconstruct what is missing. If fair presentation is layered on top of other simplifications and reliefs, it can unintentionally legitimize "silent omissions" of universally decision-relevant information, such as board oversight of sustainability, the weight of ESG KPIs in executive pay, the status of climate transition plans, or quantitative grievance and complaint data among other metrics. For fair presentation to deliver on its promise without sacrificing comparability, three conditions are crucial. First, a compact baseline of always-on disclosures should remain in the core statement regardless of DMA conclusions, covering governance roles, remuneration links, transition-plan status, and a minimal set of climate and conduct indicators. Second, each report should include a concise method note that explains materiality judgments, aggregation choices, boundaries, estimates, and key omissions with reasons, so users can compare approaches across companies. Third, connectivity must be operationalized through a standardised KPI table and cross-reference matrix, digitally tagged, so retail users and the tools they rely on can extract and compare.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BETTER FINANCE	NGO	Belgium	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Intensity-only targets can improve "efficiency per euro lent" while total financed emissions still rise as balance sheets or exposures to high-emitting sectors grow. Individual investors and their associations do not build bespoke models to re-engineer banks' targets. They need a small set of stable, comparable anchors: what is the bank's total financed emissions today, where is it headed by 2030/2035/2050, and how will management get there? Intensity alone cannot answer those questions and can be gamed by shifting denominators. Absolute targets, paired with intensity metrics, reveal both efficiency and outcome. Financial institutions can provide transparency and foresight by disclosing a clear path for absolute financed emissions from a stated base year to interim and long-term target years, with year-on-year performance versus that path; provide a short method note covering data sources, scenario choices, attribution factors, asset-class scope and boundary, treatment of mergers and run-off, and whether targets are set gross of carbon credits (and, if credits are used, quantify separately); segment the absolute trajectory by priority sectors (e.g., power, oil & gas, steel, aviation, buildings) and by asset class (corporate lending, project finance, mortgages, securities portfolios, insurance underwriting where applicable). This shows whether reductions are coming from portfolio reallocation, client decarbonisation, or balance-sheet effects. Connecting targets to governance and incentives can also help financial institutions be transparent by identifying the board committee responsible, the executive accountabilities, and the weight of climate KPIs in variable pay; confirm that risk appetite, sectoral limits, and client engagement policies are aligned with their selected pathway.			
Survey	BETTER FINANCE	NGO	Belgium	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	From an individual investor perspective, moving from the "≥50 employees and ≥10% of total headcount" rule to "top 10 countries by headcount (≥50 employees)" is a step toward greater visibility. Under the old threshold, very large, geographically dispersed groups often disclosed only one or two countries. The new rule will generally expand country coverage, is straightforward to apply, and relies on information companies already track, improving comparability and reducing the "cliff effects" created by the 10% test. For non-professional investors, this can translate into clearer, more comparable snapshots of where people are employed and how worker representation actually functions across major locations. That said, a pure "top 10 by headcount" rule also creates blind spots. It can exclude smaller but higher-risk jurisdictions that fall outside the top 10 yet are important for labour rights, industrial relations, or operational continuity (e.g., a small country with frequent disputes, very low bargaining coverage, or a history of harassment claims). The ≥50 employee floor can similarly omit sites just below the threshold even when incident rates or union disputes are acute. In addition, anchoring S1-7 specifically to the EEA risks overlooking non-EEA countries where freedom of association or social dialogue conditions may be more volatile, and therefore more decision-relevant to investors. To preserve the benefits while closing these gaps, the final standard should keep the top-10 rule as the baseline but add a risk-based override: require inclusion of any country (inside or outside the EEA) that meets one or more red-flag criteria e.g., a fatality or severe incident in the period; strike days above a group threshold; collective bargaining coverage below a set floor; a pending labour lawsuit/class action; or a demonstrated adequate-wage gap.			
Survey	BETTER FINANCE	NGO	Belgium	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I partially agree and partially disagree	The amended approach is only partially acceptable for end-users because it still permits outcomes that are formally compliant, but economically inadequate and hard to compare across companies. First, the methodology's reference to general wage-setting principles risks legitimising disclosures anchored to statutory minimums in countries where these sit well below any credible adequate/living wage benchmark. With an added disaggregation trigger: where a country-level share of sub-adequate wages exceeds a small threshold (e.g., 5–10% of headcount), provide sector/site commentary or actions and requiring a time-bound remediation plan (as well as year-on-year progress table for any material gaps), the ILO-aligned methodology could satisfy both relevance (credible benchmarks) and comparability (transparent, reproducible methods). Without them, the revised text risks producing smoother narratives that mask persistent wage shortfalls outside the EU.			
Survey	BETTER FINANCE	NGO	Belgium	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	Keeping ESRS as the feeder system for SFDR remains the right objective, and the July 2025 package does preserve most SFDR PAI coverage while cleaning up overlaps and consolidating duplicative social-policy items into a single "human rights policy" disclosure in ESRS 2. That can make reports more navigable for non-professional investors and improve consistency across stakeholder groups. The consultation materials explicitly state that, despite the broader datapoint reduction, SFDR coverage is "only marginally reduced," and explain the main social changes (policy consolidation and a single severe human-rights incidents indicator) alongside targeted environmental deletions where items are either overlapping or derivable.			
Survey	BETTER FINANCE	NGO	Belgium	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Reviewing AR 26 is the right move: after most of E4-4's specifications were stripped out, investors lost practical signposts for what a credible biodiversity target should look like. Refreshing AR 26 to reflect the fast-moving methodological landscape, especially the Science Based Targets for Nature (SBTN), would reduce ambiguity for preparers and help retail investors recognise when targets are decision-useful rather than marketing claims. The review of AR 26 should consider adding investor-oriented guardrails, like site-level triggers: if a material site sits in or near a biodiversity-sensitive area, disclose site-specific targets or explain exceptions and require progress vs milestones.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BETTER FINANCE	NGO	Belgium	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	A company can improve the unadjusted gap by altering workforce composition without addressing equal pay for equal work. Deleting the adjusted metric leaves end-users with a single ratio that is highly sensitive to changes in headcount mix and therefore prone to misinterpretation. It also weakens stewardship leverage, because investors cannot test whether management's "equal pay" claims are borne out by controlled analysis. Maintaining only the unadjusted figure also undermines comparability across countries and categories. Investors need to see whether gaps persist in key job families and major jurisdictions, because litigation, turnover, and reputational risks arise locally and can be financially material. Without an adjusted, category-or country-level view, issuers with identical global gaps can mask very different underlying realities, frustrating proxy voting, engagement, and SFDR-linked screening. Concerns about burden and consistency can be addressed without deletion. ESRS S1 could require a short method note (definition of "adjusted," variables controlled for, statistical model, coverage, handling of part-time/temporary staff) and a lean disclosure set: adjusted gap for major employee categories and the top countries by headcount, alongside the global unadjusted figure, pay-quartile distribution, and a remediation plan where gaps exceed a threshold. A phased implementation and alignment with Pay Transparency Directive methodologies would limit cost while improving reliability and digital tagging would preserve extractability.			
Survey	BETTER FINANCE	NGO	Belgium	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	To meet the CSRD's objectives for SME protection while preserving simplification, a minimal, always-on KPI set should be reinstated in G1-6 as "shall" under materiality, anchored by: (i) standard payment terms and percentage of invoices paid within terms, disaggregated at least by SME vs non-SME and EU vs non-EU; (ii) median/95th-percentile days to pay; (iii) share of spend with SMEs and share of SME invoices exceeding statutory limits; and (iv) a short method note covering definitions, scope, and any exclusion of disputed invoices. The NMIG example table can remain as guidance, but these core fields should be mandatory to ensure extractability and comparability across issuers. In short, replacing hard payment-practice datapoints with PAT narrative and a narrow SME note is not sufficient. Without reinstated, disaggregated outcome metrics in G1-6, investors and policymakers lose a critical accountability lever for safeguarding SMEs and assessing supplier-relationship risk.			
Survey	BETTER FINANCE	NGO	Belgium	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BETTER FINANCE	NGO	Belgium	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BETTER FINANCE	NGO	Belgium	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BETTER FINANCE	NGO	Belgium	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BETTER FINANCE	NGO	Belgium	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BETTER FINANCE	NGO	Belgium	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	BETTER FINANCE	NGO	Belgium	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BETTER FINANCE	NGO	Belgium	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BETTER FINANCE	NGO	Belgium	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BETTER FINANCE	NGO	Belgium	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BETTER FINANCE	NGO	Belgium	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BETTER FINANCE	NGO	Belgium	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I disagree				
Survey	BETTER FINANCE	NGO	Belgium	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BETTER FINANCE	NGO	Belgium	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		BETTER FINANCE's overall position is "partially acceptable" with targeted amendments. * ESRS 1 (General requirements): Readability and DMA clarifications help, but safeguards are necessary. The top-down/bottom-up option, the broad materiality filter, and flexibility to disclose at topic or IRO level invite divergent practices and silent omissions. We ask for a short mandatory method note, a minimal always-on baseline (governance roles, sustainability-linked pay, climate transition-plan status), IRO-to-DR mapping tables, site outlier flags, and digital connectivity (one-page KPI table, cross-reference matrix, XBRL). * ESRS 2 (General disclosures): Simplifying PAT and deleting topical specifications reduces duplication but also removes guardrails. We support consolidation only if issuers must disclose, per material topic, whether PATs exist, coverage gaps, timelines, and a brief explanation when topical standards are omitted. * ESRS E1 (Climate): Streamlined anticipated-effects disclosures and GHG boundary alignment are positive, yet reliefs (partial scope, qualitative-only resilience) and optional quantification lead to fragmentation. We suggest choosing Option 1 for anticipated effects and suggest using ranges, clear assumptions, coverage percentages, and year-on-year plans to phase out reliefs. No exemption for financial institutions from absolute portfolio targets and require paired absolute-and-intensity paths. * ESRS S1 (Own workforce): Update the non-EU adequate-wage method, requiring method notes, coverage and gap metrics, and remediation plans. Do not delete the adjusted gender pay-gap metric; investors need both unadjusted and adjusted lenses. * ESRS G1 (Business conduct): We disagree with dilution of governance datapoints. Reinstate quantitative disclosures on board competence, ESG-pay links, anti-corruption incidents and sanctions, tax transparency, and payment practices. Procurement training is insufficient without outcome metrics.			
Survey	UNESPA (Spanish Association of Insurers and Reinsurers)	Association of financial institutions	Spain	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		UNESPA (Spanish Association of Insurers and Reinsurers) appreciates the opportunity to comment on the EFRAG review of the ESRS. UNESPA is the representative body of 186 private insurers and reinsurers that stand for approximately 98% of the Spanish insurance market. As member of Insurance Europe, UNESPA has been involved in all relevant documents and discussions led by the European federation in the context of this consultation. Accordingly, UNESPA fully supports the position expressed by Insurance Europe in its response. Nevertheless, UNESPA would like to take this opportunity to emphasize some points in Part 3 of the response.			
Survey	University Pension Plan	Other - please specify (required)	Canada	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We welcome the improvements in clarity and structure of Chapter 3, particularly: (i) the stronger emphasis on materiality of information as a general filter, (ii) the new section with practical considerations that should help avoid unnecessarily complex or formalistic assessments, and (iii) the explicit framing of ESRS as a fair presentation framework, which supports principle-based application. However, we do not support the proposed deletion of the following disclosure requirements: a)Description of how likelihood, magnitude, and nature of effects of identified risks and opportunities have been assessed. b)Description of extent to which and how process to identify, assess and manage impacts and risks is integrated into overall risk management process and used to evaluate overall risk profile and risk management processes. c)Description of extent to which and how process to identify, assess and manage opportunities is integrated into overall management process. d)Description of how process to identify, assess and manage impacts, risks and opportunities has changed compared to prior reporting period. These important datapoints and methodological clarity should be preserved to maintain alignment with international standards such as with ISSB and GRI and ensure comparability of reporting for investors across the globe.			
Survey	University Pension Plan	Other - please specify (required)	Canada	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We welcome the guidance on how to consider remediation, mitigation and prevention actions when assessing materiality, as this addresses a long-standing area of divergence in practice. This guidance strengthens the robustness of impact materiality assessments, aligns with international expectations (UNGPs, OECD, ISSB), and provides investors with more relevant and comparable information.			
Survey	University Pension Plan	Other - please specify (required)	Canada	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	We welcome the changes as they allow for the necessary robustness of disclosure while giving companies flexibility to present their sustainability reporting in a more connected, concise, and accessible way.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	University Pension Plan	Other - please specify (required)	Canada	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	UPP supports the changes including the following: - The simplification and retention of General Disclosure Requirements in ESRS 2, which provides a clear baseline while reducing duplication with topical standards - The removal of overlapping and duplicative PAT datapoints between cross-cutting and topical standards, which should ease implementation and improve clarity for preparers This should clarify the requirements for preparers and improve implementation, enhancing the quality and understandability of disclosures for investors. We have concerns about the deletion of certain datapoints that are important for investors: - whether and when an entity plans to implement policies, actions and targets (PAT) for material topics, -reporting on progress against actions disclosed in prior periods. -Key actions taken (and the results) to provide for and cooperate in or support the provision of remedy for those harmed by actual material impacts This information is essential for understanding companies' trajectory on sustainability risks, opportunities and impacts, for assessing credibility of transition strategies, and for comparability and alignment with ISSB.			
Survey	University Pension Plan	Other - please specify (required)	Canada	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	UPP supports the proposed structural changes as they will likely lead to more concise and comparable disclosures that would be easier to use for investors. However, the deletion of "may disclose" datapoints is concerning, and we are opposing this proposal. These datapoints often provided helpful examples of relevant disclosures, especially in areas where reporting practices are still evolving (e.g., biodiversity, social metrics). Moving them entirely into Non-mandatory Illustrative Guidance ('NMIG') creates additional complexity and does not support transparency for investors.			
Survey	University Pension Plan	Other - please specify (required)	Canada	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We acknowledge that the introduction of horizontal reliefs (such as "undue cost or effort" and "lack of data quality") provides flexibility and can reduce the overall burden for preparers. However, we are concerned that the scope and structure of some reliefs risk undermining consistency, comparability and interoperability on a global scale for companies operating in different jurisdictions: - Reliefs that allow disclosure of only a subset of operations or activities (e.g., joint operations or newly acquired subsidiaries) may lead to a misalignment between companies' financial statements and their reported sustainability risks. This weakens the principle of connectivity between financial and sustainability reporting - During transition periods, limiting disclosures to principal segments or subsets of the reporting entity reduces investors' ability to understand company-wide exposures, and risks inconsistent comparability between EU companies and those applying ISSB Standards in other jurisdictions - The lack of explicit time-bound requirements for improving data quality or coverage when reliefs are applied may incentivize companies to rely on reliefs indefinitely, undermining the goal of robust reporting. We recommend narrowing or removing reliefs that alter the reporting boundary (e.g., acquisitions/disposals, joint operations) to preserve alignment with ISSB and ensure consistency with consolidated financial statements to equip investors with comparable decision-useful and up to date information.			
Survey	University Pension Plan	Other - please specify (required)	Canada	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	We support this relief, provided that EFRAG maintains the requirement for companies to disclose actions undertaken to improve the coverage of calculations in subsequent reporting periods – given this can support investors' engagement with companies. Further guidance from EFRAG on when and how companies should use this relief would be helpful to clarify when the relief can be applied, to prevent misuse and ensure alignment with ISSB. We caution EFRAG against any additional relief or the extension of reliefs to disclosure requirements covered by the ISSB Standards.			
Survey	University Pension Plan	Other - please specify (required)	Canada	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	UPP favors Option 1 which retains the requirement for companies to disclose both qualitative and quantitative information on anticipated financial effects, with narrowly defined reliefs to omit quantitative data under certain conditions. Quantitative disclosure is essential for investors to understand the magnitude of sustainability-related risks and opportunities and their direct connection to financial statements Further, Option 1 better preserves interoperability with the ISSB standards and by extension supports comparability of reporting across investors' global portfolios on a consistent global basis. We are strongly opposing option 2. This option, which makes quantitative reporting entirely voluntary. Option 2 would undermine the objective to deliver comprehensive, comparable decision useful information for investors by creating significant gaps in comparability between companies and across jurisdictions, diverging from ISSB Standards. This risks fragmenting the global reporting landscape and reduces the usefulness of ESRS disclosures for investors.			
Survey	University Pension Plan	Other - please specify (required)	Canada	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree	We support the retention of key datapoints in paragraphs 40-42, as reflected in the amended paragraphs. The remaining datapoints are essential for investors to understand companies' exposure to physical and transition risks, and to assess climate-related opportunities. We support the effort to align these datapoints with ISSB requirements allowing for global comparability and interoperability of disclosures.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	University Pension Plan	Other - please specify (required)	Canada	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I partially agree and partially disagree	We welcome EFRAG's efforts to strengthen interoperability with ISSB Standards. Nearly 40 jurisdictions are in a process of adopting or already using the ISSB Standards as the basis of the reporting requirements in their jurisdiction. It is crucial to achieve a high degree of interoperability with the ISSB's standards IFRS S1 and S2. In the absence of equivalence or alternative compliance, a company will need to navigate between two sets of standards to comply with both the CSRD/ESRS and the ISSB Standards. There are several areas of proposed amendments that might cause additional interoperability challenges: -the proposed option to make quantitative information about anticipated financial effects a voluntary disclosure; -organizational boundary for GHG emissions, failing to align to the GHG Protocol; -using reliefs similar to the ISSB Standards (for example, undue cost and effort) but with different language that can introduce intended or unintended scope differences and new reliefs beyond those used in the ISSB Standards. -specifying how an entity identifies sustainability-related risks and how risk mitigation activities might inform this disclosure (Gross vs Net); -the inclusion of specific requirement on value chain information regarding leased assets.			
Survey	University Pension Plan	Other - please specify (required)	Canada	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	University Pension Plan	Other - please specify (required)	Canada	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	UPP supports the intention to simplify and streamline the reporting burden. However, we oppose datapoint deletions that might create further misalignment with ISSB Standards. These deletions would lead to additional reporting complexity for companies operating in other jurisdictions that have already adopted ISSB-aligned regulations and create added complexity for investors in achieving clear and comparable information.			
Survey	University Pension Plan	Other - please specify (required)	Canada	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	We support the decision to move these six datapoints from "may disclose" to "shall disclose," as each reflects information that is already integral to existing disclosure objectives and is highly relevant for investors and stakeholders: - ESRS E3 – Own operations total withdrawal and total discharges: These datapoints are already necessary to calculate the water balance and therefore do not represent new burden. Their inclusion ensures fair presentation of material impacts, particularly in water-stressed regions, and strengthens alignment with emerging TNFD and global water risk reporting practices - ESRS E4 – Disclosure of biodiversity transition plans: Transition plans are increasingly recognized as a critical tool for managing nature-related risks and are expected to become mainstream. Making this datapoint mandatory reflects growing investor demand for transparency in this area - ESRS G1 – Training of procurement team: Supplier relationships are a key driver of sustainability risks and opportunities. Consolidating datapoints into one targeted disclosure improves clarity and ensures transparency on supplier management practices - ESRS G1 – Confirmed incidents of corruption and bribery: Providing quantitative disclosure on confirmed incidents enhances comparability and accountability. The requirement is appropriately safeguarded (excluding identifiable details), avoiding legal risks while supporting SFDR alignment			
Survey	University Pension Plan	Other - please specify (required)	Canada	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	UPP supports the proposed changes.			
Survey	University Pension Plan	Other - please specify (required)	Canada	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	UPP supports this approach. Explicitly requiring fair presentation in reporting by companies will help to ensure that disclosures are decision-useful for investors, by providing companies with clarity on the discretion and judgment they are expected to exercise when applying the standards.			
Survey	University Pension Plan	Other - please specify (required)	Canada	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I agree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	UPP agrees with the proposed exception, because it ensures material, decision useful information is preserved and avoids derivation to abstractions and assumptions which could introduce inaccuracies and confusion for both preparers and users of the information.			
Survey	University Pension Plan	Other - please specify (required)	Canada	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	UPP supports this proposal.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	University Pension Plan	Other - please specify (required)	Canada	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	UPP does not support this proposal. The proposed methodology would generate inaccuracies in adequate wages outside of the EU. Further it places an unreasonable burden on individual companies to assess whether legal minimum wages or living wage estimates align with ILO principles. The resulting data inconsistency harm comparability of data for investors.			
Survey	University Pension Plan	Other - please specify (required)	Canada	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	UPP supports the proposed approach as it will lead to streamlined data reporting and removed duplication.			
Survey	University Pension Plan	Other - please specify (required)	Canada	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I partially agree and partially disagree	UPP supports the proposed guidance on the scope of biodiversity and ecosystems-related targets. This should reference industry-led guidance (including from TNFD, the Science Based Targets Network (SBTN) and the Food and Agriculture Organization (FAO)) where possible. We recommend keeping the disclosure requirement within ESRS E4, as it is needed for investors to understand the credibility of targets disclosed.			
Survey	University Pension Plan	Other - please specify (required)	Canada	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree	UPP supports the efforts to maintain the global unadjusted pay gap as a mandatory part of the disclosure standard.			
Survey	University Pension Plan	Other - please specify (required)	Canada	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Ensuring efficient reporting between the European Union and ISSB international reporting standards is essential. Divergence between reporting requirements might cause significant costs to companies and leads to a lack of comparable information in capital markets. Many companies who will need to comply with the ESRS will be subject to reporting requirements in jurisdictions outside the European Union. Currently, nearly 40 jurisdictions are in a process of adopting or otherwise using the ISSB Standards. The following amendments can be seen as threatening to pose further challenges for interoperability. We would call attention to the following: Proposals posing a significant risk to interoperability: •Anticipated Financial Effects: the proposed option to make quantitative information about anticipated financial effects a voluntary disclosure. The proposed Option 1 would enhance interoperability between ESRS and ISSB Standards and reduce the reporting burden for companies preparing information about anticipated financial effects applying ESRS. •Organizational boundary – GHG emissions: organizational boundary for GHG emissions, failing to align to the GHG Protocol. •Reliefs: The EFRAG draft simplified ESRS propose additional and extended reliefs beyond ISSB Standards (e.g., for acquisitions/disposals in the reporting period, or using undue cost and effort for operational metrics). Such changes might add complexity for entities reporting under both ISSB and ESRS. •Risks and risk mitigation: Entities must specify how they identify sustainability risks and disclose gross vs. net impacts. EFRAG proposes a prescriptive approach on mitigation, prevention, and remediation, which creates interoperability risks and may affect the scope of required disclosures. •Value Chain Information: the inclusion of specific requirement on value chain information regarding leased assets. This proposal introduces the risk of new application differences between ESRS, ISSB Standards and the GHG Protocol.			
Survey	BDO Poland	Auditor	Poland	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I would like to skip this question and provide my feedback in Part 3				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BDO Poland	Auditor	Poland	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Despite the additional information, there is still a lack of, for example, sample thresholds that companies could use to determine materiality. Without thresholds, even in the form of guidelines, the materiality assessment will remain a subjective judgment of each company. Without thresholds and without sector-specific standards, there will continue to be uncertainty about which elements companies should select to report.			
Survey	BDO Poland	Auditor	Poland	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I disagree	Such an approach may undermine the comparability of information and take us back to the days of GRI/NFRD reports, when each company had its own reporting structure and comparing information was very difficult.			
Survey	BDO Poland	Auditor	Poland	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	Any simplification in understanding the standards and applying them in practice will be a positive step.			
Survey	BDO Poland	Auditor	Poland	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree	Any simplification in understanding the standards and applying them in practice will be a positive step.			
Survey	BDO Poland	Auditor	Poland	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				
Survey	BDO Poland	Auditor	Poland	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	If this option is not abused, the provision makes sense. However, care should be taken to ensure that the company ultimately strives to obtain the data rather than relying on selective information. Of course, this is more challenging for capital groups, but it might be better if a materiality/tolerance threshold — for example, 10%, as in the proposed changes to the Taxonomy — were introduced. Without concrete thresholds and with such a description, it again leaves a wide subjective margin for assessment.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BDO Poland	Auditor	Poland	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	In its current form, it is indeed very difficult for companies to quantify the financial impacts. At this point, it is even hard for us to predict when companies will be able to accurately assess and report such information.			
Survey	BDO Poland	Auditor	Poland	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	BDO Poland	Auditor	Poland	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	BDO Poland	Auditor	Poland	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	BDO Poland	Auditor	Poland	22.ESRS2	Comments on deleted datapoints in ESRS 2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	All information has been included for individual DPs in all standards.			
Survey	BDO Poland	Auditor	Poland	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	BDO Poland	Auditor	Poland	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	It's good that clarification has been added, especially regarding E5-4. This will significantly simplify the process of selecting materials and reporting them.			
Survey	BDO Poland	Auditor	Poland	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				
Survey	BDO Poland	Auditor	Poland	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Banks, as financing institutions and public trust entities, should report all information regarding greenhouse gas emissions and targets with precision. To ensure better understanding of the data, it is sufficient to provide appropriate contextual explanation — and this should be carefully addressed.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BDO Poland	Auditor	Poland	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I would like to skip this question and provide my feedback in Part 3				
Survey	BDO Poland	Auditor	Poland	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	If we are indeed provided with a clear reference to which report or guidelines to follow regarding adequate pay, it will definitely be a positive step toward transparency. Currently, the lack of such data leads companies to report that all employees receive at least the legal minimum wage in the country where they operate. However, this tells us nothing about the actual adequacy of the remuneration.			
Survey	BDO Poland	Auditor	Poland	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	BDO Poland	Auditor	Poland	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	This standard poses a significant reporting challenge for companies. Few still define it as material. There should be clearer guidance on how to assess the materiality of this standard and more explanations on how to define, for example, metrics related to it.			
Survey	BDO Poland	Auditor	Poland	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree	Companies have often used this option to present the adjusted pay gap. This should be a mandatory data point, as it shows us more precisely at which level of the organization the pay gap is the largest.			
Survey	BDO Poland	Auditor	Poland	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	Companies have interpreted this metric differently, so providing a clear definition would be necessary. In addition, most companies' systems do not include information on whether a given invoice relates to an SME or a large enterprise. Therefore, while the idea behind the metric is valid, it is difficult for companies to report in practice. However, a metric concerning payment practices in a more precise form — perhaps without distinguishing SMEs — is necessary.			
Survey	BDO Poland	Auditor	Poland	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BDO Poland	Auditor	Poland	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BDO Poland	Auditor	Poland	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BDO Poland	Auditor	Poland	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BDO Poland	Auditor	Poland	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	BDO Poland	Auditor	Poland	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	BDO Poland	Auditor	Poland	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	BDO Poland	Auditor	Poland	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BDO Poland	Auditor	Poland	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BDO Poland	Auditor	Poland	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BDO Poland	Auditor	Poland	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "compatibility with 1.5 degrees" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	BDO Poland	Auditor	Poland	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BDO Poland	Auditor	Poland	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	BDO Poland	Auditor	Poland	35.ESRS1_3.3.	Do you agree with the amendments of this chapter?	I disagree		ESRS1	3.3 Double materiality assessment	
Survey	University of Córdoba	Academia	Spain	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	Failed balance: The amendments do not achieve an acceptable balance between simplification and robustness of the DMA. Issues with point (b) of double materiality: It is tautological (defines "material" with "material"). Including "risks and opportunities" is inconsistent with impact materiality in ESRS 1. It focuses on users' "understanding" without clarifying the implications. A decision-making framing is insufficient because many stakeholders (e.g., nature, future generations) do not make decisions. Proposed alternative framing: Base (b) on stewardship and due diligence; suggested wording: the company should identify and address impacts (actual/potential, positive/negative) on people and the environment. Materiality of information (point 2): Useful as a filter, but must not justify omitting information on topics already identified as material. Disclosure level (point 6): Allowing reporting by topic or by IRO interchangeably breaks traceability between impacts/risks/opportunities and their metrics, hindering assurance and comparability. Non-material topics (paragraph 108): Allowing their disclosure, even if "without obscuring" material information, may introduce noise and encourage cherry-picking, biasing fair presentation. "Fair presentation" framework (point 5): The emphasis may lead to overly broad judgments without a common minimum baseline, reducing consistency and increasing the risk of litigation due to "reasonable" omissions.			
Survey	University of Córdoba	Academia	Spain	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Under the current text, there is no explicit requirement to report on preventive measures taken in prior periods when an impact has already occurred. If an impact materializes during the reporting period despite prior preventive efforts, those actions do not have to be disclosed. The standards only require disclosure of preventive measures for potential impacts, while for actual impacts, disclosure of remedial actions is required.			
Survey	University of Córdoba	Academia	Spain	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	University of Córdoba	Academia	Spain	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I disagree	Premature simplification: Cutting ESRS disclosures and data points is early; companies, auditors, and consultants have already invested, and revising now squanders the learning from this first cycle. Net societal loss: Reducing self-reported sustainability data erodes knowledge and positive externalities and may raise public monitoring/regulatory costs—likely outweighing any administrative savings. Weaker enforceability/comparability: Re-architecting between ESRS 2 and thematic standards keeps minimum "shall" items but dilutes the common baseline, inviting overly flexible interpretations across firms and sectors. Less forward-looking accountability: Dropping the obligation to declare PAT plans and timelines reduces guidance and monitoring, and limits users' ability to judge how committed organizations are to their stated sustainability goals.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	University of Córdoba	Academia	Spain	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	University of Córdoba	Academia	Spain	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Use NMIG for how-to, not what-to: It's reasonable to place guidelines/examples for disclosing datapoints in Non-Mandatory Illustrative Guidance (NMIG). But key due-diligence info is missing: The simplification would deprive users of crucial information (e.g., policies to identify/manage actual or potential, positive/negative impacts on people or the environment) that's essential to assess a company's due diligence. Mandate critical NMIG items: An in-depth review is needed to decide which NMIG disclosures should become mandatory in the delegated act. NMIG pros (with caveats): NMIG can reduce implementation questions, allow proportional innovation, and ease PAT narrative burdens when strict rules fall short. Risk to comparability: If NMIG replaces a clear baseline, methodological heterogeneity will hinder cross-sectional and time-series comparability. Bottom line: NMIG should complement, not replace, a clear regulatory minimum that preserves consistency, traceability, and insurability.			
Survey	University of Córdoba	Academia	Spain	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	C, M, N: Disagree The "undue cost or effort" principle is aligned with the goal of administrative simplification. However, the articulation of this "relief" in paragraph 89 ESRS1 is so imprecise that it may turn this set of standards into dead letter. The "undue cost or effort" principle risks transforming Directive (EU) 2022/2464 into a voluntary guideline.			
Survey	University of Córdoba	Academia	Spain	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	The amendment is generally reasonable. But the "undue cost or effort" principle is too broad, as indicated in the response to question 19.			
Survey	University of Córdoba	Academia	Spain	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	University of Córdoba	Academia	Spain	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I disagree	Thorough information on dependencies is increasingly important to motivate organizations and industries to tackle sustainability challenges. This amendment goes against the tide. This modification is not justified on the grounds of administrative simplification, as the costs of processing this information is minimal: this information is present in information systems and calculations are trivial. Instead, this modification appears to be proposed on the grounds of avoiding information that may impact corporate reputation, at the expense of resilience.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	University of Córdoba	Academia	Spain	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	IFRS and ESRS have different objectives and scope. Alignment with IFRS twists the notion of double materiality with the introduction of materiality as a filter and fair presentation, for example. As a result, ESRS is less aligned with the Green Deal.			
Survey	University of Córdoba	Academia	Spain	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I partially agree and partially disagree				
Survey	University of Córdoba	Academia	Spain	22.ESRS2	Comments on deleted datapoints in ESRS 2	I partially agree and partially disagree	The simplification proposal is depriving users of the sustainability report from information. However, given the EU mandate the proposal has achieved a reasonable balance.			
Survey	University of Córdoba	Academia	Spain	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	University of Córdoba	Academia	Spain	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	University of Córdoba	Academia	Spain	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I disagree	The notion of fair presentation is ambitious. It draws on financial reporting. Some ambition in this area is positive. However, it is inconsistent with the focus on limited assurance. Additionally, the application of fair presentation may dissuade companies from disclosing information on material topics, considering the inherent complexity and incompleteness of sustainability data.			
Survey	University of Córdoba	Academia	Spain	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Complex estimates are common to all sectors. The financial sector has a disproportionate effect on climate change. Absolute targets are essential for assessing progress on climate change, and banks are no exception in this regard.			
Survey	University of Córdoba	Academia	Spain	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree				
Survey	University of Córdoba	Academia	Spain	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	Processing information about wages, considering notions such as living wages, is a significant concern for society. This modification is not justified on the grounds of administrative simplification, as the costs of processing this information is minimal: this information is present in information systems and calculations are trivial. Instead, this modification seems to be proposed on the grounds of avoiding information that may affect corporate reputation.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	University of Córdoba	Academia	Spain	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I disagree	The "consolidation" and reduction of DPs results in a loss of granularity and breaks the traceability necessary for the SFDR to inform investors. Merging eight DPs into a single "HR policy" in ESRS 2 limits the relevance of human rights, erases nuances by stakeholder group, and weakens operational alignment with UNGP/OECD. The single "severe cases" indicator fails to capture typologies, severity, remediation, or geography. Excluding "fatalities" from the scope of the PAI on lost days is a material setback. Investors require explicit visibility into fatalities, rates, and trends. Moving content to ESRS 2 (general) instead of maintaining it in ESRS S1–S4 reduces consistency between IROs and specific metrics and hinders insurability. The supposedly "marginal" reduction in coverage is, in fact, material for time series, benchmarking, and alignment with the SFDR Annex I tables; it increases the risk of cherry-picking and mapping gaps.			
Survey	University of Córdoba	Academia	Spain	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I disagree	AR 26 could be further reviewed to better reflect current developments (e.g., SBTN).			
Survey	University of Córdoba	Academia	Spain	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I disagree				
Survey	University of Córdoba	Academia	Spain	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree				
Survey	University of Córdoba	Academia	Spain	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	University of Córdoba	Academia	Spain	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	University of Córdoba	Academia	Spain	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	University of Córdoba	Academia	Spain	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	University of Córdoba	Academia	Spain	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	University of Córdoba	Academia	Spain	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	University of Córdoba	Academia	Spain	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	University of Córdoba	Academia	Spain	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	University of Córdoba	Academia	Spain	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	University of Córdoba	Academia	Spain	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	University of Córdoba	Academia	Spain	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	University of Córdoba	Academia	Spain	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	University of Córdoba	Academia	Spain	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Environmental Defense Fund	NGO	United States	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	The improved definition of materiality of information in section 3.1 is welcome making it sharper and better aligned with CSRD and international due diligence tools. The 3.5 section (Practical considerations) is also very useful in reducing unnecessary complexity in materiality assessments. On the contrary, across Chapter 3 when the terms "topics" or "impact, risks and opportunities" are used should be improved, as currently creates a false dichotomy. While "topics" are referring to a broader thematic area, IROs are entity specific. Furthermore, in Chapter 3.3.2, paragraph 37 should include that the purpose of financial material assessment is identify material risks and opportunities.			
Survey	Environmental Defense Fund	NGO	United States	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	Further language simplification on definitions and explanations should be considered.			
Survey	Environmental Defense Fund	NGO	United States	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Environmental Defense Fund	NGO	United States	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree	The elimination of the duplication between the cross-cutting and topical standards is welcome. However, the screening of sites in materiality assessment were replaced by an application requirement to ESRS 2 IRO-1. Chapter 3 of ESRS 1, and in ESRS 2 IRO-1 should include an explicit datapoint on how the undertaking screened its locations and value chains.			
Survey	Environmental Defense Fund	NGO	United States	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We agree with the removal of "may disclose" datapoints, however few of them could have been kept as an example without the need of moving all of the to NMIG. ESRS 1 will benefit from further language improvement.			
Survey	Environmental Defense Fund	NGO	United States	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	It is not clear the impact of the combined effect of reliefs and how to interpret and apply them, creating a risk of over-usage and differences in reporting practices.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Environmental Defense Fund	NGO	United States	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	The undertaking should be required to improve the coverage and quality of the data to meet ESRS. Given the generic way they are currently formulated, they open the door to omission of material data disclosures.			
Survey	Environmental Defense Fund	NGO	United States	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	The ability to estimate financial effects is critical for the undertaking's ability to integrate sustainability into its business strategy considerations, planning and risk management. It is also key for the determination of financial materiality, including in terms of overreporting topics as financially material. Resigning on this ambition is at odds with the objective of putting sustainability reporting on the same level as financial reporting, the integration of both.			
Survey	Environmental Defense Fund	NGO	United States	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Environmental Defense Fund	NGO	United States	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree				
Survey	Environmental Defense Fund	NGO	United States	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Environmental Defense Fund	NGO	United States	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Environmental Defense Fund	NGO	United States	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Environmental Defense Fund	NGO	United States	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Environmental Defense Fund	NGO	United States	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Absolute GHG emissions value targets are essential for assessing financial institutions strategies alignment with the economy-wide transition to net zero as indicate their exposure to each sector in their portfolio, and hence, understand a bank's exposure to transition risks.			
Survey	Environmental Defense Fund	NGO	United States	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Environmental Defense Fund	NGO	United States	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree	Measurable targets related to biodiversity and ecosystems shall be set and disclosed according to the guidance and examples given by relevant global frameworks, such as SBTN (Step 3 - Measure, Set & Disclose Targets), TNFD (component P1 and P2 & Annex 5, sector guidance and guidance on Target Setting) & resources by World Economic Forum Nature-Positive Transitions.			
Survey	Environmental Defense Fund	NGO	United States	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Environmental Defense Fund	NGO	United States	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Environmental Defense Fund	NGO	United States	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Environmental Defense Fund	NGO	United States	33.E_2.	ESRS E2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Environmental Defense Fund	NGO	United States	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Environmental Defense Fund	NGO	United States	33.E_4.	ESRS E4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Environmental Defense Fund	NGO	United States	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree				
Survey	Environmental Defense Fund	NGO	United States	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Environmental Defense Fund	NGO	United States	33.S_2.	ESRS S2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Environmental Defense Fund	NGO	United States	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Environmental Defense Fund	NGO	United States	33.S_4.	ESRS S4:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Environmental Defense Fund	NGO	United States	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				
Survey	Environmental Defense Fund	NGO	United States	33.Glossary.	Glossary:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Business & Human Rights Resource Centre	NGO	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I agree	Chapter 3 is generally well-organised, however there is some confusion/conflation between 'topics' and 'impacts, risks and opportunities' that needs to be addressed.			
Survey	Business & Human Rights Resource Centre	NGO	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree	While there was considerable flexibility in the previous ESRS version already, the clarifications are meaningful.			
Survey	Business & Human Rights Resource Centre	NGO	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	The removal of a requirement for site-level analysis in the assessment of material sustainability issues is concerning, as local context is key for such assessment. Similarly, specification of biodiversity metrics should not be dropped, given the scale of the issue. We also agree with the Danish Institute for Human Rights that a focus on disclosing relevant metrics should be added to the disclosure requirements SX-4 on targets, to improve consistency and reflect the lack of predefined metrics in social standards S2-S4.			
Survey	Business & Human Rights Resource Centre	NGO	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	Moving 'may disclose' datapoints to NMIG would remove key guidance and reporting incentives from the standards; some should be kept in the standards at least as 'examples' to guide meaningful disclosure.			
Survey	Business & Human Rights Resource Centre	NGO	Germany	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	These 'reliefs' concern the gathering of information that in fact is key for medium and long-term business viability. They are far-reaching and it is unclear what their combined effects are and how they would interlink. A lot depends on good faith application by companies or otherwise there is a potential for misuse.			
Survey	Business & Human Rights Resource Centre	NGO	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	The relief is very generic and lacks clear limitations and criteria. There is a risk that relevant sustainability disclosure is undermined as companies can avoid reporting on material issues.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Business & Human Rights Resource Centre	NGO	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	While option 1 is still excessive in terms of a relief, option 2 is wholly unacceptable as such information is key to the EU's sustainable finance framework. There is no justification to go beyond the IFRS relief.			
Survey	Business & Human Rights Resource Centre	NGO	Germany	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	Business & Human Rights Resource Centre	NGO	Germany	22.ESRS2	Comments on deleted datapoints in ESRS 2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	General comment: The number of datapoints under each standard represent the absolute MINIMUM that is needed to ensure basic comparability and significance of disclosures for investors, governments, civil society and others. Cuts are far-reaching and any further reduction critically undermines the EU's sustainability (incl. sustainable finance) framework.			
Survey	Business & Human Rights Resource Centre	NGO	Germany	22.S2	Comments on deleted datapoints in ESRS S2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	Para 35			
Survey	Business & Human Rights Resource Centre	NGO	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	Moving from "may" to "shall" makes sense.			
Survey	Business & Human Rights Resource Centre	NGO	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree	These additions are reasonable.			
Survey	Business & Human Rights Resource Centre	NGO	Germany	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	We agree that explicit emphasis on this framework will enable more meaningful and decision-useful reporting in line with the materiality principle.			
Survey	Business & Human Rights Resource Centre	NGO	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Since our global carbon budget is an absolute budget, it is key that all economic actors including financial institutions disclose absolute climate reduction targets. Relative targets can hide rising emissions if e.g. a sector is growing. Absolute targets are essential for assessing real-world progress on much-needed climate action.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Business & Human Rights Resource Centre	NGO	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I disagree	The new methodology is problematic and discriminatory as it risks conflating living wages, or in the EU terminology 'adequate' wages, with minimum wages, especially for employees outside the EU. For EU employees, companies in their reporting must compare actual wages against wage levels established through collective bargaining or an 'adequate' minimum wage set in line with the EU Directive on Adequate Minimum Wages. Regarding their non-EU employees, however, there is an option for companies to measure actual wages against statutory minimum wages set in line with the ILO wage-setting principles, a process standard that, unlike the aforementioned EU directive and the ILO principles on estimating living wages, is not relevant in itself to the estimation of living wages. A living wage is widely recognised as a human right and describes the minimum income needed for workers to meet the most basic needs – food, housing, transport, clothing, healthcare, etc. – for themselves and their families. However, statutory minimum wages especially in low-income countries are often way below the living wage. According to WageIndicator (https://wageindicator.org/salary/minimum-wage/minimum-wages-higher-than-living-wages-by-country-and-by-region), only 29 of 178 countries tracked have a statutory minimum wage above the living wage level, mostly in Western Europe. The final reporting methodology must ensure all wages, EU and non-EU, are compared against a living/adequate wage in line with the EU minimum wage directive and ILO principles on estimating living wages. As government implementation, even in instances where it has strong legislation and standards, may be poor and/or delayed, documented evidence of independent trade unions' approval of a given wage level in robust social dialogue and collective bargaining is key to ensure reliability of metrics. Companies can and must engage in this and foster an enabling environment for social dialogue and collective bargaining.			
Survey	Business & Human Rights Resource Centre	NGO	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I partially agree and partially disagree	While there may be methodological difficulties that make it hard to compare metrics, an adjusted gender pay gap - in addition to the mandatory unadjusted one - is still material information for many companies. We agree with suggestions to (at least) include it in the application requirements.			
Survey	Business & Human Rights Resource Centre	NGO	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I disagree	While removal of these paragraphs is not necessary for the reduction of burden, unfair purchasing practices towards (SME) suppliers, including undue price pressure, short lead times and late invoice payments, are a key driver of human rights abuse in supply chains and have led to factory closures, mass layoffs, reduced working hours and reduced wages: https://www.business-humanrights.org/en/big-issues/labour-rights/purchasing-practices/). Yet they are an area of critical weakness for companies in many sectors, as our benchmarks regularly reveal: https://www.business-humanrights.org/en/from-us/briefings/knowthechain-ict-benchmark-2025-purchasing-practices/ We therefore recommend maintaining and strengthening disclosure requirements and guidance on these aspects, including their link to adequate wages for workers in the value chain (ESRS S2), beyond the two paragraphs treated here.			
Survey	Tanso Technologies GmbH	Consultant (including software vendor)	Germany	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	Positive: - good that DMA assessment methodology doesn't change - good to add climate risks to financial materiality Constructive: - deleting sub-sub-topic level and making the list of topics NMIG (so not mandatory) makes it even harder to enable direct datapoint mapping from DMA. The DMA < > datapoint mapping is generally still missing leading to high insecurities and inconsistencies across preparers, software providers & auditors which datapoints to include/exclude depending on DMA. Thus, we ask you to please keep the list of topics mandatory (also to ensure topics are not missed) and provide a mapping asap. - could be helpful to point out that internal stakeholder representation is fine			
Survey	Tanso Technologies GmbH	Consultant (including software vendor)	Germany	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	We agree with Paragraphs 34 & 36. However, we would urge EFRAG to give a clear guidance on the case of potential impacts (paragraph 35). The phrasing "Maintain[ing] SIGNIFICANT ongoing mitigation and/or prevention actions" gives room for interpretation. We would opt to assess potential impacts without remediation efforts as it leads companies to do a proper assessment and also gives them the opportunity to transparently report on their actions. Additionally, we would advise to include the "Business as usual" benchmark to assess actual positive impacts in paragraph 36.			
Survey	Tanso Technologies GmbH	Consultant (including software vendor)	Germany	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Tanso Technologies GmbH	Consultant (including software vendor)	Germany	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I partially agree and partially disagree	Generally, we agree. Only 2 comments: 1. It is not obvious from paragraph 30, whether a company has to report non-existence of policies vs actions vs targets for material IROs separately. I.e., what to do, when you have a policy, but no actions and no targets for a material IRO. 2. Regarding the new AR27: Please consider that having a checkmark for IROs for which a company doesn't have PATs might be misleading. Instead having a cross for the once that are missing PATs might be more intuitive. Furthermore, giving the option to provide an indicator of "in progress" would give companies the opportunity to showcase that they are intentionally working on PATs.			
Survey	Tanso Technologies GmbH	Consultant (including software vendor)	Germany	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	We welcome the general push to reducing uncertainties. Also, the placement of the ARs right after the DRs is helpful. However, with ARs still being clustered after DR section and not right after the paragraph (i.e. datapoint) they refer to, preparers might have less scrolling but still need to go back and forth within the same document. With the NMIG placed in a separate document, preparers need to look up information regarding the same datapoint in an additional third place, and a second document. The upside is, that you can have both documents open next to one another. The downside is a lot of manual information gathering is still to be done. Additionally, ARs still have "shall consider" meaning they still include mandatory information that needs to be integrated into the datapoints. This is not in line with the intended simplification purpose.			
Survey	Tanso Technologies GmbH	Consultant (including software vendor)	Germany	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	Comparability of disclosures remains a core purpose of the CSRD. Although we support the practical clarity and pragmatism introduced in the illustrative guidance, it remains to be seen how it will be adopted and used by preparers. We see the benefit of the NMIG, if regularly updated with examples, as a not legally binding guidance and harmonization instrument. To additionally enable (automated) comparability between preparers, we urge EFRAG to keep datapoint IDs and tagging for the voluntary disclosures in the NMIG.			
Survey	Tanso Technologies GmbH	Consultant (including software vendor)	Germany	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	Tanso Technologies GmbH	Consultant (including software vendor)	Germany	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 2	Transparency on financial effects of material topics is critical for assessing the performance of a company asset for financial institutions. Quantifying them where possible, will lead to more comparable and transparent financing of future-proof assets and is more in line with both IFRS and the EU Green Deal.			
Survey	Tanso Technologies GmbH	Consultant (including software vendor)	Germany	20.	ESRS E1: Disclosures on Anticipated Financial Effects The content of the disclosure requirements on Anticipated Financial Effects (formerly E1-9 now E1-11) has been significantly reduced. Several datapoints are still included, which are considered necessary for investors and lenders to be able to assess the undertaking's exposure to transition and physical risk, including for lenders to be able to meet either supervisory expectations or sector specific disclosure requirements. This question focuses on paragraphs 40 (a) to (d), 41 (a) to (f) and 42 of ESRS E1 and aims at collecting feedback on the feasibility of the remaining datapoints. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering to this question, to avoid duplication of input, you will not be allowed to include comments on DR E1-11 or paragraphs 40, 41 and 42 of ESRS E1 in Part 3. Your comments on those provisions will only be provided here. Do you agree that the amended paragraph 40, 41 and 42 of ESRS E1 have been sufficiently simplified and that they strike the right balance between reporting effort and users' needs?	I agree				
Survey	Tanso Technologies GmbH	Consultant (including software vendor)	Germany	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I agree	Regarding point 2 above: We assume the AR on operational control is AR 19 (not AR 20, as referenced)			
Survey	Tanso Technologies GmbH	Consultant (including software vendor)	Germany	23.	Six datapoints exceptionally moved from "may" to "shall" In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, "may disclose" datapoints have not been transformed into mandatory ones (subject to materiality). In the context of the comprehensive revision of some of the DRs, to provide for more focused and relevant information, 6 datapoints have been moved from "may" to "shall" subject to materiality. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter Appendix 3. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Tanso Technologies GmbH	Consultant (including software vendor)	Germany	24.	Four new mandatory datapoints (exception) In accordance with the simplification mandate received, EFRAG has adopted a general rule of not increasing the reporting obligations. Accordingly, no new "shall" datapoints have been added. In the context of the comprehensive revision of some of the DRs, to promote more focused and relevant information, 4 datapoints have been added. These exceptions are in the opinion of EFRAG justified. It is important to note that they do not add new obligations, as they refer to an already existing disclosure objective, but they make explicit a separate element of required information. In consideration of their very low number when compared to the overall datapoint reduction, they are not considered to jeopardise the achieved substantial simplification. On the contrary, their change of status improves the clarity of the reporting requirements. More details on these datapoints can be found in the Basis for Conclusions (BfC) Chapter 6. Do you agree that these exceptions to the general rule are appropriate and justified?	I agree				
Survey	Tanso Technologies GmbH	Consultant (including software vendor)	Germany	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	Financial sector institutions can explain high absolute emission targets with the necessity for transition finance and show progress this way as well. High absolute emissions will automatically also cause high intensity values. Thus, the need for explanation will be there anyways.			
Survey	Tanso Technologies GmbH	Consultant (including software vendor)	Germany	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I partially agree and partially disagree	As the goal should be to cover as many employees as possible (>90%), we propose to change the requirement to list all countries sorted by number of employees until one has reached 90% of all employees. This way also big international corporates with 10+ large subsidiaries in different countries would need to report. One could also set a lower limit of only listing countries with 50+ employees to keep anonymity. But this might introduce unwanted exclusions if companies are present in several countries with < 50 employees.			
Survey	Tanso Technologies GmbH	Consultant (including software vendor)	Germany	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree				
Survey	Tanso Technologies GmbH	Consultant (including software vendor)	Germany	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree				
Survey	Tanso Technologies GmbH	Consultant (including software vendor)	Germany	30.	ESRS E4 DR E4-4: Application requirement to guide undertakings in setting biodiversity- and ecosystems-related targets As part of the simplification process, E4-4 (targets) disclosure specifications and application requirements have been mostly removed. In this context, methodological guidance for companies to what biodiversity and ecosystems-related targets can cover would be helpful. ESRS SET 1, E4 AR 26) outlines aspects that targets can address, including in relation to the size of areas protected or restored, the recreation of natural surfaces or the number of company sites whose ecological integrity has been approved. While this AR could be kept in the revised ESRS E4, some stakeholders highlighted that it could be further reviewed to better reflect latest trends in the evolving methodological landscape related to biodiversity and a stronger alignment with relevant content from science-based frameworks such as SBTN. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the review of AR 26 in Amended ESRS E4?	I agree				
Survey	Tanso Technologies GmbH	Consultant (including software vendor)	Germany	31.	ESRS S1 DR15: Gender pay gap Some of the feedback obtained during the public outreach on the Remuneration metrics (ESRS S1-15), which are derived from the SFDR PAI, was to revisit the gender pay gap ratios and consider replacing it by the adjusted gender pay by employee category or, in some cases, by country. The gender pay gap metric in set 1 is aligned with the Pay Transparency Directive, (EU) 2023/970, where the unadjusted ratio is required as a global percentage and the adjusted gender pay gap by employee category is a voluntary ("may") datapoint. The voluntary datapoint of adjusted gender pay gap by employee ratio has not been included in Amended ESRS S1, following careful analysis and consideration of the EFRAG SRB where the pros and cons of changing the basis for gender pay gap were weighted. The conclusion reached was to maintain the global unadjusted pay gap and delete the adjusted gender pay gap by employee ratio that is a voluntary datapoint in set 1. The deletion of voluntary datapoints obey to the general approach in the revised architecture. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Do you agree with the deletion of the voluntary datapoint on adjusted gender pay gap?	I agree				
Survey	Tanso Technologies GmbH	Consultant (including software vendor)	Germany	32.	ESRS G1 DR G1-2 and G1-6: Payment practices The revision of ESRS G1 has led -among others - to the deletion of former paragraphs 14 and 33(a), addressing "payment practices" (within the context of management of relationship with suppliers). These datapoints have been replaced by the PAT provisions and an additional specification for SMEs in paragraph 33(b). However, this deletion may still reduce visibility on how undertakings engage with and support SMEs. If the respondents intend to comment on the respective paragraphs of Section 3, they will not be permitted to do so. Is the current replacement/formulation sufficient to meet the objectives of the CSRD in respect to the protection of SME's?	I partially agree and partially disagree	We observe that supplier-related information such as payment practices are often considered material. Thus, we would keep datapoints on payment practices explicitly in the list of mandatory datapoints apart from PATs - similar to the climate transition plan.			
Survey	Tanso Technologies GmbH	Consultant (including software vendor)	Germany	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	E1 - Overall datapoint reductions are good. However, some of the datapoints still seem to be hidden in the ARs. We additionally urge to keep the revenue emission intensity as a key comparative indicator, as well as encouraging the disclosures on investments in climate mitigation, adaptation, transition opportunities.			
Survey	Tanso Technologies GmbH	Consultant (including software vendor)	Germany	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		It is unfortunate to have a new numbering in the DRs, ARs and the datapoint IDs, as this will make comparability across different years difficult and effortful. However, if the EU commits to keeping the new structure without new major changes in the future, a new numbering is beneficial for clarity. However, a concrete mapping from old to new datapoint IDs is needed to support market adoption and reduce thousands of instances of duplication efforts.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Opportunity at Work	NGO	United States	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We support simplification. We encourage EFRAG to also clarify that education/training datapoints can be mapped to existing EU frameworks (EQF, ESCO, RPL), reducing burden and increasing comparability.			
Survey	Opportunity at Work	NGO	United States	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree				
Survey	Opportunity at Work	NGO	United States	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I agree				
Survey	Opportunity at Work	NGO	United States	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Opportunity at Work	NGO	United States	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Opportunity at Work	NGO	United States	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I agree				

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Opportunity at Work	NGO	United States	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I agree				
Survey	Opportunity at Work	NGO	United States	27.	ESRS S1: New threshold for reporting metrics disaggregated at country level Amended ESRS S1 changes the threshold for the requirement to disaggregate the metrics for Characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1). Refer also to Basis for Conclusions (BfC) Chapter 8. Instead of being defined based on at least 50 employees by head count representing at least 10% of the total number of employees, the requirement is now to disaggregate the metrics for the top 10 largest countries by employee headcount, to the extent that there are more than 50 employees in those countries. A minority of EFRAG SRB members noted that this change could trigger, in some cases, an increase in the number of countries to report on for these two disclosures, and so an increased burden to prepare the information. The majority of EFRAG SRB members supported the change because the current requirement has led to limited information available by country. In addition, the information is usually easily accessible, so the burden to prepare the information per the new requirement is estimated to be limited. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, to avoid duplication of input, you will not be allowed to include comments on DR ESRS S1-5 and ESRS S1-7 in Part 3. Your comments on those provisions will only be provided here. Do you agree with the change to the threshold for country-by-country disclosure for the DRs ESRS S1-5 and ESRS S1-7?	I agree	We support the revised threshold, which improves comparability across companies. We encourage EFRAG to clarify that country-level breakdowns should also enable reporting on education and training pathways (using EQF/ESCO classifications), so that mobility opportunities for non-degree workers can be consistently tracked across markets.			
Survey	Opportunity at Work	NGO	United States	28.	ESRS S1: Calculation approach to adequate wages outside the European Union (EU) The Amended ESRS S1 reflects an amended methodology for the calculation of non-EU adequate wages set out in the Application Requirements (ESRS S1 AR 22). This change draws on language from different parts of the agreement on the issue of wage policies, including living wages, adopted by the ILO Governing Body in 2024, after the ESRS Delegated Act was adopted. A minority of EFRAG SRB members flagged three interrelated concerns: (1) the reference to wage-setting principles risks disclosures of minimum wages that fall well-below an adequate wage standard, (2) the hierarchy requires companies to only assess relevant living wage data sets as a last resort, and (3) the DR/AR does not require companies to disclose which prong of the methodology is used, which leads to lack of comparability. In consideration of the complexity of this issue, EFRAG is running a targeted field test and is interested in involving a diversified sample of companies. This entails participating in dedicated working sessions with EFRAG Secretariat where the company is expected to present how the revised methodology is feasible and relevant in practice (refer to the non-EU hierarchy described in ESRS S1 paragraph AR 22 (b) i) to iii) to ensure transparency and comparability on this issue. A dedicated questionnaire will be sent directly to the companies participating in the test to allow for their preparation. The working sessions will take place between 8 and 26 September. To confirm your interest in participating to the field test on Adequate Wage please send an email to fieldtestadeqwages@efrag.org by August 18, 2025. Do you agree with the proposed change to the methodology for the calculation of non-EU adequate wages in ESRS S1?	I agree	We agree with the amended methodology. To strengthen relevance, we recommend ensuring that wage reporting links transparently to training and career progression pathways, so that the impact of adequate wage policies on STARs and other non-degree workers can be understood in relation to mobility and inclusion outcomes.			
Survey	Opportunity at Work	NGO	United States	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	We support the simplification of ESRS S1 as it reduces burden while preserving essential disclosures. We recommend clarifying that existing EU frameworks (EQF, ESCO, RPL) can be used to structure education, skills and training data, enabling companies to report consistently on mobility pathways for STARs and other non-degree workers. This alignment would improve comparability and strengthen S1's value without introducing new datapoints.			
Survey	Opportunity at Work	NGO	United States	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		Opportunity@Work appreciates the opportunity to provide feedback on the Amended ESRS S1 (Own Workforce) Exposure Draft (July 2025). We commend EFRAG for simplifying the Standards while retaining core objectives, and we strongly support the CSRD's commitment to greater transparency on social matters in sustainability reporting. Our proposal is modest: strengthen ESRS S1 by clarifying how undertakings should disclose workforce education and training attributes. This can be done without creating new datapoints by referencing existing EU frameworks: the European Qualifications Framework (EQF), the ESCO taxonomy, and Recognition of Prior Learning (RPL). These frameworks already provide consistent ways to categorize qualifications and skills, including those gained outside traditional degree programs. Aligning S1 disclosures with them would ensure comparability, minimize reporting burdens, and better reflect Europe's commitment to lifelong learning and equal opportunity. We recommend that undertakings disclose a small set of indicators on workers Skilled Through Alternative Routes (STARs), defined as employees without tertiary degrees (below EQF Level 6). Suggested metrics include: (1) STARs Representation in Workforce (%), (2) STARs Hiring Rate (% of new hires without tertiary degrees), and (3) STARs Advancement (promotion rates or share in management). These indicators are easy to derive from HR data already collected and would provide stakeholders with critical insight into inclusion and mobility pathways. Phased introduction is advisable: STARs Representation could be included as an extension of workforce characteristics (S1-5), while Hiring and Advancement could be encouraged in Non-Mandatory Guidance. Over time, uptake could be monitored and requirements formalized as appropriate. Explicitly recognizing STARs in ESRS S1 would make visible how companies provide mobility opportunities for millions of skilled workers who lack university degrees, aligning with EU policy objectives and improving global comparability. This small refinement would meaningfully enhance ESRS's ability to capture workforce diversity, inclusion, and resilience.			
Survey	Accountability Counsel	NGO	United States	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	We commend the development of guidelines that instruct regulated entities to approach disclosure of potential and actual adverse impacts distinctly from actions taken to remedy, mitigate, and prevent harm. Addressing the possibility that regulated entities may seek to report only on net impacts, the guidelines stand to limit reporting that misrepresents or obscures instances of serious harm and undermines the ability to assess the effective implementation of due diligence and human rights policies. We encourage further instruction under Paragraph 34 as to need to report on whether and how remediation actions were developed in consultation or collaboration with adversely impacted people. Reporting on the extent of stakeholder engagement in the development of remedy would be helpful to better assess whether solutions to address issues are truly durable and sustainable. We recommend the following language, to follow the sentence "Where the impact is deemed material based on this assessment, the undertaking shall disclose the remediation actions undertaken and their expected or actual outcomes": Disclosure on remedial actions shall detail how the interests of stakeholder groups were considered and incorporated, and how those groups are engaged to track the implementation and outcomes of remedial actions.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Accountability Counsel	NGO	United States	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	The instinct to separate core requirements from instruction on how to report under those requirements is understandable, but may result in a disregard of important details essential for evaluating the actual effectiveness of due diligence efforts. Requiring undertakings to scan two separate documents may hinder uniformity and comparability across reporting, as some organizations will undoubtedly report using the mandatory document without ever considering the non-mandatory guidance. A better approach would be to house both mandatory and discretionary reporting expectations under one document, encouraging full consideration of each by undertakings. Undertakings that choose not to report under non-mandatory provisions should do so affirmatively, not passively. For example, the current non-mandatory illustrative guidance for ESRS S3 ("Affected Communities") asks undertaking to consider, among other things, the frequency of stakeholder engagement efforts and how staff are equipped and trained to deliver meaningful stakeholder engagement, as a supplement to the core requirement to disclose how an undertaking engages directly with affected communities. Rather than avoid these considerations, the undertaking should be required to state affirmatively "We decline to report on the frequency of stakeholder engagement", or "We decline to report on the qualifications and training of staff performing stakeholder engagement." Requiring affirmative statements in this regard is the only way to facilitate truly comparable reporting under the narrative approach offered by the ESRS.			
Survey	Accountability Counsel	NGO	United States	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	S3	In general, the NMIG offered for ESRS S3 (Affected Communities) is effective to instruct how to report on the design and operation of grievance mechanisms in accordance with the effectiveness criteria of the UN Guiding Principles for Business and Human Rights. We reiterated that comparable reporting is only served if undertakings report or affirmatively state that they refuse to report according to the normative framework for assessing the effectiveness of the grievance mechanisms. Equally important is the comparability of the nature of grievances, from whom they are received, and ways they have been addressed. In this regard, should undertakings opt to not report according to the depth advised by the NMIG, then they should provide a clear statement as to that choice.			
Survey	Accountability Counsel	NGO	United States	33.S_3.	ESRS S3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of "'compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	Disclosures related to the management of impacts to affected communities offer a dual purpose; not only do they provide insight into stakeholder engagement and grievance redress, but also transparency of feedback received through dedicated channels helps to ground overall reporting on environmental, social, and human rights performance. We write to urge that simplification not compromise the dual purpose of grievance and remedy disclosures. The proposed Paragraph 13 under ESRS S3 seems to have omitted a critical requirement. Whereas Paragraph 27(d) of the original text states that the undertaking shall describe "how it tracks and monitors issues raised and addressed," in addition to how it ensures the effectiveness of grievance channels, the proposed consolidated language under paragraph 13 fails to state particularly the requirement to report on processes for tracking and monitoring the implementation and outcomes of complaints handled through grievance redress processes. We urge not to overlook that distinct mandatory requirement. Reporting on implementation and outcomes can be easy to accomplish if undertakings maintain active complaints registries designed to track complaints throughout various stages of a grievance redress process (e.g., registration, assessment, investigation, dispute resolution, remedial action, closure). Ideally, complaints registries should be public-facing, which provides assurances that grievances are duly considered and engaged with meaningfully.			
Survey	EARTH PBC	Consultant (including software vendor)	United States	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	The top-down approach (ESRS 1, Chapter 3.6) represents meaningful progress. However, the amendments miss a transformative opportunity: smartphone proliferation is eliminating the fundamental barrier to accurate materiality assessment in complex value chains. Frontline workers—farmers, fishers, factory employees—are coming online globally. This enables forward-facing brands to build direct digital links with workers, bypassing intermediaries who have historically controlled information flows. The materiality paradox: Companies must assess whether forced labor or environmental destruction is material in their supply chains, yet lack reliable data to make this determination. Annual audits capture snapshots. Suppliers control audit access. Workers fear retaliation. The smartphone solution: Direct worker reporting via smartphone with GPS-tagged evidence provides the real-time data companies need for defensible materiality assessments. A CPG company recently told us they couldn't determine if forced labor was material in their palm oil supply chain until workers could report directly, bypassing plantation management. Recommendation: EFRAG should explicitly recognize that technology-enabled continuous monitoring is simplification infrastructure, not additional burden. When brands establish direct digital connections with frontline workers, they gain actual evidence for materiality assessment while reducing audit costs. This serves CSDD, EUDR, and Modern Slavery Act requirements simultaneously. The real simplification comes from better evidence systems enabling accurate materiality conclusions, not from reducing disclosure standards while leaving companies blind to their value chain realities.			

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Survey	EARTH PBC	Consultant (including software vendor)	United States	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I agree	We strongly support assessing potential impacts before mitigation actions when "significant ongoing actions" are needed (ESRS 1, paragraphs 34-36, Appendix C). This provision is essential and should be strengthened. Real-world evidence: P&I insurance clubs now require our monitoring as insurance conditions because their claims data revealed systematic worker welfare violations on vessels with certified safety management systems. Certifications reflected prevention policies on paper, not actual conditions at sea. If the fishing industry could claim "not material" due to extensive regulations, these violations would remain invisible. The compliance burden argument is backwards. Smartphone proliferation enables fishers, farmers, and factory workers to document reality in real time. When forward-facing brands build direct digital links with frontline workers: Disclosure becomes straightforward: "Here's our continuous data showing prevention works" Audit costs decrease dramatically compared to periodic verification Legal risk reduces through evidence-based materiality assessment Stakeholder trust increases from transparent, verifiable claims Companies resisting gross assessment are arguing "don't make us prove our prevention works." This increases compliance burden through stakeholder skepticism, higher audit intensity, and legal exposure when violations emerge despite net assessments. Recommendation: Strengthen Appendix C to explicitly state that continuous monitoring via direct worker reporting provides efficient gross assessment. Technology enabling brands to connect directly with frontline workers reduces compliance burden by providing real evidence of prevention effectiveness. The goal is accurate reporting backed by verifiable data, not excessive reporting based on assumptions. Earth PBC is a San Francisco-based Public Benefit Corporation that develops community-driven transparency technology, combining smartphone-based worker reporting with satellite verification (in partnership with Planet Labs PBC) across the forestry, fisheries, agriculture, and manufacturing sectors globally.			
Survey	EARTH PBC	Consultant (including software vendor)	United States	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I partially agree and partially disagree	The relief for partial scope calculation when reliable data is unavailable (ESRS 1, paragraph 92) addresses a real problem, but the solution misses the fundamental issue: value chain data gaps exist because companies lack direct connections to frontline operations. Traditional supply chain monitoring relies on intermediaries—suppliers, subcontractors, agents—who control information flows. These intermediaries have incentives to filter or manipulate data. The result: companies genuinely cannot obtain reliable metrics for Scope 3 emissions, labor conditions, or environmental impacts. Smartphone proliferation is eliminating this structural barrier. Frontline workers—fishers documenting catch locations, farmers tracking harvest activities, factory employees reporting working hours—can now report directly to forward-facing brands via smartphone with GPS-tagged evidence. This bypasses information gatekeepers entirely. Real-world validation: P&I insurance clubs now require continuous monitoring as insurance conditions because traditional audit data proved unreliable. Direct worker reporting provides the data quality that periodic supplier questionnaires cannot deliver. The relief without time limit concern: Some EFRAG SRB members rightly worry that unlimited relief removes incentive to improve data quality. However, this assumes data quality improvement requires extensive effort. When brands establish direct digital links with frontline workers, data quality improvements happen rapidly and cost-effectively. Recommendation: EFRAG should clarify that paragraph 92 relief is intended for genuine data unavailability, not avoidable gaps. Explicitly state that technology-enabled continuous monitoring via direct worker connections represents reasonable effort to improve data quality. Companies should not claim "undue cost" for implementing smartphone-based reporting systems that cost less than traditional audit programs while delivering superior data quality. The relief should encourage rather than delay adoption of direct monitoring capabilities.			
Survey	EARTH PBC	Consultant (including software vendor)	United States	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I agree	The streamlined approach to SFDR Principal Adverse Indicators (PAI) in Appendix A maintains necessary investor information while reducing preparer burden. However, implementation success depends on addressing the fundamental data collection challenge. The investor information gap: Asset managers tell us they need reliable PAI data but their investee companies cannot provide it. The problem is not reporting requirements—it's the absence of reliable primary data from complex value chains. Companies lack direct visibility into forced labor indicators, environmental impacts, or governance practices deep in their supply chains. Smartphone proliferation solves this systematically. When forward-facing brands build direct digital connections with frontline workers via smartphone: For Social PAIs: Workers document violations of UNGC principles, human rights incidents, gender pay gaps, and workplace accidents in real time with GPS-tagged evidence—exactly the indicators investors need (PAI 10, 11, 14 from Table 1 and Table 3). For Environmental PAIs: Fishers report IUU fishing activities, farmers document deforestation incidents, and workers track emissions from operations—providing the granular data for PAI 12, 13, 15. For Governance PAIs: Direct worker reporting reveals where policies exist on paper but violations occur in practice—the critical distinction investors need to assess actual ESG performance versus claimed performance. Real-world validation: Financial sector clients (P&I insurance clubs) now require our monitoring because it generates reliable PAI data their risk models depend on. Traditional supplier questionnaires and periodic audits could not deliver this data quality. Recommendation: EFRAG should explicitly acknowledge that technology-enabled continuous monitoring via direct worker connections is the practical pathway to reliable SFDR data generation. This serves both preparer efficiency (one monitoring system serves multiple regulatory requirements) and investor information needs (reliable primary data versus estimated or supplier-reported data).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Malta Institute of Accountants	Auditor	Malta	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I partially agree and partially disagree	We agree with the proposal that the material information should be the main aspect of the report, however, we are of the opinion that there should not be the obligation for the provision of non-material information. We would appreciate if in the text it is clearly stated as to why certain information should be reported.			
Survey	Malta Institute of Accountants	Auditor	Malta	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I partially agree and partially disagree	Clarification on the distinction between the positive impacts and the actions is ideal. Guidance as to whether risk and opportunities would apply, and guidance for risk and opportunities as a whole would be appreciated.			
Survey	Malta Institute of Accountants	Auditor	Malta	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	Guidance on how to prepare an Executive Summary, Appendices and sections with information material only to certain users, including how to ensure fair presentation (of IROs) and avoid greenwashing, would be ideal. With regards to the Appendices, ideally we are provided with guidance as to what information should be placed in the main body, and what information may be provided in the Appendices.			
Survey	Malta Institute of Accountants	Auditor	Malta	14.	Restructuring of the architecture and interaction between ESRS 2 and Topical Standards Rationale for the changes The Amendments have restructured the architecture of ESRS, focusing on the interaction of ESRS 2 and topical standards. They have also modified the standard-setting approach for policies, actions and targets (PAT) to adopt a more principles-based and less prescriptive approach. These Amendments are described as Lever 3 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes, which aim to strike an appropriate balance between (a) prescriptiveness of the requirements and preparation effort and (b) the users' need for relevant, faithful and comparable information: Minimum Disclosure Requirements in ESRS 2 (renamed "General Disclosure Requirements") have been simplified but retained as 'shall' disclose. A drastic reduction of 'shall' datapoints PAT has been achieved, sometimes reformulating them as Application Requirements ('ARs') to support more consistent application. Topical specifications to GOV, SBM and IRO (Appendix C of ESRS 2) have been deleted, with a few exceptions maintained as separate Disclosure Requirements in topical standards (e.g. resilience in ESRS E1). The requirement to disclose PAT for material IROs if adopted is maintained. But the requirement to disclose whether the undertaking plans to implement a PAT for material topics and timeline has been eliminated. The indication of which material topics are not covered by PAT is maintained. The amendments have improved the connectivity between the disclosure of PAT and the description of IROs (now in ESRS IRO 2) to which they relate. They have also improved the ability to disclose information at a higher aggregation level than the material IROs, if this reflects the way IROs are managed. Question Do you agree that these proposed amendments strike an appropriate balance between (1) prescriptiveness of the requirements and preparation effort from the one hand, and (2) need for relevant and comparable information from the other?	I agree				
Survey	Malta Institute of Accountants	Auditor	Malta	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I agree				
Survey	Malta Institute of Accountants	Auditor	Malta	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	We are in agreement with EFRAG, and do not think that this is included in the Delegated Act – rather, it should be finalised at a later stage to ensure that the guidance is as comprehensive as possible and takes into account all the feedback received.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	Malta Institute of Accountants	Auditor	Malta	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I partially agree and partially disagree	We are in agreement with the majority of the reliefs which have been introduced, particularly relief 7. Agreed with flexibility for preparers due to undue cost and effort.			
Survey	Malta Institute of Accountants	Auditor	Malta	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I would like to skip this question and provide my feedback in Part 3	The exception may result in less useful data for the users. Ideally, companies are required to explain why they cannot provide certain data, along with the plan to be able to provide such data in the future. Not introducing a time limit could result in prolonged limited reporting.			
Survey	Malta Institute of Accountants	Auditor	Malta	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1				
Survey	Malta Institute of Accountants	Auditor	Malta	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I agree				
Survey	Malta Institute of Accountants	Auditor	Malta	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I partially agree and partially disagree	Prior to requiring this, it would be ideal to ensure there is further guidance on how to correctly apply the principles of fair presentation.			
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	11.	Clarifications and simplification of the Double Materiality Assessment (DMA) (ESRS 1 Chapter 3) and materiality of information as the basis for sustainability reportingRationale for the changes The Amendments have clarified the requirements in ESRS 1 Chapter 3 about materiality of information and simplified the DMA process. They are described in Lever 1 of simplification in the Basis for Conclusions (see BfC Chapter 4). Link here to access the Log of Amendments, ESRS 1, Chapter 3 if you would like to review the detailed Amendments and their rationale. The Explanatory Memorandum (EM) which accompanies the EC Omnibus proposals (page 5) identified the following objective for this lever: "[the simplification] will provide clearer instructions on how to apply the materiality principle, to ensure that undertakings only report material information and to reduce the risk that assurance service providers inadvertently encourage undertakings to report information that is not necessary or dedicate excessive resources to the materiality assessment process".Description of the changes To meet this objective, EFRAG has introduced the following changes which aim to strike a balance between simplification and the necessary robustness of the Double Materiality Assessment (DMA): A new section presenting practical considerations for the DMA has been drafted, including the option of implementing either a bottom-up or top-down approach (Chapter 3.6 of ESRS 1) More prominence has been given to materiality of information as a general filter and all the requirements are subject to it. The relationship of impacts, risks and opportunities, and topics to be reported has been clarified (ESRS 1, paragraph 2 and 22) It has been explicitly allowed to include information about non-material topics (ESRS 1, paragraph 108) if they are presented in a way that avoids obscuring material information Emphasis is put on ESRS being a fair presentation framework, to reinforce the effectiveness of the materiality principle and avoid excessive documentation effort due to a compliance and checklist approach to the list of datapoints (DP); an explicit statement of compliance with ESRS is included in (ESRS 1, Chapter 2) To avoid excessive detail in reported information, it has been clarified that all the disclosures can be produced either at topical level or at impacts, risks and opportunities (IRO) level, depending on the nature of the IROs and on how they are managed The list of topics in AR 16 (now Appendix A) has been streamlined by eliminating the most detailed sub-sub-topic level and has now an illustrative only and non-mandatory status. More emphasis has been put on the aggregation and disaggregation criteria for reporting information at the right level. Explanations have been provided with respect to the consideration of sites for the DMA and reported information, so as to avoid long lists of sites being included in the sustainability statement. Please do not comment here in "Gross versus Net" as it is covered by the next question.Question If you intend to provide feedback also on Part 3 of this questionnaire (at level of DR or paragraph), please note that by answering this question, you will not be allowed to include comments on Chapter 3 of ESRS 1 in Part 3, to avoid duplication of input. Your comments on Chapter 3 can only be provided here. Do you agree that the proposed amendments have sufficiently simplified the DMA process, reinforced the information materiality filter and have succeeded in striking an acceptable balance between simplification and robustness of the DMA? Do you agree that the wording of Chapter 3 of ESRS 1 is sufficiently simplified?	I disagree	1.ESMA disagrees with the proposed amendment to the notion of materiality of information. Due to conceptual and drafting issues which are further explained in paragraphs 3-8 of ESMA's detailed response, the proposed amendment is unlikely to lead to simplification in practice, and it will undermine the disclosure of relevant information. ESMA also cautions against the inclusion of a new definition of "general-purpose sustainability reporting" in the way it has been proposed in the ED and without sufficient explanations as to what this notion is meant to achieve in practice. This latter aspect is further addressed in par. 9 of ESMA's detailed response.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	12.	New guidance in ESRS 1 on how to consider remediation, mitigation and prevention actions in assessing materiality of negative impactsRationale for the changes To address a frequent implementation question and an area of divergence in practice, new guidance has been introduced (ESRS 1 paragraphs 34 to 36 and Appendix C; Basis for Conclusions (BfC) Chapter 8) on how to consider implemented remediation, mitigation and prevention actions in the DMA (the so called "gross versus net" issue). The EFRAG SRB has prioritised the guidance on impacts, as in financial materiality there is already reporting experience which can be leveraged.Description of the changes Appendix C, which has the same authority as other parts of the Standard, illustrates how to perform the assessment, i.e. before or after the actions that have been taken and have reduced the severity of the impact. The new guidance specifies how to treat actions in DMA differentiating 'actual' from 'potential' impacts. It also differentiates the current reporting period from the future reporting periods (the latter is relevant as impacts of previous years that are material are also to be reported in the current period). For impacts that are assessed as material, the respective actions are reported (which also include policies implemented through actions). Actual impacts are assessed for materiality before the remediation actions in the reporting period when they occur, while in future periods they are not reported if fully remediated. For potential impacts, when the undertaking must maintain significant ongoing actions to contain severity and/or likelihood below the materiality level, the impact is assessed before the actions are reported. This provision has been introduced to deal with cases such as health and safety negative impacts in highly regulated industries.Key discussion points at EFRAG SRB level Some of the EFRAG SRB members consider the added guidelines excessively complex. The approach to disregard implemented actions when assessing materiality of potential impacts, if there are significant ongoing actions, has been the source of split views in the EFRAG SRB. The members that supported the inclusion of this provision considered that it would be inappropriate to conclude that due to the high level of prevention and mitigation standards in a sector, a given topic is not reported. On the contrary, other members think that this gross approach to potential impacts will result in excessive reporting.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on Paragraphs 34 to 36 and Appendix C of ESRS 1, in Part 3 to avoid duplication of input. Your comments on Paragraphs 34 to 36 and Appendix C of ESRS 1 can only be provided here. Do you agree that the new guidelines clarify how to consider remediation, mitigation and prevention implemented actions in the DMA, contributing to more relevant and comparable reporting?	I disagree	10.ESMA disagrees with the draft guidance provided in the proposed Amended ESRS 1 and the related appendix. ESMA believes that EFRAG should be clear in setting a core principle based on the gross approach and deal with any exceptions, application aspects, through specific guidance. As currently drafted, the guidance is too complex, which questions its value as part of the simplification exercise and may lead to confusion and unintended consequences as, for example, it remains unclear in which cases chronic impacts will be assessed as material even though they benefit from mitigation measures that reduce such impacts within an acceptable range. ESMA also stresses that the proposed guidance should take into account the implications of potentially significantly changing the required assessment methodology considering the efforts put in place by issuers who have conducted their double materiality assessment for the first reporting period. ESMA's detailed comments are available in its detailed response (paras 11-14).			
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	13.	Improved readability, conciseness and connectivity of ESRS Sustainability StatementsRationale for the changes Starting with the input gathered from the first-time adopters, EFRAG has introduced several changes to support the production of more readable and concise sustainability statements, that are better connected with corporate reporting as a whole. This corresponds to Lever 2 of simplification in the Basis for Conclusions (BfC) (Chapter 4).Description of the changes EFRAG has clarified the flexibility that preparers have in preparing their statements. The Amendments describe the possibility of including an 'executive summary' at the beginning of the sustainability statement and have put greater emphasis on the use of appendices to separate more detailed information from key messages. The amendments have also clarified the concept of 'connected information', discouraging fragmentation and/or repetition of information (ESRS 1, Chapter 8).Question Do you agree that these proposed Amendments, when combined with the other changes in the Amended ESRS, provide an appropriate level of flexibility to support more relevant and concise reporting, as well as to promote better connectivity with corporate reporting as a whole?	I partially agree and partially disagree	15.ESMA partially agrees and partially disagrees with the proposed amendments, we provide detailed comments in relation to the presentation and structure of the sustainability statement in paras. 17-20 of ESMA's detailed response. 16.ESMA notes that one of the areas flagged by stakeholders with regards to the complexity in the application of ESRS related to the seemingly unnecessary granularity required by the standards in some areas of the reporting on sustainability information. Particularly, a wide divergence could be observed with regards to the level of disclosures provided by undertakings between some undertakings focusing on a granular list of IROs throughout the sustainability statement and others remaining at a higher level of aggregation, i.e. topic/sub-sub-topic level or sustainability matter. ESMA notes that the ESRS should be clear throughout the text that, in line with the CSRD, the information provided needs to enable an understanding of the IROs linked to sustainability matters and how an undertaking manages them. The preparation of the information should pursue and not compromise this ultimate objective. This does not mean the presentation of the information in the sustainability statement should necessarily be as granular as each individual IRO. The ESRS should therefore provide clear guidance both at horizontal level as well as, where necessary, at disclosure requirement-level as to how companies shall apply the aggregation and disaggregation principle in a way that balances conciseness and understandability with users' ability to understand the IROs and how undertakings manage them. See also the responses to questions 15 and 33 on this issue.			
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	15.	Improved understandability, clarity and accessibility of the StandardsRationale for the changes The Amendments have reorganised the content of the requirements, clearly separating the mandatory from the non-mandatory ones, and eliminating the "may" disclose provisions, which proved to be problematic to understand. These Amendments are described as Lever 4 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum (page 5) identified the following objective for this lever: simplify the structure and presentation of the Standards. Description of the changes To achieve this objective, EFRAG has implemented the following changes: "May disclose" datapoints have been all eliminated. All the "shall disclose" datapoints are now in the main body of the standard (no more datapoints in AR) and mandatory application requirements are relocated below the DR to which they belong (and below each Chapter in ESRS 1), covering 'how to disclose' guidelines. Language of the Standards has been improved for understandability, conciseness and consistency of ESRS. Question Please focus your considerations only on the mandatory content of the Exposure Drafts. The following question covers the Non-mandatory Illustrative Guidance ('NMIG'). If you intend also to provide feedback on Part 3, when providing your comments, please refrain from duplicating the comments that you will provide at Standard or DR level. Do you agree that these proposed amendments achieve the desired level of clarity and accessibility?	I partially agree and partially disagree	21.ESMA partially agrees and partially disagrees with some of the proposed amendments aiming at improving the understandability, clarity and accessibility of the ESRS. ESMA generally supports the increased clarity between mandatory and non-mandatory requirements and the removal of most of the "may" requirements. These steps contribute to improving the overall usability of the ESRS. However, we have also identified some practical issues relating to the clarity/understandability of the proposed amendments. These issues are further explained in our detailed response (paras 22-40) and relate to: the use of the terms "shall consider", the use of reminders in topical standards relating to cross-cutting principles set out in ESRS 1, the proposed location of Application Requirements, aspects relating to the ease of navigation across the standards, clarity on the articulation between IROs and topics/sub-topics in ESRS 1 and ESRS 2 and the clarity of ESRS 1 requirements relating to group reporting vs. subsidiary reporting.			
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	16.	All:16. Usefulness and status of "Non-Mandatory Illustrative Guidance" (NMIG) As a result of the simplification process, part of the mandatory content in the 2023 Delegated Act has been moved to "Non-Mandatory Illustrative Guidance" (NMIG). NMIG does not address all the existing implementation questions on each standard. It simply gathers the content that: a) was in the Delegated Act b) is now deleted; and c) contributes to the overall datapoints reduction. It contains 'how to report' guidelines (methodology) and examples of possible items to cover when disclosing in accordance with a mandatory datapoint, mainly for narrative PAT disclosures. Its content should not be understood as a list of items of information requiring justification when not reported, consistent with the fact that the previous datapoints are deleted. The legal status of the NMIG will be considered by the European Commission (EC) in due course. However, EFRAG recommends that the EC not include this content in the Delegated Act. On the one hand, NMIG contains helpful support material that may reduce the implementation questions. On the other hand, it could trigger additional efforts of analysis and/or have an ambiguous role as possible additional disclosure with entity-specific relevance if issued within the Delegated Act. You are invited to provide your comments on the purpose of NMIG, if any. You can access the NMIG at this link. Please select the NMIG you would like to comment on from the list below:	ESRS1; ESRS2; E1; E2; E3; E4; E5; S1; S2; S3; S4; G1	41.ESMA partially agrees and partially disagrees with the purpose of the NMIG as, on the one hand, it has the potential to convey helpful material, but it also contains text that may be more suitable for the body of the ESRS. ESMA notes that the practical relevance of this accompanying material should not be underestimated. Corporate reporting requirements are living systems which are based on a core set of strictly mandatory requirements often accompanied by guidance materials which crystallise the experience arising from the application of the core principles-based requirements. As such, the NMIG will be a critical element of the consistent application of the requirements and this fact should be clearly acknowledged by EFRAG. 42.ESMA notes that, in some cases, the draft NMIG provides clarifications on the reading of certain ESRS and points at methodologies. These indications seem quite critical and not suitable for merely optional material. The test that the NMIG's content should pass to conclude that it should not be included in the body of the ESRS is understanding whether an undertaking can still produce disclosures that are compliant with the ESRS requirements, including the qualitative characteristics of information (and fair presentation), should that undertaking decide to ignore or apply inconsistent methodologies than those set out in the NMIG. 43.In this respect, ESMA has identified cases in the NMIG which relate to content that does not seem to pass the above-mentioned test and which should therefore be included in the body of the ESRS. For example, guidance on group reporting and subsidiary-level IROs (NMIG for ESRS 1 Par. 5 for para. 52), on the treatment of leased assets (NMIG for ESRS 1 par. NMIG 7 for para. 71) or on the different types of impacts (NMIG for ESRS 2 par. NMIG 12 para 28(a)).			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	17.	Burden reliefs and other suggested clarificationsRationale for the changes The Amendments introduced several horizontal reliefs (i.e. applicable across different requirements) that were suggested in the input gathered from preparers. They are expected to contribute substantially to the reduction in the overall reporting efforts, beyond the datapoints reduction. These Amendments are described as Lever 5 in the Basis for Conclusions (BfC) (Chapter 4). The Explanatory Memorandum did not explicitly mention the reliefs, but the letter of the EC dated 5 May 2025 recommended including those foreseen in the ISSB's IFRS sustainability disclosure standards (IFRS S1 and S2). The Explanatory Memorandum nevertheless included the following objective (page 5): [the simplification] will also make any other modifications that may be considered necessary, considering the experience of the first application of ESRS. The revision will clarify provisions that are deemed unclear. It will improve consistency with other pieces of EU legislation. Description of the changes EFRAG has implemented the following changes: The relief "undue cost or effort" has been introduced, including for the calculation of metrics. A relief for lack of data quality has been introduced for metrics (ESRS 1 Paragraph 91), allowing to report a partial scope and disclosing actions to improve the coverage in future periods. The systematic preference for direct data as input to the calculation of value chain metrics has been removed and undertakings may use direct data or estimates depending on practicability and reliability (ESRS 1, Paragraph 91). Undertakings may exclude from the calculation of metrics their activities that are not a significant driver of IROs (ESRS 1, Paragraph 90) and may exclude joint operations on which they do not have operational control when calculating environmental metrics other than climate (ESRS 1, paragraph 60). Disclosure about resilience is now limited to risks only and limited to qualitative information only (ESRS 2, Paragraph 24 and ESRS E1, Paragraph 21). When disclosing financial effects, the information on investments and plans is now limited to those that are already announced (ESRS 2, AR 16 Paragraph 23(b)). A new relief for acquisitions (disposals) of subsidiaries has been introduced (ESRS 1 Chapter 5.4) allowing to include (exclude) the subsidiary starting from the subsequent (from the beginning of the) period. From October 2024 to February 2025, several implementation issues were identified in the EFRAG ESRS Appendix dedicated to the Q&A implementation platform (Chapter of Basis for Conclusions (BfC)). These issues have now been addressed by clarifying the corresponding provisions. Following the EC representatives' recommendation, EFRAG did not include additional relief for commercial sensitive information, pending the changes of level 1 regulation, where this issue is being considered.Question EFRAG considered how to improve consistency with other pieces of regulation. Considering what can be achieved in these Amendments (as opposed to what requires modification by the other regulation) EFRAG gave priority to the SFDR regulation. Please refer to question 28 if you intend to comment on this aspect. Other selected changes to enhance consistency are described in the Log of Amendments for each standard. Please note that some of the reliefs described above go beyond the ones in IFRS S1 and S2 described in question 21 below. As interoperability with IFRS S1 and S2 is specifically addressed in question 21 should be commented upon there. Please also refrain here from comments on the options proposed for quantitative financial effects, as question 17 is specifically dealing with them. Do you agree that these proposed Amendments provide sufficient relief and strike an acceptable balance between (a) responding to the stakeholders' demands for burden reliefs and (b) preserving the transparency needed to achieve the objectives of the EU Green Deal, as well as interoperability with the ISSB's IFRS S1 and S2?	I disagree	44.ESMA disagrees with the proposed reliefs as currently drafted as they are unlimited in time, affect own operations and do not encourage the improvement of disclosures over time. ESMA sets out arguments supporting its position and proposes possible ways to improve the proposed reliefs in its detailed response (paras. 45-53). ESMA also stands ready to discuss with EFRAG possible additional reliefs which may address burden reduction concerns while preserving investor protection and supporting the improvement of data quality and disclosure quality in the medium term.			
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	18.	Relief for lack of data quality on metrics (ESRS 1 paragraph 92) Amended ESRS have introduced the 'undue cost or effort' relief for all the elements of the reporting, from the identification of material IROs to the calculation of metrics (paragraph 89 of ESRS 1), in line with IFRS S1 and S2, extending it to all metrics. In addition, paragraph 92 of ESRS 1 has introduced a provision applicable both to metrics in own operations and in upstream and downstream value chain. This allows an undertaking to report metrics with a partial scope of calculation, when there are no reliable direct or estimated data to be used in the calculation. This relief does not exempt an undertaking from providing a disclosure, but it allows to disclose a calculation that includes only a partial scope. When using this relief, the undertaking shall disclose actions undertaken to improve the coverage of its calculation in next periods. This transparency is expected to provide sufficient incentive to improve the data quality and achieve a more complete scope in the calculation of the metrics. Accordingly, no time limit is included for the use of the relief. On this point, some EFRAG SRB members, while supporting the relief, considered it essential to include a time limit. If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 92 of ESRS 1 in Part 3 to avoid duplication of input. Your comments on paragraph 92 of ESRS 1 can only be provided here. Do you agree that the proposed relief for lack of data quality on metrics strikes an acceptable balance between providing the necessary flexibility for preparers and avoiding undue loss of information?	I disagree	54.ESMA disagrees with the relief in par. 92 of the proposed Amended ESRS 1. This relief would exclude joint operations for which the undertaking has no operational control from the calculation of metrics required by ESRS standards E2, E3, E4 and E5. ESMA notes that should an undertaking be exposed or give rise to material IROs through joint operations over which it has no operational control, the application of this relief should result in the sustainability statement not providing material information and a fair presentation. This would also create a disconnect compared to the reporting boundary for financial reporting. Furthermore, also in this case, this reliefs risks providing incentives for structuring opportunities. ESMA therefore does not support this proposed relief and rather suggests that EFRAG considers providing a phase-in period for undertakings to establish the necessary data collection mechanisms to enable it within a given period of time to be able to collect the necessary information.			
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	19.	Relief for anticipated financial effectsRationale for the changes Preparers' feedback to the public call for input indicated that disclosing quantitative information for financial effects is particularly challenging. This includes issues of lack of mature methodologies and being commercially sensitive (refer to Basis for Conclusions (BfC) Chapter 7). Suggested solutions included the IFRS corresponding relief (IFRS S1 paragraph 37), the deletion of the requirement to report quantitative information, or to report them only on a voluntary basis. The EFRAG SRB is specifically seeking input that would support the determination of the most appropriate relief.Description of the changes The Amended ESRS currently includes two possible options, which would apply to all topics, including climate (DR E1-11): a) Option 1 requires an undertaking to disclose both qualitative and quantitative information but allows omission of quantitative information under certain conditions. Option 1 is substantially aligned with the IFRS relief, despite the fact that it includes some differences compared to it: under Option 1, as in the IFRS relief, the undertaking need not provide quantitative information when it is not able to measure separately the financial effect of a specific topic (or IRO) or when the level of uncertainty is so high that the resulting information would not be useful. Differently from the IFRS relief, Option 1 specifies that the undertaking may use the relief when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects. Different from the IFRS relief, the undertaking cannot omit quantitative information when it does not have the skills, capabilities or resources to provide that quantitative information, as this part of the relief was considered not compatible with the entities that are expected to be in scope of the Amended ESRS. b) Option 2 limits the requirement to qualitative information only, and leaves companies to choose to report quantitative information on a voluntary basis, without having to meet any conditions. This option is not aligned with the treatment in IFRS S1 and S2. Some of the EFRAG SRB members noted that Option 2 would result in undue loss of information important for investors and would fail to provide the correct incentive to build more mature methodologies and reporting practices. Other members, on the contrary, supported the inclusion of Option 2.Question If you intend to provide feedback also on Part 3 of this questionnaire, please note that by answering this question, you will not be allowed to include comments on paragraph 23 of ESRS 2 in Part 3 to avoid duplication of input. Your comments on that paragraph can only be provided here. Please select from the alternatives below the one that represents your view:	I agree with Option 1	55.ESMA agrees with the first option for the enhancement of the disclosures on anticipated financial effects (i.e. disclosure of quantitative information unless specific conditions are met) due to the critical importance that information on anticipated financial effects plays in decision making by investors. ESMA also notes that Option 2 would be contrary to the need – as per the Commission's mandate to EFRAG – to enhance rather than undermine the interoperability with international standards, most notably in this case the ISSB standards. ESMA notes that some of the aspects in the definition of the reliefs under Option 1 raise doubts, notably the reference to a high level of measurement uncertainty as a factor preventing an estimate from providing a faithful representation, as long as the nature of the uncertainty, the expected range, and the methodology used are disclosed. It could be argued that this provision is inconsistent with par. AR 30 of the proposed Amended ESRS 1 whereas it is stated that "a high level of measurement uncertainty would not prevent" an assumption or estimate from providing useful information or meeting the qualitative characteristics of information. ESMA acknowledges that such provision in the ED mirrors the ISSB's IFRS S1 relief, however it recommends that if such relief is ultimately retained, EFRAG provides some guidance or examples on what should be considered a 'high' level of measurement uncertainty. We provide additional comments in our reply in par. 56.			
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	21.	Enhanced interoperability with the ISSB's standards IFRS S1 and S2Rationale for the changes EFRAG has implemented several changes to enhance the level of interoperability with the ISSB's standards IFRS S1 and S2. These amendments are described in Lever 6 of simplification in the Basis for Conclusions (BfC) (see Appendix 6). At the same time, however, the Amendments implemented for simplification reasons affect the level of interoperability with IFRS S1 and S2, as resulting from the joint EFRAG IFRS interoperability guidelines (May 2024). For example, reliefs beyond those in IFRS S1 and S2, described above, negatively affect interoperability. One of the Explanatory Memorandum (page 5) objectives is to further enhance the already very high degree of interoperability with global sustainability reporting standards. EFRAG prioritised the interoperability with IFRS S1 and S2, following the majority input gathered in the public call for input and outreach.Description of the changes To achieve this objective, EFRAG implemented the following changes, which aim to achieve a higher level of interoperability while being compatible with the objectives of the Amendments. In line with IFRS S1, emphasis has been put on ESRS being a fair presentation framework; materiality of information is now as general filter for the reported information. To remove one of the main interoperability differences, the ESRS E1 GHG emission boundary has been replaced by the financial consolidation approach (ESRS E1 AR19), aligned with the financial control approach in the GHG protocol, while a separate disclosure based on operational control is now required (and aligned with the corresponding disclosure in the GHG protocol) only for entities with more complex ownership structures (ESRS E1, AR 20). The IFRS reliefs (undue cost or effort, disclosure of ranges for quantitative financial effects) have been implemented, with the exception of the one on omitting commercially sensitive information about opportunities (pending the outcome of Level 1 discussions), the one allowing to omit Scope 3 GHG emissions when impracticable and the one allowing to omit quantitative financial effects when the undertaking does not have the necessary skills (please note that the relief on anticipated financial effects is treated in question 20). The implementation of reliefs that go beyond the ones in IFRS S1 and S2 results in new interoperability differences (see question 16). Language for requirements that are common to ESRS and IFRS S1 and S2 has been aligned whenever possible with the one in IFRS S1 and S2, in ESRS 1, 2 and E1. The reference to SASB Standards and IFRS Industry-based Guidance as a source of possible ("may consider") disclosure when reporting entity-specific sector information is now a permanent feature (before it was temporary, i.e. until the issuance of ESRS sector standards). The datapoint reduction resulted in the elimination of 7 "shall" datapoints aligned with ISSB standards described in Basis for Conclusions (BfC) (Chapter4). Several changes have been introduced to further advance interoperability in ESRS E1 (Basis for Conclusions (BfC), Chapter 4). Question Do you agree that these proposed Amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives?	I disagree	57.ESMA disagrees that the proposed amendments achieve an appropriate balance between increasing interoperability and meeting the simplification objectives. While the ED increased interoperability with IFRS S-standards in some respects, ESMA believes that the areas of possible departure from the ISSB standards are so severe that they would undermine the overall interoperability for reasons that are unrelated to the specificities of EU policy objectives and which are likely to result in additional costs for undertakings. We provide additional comments in our reply in paras. 58-60.			
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	22.	Reduction in the number of mandatory and voluntary datapoints The Amendments have realised a substantial reduction in the number of mandatory (-57%) and voluntary (-100%) datapoints, described in the Basis for Conclusions (BfC), Appendix 3. The Explanatory Memorandum (page 6) specified that "the revision of the Delegated Act will substantially reduce the number of mandatory ESRS datapoints by (i) removing those deemed least important for general purpose sustainability reporting, (ii) prioritising quantitative datapoints over narrative text and (iii) further distinguishing between mandatory and voluntary datapoints, without undermining interoperability with global reporting standards and without prejudice to the materiality assessment of each undertaking." To achieve this objective, EFRAG undertook a systematic review of the datapoints, to eliminate the least relevant, i.e. those that are not strictly necessary to meet the disclosure objectives. Most of the deleted datapoints stem from the narrative PAT disclosures, where a less prescriptive and more principles-based approach has been implemented. Therefore, most of the deletions refer to narrative datapoints. In the context of such a systematic review, merging two distinct datapoints was not considered as a reduction. Do you agree that the proposed reduction in "shall disclose" datapoints (under materiality) strike an acceptable balance between burden reduction and preserving the information that is necessary to fulfil the objectives of the EU Green Deal?	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)				
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	22.ESRS2	Comments on deleted datapoints in ESRS 2	I believe some of the deleted content should be maintained (please specify in the comments by indicating the relevant paragraph in the standard)	This question was selected by mistake but it is not possible to de-select it, so please disregard the response to this question.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	25.	Emphasis on ESRS being a "fair presentation" reporting framework The Amendments clarify that ESRS is a fair presentation reporting framework, as it is for IFRS S1 and S2, with the expectation that this will support a more effective functioning of the materiality filter and reduce the check list mentality associated to the adoption of a compliance approach. Adopting fair presentation is expected to support a reduction in the unnecessary reported information and of the documentation needed to show that omitted datapoints are not material. The majority of the EFRAG SRB members consider that ESRS was already conceived as a fair presentation framework and interpret the CSRD as requiring it. A minority of the EFRAG SRB members think that the CSRD does not require fair presentation. They think that adopting fair presentation is not a simplification, due to the difficulty of exercising judgement of what is needed to fulfil the requirement, in particular for impact materiality where there are less established reporting practice. They think that the Amendments may result in increased legal risks and audit costs. Do you agree that explicitly requiring to adopt fair presentation in preparing ESRS sustainability statements will support a more effective functioning of the materiality filter, therefore enabling more relevant reporting and reducing the risk of excessive reported information?	I agree	61.ESMA agrees with the proposed inclusion of the fair presentation principle but recommends that EFRAG considers supporting the application of this principle during a transitional period to cater for any application issues that may arise, especially in connection with the impact materiality assessment. ESMA's detailed response (paras. 62-70) provide the specific arguments underlying ESMA's position and its proposed approach.			
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	26.	Exception for Financial Institutions' Absolute climate reduction Targets One of the implementation challenges noted by financial institutions relates to the requirement in ESRS E1 paragraph 26(a). This requires, when the undertaking has adopted GHG emissions intensity targets in conjunction with AR12 ("when only setting intensity targets"), to disclose also the associated absolute values" (refer also to Basis for Conclusions (BfC) Chapter 8). EFRAG SRB and SR TEG discussed whether an exception would be needed for insurance, banking and asset management sectors, but they decided that it would be appropriate to receive specific feedback before concluding. Those that support the exception argue that this information is not useful. They think that while for fossil fuel sectors gradual de-commissioning is foreseen, emphasising the role of absolute targets for lenders and investors in all sectors would provide the wrong incentive, as high-emission sectors are those in need of transition financing. They also consider that estimating the absolute targets would require multiple assumptions (such as about the composition of the portfolios, the production capacity, the market shares and the level of emission intensity), making results unreliable and thus not leading to meaningful disclosures. Those who oppose this exception note that complex estimates are common to all sectors. They also note also that both the information types of intensity and absolute targets are needed for a proper understanding of the undertaking's progress on climate and banks are no exception in this case. Intensity targets, while capturing efficiency, may mask rising emission levels. Absolute targets capture the total impact but fail to take into account the effect of business growth. They finally note that an exception only for financial institutions would result in an unlevel playing position for the other sectors.	I disagree that financial institutions should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets	71.ESMA disagrees that financial institutions (insurance, banking and asset management sectors) should be exempted from disclosing climate absolute GHG emission values targets when they have only set intensity targets. 72.Regarding the argument that high emission sectors are in need of transition financing, ESMA's view is that absolute values would not be disclosed in isolation but together with the intensity targets the financial institution has set, leaving full possibility to explain its strategy and demonstrate how it steers its portfolio towards the actors of the real economy having made credible commitments. 73.Regarding the multiple assumptions and high uncertainty attached to translating intensity targets into absolute values, ESMA acknowledges that the financial data necessary for financial institutions to calculate their share of emissions may evolve in ways that are unrelated to the GHG emissions of their counterparties, and that projecting multiple financial ratios is a challenge, especially for banks. It can be argued however that such projections are at the core of their overall risk management processes.			
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	29.	SFDR and other EU datapoints in Appendix B of Amended ESRS 2 The Omnibus proposals have not changed the general objective of supporting the creation of the data infrastructure necessary for implementing the Sustainable Finance Disclosure Regulation (SFDR). Input from investors confirms the need to implement the correct flow of information from their investee. However evidence also suggests some of the Principal Adverse Indicators (PAI) are not considered relevant in practice. As part of the systematic review of the datapoints for their reduction, EFRAG has assessed the relevance of the SFDR PAIs, as well as the level of coverage of them resulting from the general datapoint reduction. Appendix 4 of the Basis for Conclusions (BfC) illustrates how the EU datapoints in Appendix B of ESRS 2 (now Appendix A of Amended ESRS 2) have been modified. The key changes for Environmental standards (ESRS E1-E5) are : (a) 8 SFDR PAI sensitive DPs have been deleted but they were either overlapping with other DPs or can be derived from other information (E1-5, para.38, 40-43; E1-6 para44, 53-55; E3-1, para 14; E3-4, para 29; E5-5 para 37 (d) and 39); (b) 1 SFDR PAI sensitive DPs in Appendix B (indicator number 12 Table #2 of Annex) was removed, following EFRAG's approach of reducing the content provisions related to PAT under topical standards. This refers to the topic of marine resources, which is not in scope of ESRS E3. The key changes for Social standards (ESRS S1-S4) are: (a) this was a consolidation exercise. Firstly, for the policies related to human rights and for the alignment with UNGP and OECD MNE Guidelines (two SFDR PAI number 9 Table #3 and Indicator number 11 Table #1 of Annex 1), eight datapoints from the four Social standards have been merged into a "human rights policy" in ESRS 2 GDPR-P, for the four affected stakeholder groups. Secondly, the indicator in relation to severe human rights cases (SFDR PAI number 14 of Table #3 and number 10 of Table #1 of Annex 1) have been merged into one and it is maintained across the four Social standards. (b) a small number of amendments on the scope has taken place for SFDR PAI Indicator 3 of Table #3 in relation to days lost. Fatalities (ESRS S1-13) has been deleted from its scope. The scope of revised human rights incidents datapoint (ESRS S1-16, S2-3, S3-3, S4-3) is now clarified. There were no changes in the ESRS G1. In conclusion, despite the general significant reduction in DPs, the coverage of SFDR PAI has been only marginally reduced and thanks to a limited number of amendments, the relevance of the corresponding information is increased. Do you agree with the way the SFDR PAI have been incorporated in the Amended ESRS? You are invited to explain the reason why you agree or disagree and to provide your suggestions for improvements or alternative simplification proposals, if any.	I partially agree and partially disagree	74.ESMA partially agrees and partially disagrees with the proposed amendments to datapoints in ESRS related to EU legislation. ESMA, in particular, has assessed the datapoints relating to the SFDR PAI and the indicators relating to the Benchmark Regulation (BMR). In general, we found that most of the proposed amendments preserve the data collected to fulfil SFDR PAI and BMR indicators, however it can be noted that in some cases the burden is shifted from undertakings to users of the information who will then have to compute some of the KPIs or retrieve them based on other datapoints or in other cases the level of detail on the disclosures is reduced. 75.One notable exception to this overall prudent approach that EFRAG has taken is the proposed amendment to the transition plan disclosures in ESRS E1-1 to no longer include a datapoint about whether the undertaking is excluded from Paris-aligned Benchmarks (PABs). In the Basis for Conclusions to the ED, EFRAG provides a somewhat contradictory explanation for this deletion indicating that issuers found it difficult to produce this information, but that users can retrieve it elsewhere from published information of the issuer. ESMA disagrees with the conclusion that individual issuers do not have all the information necessary to conclude whether or not they meet the exclusion criteria from PABs and that, on the contrary, users of the sustainability statement would be in a position to make this assessment. In addition, ESMA notes that this datapoint is currently required in the Commission recommendation on the VSME (disclosure requirement C8). Consequently, it seems incoherent to not require large companies in the ESRS to provide this information, while SMEs would be required to do so, if they use the VSME standard. ESMA therefore recommends that EFRAG carefully assesses whether to retain this datapoint.			
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	33.ESRS1.	ESRS 1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	76.ESMA partially agrees and partially disagrees that the proposed revisions to ESRS 1 strike the right balance between the need for significant simplification and meeting the core objectives of the EU Green Deal. Throughout our response in specific questions, we have indicated areas of the standard that would require further attention, in addition to those comments we also provide some additional critical comments at disclosure requirement or paragraph level, which will be reflected in the Section 3 of the EFRAG questionnaire. 77.Regarding transition plans, ESMA suggests to include in ESRS 1 clarifications on the concept of transition plan as it is used in the ESRS (E1 and E4), including a definition, a clarification of the differences between a transition plan and an action plan, an explanation of how the related disclosures fit into the logic of the overarching structure of the ESRS (description of the IROs and of how they are managed through policies, actions and targets) and elements regarding the minimum level of information expected (acknowledging that this will depend on the maturity of the topic covered). 78.In this respect, ESMA cautions against the inclusion of ambiguous wording to the effect that undertakings would not be required to "disclose all internal information used to manage the transition plan" (AR 2 of proposed Amended ESRS E1). The reporting standards should be more specific as to what information is not expected to be provided. ESMA also questions the limitations introduced in par. 12 of Amended ESRS E4 ("when it has in place and has made public a biodiversity and ecosystems transition plan"). While agreeing that the level of details in the disclosures should be lower for biodiversity, owing to the lower level of maturity for this topic, the circumstances for making the disclosure should not be different.			
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	33.ESRS2.	ESRS 2:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	84.ESMA partially agrees and partially disagrees that the proposed revisions to ESRS 2 strike the right balance between the need for significant simplification and meeting the core objectives of the EU Green Deal. Throughout our response in specific questions, we have indicated areas of the standard that would require further attention, in addition to those comments we also provide some additional critical comments at disclosure requirement or paragraph level, which will be reflected in the Section 3 of the EFRAG questionnaire.			
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	33.E_1.	ESRS E1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	102.ESMA partially agrees and partially disagrees that the proposed revisions to ESRS E1 strike the right balance between the need for significant simplification and meeting the core objectives of the EU Green Deal. We provide critical comments at disclosure requirement or paragraph level below, especially regarding transition plan and targets disclosures. These comments will be reflected in the Section 3 of the EFRAG questionnaire.			

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	33.E_3.	ESRS E3:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	82.Appendix A of ESRS 1: ESMA suggests to specifically address marine resources in one of the opening paragraphs of Appendix A. ESMA concurs with the ED's approach to clarify the topical scope of E3 as covering water (including marine water) only, also noting that the objectives of E2, E3, E4 and E5 all include references to the specific aspects of the marine environment the respective topic covers. This approach sustains a clearer structure and reduces duplication of disclosures. As the CSRD however explicitly includes marine resources in the environmental factors to be covered by the ESRS (Article 29b par. 2 a), an explanation of how the different related aspects are covered in the environmental standards would be relevant. 83.In addition, analysis of the 2025 reporting exercise showed that cybersecurity was often included in the sustainability statements as an entity-specific topic. ESMA suggests that the opportunity to include cybersecurity as a specific sub-topic to G1 in Appendix A of ESRS 1 could be explored. As explained in par. 461 of the Basis for Conclusions to the ED, cybersecurity is not addressed by the CSRD, nevertheless the inclusion of this sub-topic in the ESRS would not seem inconsistent with the CSRD requirements. In addition, or as an alternative, guidance on how cybersecurity, or more broadly, data and use of AI issues should be reported in the existing framework (also noting the S4 subtopic on privacy) could be included in NMIG to foster common reporting practice and increase comparability.			
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	33.E_5.	ESRS E5:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	114.As part of the considerations linked to EU legislation, the proposed Amended ESRS should clarify references to the Ecodesign for Sustainable Products Regulation (ESPR), especially for reporting on unsold products. In line with the objective of revised ESRS to ensure greater consistency between European regulations, an AR for E5-5 could be added related to ESPR Art 24.1. The ESPR text already provides for the possibility of incorporating this information into sustainability reporting.			
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	33.S_1.	ESRS S1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	115.ESMA partially agrees and partially disagrees that the proposed revisions to ESRS S1 strike the right balance between the need for significant simplification and meeting the core objectives of the EU Green Deal. ESMA observes that EFRAG has significantly simplified the topical social standards by trimming down the narrative disclosures, reducing the scope of application of disclosure requirements, merging disclosure requirements / data points and cutting back the application requirements. The topical social standards that remain still appear to address the social and human rights factors which are required by CSRD Article 29b(2)(b). We provide some critical comments at disclosure requirement or paragraph level below. These comments will be reflected in the Section 3 of the EFRAG questionnaire. 121.S1 and S2: Lastly as regards the topical social standards, ESMA suggests it would be beneficial to clarify how to treat franchisees, i.e., whether they are captured under S1 as non-employees or under S2 as workers in the value chain.			
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	33.G_1.	ESRS G1:33. Overall feedback per standard The 12 ESRS Standards have been simplified. The Glossary (Annex II to the 2023 ESRS Delegated Act) has been amended to reflect the changes in the Standards. This includes the reduction of datapoints, the clarification of several provisions that created implementation issues, the enhancement of readability and streamlining of their structure and content. Amendments to the 12 Standards have been designed and implemented to achieve a substantial reduction in reporting efforts, while maintaining the core content that is needed to meet the objectives of the European Green Deal. Please note the following requirements that were not changed in the Amended ESRS as recommended by the EC representatives, as they are subject to ongoing developments on level 1 regulation: 1. Definition of value chain for financial institutions (ESRS 1); 2. Exemption from consolidating subsidiaries by undertakings that are financial holdings (ESRS 1); 3. Relief for omission of confidential/sensitive information (ESRS 1); 4. Phasing-in provisions (ESRS 1); 5. Clarify the meaning of '"compatibility with 1.5 degrees'" for the Transition Plans disclosure (ESRS E1). In this question you are allowed to provide your overall opinion on the level of simplifications achieved per each standard. You can choose to reply to one or more of the Standards. If you intend to comment also at level of single DR in Part 3 of this questionnaire, you are kindly invited not to repeat the same content twice (here and in Part 3). You can access the Exposure Drafts of the Revised ESRS and the amended Glossary at this link. In case you would like to see the rationale behind the amendments, you can access the Log of Amendments and the markup of the Annex II (Glossary) at this link.Do you agree that the proposed Amended ESRS strikes an appropriate balance between the need for significant simplification and meeting the core objectives of the European Green Deal?	I partially agree and partially disagree	122.ESMA partially agrees and partially disagrees that the proposed revisions to ESRS G1 strike the right balance between the need for significant simplification and meeting the core objectives of the EU Green Deal. ESMA welcomes the clear structure for Policies, Actions and Targets which has been introduced in G1, similar to the one observed in other topical standards. However, ESMA would like to flag that par. 6 of the amended ESRS G1 requires disclosing the number and nature of confirmed incidents of corruption or bribery that occurred during the year (in addition to the number of convictions required under par. 5). ESMA suggests clarifying the definition of a "confirmed incident" in the glossary as the interpretation of this term may otherwise vary from one company to another making the information difficult to compare. Should this concept remain vague, divergence in practice may be so significant to suggest that this datapoint should not be required until its disclosure can lead to comparable information.			
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	34.	Any other comments Please provide here any other comments on the 12 EDs or on the Glossary		82.Appendix A of ESRS 1: ESMA suggests to specifically address marine resources in one of the opening paragraphs of Appendix A. ESMA concurs with the ED's approach to clarify the topical scope of E3 as covering water (including marine water) only, also noting that the objectives of E2, E3, E4 and E5 all include references to the specific aspects of the marine environment the respective topic covers. This approach sustains a clearer structure and reduces duplication of disclosures. As the CSRD however explicitly includes marine resources in the environmental factors to be covered by the ESRS (Article 29b par. 2 a), an explanation of how the different related aspects are covered in the environmental standards would be relevant. 83.In addition, analysis of the 2025 reporting exercise showed that cybersecurity was often included in the sustainability statements as an entity-specific topic. ESMA suggests that the opportunity to include cybersecurity as a specific sub-topic to G1 in Appendix A of ESRS 1 could be explored. As explained in par. 461 of the Basis for Conclusions to the ED, cybersecurity is not addressed by the CSRD, nevertheless the inclusion of this sub-topic in the ESRS would not seem inconsistent with the CSRD requirements. In addition, or as an alternative, guidance on how cybersecurity, or more broadly, data and use of AI issues should be reported in the existing framework (also noting the S4 subtopic on privacy) could be included in NMIG to foster common reporting practice and increase comparability.			
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	35.ESRS2_BP-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	85.BP-1: The obligation to provide the list of exempted subsidiaries covered in the consolidated statement has been removed from the standard. As this is a requirement from the CSRD, as well as relevant information for investors, ESMA recommends this datapoint to be re-instated.	ESRS2	BP-1 - Basis for the preparation of the sustainability statement	
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	35.ESRS2_IRO-1.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	86.BP-2 and IRO-1: In line with the other instances where more flexibility on presentation was introduced in the revised ESRS, ESMA suggests allowing disclosure in the relevant topical sections, rather than in the General information section for the relevant BP-2 and IRO-1 datapoints. Such increased flexibility should be accompanied with the same requirement used elsewhere to disclose a summary statement in ESRS 2.	ESRS2	IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	

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Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	35.ESRS2_IRO-2.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	94.There is inherent flexibility in the materiality assessment process on the granularity and the setting of thresholds and ESMA sees the resulting granularity of IROs as a matter of practice which will most likely converge in the medium term. Having an additional flexibility on the description of the IROs risks undermining the transparency of the materiality assessment process and could lead to inconsistencies with the objective of sustainability reporting as expressed in ESRS 1 par. 6 "to present fairly the undertaking's material impacts on people and environment, as well as the material sustainability risks and opportunities". As a consequence, ESMA recommends having clear limitations to the level of aggregation allowed in par. 28 related disclosures." "95.In addition, considering the increased flexibilities in grouping of IROs and presentation, ESMA thinks that the IROs should be clearly disclosed as related to one or several ESRS sub-topics, where relevant, or topics or signposted as related to entity-specific disclosures as part of their description. This could be part of the table proposed in AR 25. ESMA would be in favour of this table being a mandatory requirement rather than a voluntary one. See also the responses to questions 13 and 15 on this issue." "96.IRO-2 par. 28 e: Regarding the table of EU datapoints, an option to refer to the datapoint as "non applicable" in addition to "non material" could be introduced, as it would fit better with some of the disclosures (e.g., SBM-1 par 17 c) and was used by some Wave 1 undertakings in their 2025 disclosures. The circumstances in which these different notions should be used could be clarified in an Application Requirement.	ESRS2	IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	35.ESRS2_GDR-PAMT.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	101.Finally, ESMA stresses the fact that the disclosures on policies, actions, targets and metrics should enable users of the sustainability statements to understand whether and, if so, how IROs were managed and any associated targets/metrics and which actions have been taken, planned (or not taken) and their effectiveness to address the pre-defined policy objectives. Whenever an undertaking has only partially addressed one or more of these information elements, the user of the sustainability statement should be able to understand this fact and be able to determine how well the material IROs are being managed by the undertaking. ESMA therefore recommends that the general requirements proposed in paragraphs 29-32 are clarified in this spirit to specify that the objective of policies, actions, targets and metrics remains to shed light on the material IROs and their management and that this objective can be fulfilled based on the aggregation and disaggregation requirements in ESRS 1.	ESRS2	General Disclosure Requirements for Policies, Actions, Metrics and Targets	
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	35.E1-6.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	109.E1-6: ESMA notes the point made in the Basis for Conclusions (par. 255) regarding the increased flexibility in reporting targets, that may result in less comparability and information of users (see also our comments in Question 33 in relation to ESRS 1). ESMA is concerned that when put together, these flexibilities (removing the requirement to disclose a target for 2030, the normalising of baseline values and the requirement to update the base year every 5 years after 2030) will make it more difficult for users, including investors, to compare or aggregate the targets, could increase greenwashing and more generally question the overall consistency with the Green Deal objectives. 110.Regarding decarbonisation levers, the overall quantitative contributions are no longer required to be disclosed and only appear as a voluntary presentation provision (AR14). ESMA thinks it is key for the credibility of the transition plans to keep a mandatory disclosure of these quantitative contributions, which could be included in E1-1 par. 14 a.	E1	Disclosure Requirement E1-6 - Targets related to climate change	
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	35.E1-8.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	111.E1-8: Regarding the disclosure of GHG emissions in E1-8, ESMA welcomes the exclusion of scope 3 emissions from the relief on metrics introduced in ESRS 1. ESMA would favour keeping the use of the table in AR 27 as mandatory rather than voluntary, as tables generally increase comparability.	E1	Disclosure Requirement E1-8 - Gross Scopes 1, 2, 3 emissions	
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	35.E1-9.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	112.E1-9: ESMA's view is that the concept of GHG neutrality claim (par. 37) should be defined in the Glossary, where it should be specified that the concept covers all types of claims, including neutrality targets. 113.ESMA also regrets the removal of all reference to net-zero targets from the standard. Such targets are widely used by issuers in some constituencies where supervisors could note improved disclosures and reduced instances of greenwashing in the 2025 sustainability statements. While ESMA agrees that a specific disclosure on how residual emissions will be addressed poses reporting challenges and should be removed at this stage, the concept of net-zero target itself should be defined and disclosure, where applicable, re-introduced, for instance through broadening par. 37. The definition of net-zero targets should clarify that all types of removals (removals in the value chain, as well as carbon credits of the removal type) are allowed for the neutralisation of residual emissions step.	E1	Disclosure Requirement E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	
Survey	European Securities and Markets Authority (ESMA)	European supervisory authority	France	35.S1-8.	Do you agree with the amendments of this chapter?	I partially agree and partially disagree	119.S1-8: ESMA believes the deletion of the age distribution of a company's employees is problematic as this is an important information for investors. ESMA therefore encourages EFRAG to reinsert age distribution in S1-8. ESMA also recommends that when an undertaking decides to depart from the definition of 'top management' provided in the ESRS, it shall also disclose that definition.	S1	Disclosure Requirement S1-8 - Diversity metrics	
Excels	ASD					I partially agree and partially disagree	Revised CSRD is inconsistent with proposal of revised CS3D, which limits value chain to Tier 1. Guidance on risk-based approach, to ensure that efforts are focused on most severe risks, should be developed in consultation with the industry and be consistent with CS3D obligations. Anyway, proposed wording relating to the key reliefs such as the request to provide "reasonable and supportable information that is available without undue cost or effort" could be used in the context of the supply chain and shows some progress. It could nonetheless be further improved, for instance maybe by taking into account the capacity of companies to influence (or not) their suppliers when it comes to sustainability matters and related information gathering. This could duly supplement the notion of "undue cost or effort".	ESRS1	ESRS 1 - Objective	1.
Excels	ASD					I partially agree and partially disagree	We understand that "relief for omission of confidential/sensitive information" is not addressed in the EFRAG's proposal as it is under discussion for possible ammendments in the level 1 legistation (Content Directive). However, consistency between the potential new provisions of the Content Directive and the revised ESRS need to be secured. We consider that, although there is a very restrictive relief related to commercial position, its implementation depends on Member States. This clearly makes complex and prevents consistency across Member States, and therefore companies. For Defence, note that the Commission Notice ref C(2025) 3800/3 paragraph 3.2.5. adresses the issue, including a mention of auditors. However, this Notice - part of the Defence Readiness Omnibus - is not a legislation and its wording remains subject to interpretation by auditors.	ESRS1	ESRS 1 - 7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	98.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ASD					I agree	We called to make exemptions possible for small subisdiaries from the scope of reporting (in consistency with current First Simplification Omnibus proposal, which exempts from CSRD reporting undertakings with less than 1,000 employees). Therefore, we welcome EFRAG proposed change.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	90.
Excels	ASD					I partially agree and partially disagree	For negative impacts, the new proposed approach as outlined in paragraphs 34 and 35 of ESRS 1 seems more balanced, provides more flexibility and explains how and when companies can consider their mitigation and prevention measures when assessing the materiality/severity of a negative impact (potential), but definitions and harmonisation of wording are needed. However: 1. The tables in Annex C do not clearly illustrate the EFRAG simplifications induced in paragraphs 34 and 35 (tables to be removed or at least moved to the non-mandatory illustrative guidance). 2. QC 8 (addressing gross/net concepts) remains in revised ESRS, and creates a lot of confusion. It is the only occurrence of gross vs net and must be removed. 3. Positive impacts are addressed in paragraph 36, but principles to follow are not clear, especially when compared to paragraphs 34 and 35 related to negative impacts. Wording related to positive impact must be improved accordingly.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	ASD					I partially agree and partially disagree	Positive move towards simplifiation, though this section remains quite complicated and long. Therefore, further streamline and simplify double materiality process to make it easier to comply with, and easier to audit. To this end, develop dialogue with industry and auditors.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	24.
Excels	ASD					I disagree	Make clear that undertakings' specific characteristics shall prevail on sectoral trend with respect to double materiality assessment.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	24.
Excels	ASD					I partially agree and partially disagree	Changes are considered as rather positive, especially regarding the use of appendixes. However, paragraph 105 still imposes a structure in 4 parts, which does not allow reporting of entity specific disclosures in a specific part (not alongside environment, social or governance) for entity specific topics which are not related to E, S or G. An example is sovereignty, which is a prerequisite to all ESG goals and should be presented separately and not only at the level of an appendix to one of the three pillars.	ESRS1	ESRS 1 - 8.1 General presentation requirement, structure and content of the sustainability statement	105.
Excels	ASD					I disagree	The limited possibility of using incorporation by reference causes a further burden on the financial statements, which complexity already increased compared to the previous years, due to the large number of datapoints in the ESRS. Remove the strict criteria (envisaged by ESRS 1 - paragraph 9.3 - datapoint 118) that documents need to comply with, in order to be eligible for "incorporation by reference" of information. This to avoid duplication of information published by companies, and to reduce the page numbers of Annual Reports.	ESRS1	ESRS 1 - 9.3 Incorporation by reference	118.
Excels	ASD					I disagree	Replace the "first 3 years" by "3 years after the first year of mandatory reporting for wave 2 and wave 3 undertakings" to ensure a level playing field.	ESRS1	ESRS 1 - 10.1 Transitional provision related to Chapter 5 Value chain	122.
Excels	ASD					I partially agree and partially disagree	We welcome the benefits of the Quick Fix Directive that provided wave 1 companies some relief linked to the phased in requirements. However, the additional timing granted to wave 2 and wave 3 companies still penalise wave 1 reporters. If such phased in requirements do not seem indispensable for the next reporting exercises, they should just be removed, also to ensure a level playing field.	ESRS1	ESRS 1 - 10.3 Transitional provision: List of Disclosure Requirements that are phased in	127.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	Should paragraph 19 refer to paragraph 18 or specifically to 18a? On the one hand we have "Fair presentation" and on the other "Faithful representation" (a prerequisite). But what does achieving "Faithful presentation" mean? It seems to be a mix of the two? Should it read "19. To achieve fair presentation,..."?	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	19.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	This part should be in a separate AR as it does not address aggregation as such: "Information may also be obscured as a result of material information being hidden by immaterial information." Perhaps it could be connected to the new para. 108?	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	AR 25
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	S1/S2: The topic "Water and sanitation" should also be applicable S1 not only S2. As a company needs to make sure employees (for example female employees during their period) have access to water and sanitation, this topic should also apply to S1 and not only to S2. We recently had a case in Stockholm Sweden where a company providing cosmetic services in a shopping mall - at a stand in the middle of the mall - did not allow for employees leaving the stand unattended, and as they worked alone for long periods of time they could therefor not go to the bathroom at the other end of the mall.	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	9.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	G1: Merge protection of whistle-blowers into anti-corruption and bribery, but keep separate from Culture as they cover legal requirements and not set of values and beliefs expressing goals. G1: Keep Animal welfare a separate topic, as it is not only a bout values and beliefs expressing goals but about protecting living creatures. The topic is especially important for agriculture, food and lether industries, and influences consumer choices (and even more so with vegan consumers). (Corporate culture expresses goals through values and beliefs. It guides the undertaking's activities through shared assumptions and group norms such as values or mission statements or a code of conduct.) Even though a code of conduct can include many different topics, including diversity, tolerance, etc, legal requirements and protection of living creatures go beyond norms and shared assumptions expressed in a mission statement or code of conduct.	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	9.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	Where is it explained that metrics can be either quantitative or qualitative? Targets can be either quantitative or qualitative, but metrics? Mapping of sub-topics to disclosures in topical standards For metrics, which can be either quantitative or qualitative, there is no systematic 'one-to-one' relationship between sub-topics (as captured by ESRS 1 Appendix A) and a topical Disclosure Requirement except for the majority of the ESRS S1 metrics.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	50.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	Suggested wording: "Information shall be presented either for groups of negative impacts, positive impacts, risks or opportunities levels, or at individual negative impact, positive impact, risk or opportunity level, depending on what provides the most relevant information, such as reflecting their nature or the way they are managed (refer to the general requirement on level of disaggregation in Chapter 3.7)."	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	22.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	The rational to promot a reporting more close to the management view does not ensure progress on CSRD (29): "The fitness check on corporate reporting shows that those two perspectives are often not well understood or applied. It is therefore necessary to clarify that undertakings should consider each materiality perspective in its own right". By merging and presenting information regarding IROs on topical level - and thereby mixing negative and positive impacts, risks and opportunities - the presentation of information specificially related to one of the two perspectives can be aggregated, netted and obscured. The suggested wording is intended to emphasize that aggregation is only allowed by type of IRO family, to avoid netted outcomes. Also, the rationale for para. 66 is "Clarify that materiality is assessed at IRO level". It is then logical that all IROs cannot be merged into reporting on topic level only. And in para. 113 it is stated that "the undertaking shall make explicit which policies, actions and targets relate to which material impacts, risks, or opportunities, in accordance with paragraph 22". It's not possible to map PATs to "which material" IROs, if they are all aggregated and presented only at topic level.	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	22.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	Should this sentence not read: "The results of the undertaking's mitigation or remediation actions on negative impacts caused by or contributed to by the undertaking, and its compliance with law and regulation, are not positive impacts." With current wording I understand that negative impacts are caused by compliance with law and regulation...	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	36.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	In the table for potential impacts, in the last square first row, the word "risk" is used. This could be confusing since it is already difficult for many to understand the difference between risk and impact.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	The reference to "when the remediation became effective" and to "significant ongoing mitigation" will likely spark discussions with auditors on when to consider remediation effective (in the sense successful) and when to consider mitigation significant. Guidance would be helpful on this. The meaning of "supportable evidence" could also be explained, and clarifications added that the evidence does not refer to the existence of actions taken but to the fact that they have actually reduced the impact (what type of evidence could be put forward to support reduction?). (I also think guidance for net/gross risk assessment would be helpful. I only agree partially with the rationale "This has been done with a focus on impacts, in consideration that in financial materiality companies in general have already the experience of financial reporting which they can leverage. "Many companies are still beginners when it comes to risk assessment and we get as many questions for risks as for impacts.)	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	In IG1 FAQ 23 it is written: As a general principle, environmental impacts are considered before any mitigating actions in the materiality assessment. This is linked to the objective of providing information on the management of impacts by the undertaking over time. Are the new instructions mainly aimed at S and G impacts?	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	Chamber of Labour, Austria	Trade union	Austria			I partially agree and partially disagree	This new principle of "fair presentation" is generally welcomed. However, it must not lead to the omission of important topics that are necessary for complete, meaningful, comparable and auditable sustainability reporting under this guise.	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	16.
Excels	Chamber of Labour, Austria	Trade union	Austria			I agree	This regime is extremely important for assessing the materiality of impacts.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 10
Excels	Chamber of Labour, Austria	Trade union	Austria			I agree	This rule is extremely important for assessing the materiality of the impacts, in particular for the positions of employee representatives.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 11
Excels	Chamber of Labour, Austria	Trade union	Austria			I disagree	The new optional simplifications also increase the risk of possible misuse by companies that classify information as non-material and thus simply do not report on risk areas of their company. The BAK is particularly concerned about proposed simplifications in the collection of data in the General Requirements (Chapter 7.4 Reliefs for metrics): There is to be a new simplification if companies state that they cannot collect reliable data. In such a case – which is to be applied to one's own activities and the value chain – it should be possible to report key figures that cover only part of the covered area and for an indefinite period of time. This blanket simplification can easily be abused and can potentially lead to significant loss of information. At the very least, however, the application of such a facilitation must be limited until better and complete data can be collected.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	91.
Excels	Chamber of Labour, Austria	Trade union	Austria			I disagree	An important objective of sustainability reporting is the integration with financial reporting. In the new paragraph 114, unfortunately, the relevant specification has been changed from "shall" to "may". For the BAK, this new regulation thwarts the achievement of the target. Financial and sustainability reporting are only coordinated if the sustainability issues and financial aspects must be clearly disclosed in the report.	ESRS1	ESRS 1 - 9.2 Direct/indirect connectivity with financial statements and consistency of assumptions	114.
Excels	Chamber of Labour, Austria	Trade union	Austria			NMIG	General information on Non mandatory illustrated Guidance (NMIG) Unfortunately, the present draft provides that the mandatory guidelines have been downgraded to "no longer mandatory". In the view of the BAK, this is also associated with a significant deterioration in sustainability reporting. In addition, it is questionable what effect EFRAG's interpretative guidelines, which are declared non-binding, will have in practice. It can be assumed that they will have a certain binding effect. However, in such important areas of the European economy, this is viewed critically. Direct publications by the European institutions, specifically by the Commission, would be preferable. This would also better support companies in reporting.	ESRS1	Non-mandatory Illustrative Guidance (NMIG)	NMIG
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Overall, the summary of the sub-sub-topics at sub-topic level is welcomed. However, the addition in brackets and the naming of several topics indirectly maintains this fine distinction. The sub-topics should therefore be simplified	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	9.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	To support implementation, the sub-topics should be reflected in the respective topical reporting standards (e.g. in the respective headings for metrics) so that it can be identified more precisely which reporting requirements contribute to which sub-topic in order to be able to exclude non-essential topics more reliably. Alternatively, there should be a table showing which DRs relate to which sub-topic.	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	50. (b)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	The presentation gives the impression that the entire topic standard is to be reported when the topic (through at least one sub-topic) is material. This should be clarified at sub-topic level.	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	22.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	A reference to the undue cost of effort would be useful to avoid giving the impression that engagement with affected stakeholders is mandatory to conduct materiality assessment. The description should be aligned with ESRS 1 -5.2.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	33.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Overall, the inclusion of the supply chain should be simplified and eliminated as far as possible. It should be made clear that the company reports on its own targets, actions, policies and metrics. The supply chain is only taken into account to the extent that the company has, for example, targets / measures for sustainable procurement and sustainable use of products. It should not be necessary to collect data from suppliers and/or customers for the purposes of the company's own sustainability reporting.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	62.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Data points for which phase-ins are planned should be omitted entirely or become voluntary.	ESRS1	ESRS 1 - 10.3 Transitional provision: List of Disclosure Requirements that are phased in	127.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	The terms short-term, medium-term and long-term should be clearly defined. It remains unclear how to deal with impacts that exist throughout the entire duration of business activities but do not have long-term consequences in themselves, such as continuous water consumption.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	30.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	The materiality analysis should be limited to direct business relationships. Global supply chains are very complex, and only a few companies can influence or oversee the entire supply chain. -> Deletion	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	30.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Within the framework of the double materiality analysis, a comprehensible and well-founded argument should suffice to substantiate the assessment of materiality. Formal evidence should not be mandatory. Since the analysis must be regularly reviewed and updated, a high level of documentation would not be practicable for companies in the long term.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (b)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	useful approach, as it allows other obligations to be covered by the CSRD report (e.g. EMAS environmental statement). However, companies should also be able to include additional information in the report in order to fulfil other purposes if necessary (e.g. as evidence for portals such as EcoVadis).	ESRS1	ESRS 1 - 8.2 Presentation of additional information included in the sustainability statement	107.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Expand the concept of decision usefulness described in a) to all users or define the objective for users under b) identical to a) (-->decision usefulness)	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21.
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Not having to compulsory follow a specific listt—which is sometimes unclear and includes topics unrelated to our sector—is great. However, although the list is not exhaustive, its application will depend on the DPs of the standards; therefore, in order to exclude some of the topics required in the DPs, it will be necessary to analyze the IROs at the sub-subtopic level. In practice, this will allow us to maintain the ability to select relevant topics and thus identify which DPs apply and which do not. In any case, it would be a good idea to develop an illustrative list of topics and DPs that are related to them.	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	AR 16
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	The scope of the value chain activities included in the CSRD impact materiality assessment and the scope of the "chain of activities" subject to due diligence obligations under CSDDD should be aligned. The differences in the activities covered by CSDDD and CSRD creates unnecessary, duplicative, and burdensome variations in the process for identifying and assessing a company's sustainability impacts for reporting versus due diligence purposes. Similarly, the definition of "business partner" and "business relationship" should be the same for both CSRD reporting and CSDDD due diligence purposes. This paragraph should be revised to explicitly state that material impacts are impacts that an undertaking causes, contributes to, and/or is directly linked to, consistent with the U.N. Guiding Principles on Business & Human Rights (UNGPs). This language from the UNGPs is referenced in other parts of the Amended ESRS (e.g., ESRS S1 - 3, AR 6). The language should also be included in the description of the DMA process in order to more clearly delineate the boundaries of an undertaking's assessment of impacts, risks, and opportunities.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	30.
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	It should be clarified that the list of referenced types of information is non-exhaustive. This may result in only this type of documentation being accepted as evidence.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	27.
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I agree	We agree but If the main objective is that the users of general purpose sustainability statements is to understand the undertaking's material impacts, risks and opportunities and how it identifies and manages them, it would be very grateful a rule for reporting these IROs. Currently each company reports in its own way.	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	21. (b)
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	A single sub-topic may include different IROs if they belong to distinct sub-subtopics. According to AR 21, when an IRO refers to a specific topic, the company is only required to report material information related to that sub-topic. However, this wording could lead auditors to interpret that if a sub-topic is considered material due to an IRO previously linked to a sub-subtopic, then all data points (DPs) associated with that sub-topic should be reported	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	22.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	There is confusion between mitigation measures and remediation measures. In addition, further confusion arises when considering how to handle subsequent years. Additionally, there is still no clear framework for accurately assessing severity. This lack of consistency can result in the same impact being deemed highly significant by one company and barely relevant by another, even when both operate in the same country and the analysis focuses solely on gross impact. Additionally, Given that "remediation" is defined as including actions that "counteract" (i.e., mitigate) a negative impact, the third sentence should be amended to clarify that remediation actions are not considered in relation to actual negative impacts only to the extent that they occur after the impact occurs. In the fourth sentence, remediation actions should only be required to be disclosed if material.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	We do not agree with this approach. It is impossible to calculate probability without considering existing mitigation measures, as these can reduce severity to the point where a potential impact is no longer material. The guidance refers to assessing the potential impact before mitigation, not just evaluating severity. When applying probability, potential impacts can become non-significant. It is unclear how a gross impact is applied to a potential impact when probability—which necessarily includes mitigation measures—must be considered. Under this premise, all negative impacts would need to be reported in the first year, which lacks practical sense. Moreover, conceptually, if potential impacts must be assessed without considering prevention measures, it no longer makes sense to carry out individual company-level assessments. In practice, the result would be identical for any telco, without reflecting differences in how each one manages these issues. In such a case, a sector-wide assessment would suffice, which would go against the CSRD's objective: ensuring comparability between companies, which is precisely what investors seek. Additionally, this approach would lead to too many topics being considered material, significantly increasing the reporting burden. Furthermore, there is no definition of what constitutes significant mitigation measures (financial resources, difficulty, human resources, etc.).	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	It is unclear what is meant by "reasonable and supportable information" and how can we provide evidence of it.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	60.
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	It is unclear what you mean by use reasonable and supportable evidence. Unless "reasonable and supportable evidence" is intended to mean something different, should conform to "reasonable and supportable information." The paragraph should also clarify that the relevant "reasonable and supportable" evidence or information is such that is "available to the undertaking at the reporting date without undue cost or effort." Should clarify, similar to paragraph 35, that when evaluating risks, undertakings can take account of existing mitigation and prevention actions.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (b)
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Given that it is not clear what "significant" means in relation to remediation actions, this AR should be revised to provide that remediation actions only need to be disclosed if they are material.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 13
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	The requirements to follow a list—which is sometimes unclear and includes topics unrelated to our sector—are reduced. Although the list is not exhaustive, its application will depend on the DPs of the standards; therefore, in order to exclude some of the topics required in the DPs, it will be necessary to analyze the IROs at the sub-subtopic level. In practice, this will allow us to maintain the ability to select relevant topics and thus identify which DPs apply and which do not. OK, but we would need an illustrative list of topics and DPs.	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	AR 16
Excels	BDEW	Other - please specify (required)	Germany			I disagree	Clear differentiation (and definition - see Annex II) between remediation, mitigation, and prevention is lacking	ESRS1	ESRS 1 - Objective	34.
Excels	BDEW	Other - please specify (required)	Germany			I disagree	The time at which to conduct DMA is not clearly defined. Similar to IG 3, which states, "the undertaking is supposed to determine [material IROs] at each reporting date", ESRS 2.0 refer to the IFRS, which also state, "materiality judgments at each reporting date". Experience has shown that the materiality assessment must be conducted before the reporting year to prepare the sustainability statement.	ESRS1	ESRS 1 - Objective	87. (a)
Excels	BDEW	Other - please specify (required)	Germany			I agree	agreement (while par. 14 explains the therm "shall")	ESRS1	REVISED STRUCTURE AND DRAFTING CONVENTIONS	overall
Excels	BDEW	Other - please specify (required)	Germany			I agree	- contradicts par 8, because it says that "IRO management (i.e. policies and actions)" whereas par 8 says: " (1) ... IRO management, and (2) policies, actions, targets and metrics" - the latter implies that there is a difference between IRO management and P/O; where in fact "IRO management" is (i.e.) policies and actions.	ESRS1		AR 1 for para 11
Excels	BDEW	Other - please specify (required)	Germany			I agree	- Why is it necessary to refer to "performance metrics" in (a) - it seems to rather be an AR on general aspects to consider for "metrics" in general (why specify in (a) that it is "performance metrics"? - (b) seems to match the qualitative characteristic requirements in general - needed? - What does AR3 generally add - compared to already existing requirements re/ QC?	ESRS1		AR 2 for para 11
Excels	BDEW	Other - please specify (required)	Germany			I agree	To discuss: is explanation on understanding of "shall consider" helpful? Or clarification needed or deletion of "shall consider"?	ESRS1		par 15
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	agreement to include explicit reference to fair presentation	ESRS1	Chapter 2 Fair presentation and QC	
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	BDEW is fine with current definition, more precision helpful.	ESRS1		par 16 ff
Excels	BDEW	Other - please specify (required)	Germany			I disagree	BDEW would appreciate a scope limited to users of the statement for decision purposes (ISSB), but understands, that CSRD targets a broader stakeholder group. - par 21 (b) widens the scope of information that needs to be reported on due to general reference to information being "necessary for users of general purpose sustainability statements to understand..."	ESRS1	Ch. 3 Double materiality	par 21
Excels	BDEW	Other - please specify (required)	Germany			I agree	See comment above. The "group of data users" would mainly be investors, while a descriptive text for "society" would look completely different in terms of "decision usefulness". To be more specific, it would make sense to describe stakeholder groups (without allocating responsibility to a reporting company to judge what detail of reporting might be necessary for various group of users" > we consider this approach be covered by "fair representation")	ESRS1		AR 3 fro para 21

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	BDEW agrees, but understands this is just referencing to other wordings in other standards and frameworks. Reference to "most significant impacts" helpful? Or distracting (due to additional / new wording)?	ESRS1		AR 4 for para 21
Excels	BDEW	Other - please specify (required)	Germany			I agree		ESRS1		par 22
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	Suggestion to re-draft current wording, as the ESRS logics are generally based on impacts, risks and opportunities (no separation between I vs RO)	ESRS1		par 26
Excels	BDEW	Other - please specify (required)	Germany			does par 27 reflect the "usual internal and external sources"? ; necessary to include a "such as"?	BDEW agrees	ESRS1		par 27
Excels	BDEW	Other - please specify (required)	Germany			- There seems to be the need to clarify that this update is needed annually - it currently does not say that (intentionally?)	BDEW agrees	ESRS1		par 29
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	"Affected stakeholders" - do we need to clarify that (although performing a thourough assessment), there might be affected stakeholders, a reporting company might not be aware of (e.g. by them not reaching out to the reporting company)? - impact as general starting point for IRO DMA - "although there may also be material RO that are not related to undertaking's impacts" - is this sufficiently clear regarding Impacts vs. RO?	ESRS1	Affected stakeholders	par 33
Excels	BDEW	Other - please specify (required)	Germany			I disagree	This is a decisive point! Consistency between appendix and this main DRs needs to be improved especially with regards to "implemented mitigation measures" and resulting RESIDUAL impacts and the need to report or derive a materiality!! Clear reference to appendix C needs to be included here. Appendix C and the examples are very helpful. The same clarity should be found in par 34 et seq. In general good to include gross-net definitions directly in standard instead of the separte non-binding guidance so far. For company risk management the KontraG-rules should apply. For the assessment of risks, always a net perspective applies taking all implemented mitigation measures into consideration. So consistency for the impacts is appreciated. With the current text in the standard (par 34 et seq) and the appendix not being consistent, misinterpretations or discussions with auditor could result!!	ESRS1	Gross/net	par 34 et seq
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	to discuss: helpful to have examples (even these obvious ones) in the standard or should examples be placed elsewhere?	ESRS1		AR 5 and 6 - Examples for connected impacts
Excels	BDEW	Other - please specify (required)	Germany			I disagree	ESRS 1, AR 11 seems to establish a requirement regarding communication of workers' representatives' opinions - this is indeed (as a requirement to management) part of the CSRD (see recital (52) as well as Art. 19a, 5. / Art. 29a, 6) - however: wondering if this is in line with assumption that ESRS do not dictate behaviour? : Engagement with workers representatives is no change from current regulation, but for all stakeholders, representatives should be explicitely mentioned -> position "representatives" at end of sentence: "the undertaking may also seek direct input into its materiality assessment from affected stakeholders, as well as users of sustainability reporting and other experts or their representatives (such as employee representatives or trade unions)" . Further, the stakeholder interaction should not oblige a "feedback on the undertaking's conclusions" to all stakeholders, but only to workers representatives.	ESRS1		AR 11 for para 33 - workers' representatives
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	Material RO "derive from... impacts, dependencies, other factors"... Still necessary to include "can derive"? Or sufficiently addressed through "other factors"?	ESRS1	Financial materiality assessment	par 40
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	BDEW agrees to need for clarification: "Shall consider ist dependencies ... either in terms of CF or in terms of resources not recognised in f/s" - so far AR 13/14 refer to "changes in capital not recognised in f/s"...	ESRS1		AR 14 for para 41
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	If Internal Control Systems rely on net risks, the current wording would be inconsistent with the gross perspective ESRS is currently based on. BDEW would appreciate the wording in AR15 and prefers a NET consideration.	ESRS1		Ar 16 for para 41
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	reference - among others - to "location" and "site", both are added (also: sector was added), but not supposed to change anything as the current concept included both; however, explanation (table of amendments) talks about "key sites" --> necessary to add? Probably not because the par is referring to "materiality" in the last sentence	ESRS1	3.7 Level of aggregation, disaggregation and group reporting	par 51
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	51 lists "locations, water basin, site, asset... " as though they are all different aspects to consider; in AR 23 "by location" is specified as "by location - such as by site, water basin or local ecosystem", not as though if you differentiate by location, it can be one of the following - why is "location" needed then?	ESRS1		par 51 and AR 23 for par 51
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	References to location, sites, assets etc. should be deleted, since they not only drive granularity but also create additional work in DMA and reporting. Paragraph 53 would be sufficient. The two pragraphs 51 and 52 are to detailed and not required and respective ARs are also not required.	ESRS1		par 51 and 52
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	It seems line para numbering from 54 onwards is wrong (54 should be 59?!?), file "Log of amendments"	ESRS1	4. Due Diligence	par 54
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	Has been a red flag for numerous German constituents; however: seems like a general approach to (very broadly) describe own operations / scope of consolidation; it is meant to address the numerous questions on own operations / scope of consolidation; is "usually" sufficient to capture the differences (e.g. leasing etc.)? sufficiently clear that reporting boundaries include own operations and VC?	ESRS1	5. Reporting undertaking and upstream and downstream value chain	par 59
Excels	BDEW	Other - please specify (required)	Germany			I agree	no hierarchy for determination of metrics in VC (direct from counterparties OR estimates...)	ESRS1		par 62
Excels	BDEW	Other - please specify (required)	Germany			I agree	par 63 seems to be a requirement to the ESRS standardsetting itself ("information required by ESRS ... shall not exceed"... there is nothing the undertaking can do / has to do about it)	ESRS1		par 63

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	We assume it would be a better option for e time horizon definition "according to financial reporting" par 77 (a) now includes a "definition" for "short-term time horizon" being "the length of the periood adopted for its financial statements; apparently this was on Q&A Platform; however: why is this reference to f/s needed? It is the same period that is adopted for the sus statement... so basically it is the reporting period... why not say so? Which other "period adopted for f/s" could there possibly be? Or is this a misunderstanding? Is this referring to Management Report and the "short-term" definition applied there? Also: still the question remains to FA NB whether IFRS alignment (i.e. time horizons being entity specific) should be considered instead of the specific requirements?	ESRS1	6. Reporting period, base year and time horizons	par 77
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	When stating "comparative information... for amounts", does this adress already reported KPIs (then better wording "metrics"?)	ESRS1		par 81
Excels	BDEW	Other - please specify (required)	Germany			I disagree	Include in section 7 or 8 that undertaking can choose the unit (for each metric) as they see fit : Would choosing a unit not contradict "comparative information" (among reporting organizations)?	ESRS1		not yet included (if I read correctly)
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	We generally consider a certain order as useful to data users, "ESG" seems quite common. par 105 is amended a little bit, but the same as before; question to FA nB remains: is there a need to provide a specific order for the information in the sust statement? CSRD does not seem to provide a specific order / required order for the presentation	ESRS1	8. Presentation requirements and structure of the sustainability statement	par. 105
Excels	BDEW	Other - please specify (required)	Germany			I agree	so far FA NB agreed to additional (non-material) information if requested by specific user - this possibility (and criteria, e.g. clearly identified etc.) is explicitly addressed in par 108. Does the FA NB agree with par 108?	ESRS1	additional (non-material) information	par 108
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	Why is a specific AR needed to address that undertaking may present more detailed information on GHG emissions and include in an appendix? Is this meant to be an example for how to deal with additional / more granular information?	ESRS1		AR 36 for para 109
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	"Explain level of consistency" with data / assumptions of f/s is new (intended as a clarification); however, better to ask for explanations of differences in the assumptions as "level of consistency" is a term not used / unclear	ESRS1	9. Connected information and linkages with other parts of corporate reporting	par 116
Excels	BDEW	Other - please specify (required)	Germany			I agree		ESRS1	Appendix A - List of topics	page 26 of ESRS 1
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	Very helpful appendix, but clarity should be increased for cases with "significant ongoing mitigation actions" - reporting only, if there is a residual material impact. This appendix and the text in the standard (par 34 et seq) require more consistency / harmonisation to avoid misinterpretations or discussions with auditor!! see above.	ESRS1	Appendix C - Assessing actual and potential negative impacts for materiality	
Excels	Randstad	Preparer (non-financial preparing a sustainability report)	Netherlands			I partially agree and partially disagree	We suggest adding clarifications: use identical segmentation level which is applicable for the financial statements: sustainability statement shall follow the segmentattion form of the financial statement and avoid country-level reporting.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	51.
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The sub-sub-topic level has been eliminated; however, no topics have been removed, they have only been restructured. According to Annex A of ESRS1, which replaces the AR 16 list, the formerly stand-alone sub-sub-topics "adequate wages," "work-life balance," "working time," "secure employment," and "social protection" now fall under the sub-topic "working conditions." Does this mean that if the sub-topic "working conditions" is material, all these topics automatically become material, or is it still possible that, when the sub-topic "working conditions" is material, only some of the aforementioned (formerly sub-sub-topic) themes are material and therefore reportable? AR 21 states that if a material IRO (Impact, Risk, or Opportunity) exists, the company is (only) required to report the material information related to that sub-topic and that could be just one or all.	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	AR 21
Excels	BSR	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	It is unclear what is meant by "appropriate qualitative and/or quantitative thresholds" in practice. How should companies determine what qualifies as "appropriate," and what evidence is required to support such thresholds? Allowing multiple thresholds across topics risks adding complexity to the materiality process and makes it more difficult to ensure consistency, comparability, and auditability. Each threshold would need to be well-justified, transparently applied, and aligned across both impact and financial materiality. Clearer guidance would therefore be valuable - for example, whether thresholds should align with existing risk frameworks, and what type of threshold is expected for each topic (e.g., quantitative for climate, such as Scope 3 categories representing more than 10% of total GHG emissions; and qualitative for workforce, such as any instance of forced labor regardless of scale). If multiple approaches are allowed, please clarify that there is flexibility for companies.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	28.
Excels	BSR	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	Generally, the top-down approach resonates by BSR members. However, it remains unclear how companies should balance the flexibility to prioritize well-established issues with the need to systematically surface less obvious, but potentially material, IROs. When a topic is identified as material, but no IRO assessment is conducted, it seems that post-DMA, the company still needs to identify/disclose material IROs. Therefore it makes sense to include the IRO identification (even if it is quick) in the DMA, also for material topics. Guidance on what this looks like in practice would be useful.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 5
Excels	BSR	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	We agree with the proposed criteria for assessing impacts; however, it is unclear how these criteria should be calculated or weighted to enable comparability across companies. While overly prescriptive detail may not be necessary, a consistent methodology or scoring scale would help ensure more comparable outcomes. For instance, should criteria be assigned numerical values and then averaged, multiplied, or otherwise combined?	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	31.
Excels	BSR	Business association (other than association of financial institution)	United States			I disagree	This paragraph adds complexity to the impact materiality assessment by requiring companies to identify when mitigation measures were implemented and to evaluate their effectiveness over defined time frames. While the intent is understood, this substantially increases the data companies must collect and analyze. It also suggests that the assessment should be conducted on a net basis, though this expectation is not clearly defined.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	BSR	Business association (other than association of financial institution)	United States			I disagree	It is unclear what qualifies as "supportable evidence." As with paragraph 34, this requirement adds complexity to the impact materiality assessment by obliging companies to identify when mitigation measures were implemented and evaluate their effectiveness over defined time frames. While the intent is understood, it significantly increases the information companies must collect and analyze. It also implies that the assessment should be conducted on a net basis, though this is not clearly defined. Clearer guidance on what constitutes "supportable evidence," as well as how to treat impacts that require ongoing controls, would make this requirement more practical and consistent across companies. In addition, clarification is needed on the apparent conflict between Appendix C and paragraph 35, as Appendix C requires disclosure of material potential negative impacts at the gross level in the period of occurrence.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	BSR	Business association (other than association of financial institution)	United States			I disagree	This paragraph indicates that any single impact criterion can render a negative impact severe, suggesting that one criterion may outweigh the others. However, this appears to conflict with paragraph 31, which states that materiality should be determined by severity and likelihood, with severity assessed through scale, scope, and irremediable character. It remains unclear whether all criteria should be scored and averaged, or if a single criterion can override the rest.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 8
Excels	BSR	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	This paragraph indicates that any single impact criterion can render a negative impact severe, suggesting that one criterion may outweigh the others. However, this appears to conflict with paragraph 31, which states that materiality should be determined by severity and likelihood, with severity assessed through scale, scope, and irremediable character. It remains unclear whether all criteria should be scored and averaged, or if a single criterion can override the rest.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	31.
Excels	BSR	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	This paragraph states that risks and opportunities should be assessed over the short, medium, and long term. Clarification is needed on the appropriate scope of this assessment -should companies focus on the time horizon in which the risk or opportunity is most likely to materialize, or evaluate it across all time horizons? And what if a company aligns financial materiality with its risk register, which often does not go beyond 2 years or so?	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	AR 15
Excels	BSR	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	This paragraph suggests that companies can - or should - fully align with existing enterprise risk management frameworks, thereby using them to determine whether a gross or net assessment is appropriate. To avoid underreporting, clearer guidance is needed on when to apply gross versus net risk assessments, how companies should explain their approach, and what level of evidence is required to demonstrate control effectiveness.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	AR 16
Excels	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States			I disagree	Reporting on material topics not covered by the ESRS is defined as mandatory (shall) – whilst reporting of additional issues may be beneficial, it should not be mandatory	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	10.
Excels	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States			I disagree	Whilst companies routinely benchmark their performance against peer companies, it is not reasonable to make this a mandatory requirement for the reporter. Full information is unlikely to be available in the public domain prior to the reporting period. Whilst CSRD reporting would provide a good source of information, company comparisons should be down to users of the data, not mandatory for reporters – this is the role of ratings agencies, investors, regulators, not the companies themselves	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	11.
Excels	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States			I disagree	The extend and depth of indirect business relationships should be clearly defined, and be voluntary reporting. Making this a mandatory requirement without defining the extent leads to ambiguity. Whilst there are clear indirect relationships with customer service providers, class, flag etc, and suppliers, having this mandatory AND open ended is unreasonable	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	5.
Excels	Society for Corporate Governance	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	The Society respectfully requests EFRAG clarify and revise three aspects of its proposed approach to (1) permit companies to consider the effect of all mitigation and prevention actions taken during a reporting year when assessing the materiality of potential negative impacts for that same reporting year; (2) permit companies to take mitigation and prevention actions that require significant ongoing efforts into account when assessing materiality; and (3) to avoid any ambiguity, expressly permit consideration of mitigating and preventative actions when assessing financial materiality. In that the word limits in this survey tool (Parts 2 and 3) won't accommodate our full response to this question, we detailed these points in our concurrently submitted comment letter to EFRAG.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	Society for Corporate Governance	Business association (other than association of financial institution)	United States			I disagree	Eliminate the standard governing this disclosure requirement so as to align the materiality assessment process for human rights impacts with that of other sustainability topics or consider alternative text as previously explained and proposed in our May 2025 letter. This requirement is difficult to implement in practice and unclear, leading companies and assurance providers to take different approaches and impairing disclosure comparability. Almost every sustainability topic arguably can have human rights impacts. Companies have taken different approaches to giving precedence to impact over likelihood, in some cases focusing only on magnitude and in others overweighting magnitude. If retained, it should be clarified to clearly provide that companies may take their individual circumstances into account and determine the appropriate approach to applying the requirement. Companies should have flexibility to determine that they won't apply the requirement when evaluating IROs that do not principally concern human rights or will take likelihood into account with a reduced weighting when evaluating impacts determined to principally concern human rights. Further allow reporting discretion as set forth in our concurrently submitted comment letter.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	31.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Society for Corporate Governance	Business association (other than association of financial institution)	United States			I disagree	Eliminate entity-specific disclosure requirements. This disclosure would require companies to expend substantial effort and costs to identify matters for which entity-specific disclosures may be required, expand a double materiality assessment to address those topics, prepare disclosures in the absence of any standards, and work with assurance providers to confirm both that no additional entity-specific disclosures are required and that any included are adequate. This requirement also leaves significant discretion to assurance providers who, in the absence of defined standards or market practice, may significantly increase the cost of the assurance exercise through the enhanced rigor and scrutiny they may believe is necessary to assess novel entity-specific disclosures. This effort and cost is unlikely to bring a significant benefit to users of sustainability information, as the metrics used by companies may vary (and even where similar metrics are provided, the use of varying calculation methodologies may still limit their comparability). Alternatively, EFRAG should provide that entity-specific disclosures be voluntary, exempt from assurance, or subject to an additional phase-in period so that the most comparable information across entities can be established in the initial reporting years before companies incur costs and efforts to tailor metrics and disclosure on an entity-specific basis.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	10.
Excels	Society for Corporate Governance	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	The term "supportable" in particular needs to be clarified as it could be otherwise interpreted as requiring a level of validation or the implementation of governance and control processes that would defeat the term's intended purpose of providing relief to undertakings in situations where available data is imperfect (see IFRS FAQs). The use of assumptions and estimates is integral to an undertaking's underlying processes used to identify material IROs, scope its value chain, and otherwise conduct its materiality assessment. Using the term here therefore requires clarification of its meaning as these processes–unlike the quantitative disclosures for which the term was originally employed (i.e., IFRS 9 and 17)--rely heavily on qualitative information, which may be anecdotal or come from third parties or be limited in nature, due to restrictions on obtaining value chain information or the fact that obtaining additional information would entail undue cost or effort. Consequently, assumptions and estimates should be deemed supportable to the extent that they represent the undertaking's good faith analysis of the information available to it as of the reporting date without undue cost or effort. Further, EFRAG should clarify that "reasonable" assumptions and estimates are those which are relevant to the applicable subject matter.	ESRS1	ESRS 1 - 7.2 Judgement, measurement uncertainty and outcome uncertainty	AR 30
Excels	Society for Corporate Governance	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	The term "reasonable and supportable," particularly "supportable," needs to be clarified as it could be interpreted as requiring a level of validation or the implementation of governance and control processes that would defeat the term's intended purpose of providing relief to undertakings in situations where the available data is imperfect (see IFRS's Sustainability Reporting Standards FAQs). Since these clauses relate to the inclusion of information in the sustainability statement, "reasonable and supportable information" in this context should mean that the information is relevant and satisfies the fair presentation and qualitative characteristics of information requirements specified in ESRS 1. Such an approach is consistent with the acknowledgement in Section 7.2 of ESRS 1 that disclosed information is subject to the application of judgment, as well as measurement and outcome uncertainty.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	87. (c)
Excels	Society for Corporate Governance	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	The term "reasonable and supportable," particularly "supportable," needs to be clarified as it could be interpreted as requiring a level of validation or the implementation of governance and control processes that would defeat the term's intended purpose of providing relief to undertakings in situations where the available data is imperfect (see IFRS's Sustainability Reporting Standards FAQs). Since these clauses relate to the inclusion of information in the sustainability statement, "reasonable and supportable information" in this context should mean that the information is relevant and satisfies the fair presentation and qualitative characteristics of information requirements specified in ESRS 1. Such an approach is consistent with the acknowledgement in Section 7.2 of ESRS 1 that disclosed information is subject to the application of judgment, as well as measurement and outcome uncertainty.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	87. (d)
Excels	Society for Corporate Governance	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	Requiring the use of "reasonable and supportable information" in relation to the activities specified in clauses (a) and (b) is problematic given that "supportable" can be interpreted as requiring a level of validation or the implementation of control processes that are unlikely to be possible in practice given the nature of the information that is often available to an undertaking in connection with such activities that underlie the materiality assessment process. For example, when an undertaking seeks to identify its material IROs or scope its value chain, it will need to consider information that often is imperfect (e.g., anecdotal, contains assumptions or estimates, is difficult to validate since it comes from third-parties, or is limited given that complete information would require undue cost or effort). In such cases, an undertaking should instead be required to perform the specified activities by considering the relevant information available to it as of the reporting date without undue cost or effort and applying its good faith judgment, which is how undertakings typically make determinations in other business contexts with imperfect or limited information. Further, EFRAG should clarify that "reasonable" means the information is relevant to the applicable subject matter	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	87. (a)
Excels	Society for Corporate Governance	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	Requiring the use of "reasonable and supportable information" in relation to the activities specified in clauses (a) and (b) is problematic given that "supportable" can be interpreted as requiring a level of validation or the implementation of control processes that are unlikely to be possible in practice given the nature of the information that is often available to an undertaking in connection with such activities that underlie the materiality assessment process. For example, when an undertaking seeks to identify its material IROs or scope its value chain, it will need to consider information that often is imperfect (e.g., anecdotal, contains assumptions or estimates, is difficult to validate since it comes from third-parties, or is limited given that complete information would require undue cost or effort). In such cases, an undertaking should instead be required to perform the specified activities by considering the relevant information available to it as of the reporting date without undue cost or effort and applying its good faith judgment, which is how undertakings typically make determinations in other business contexts with imperfect or limited information. Further, EFRAG should clarify that "reasonable" means the information is relevant to the applicable subject matter	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	87. (b)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Society for Corporate Governance	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	Unless "reasonable and supportable evidence" is intended to have its own unique meaning, EFRAG should conform this term to "reasonable and supportable information" (emphasis added). "Evidence," in the context of 45(b), can be construed as encompassing a smaller scope of sources than those which are listed in paragraph 27. For example, it is unclear whether industry experience–which is appropriately often a key input into IRO evaluations–would qualify as "evidence" (as opposed to "information"). These provisions should also clarify that the relevant "reasonable and supportable" evidence or information does not extend beyond that which is "available to the undertaking at the reporting date without undue cost or effort."	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	Society for Corporate Governance	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	Unless "reasonable and supportable evidence" is intended to have its own unique meaning, EFRAG should conform this term to "reasonable and supportable information" (emphasis added). "Evidence," in the context of 45(b), can be construed as encompassing a smaller scope of sources than those which are listed in paragraph 27. For example, it is unclear whether industry experience–which is appropriately often a key input into IRO evaluations–would qualify as "evidence" (as opposed to "information"). These provisions should also clarify that the relevant "reasonable and supportable" evidence or information does not extend beyond that which is "available to the undertaking at the reporting date without undue cost or effort."	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (b)
Excels	Society for Corporate Governance	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	This provision should clarify that the relevant "reasonable and supportable" information does not extend beyond that which is "available to the undertaking at the reporting date without undue cost or effort."	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	47.
Excels	Society for Corporate Governance	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	This provision should clarify that the relevant "reasonable and supportable" information does not extend beyond that which is "available to the undertaking at the reporting date without undue cost or effort."	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	60.
Excels	Society for Corporate Governance	Business association (other than association of financial institution)	United States			I disagree	To promote interoperability and minimize unnecessary costs and burdens, ESRS should afford companies the flexibility to draw their organizational boundaries using the equity share approach or the financial or operational control approaches as permitted under the GHG Protocol and IFRS S2.EFRAG's proposed revision creates significant misalignment between E1 and key emissions reporting standards and unnecessarily burdens the multitude of companies that use the operational control or equity share approaches for their organizational boundaries and would need to recalculate their emissions solely for the purposes of complying with the CSRD. The GHG Protocol and IFRS S2 provide companies the flexibility to draw their organizational boundaries using the equity share approach or the financial or operational control approaches (see section A.3 of this analysis). Indeed, the GHG Protocol explicitly states that it "makes no recommendation" as to which approach a company should use for voluntary public GHG emissions reporting (see p. 20), and this flexibility should carry over to ESRS GHG emissions reporting given the competing interests that a company may need to consider in selecting its optimal approach (see p. 20-21) and to promote interoperability and associated reduction of compliance costs and burdens.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 18
Excels	Materiality	Consultant (including software vendor)	Poland			I disagree	To ensure clarity, in our opinion it should be specified that while an undertaking may indicate that it has not yet set specific targets, it should not be allowed to claim that no metrics have been established. The ESRS should explicitly state whether metrics related to material impacts, risks, and opportunities must be identified and disclosed, even if targets have not yet been defined.	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	AR 1
Excels	Materiality	Consultant (including software vendor)	Poland			I disagree	To align par 27 and par 33 on stakeholders (if engagement with stakeholders is mandatory) I would suggest changing wording in 27 to "shall" in relation to "engagement with affected stakeholders"	ESRS1	ESRS 1 - 3.3 Double materiality assessment	27.
Excels	Materiality	Consultant (including software vendor)	Poland			I disagree	To align par 27 and par 33 on stakeholders (if engagement with stakeholders is mandatory) I would suggest changing wording in 27 to "shall" in relation to "engagement with affected stakeholders"	ESRS1	ESRS 1 - 3.3 Double materiality assessment	33.
Excels	Materiality	Consultant (including software vendor)	Poland			I disagree	Here, We would simplify the wording to emphasize that when judging the materiality of actual negative impacts, the undertaking should assess the severity before any mitigation or remediation is applied. Mitigation or prevention measures implemented before the impact occurred can be considered in the severity assessment. However, remediation actions taken after the impact has occurred do not reduce the assessed severity, although they must still be disclosed if the impact is material.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	34.
Excels	Materiality	Consultant (including software vendor)	Poland			I disagree	Par. 36 of the draft attempts to define what a positive impact is ((…) "if its business activities, products and services mitigate or remediate negative impacts of another party, this is considered a positive impact of the undertaking)". We understand positive impact as value added, and something that helps to better the existing state of things. The example provided (remediating the impact of another party) is helpful and confirms this, but in our opinion it should be elaborated. Is having a supplier code of conduct enough? When does a company truly have a positive impact on eg. climate change? Do negative actions, such as producing emissions, counterbalance positive contributions, such as manufacturing energy-saving solutions? Overall, the definition of positive impact needs more guidance and clarification. This issue is also related to situations where there is no impact (and the lack of its clear definition), e.g., many companies claim that topics such as employing people with disabilities are not relevant to them because they do not hire from these groups.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	36.
Excels	Materiality	Consultant (including software vendor)	Poland			I disagree	This point lacks sufficient guidance on practical implementation and last year, in our experience, it was overlooked in methodologies of many companies. In practice, companies often set thresholds, typically from 1 to 5, for each parameter and define a cut-off point above which a topic becomes material. For example, if for a given topic the scale and the scope are set at 1, and irremediable character is set at 5, but the cut-off point based on the sum of the three parameters is only higher than 7, the topic would not reach the threshold. Therefore, we believe this point needs additional guidance on how to implement it in practice.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	AR 8
Excels	Materiality	Consultant (including software vendor)	Poland			I disagree	In our experience, this sentence has been subject to different interpretations. It is clear that nature is indeed a silent stakeholder, as it cannot speak for itself. However, is it mandatory to consider its needs in the double materiality analysis for example by reviewing scientific reports and research findings? The wording "may be" leaves room for interpretation that it is not, which suggests that further clarification is needed. "May be" should be replaced with "shall be".	ESRS1	ESRS 1 - 3.3 Double materiality assessment	AR 10

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Danish Institute for Human Rights	NGO	Denmark			I disagree	Suggest to avoid the term 'primary' users which suggests a hierarchy amongst different users	ESRS1	ESRS 1 - Objective	4. (a)
Excels	Danish Institute for Human Rights	NGO	Denmark			I agree	Very important to keep 'other users' and their information needs central in the objective	ESRS1	ESRS 1 - Objective	4. (b)
Excels	Danish Institute for Human Rights	NGO	Denmark			I agree	important to stress role of entity specific reporting	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	10.
Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	Impact definition incomplete/ too implicit. Should say impact on people and planet or sustainability or the like. Impact in and of itself is not clear	ESRS1	ESRS 1 - 1.2 Drafting conventions	12. (a)
Excels	Danish Institute for Human Rights	NGO	Denmark			I agree	support fair presentation content, though it may need further clarification on what it means including in context of impacts	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	16.
Excels	Danish Institute for Human Rights	NGO	Denmark			I agree	critically needed to ensure double materiality basis for interpretation of new materiality of information filter. Could potentially include decision making in addition to understandability as also 'other users' reach decisions on the basis of this data. Caution against overly constraining what may be information needs of 'other users'	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21. (b)
Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	agree with substance, but drafting is overly complex	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	Concerned with the default net framing and possible interpretation of this text. Alignment of the principles with the contents of the table would help and enable a better balance with the need for gross.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	Danish Institute for Human Rights	NGO	Denmark			I disagree	unnecessary and may introduce loopholes - suggest deletion	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 12
Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	Delete 'may be more pragmatic' from the last sentence as this is a value judgement and emphasises one over the other	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 17
Excels	Danish Institute for Human Rights	NGO	Denmark			I agree	support this important chapter	ESRS1	ESRS 1 - 4. Due diligence	54.
Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	specify metrics where the use of significant driver releif is is not appropriate such as S1 5 and S1-6	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	90.
Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	Exclude own operations from this relief	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	91.
Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	Appendix A: the social susubtopics in parenthesis are not exhaustive of the sub-topic title/ human rights instruments mentioned in CSRD. Hence the parenthesis should start with 'including'.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	9.
Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	Amend final sentence to make explicit that this is only where the preparer is not involved with the harm to close loophole / prevent abuse.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	36.
Excels	European Transport Workers' Federation (ETF)	Trade union	Belgium			I agree	This is crucial for understanding impact materiality assessment	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 10
Excels	European Transport Workers' Federation (ETF)	Trade union	Belgium			I agree	This is crucial for understanding impact materiality assessment, in particular the point on reporting on the opinion of workers' representatives	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 11
Excels	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy			I partially agree and partially disagree	In the Log of Amendments, the note relating to new paragraph 22 of ESRS 1 indicate that it was introduced also to emphasize a specific concept: IROs are material, while topics must be reported if they relate to material IROs (and are not material in themselves). However, in three occasions in the ESRS documents (general and topical), reference is made to “material topics” and not to topics related to material IROs (ESRS S2 AR 27, ESRS E5 para. 15, and ESRS S1 para. 3). Is this a typo? If it is a typo, would it be correct to conduct a top-down materiality analysis (as described in ESRS1 AR17), starting with the topics and considering them material?	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	22.
Excels	GKK Partners	Consultant (including software vendor)	Germany			I disagree	Results of the double-materiality-analysis (DMA) should be only depended by the stated criteria of financial- and impact materiality. This concept is seen as an additional layer of complexity, that only dilutes comparability. Unclear "(see paragraph 90)"-referencing. Unclear IFRS S1 has connection to "entity's prospect".	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	87. (a)
Excels	GKK Partners	Consultant (including software vendor)	Germany			I disagree	To link this extented concept also to the metrics, posses risk that metrics are not comparable as outlined before. If the concept and connection to (d) is to be implemented, at least an additional highlighting (e.g. footnote or central table of "affected metrics") should state clarity for the users of sustainability statements.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	87. (d)
Excels	GKK Partners	Consultant (including software vendor)	Germany			I disagree	This would required a structured consideration of the stated factors and "included information". If not accessible for the users, at least the undertaking should provide a clear structure, so that external assurance providers could rather comparatively consider this information.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	88.
Excels	GKK Partners	Consultant (including software vendor)	Germany			I disagree	This assessment is seen to be problematic, for the following reasons: 1) Unclear structure on how to conduct the assessment 2) Inherent conflict of objectives between undertaking and users 3) Time-bounded 4) Who judges the "balanced consideration" between cost or effect	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	89.
Excels	GKK Partners	Consultant (including software vendor)	Germany			I partially agree and partially disagree	Connection to value chain and "undue cost or effort" understandable. Unclear: data quality and referencing "only" to ESRS 1 paragraph 92. Suggestion: - if introduced this calls for a clear transparency, and guideance where the undertaking applied that, to ensure the users comparability. - If the undertaking discloses "a calculation that includes only a partial scope" this should be directly highlighed at the specific disclosure point. Otherwise the users might mistake it for a "full disclosure". Moreover, the aspect "data quality" should be described with criteria.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	92.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	GKK Partners	Consultant (including software vendor)	Germany			I agree	Good clarification on nature of impacts	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	36.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	- We do not see the benefit of adding the briefing of workers representatives to ESRS (AR 11 for paragraph 33). This is (a) mentioned in the CSRD itself already and (2) no disclosure requirement but a task.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 11
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	lack of a definition of fair presentation will likely lead to different interpretations	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	16.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	rules of when to include remediation measures for negative impacts is very theoretical and complex to apply in practice.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	- Paragraph 59 and 70 contain a list of examples (e.g., assets and liabilities). Explicit mentioning, that this is just an example would be beneficial	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	59.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	- Paragraph 59 also specifies cases in which financial non-material entities have to be included in the sustainability statement. As it is currently written, the paragraph would require companies to test all entities not consolidated for financial reporting. It would be more efficient if entities first check the entities business model, only in case the business model differs, different IROs can occur, consequently only those entities need to be screened.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	59.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	- Paragraph 62 allows value chain estimations, we see the need for the clarification, that the phased in criteria to not report on the value chain for the first three years, is not applied here.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	62.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I agree	We welcome the introduction of this new provision to clarify that the ESRS do not mandate behavior.	ESRS1	ESRS 1 - Objective	5.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	The CSRD (paragraph 9) clearly states that the second group of users of the sustainability statements consists of civil society actors, including non-governmental organizations and social partners, which seek to better hold undertakings to account for their impacts on people and the environment. The ESRS definition of users must reflect this emphasis on civil society actors to ensure that the perspectives of affected stakeholders are not diluted. The ESRS should also recognize the crossover of needs between the two primary groups of users (investors and civil society), in that investors want to better understand the impacts of their investments on people and the environment, as they recognize that these impacts lead to risks to the organization over time.	ESRS1	ESRS 1 - Objective	4.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	The definition of 'potential impacts' in Annex II could be further aligned with GRI's definition for clarity and simplification purposes: "potential impacts are those that could occur but have not yet occurred".	ESRS1	ESRS 1 - 1.2 Drafting conventions	12. (a)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I disagree	The wording of this paragraph suggests that the scope of sustainability-related risks and opportunities has been broadened to include all "financial risks and opportunities" whereas the focus of the ESRS is on sustainability matters.	ESRS1	ESRS 1 - 1.2 Drafting conventions	12. (b)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I disagree	The notion of 'fair presentation' being satisfied by simply applying the ESRS (in ESRS 1, para 17) is inconsistent with company law in the EU and the directors still need to make a judgement as to whether the statement achieves fair presentation. IAS 1 has 'true and fair' override where merely applying the standards would not lead to fair presentation.	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	17.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	While it is positive that the ESRS apply a principles-based approach, reflecting principles from financial reporting should be carefully considered to ensure they do not undermine double materiality, and are appropriately used in the context of the impact dimension of the CSRD. Directly importing financial concepts without proper adaptation can shift attention away from the assessment of impacts, undermining double materiality reporting. For example, the qualitative characteristic of relevance, as defined in the IFRS Conceptual Framework, emphasizes confirmatory and predictive value, which while appropriate for assessing future cash flows, is not directly applicable to evaluating an organization's impacts.	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	18.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	This paragraph should refer to 'faithful representation' not 'faithful presentation'.	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	19.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I agree	We support the explicit recognition that a 'double materiality' assessment begins with impacts. We share the understanding that impacts are the necessary first step for a comprehensive understanding of risks and opportunities.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	26.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I agree	We welcome the introduction of this new provision to clarify the review of materiality assessments.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	29.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	It is confusing to introduce the notion of 'identification of information' in the impact materiality assessment. The impact materiality assessment should focus on identifying and assessing impacts, in line with the remaining paragraphs of this section (31-36), then followed by the identification of material information to report for those impacts.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	30.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I agree	We support the retention of the criteria (severity and likelihood) for assessing impact materiality.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	31.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	ESRS 1 paragraph 36 states that "if its business activities, products and services mitigate or remediate negative impacts of another party, this is considered a positive impact of the undertaking." This can lead to incorrectly classifying negative impacts as 'positive' when the organization has contributed to the negative impacts caused by the other party or when it is directly linked to them. Therefore this provision should be clarified by stating that this is only the case when the organization is not connected to or involved with such negative impacts (it has not caused, contributed to nor it is directly linked to them).	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	36.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I agree	We support the retention of the steps for assessing impact materiality.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 5

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	It would be helpful to include one example for each type of involvement with negative impacts: impacts that the undertaking has caused, impacts that the undertaking has contributed to, and impacts that are directly linked to the undertaking's operations, products and services by business relationships, consistent with international due diligence instruments.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 6
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We recommend changing 'employees and/or workers' representatives' to 'workers, including employees, and workers' representatives', to make sure that non-employees are also considered.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 10
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	This paragraph states that information on ongoing/implemented remediation action for potential negative impacts shall be considered material and reported in accordance with ESRS 2 GDR-A. This implies that, in the absence of this provision, reporting such information could be deemed to be not material, raising the question as to whether entire DRs in ESRS 2 (e.g., on actions) may be able to be omitted based on materiality. We do not believe that entire DRs in ESRS 2 should be able to be omitted on the basis of materiality since they elicit essential information about an undertaking and its approach to material topics.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 13
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	Variation is not the only trigger of material differences that require disaggregation. For example, biodiversity impacts are location-specific, requiring a clear understanding of where those impacts occur to effectively assess and manage them.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	51.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	The third paragraph should read 'impacts, risks and opportunities that may be material' instead of 'material potential impacts, risks and opportunities'. Both potential and actual impacts need to be considered in the materiality assessment.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 17
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	AR 17 states that "Once identified as material, they are aggregated into topic(s) for reporting purposes, unless not appropriate." We deem it important to aggregate impacts into topics for comparability purposes, such as on a sectoral basis. The list of material topics should then be supported with a description of the specific material impacts. We suggest aligning verbatim with GRI 3-2-a and 3-3-a for this purpose.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 17
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I disagree	This statement seems to suggest that the undertaking may omit entire DRs in ESRS 2 (e.g., IRO 1, IRO 2) on the basis of that information being assessed as not material. We do not believe that entire DRs in ESRS 2 should be able to be omitted on the basis of materiality since they elicit essential information about an undertaking and its approach to material topics. We believe the DRs in ESRS 2 should be required of all undertakings, and only material information should be reported for each of those DRs.	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	AR 20
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	The definition of business relationships should be clearly stated in the body of ESRS 1 and the examples in paragraph 68 should be extended to include other business relationships, to avoid misinterpretation that business relationships are limited to investments.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	68.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We recommend avoiding the use of 'directly connected' to avoid confusion with 'directly linked'. Whether a lessor has contributed to or is directly linked to the impacts of the leased asset is dependent on the specific circumstances.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	70.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	We have had discussions with our auditors about the definition of 'comparable' data. In finance, there is a difference between published and restated data. For the sustainability statements, in order to keep the workload management, we suggest that the norms clearly state that the undertaking can report "published" n-1 data. This would provide clarity and avoid the potential question of auditors to restate the n-1 data for all metrics.	ESRS1	ESRS 1 - 8.1 General presentation requirement, structure and content of the sustainability statement	
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Typo in sentence, need to add 'reasonable effect' after 'every'	ESRS1	ESRS 1 - 10.1 Transitional provision related to Chapter 5 Value chain	
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Can it be clarified if this is also applicable for mergers?	ESRS1	ESRS 1 - 5.4 Relief for acquisitions and disposals	72.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Table of Content: Appendix C should be before Appendix B since "assessing impacts" are part of DMA and thus more related to App. A.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	7.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Why linkage to ESRS 1.21 instead of including the definition of materiality of information as core element of a faithful presentation under ESRS 1.19?	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	19.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Option for reporting on IRO level or topical level. However, ESRS 1.AR17 states that the reporting should be done on a topic level while ESRS 1.AR21 permits to report a material IRO on a sub-topic level. Given the general permission and flexibility of a bottom-up approach on IRO Level, the mapping between IROs, topics and disclosure requirements should be flexible in the same way. So far no further guidance is integrated for mapping IROs to DRs (only in the NON-MANDATORY implementation guidance). Thus, complexity for implementation is not decreasing and dependent on companies' auditor alignment the results of DMA will probably be not comparable between companies.	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	22.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Why should mitigation measures not be accounted for in the assessment of actual negative impacts that have occurred in previous periods? Some companies might have set up lots of efforts and mitigation measures to reduce impacts in the past, resulting in no material impacts for the company in the current period. Why should a company report on an impact that it has managed well on a company level, maybe for several years? This would not represent material information anymore for their stakeholders. Example: water pollution on the own activity level. Companies faced water pollution some decades ago; however, due to successful mitigation measures in the past, this impact has not existed in their own operations level since decades. Moreover, please consider the deletion of the rephrasing of the following: "Where the impact is deemed material based on this assessment, the undertaking shall disclose the remediation actions undertaken and their expected or actual outcomes. " The wording indicates a disclosure requirement of remediation actions on the level of each material impact.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Who and how should define "significant ongoing mitigation and /or prevention actions"? This will lead to discretionary rules since a common framework/benchmark for "significant" actions is missing and is very specific for each company and sector. The way of operationalisation is unclear. e.g. a mitigation measure that equals current legal requirements would lead to ongoing reporting about this specific impact while a company fulfils all legal requirements that are stipulated to avoid this negative impact.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The way of operationalization is totally unclear. The risk for incomparable results of DMAs related to different companies still remain. Furthermore, all measures that are decided and implemented in a company during the reporting period should be included in the assessment of an impact. Similiar to financial reporting, a provision has also to be evaluated including counter measures that influence the provision at the end of a reporting period.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 9
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	ESRS 1.45-47 could be more linked to ESRS 1.87-89. Firstly, the requirements are a bit doubled regarding undue cost and efforts principle. Secondly, examples are given under ESRS 1.47 but under ESRS 1.89 there is only a general explanation without reference to ESRS 1.47. These sections could be more coherent.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	See remarks related to ESRS 1.22	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	AR 21
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	This amended requirement will help for faithful presentation and comparable information to stakeholders generated by the reporting of different reporting undertakings.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	59.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	This new requirements will increase the faithful presentation and comparable information. However, the NMIG 7 is not referenced under ESRS 5.3 and no further specification is given as AR.xx. It could worthwhile to have more practical hints for implementation.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	70.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	In this context, a reference to ESRS 1.87 could be integrated to avoid discussions about the term "impracticable".	ESRS1	ESRS 1 - 7.1 Presenting comparative information	82.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	While we support the general relief for metrics related to ESRS E2 to E5 in case of a joint operation, it remains unclear in which case a parent company may not have (partially) operational control over a joint arrangement although it should have financial control (otherwise this would not represent a joint operation). In addtion, the relief could be also extended to ESRS Sx and G1 since the data gathering for metrics related to these standards may also be burdensome and complicated within a joint operation. We would recommend further specification.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	92.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We can follow the approach under ESRS 1.94. Nevertheless we would recommend to integrate ESRS 1.94 with ESRS 1.81-84, e.g. as "changes related to sustainability information and presenting comparative information". Both requirements describes the process for comparative figures and other sustainability information.	ESRS1	ESRS 1 - 7.6 Changes in the preparation or presentation of sustainability information	94.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We support the explanation about the reporting on material opportunities. We would highly recommend to precise that this requirement only affects "material" opportunities. So far this term is missing in ESRS 1.102 and in the sub-headline "Reporting on opportunities".	ESRS1	ESRS 1 - 7.9 Reporting on opportunities	102.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We highly support this increasing flexibility for additional disclosures that are not related to material IROs but relevant information items for specific stakeholder needs. However it could be worthwhile to align the requirements with ESRS 1.107 (b). Otherwise we would expect different levels of qualitative characteristics of information within the sustainability statement.	ESRS1	ESRS 1 - 8.2 Presentation of additional information included in the sustainability statement	108.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The wording of this AR should be revised to adopt a more flexible approach when introducing examples, avoiding prescriptive language that may limit interpretation or implementation. Parts of the AR that do not add any further value to the reporting requirements should be deleted.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	AR 28
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Despite it is voluntary (may), the requirement to include a summary of the report should be removed and not prescribed by the standards. As it would result in duplicated information and unnecessarily increase the length of the report.	ESRS1	ESRS 1 - 8.3 Options in presenting information across parts of the sustainability statement	109.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	This datapoint, among others, demands an overly detailed level of interconnection between impact, risk and opportunity disclosures (IROs), policies, actions, and targets. We believe this granularity is unnecessary and may complicate the reporting process without adding proportional value. A more practical approach would be to establish correlations at the topic level only, without requiring the inclusion of empty content or endless cross-references for each individual policy, action, and target.	ESRS1	ESRS 1 - 9.1 Connected information	113.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	We strongly advocate for the possibility of referencing documents that form part of the management report, even if they are subject to a different level of assurance. This flexibility is essential to ensure coherence and efficiency in reporting. For example, the Annual Corporate Governance Report and the Annual Directors' Remuneration Report contain relevant and complementary information that should not be duplicated within the ESRS disclosures. Enabling cross-references to these documents would significantly reduce redundancy, avoid unnecessary extension of the report, and mitigate the risk of inconsistencies arising from repeated content. We consider this approach both practical and aligned with the principles of proportionality and relevance.	ESRS1	ESRS 1 - 9.3 Incorporation by reference	118. (d)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	ESRS 1.AR 26 in reference to ESRS 1 3.7 may result in a high number of new datapoints depending on its interpretation by auditors. EFRAG should clearly state that the disaggregation of data is voluntary ("may...") or delete the AR completely. Furthermore, this disaggregation does not provide any added value for the users of the information; instead, it leads to information overload and unjustified burdens for the disclosing company (information may not be available or only with high effort) - NEW	ESRS1	ESRS 1 - 4. Due diligence	AR 26
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	It is utmost important to clarify that the materiality assessment shall not be reperformed every year in case no significant changes in the assumptions/circumstances occurred. The way it is written could lead to confusion and it seems anyway the undertaking shall reperform the assessment every year.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	29.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	This requirement is not a relief but constitues a behavioural obligation, which contradicts Paragraph 5 stating that "the ESRS do not mandate behavior but set Disclosure Requirements[...]". Secondly, it is inconsistent with the possibility of investments or divestments being part of the business strategy to achieve the target. It should therefore be deleted and the initial paragraph 85 should be reintegrated: "Sometimes, it is impracticable to adjust comparative information for one or more prior periods to achieve comparability with the current period. For example, data might not have been collected in the prior period(s) in a way that allows either retrospective application of a new definition of a metric or target, or retrospective restatement to correct a prior period error, and it may be impracticable to recreate the information (see ESRS 2 BP-2). When it is impracticable to adjust comparative information for one or more prior periods, the undertaking shall disclose this fact."	ESRS1	ESRS 1 - 7.1 Presenting comparative information	84. (c)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Defining the long-term horizon as >5years, without limiting it to a certain number of years (e.g. >5-10 years) makes it very challenging to evaluate and estimate the severity and likelihood of Impacts, Risks and Opportunites. Due to the volatile nature of different factors that influence these IROs it is often very challenging to estimate the severity & likelihood of an impact, if the time period has an open end. We therfore recommend to limit the long-term horizon, e.g. to >5-10 years in order to generate meaningful outcomes.	ESRS1	ESRS 1 - 6.2 Time horizon: definition of short-, medium- and long-term for reporting purposes	78.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	Please add "opportunities" after "[...] of risks [...]" -> "[...] materiality assessment of risks and opportunities."	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	AR 16
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	ESRS 1.AR 26 in reference to ESRS 1 3.7 may result in a high number of new datapoints depending on its interpretation by auditors. EFRAG should clearly state that the disaggregation of data is voluntary ("may...") or delete the AR completely. Furthermore, this disaggregation does not provide any added value for the users of the information; instead, it leads to information overload and unjustified burdens for the disclosing company (information may not be available or only with high effort). ESRS 1.51 stipulated different level for aggregation and "other appropriate level". The segment approach (which is based on a management approach under IFRS) could be highly relevant category for aggregation and should be added as an explicit category.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	51.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	This requirement might be very complex as the undertaking has to agree with the external auditor which are these significant event, considering this entity is a new acquisition and we don't even know it. Moreover, it is not clear why to report on "significant events" in relation to the "Subsidiary's or business's exposure to material IROs". In our opinion, significant events should only be considered in case that they might affect the overall evaluation of material IROs on group level. Suggestion to either delete or further clarify paragraph.	ESRS1	ESRS 1 - 5.4 Relief for acquisitions and disposals	73.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Please change the phrase "[...]over the short, medium or long term" to "[...] over the short, medium and/or long term" in order to make more clear, that impacts cannot only occurr, e.g. EITHER in the short OR in the medium/long term, but that impacts can occurr over several time horizons, e.g. over the short, medium, AND long-term. Moreover, please amend and specifiy as follows: "The time horizon is intended to classify both when a material impact/effect occurs (or is expected to occur) and how long the effect is expected to last. If it can be assumed that the impact will decrease or disappear completely in a future time horizon (e.g. due to the implementation of certain actions/policies) and this impact therefore falls below the materiality threshold in the assessment, then the respective time horizon does not apply. Only the period in which the impact is assessed as material must be declared externally."	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	30.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	While the sentence "ARs also include text where the term 'shall consider' is used to indicate issues, resources or methodologies that the undertaking is expected to take into account or to use in the preparation of a given disclosure. " tries to specify the use of "shall consider", it is a contradiction to para. 5 where it states that "The ESRS do not mandate behaviour [...]". A "if applicable" should therefore be added. Additionally, "shall consider" is not consistently applied as sometimes only "shall" is used (eg. ESRS E1 Ar 4 and 5).	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	15.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	It remains unclear who "primary users", "users of general purpose sustainability statements" refer to and at what point an information is considered "necessary". The proposed wordings risks an expansion of the information provided by companies as sustainability information might be interesting for a very broad group of users. "Decision-usefulness" should be key for sustainability information as well.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The examples are not very helpful as these are rather obvious connections. However, the supply chains of mulitnational companies are much more complex. Including examples should not be part of the disclosure requirements but could be part of the NMIG and should be deleted here.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	AR 6
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The Appendix C should be deleted as it rather adds complexity to the topic and might require additional documentation effort as part of the audit procedures.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	AR 9

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The part"Under the CSRD, the management of the undertaking shall inform the workers' representatives at the appropriate level and discuss with them the relevant information and the means of obtaining and verifying sustainability information. The workers' representatives' opinion shall be communicated, where applicable, to the relevant administrative, management or supervisory bodies." should be deleted. This is part of level 1 legislation. Additionally, it seems to indicate behavioural obligations going against para. 5.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	AR 11
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Reasonable and supportable information is subject to the interpretation of auditors. A clear definition is missing otherwise it undermines the level playing field and will be applied unevenly.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	88.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	A "balanced consideration of the costs and efforts" is subject to companies and auditors interpretation. If at all, the relief might be helpful for wave 2 companies but at what point is a multinational company able to use this argumentation?	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	89.
Excels	UNICEF	NGO	United States			I agree	UNICEF welcomes the requirement to provide entity-specific disclosures on material topics that an ESRS does not cover. UNICEF seeks decision-useful material disclosures on the impacts companies have on child rights, and these are often specific to a particular company or sector and therefore not included in the ESRS. Given that EFRAG will no longer create sector-specific standards, we encourage a strong emphasis on the importance of entity-specific material disclosures in EFRAG's communications and a clear direction that companies should not take the ESRS as an exhaustive checklist. It is important to note that children are still not commonly considered as a stakeholder by business in their reporting, with only 13% of large companies reporting that they identify, consult or engage with children as a stakeholder group in a recent UNICEF study (Corporate Reporting on Children's Rights, 2025).	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	10.
Excels	UNICEF	NGO	United States			I partially agree and partially disagree	UNICEF welcomes the reference to "available best practices and/or available frameworks and reporting standards" in the context of entity-specific and sector-specific disclosures. We encourage EFRAG to broaden the examples beyond GRI/IFRS to include other credible disclosure guidance published by multi-lateral and multi-stakeholder organizations. For example, companies can improve the quality of their child rights impact disclosures by using UNICEF's guidance briefs for "Children as stakeholders at heightened risk of adverse impacts", "Children's Rights and Double Materiality" , and "Reporting on children's rights under the social standards" , as well as UNICEF's "Disclosure Recommendations for Corporate Reporting on child rights impacts in relation to the digital environment". These resources and frameworks have all been created to be interoperable with ESRS; referencing their availability and increasing their profile will help ensure that companies make entity-specific and sector-specific disclosures about material impacts on children. See: https://www.unicef.org/reports/unpacking-childrens-rights-under-european-sustainability-reporting-standards and https://www.unicef.org/childrightsandbusiness/workstreams/responsible-technology/reporting	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	11.
Excels	UNICEF	NGO	United States			I partially agree and partially disagree	While the substance of ESRS 1 hasn't changed (i.e., that the results of human rights due diligence should inform the materiality assessment), UNICEF believes that the prior ESRS was clearer in this regard than the exposure draft. UNICEF recommends that EFRAG revert to its original text ("The materiality assessment of a negative impact is informed by the due diligence process defined in the international instruments of the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises."). This clarity will be especially important in the context of emphasizing a "fair presentation framework" and entity-specific disclosures.	ESRS1	ESRS 1 - 4. Due diligence	54.
Excels	UNICEF	NGO	United States			I agree	UNICEF welcomes the option for companies to "use appendices or separate sub-parts in its sustainability statement." Decision-useful disclosures about impacts on child rights may require the inclusion of detailed, nuanced, and complex information, especially for experts, and this might be facilitated by the option to refer to appendices with more information.	ESRS1	ESRS 1 - 8.3 Options in presenting information across parts of the sustainability statement	110.
Excels	UNICEF	NGO	United States			I agree	UNICEF welcomes the emphasis that the results of engagement with affected stakeholders as part of its due diligence process to identify, assess, and address adverse impacts provide critical input to a materiality assessment, without necessarily putting in place a separate engagement process for the materiality assessment. Children are essential stakeholders for companies to consider in a materiality process, but gathering the insights, interests, and views should be undertaken with due care, and it may not always be appropriate to engage with children directly as part of a materiality assessment. For this reason, the flexibility to incorporate the results of engagement undertaken during due diligence, rather than being constrained by a narrow materiality process, is welcome.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	33.
Excels	UNICEF	NGO	United States			I partially agree and partially disagree	UNICEF welcomes the emphasis on "persons in vulnerable situations" in the context of stakeholder engagement to inform the impact materiality assessment. However, we believe it is essential to specifically reference children as a stakeholder category in the materiality assessment, considering (1) the increased emphasis on the materiality of information as an overarching filter for report content and (2) the importance of entity-specific information related to child rights (see our response to ESRS 1-10). While children as a stakeholder category are mentioned elsewhere (e.g., S3-2 and S4-2), we think that effectively addressing impacts on children also necessitates explicitly referencing children as a stakeholder in ESRS 1 for the overall impact materiality assessment.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 10

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	UNICEF	NGO	United States			I disagree	The removal of the term "for example" from the list of economic, social, cultural, civil, and political rights of relevance to ESRS S3 and ESRS S4 in Appendix A - List of Topics is highly problematic and contradicts one of the core tenets of human rights-based approaches. For example, Principle 18 of the UNGPs states that companies "should include all internationally recognized human rights as a reference point, since enterprises may potentially impact virtually any of these rights." By removing the term "for example", these parts of Appendix A become a narrower list of sub-topics, creating the risk that companies will use this list as an exhaustive checklist, rather than considering the full range of economic, social, cultural, civil, and political rights relevant to consumers and end-users. There are many examples, but education (UDHR 16), peaceful assembly (UDHR 20), and culture (UDHR 27) are all human rights of relevant to consumers and end-users. Referencing all potentially relevant human rights, not just a subset, is significant in the context of emphasizing a "fair presentation framework" and entity-specific disclosures, as it provides the full range of potential impacts for companies to consider.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 17
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We suggest complementing Appendix A with respect to the sub-topics related to ESRS E5 as follows, consistently with § 4 of the topical standard: "Resource inflows (including mineral and biotic marine resources)".	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	9.
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We suggest complementing the last sentence ("such as…") with situations that could lead to provide entity-specific disclosures by referring to the inclusion of upstream and downstream value chain data when disclosing on metrics, consistently with AR 28.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	10.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	See our comments to question 25 in Part 2 of EFRAG's survey. § 16 indicates that fair presentation requires disclosure of "relevant information that meets the conditions in paragraph 21" which refers to the materiality of information. We believe this wording is inconsistent with QC 4 according to which materiality is an entity-specific aspect of relevance. Overall, we recommend that EFRAG align ESRS 1 with IFRS S1 wording to enhance interoperability between both reporting frameworks.	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	16.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	Should the fair presentation principle be confirmed in the revised Set of ESRS, we encourage EFRAG to provide guidance on how to deal with situations where the Set 1 has been considered as a compliance framework: how to deal with any changes in the information that is presented with respect to comparative information?	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	16.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	In connection with the comment made on line 5, we recommend that EFRAG restructure § 19 to better articulate it with § 16 as the beginning of the sentence overlaps with § 16.	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	19.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We believe that the term "usually" used in the first sentence of § 59 should be further explained / justified as it could lead to different interpretations of what own operations cover, therefore leading to divergence in pratice. Besides, we suggest clarifying which "assets and liabilities" recognized in the balance sheet have to be considered as own operations since some assets and liabilities may be considered to be related to the downstream value chain in the financial sector. We also suggest adding explanations regarding "income and expenses" since, as with assets and liabilities, the current wording may not be sufficiently clear to conclude if the underlying activity is part of the own operations or of the downstream / upstream value chain, particularly in the service industry.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	59.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	It should also be clarified that joint operations accounted for in accordance with IFRS 11 and that joint ventures accounted for in accordance with proportionate consolidation under local GAAP are part of an entity's own operations. This being said, the treatment of joint operations under social standards should be further clarified.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	59.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We recommend replacing "relevant EU law and regulation" with "voluntary reporting standard to be adopted by the Commission by means of a delegated act" to align the reference to the value chain cap with what is presented in the Recommendation issued by the European Commission end of July 2025 on a voluntary sustainability reporting standard for SMEs (cf. Recital 14 according to which the value chain cap "would be defined by the voluntary reporting standard for use by undertakings with up to 1000 employees, to be adopted by the Commission by means of a delegated act and based on the VSME standard developed by EFRAG.").	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	63.
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	Proposed § 65 indicates that the DMA regarding the upstream/downstream value chain may be conducted without direct information from counterparts. While this is not as such contradictory with § 62 given the flexibility introduced by this § which removes the previous "two-steps approach" under former § 69 (i.e. first try to collect direct data with reasonable effort, then estimate), we suggest EFRAG refine the wording to better align it with § 62 (or refer to this §) which states that in the identification of material IROs in the upstream/dowstream value chain, the undertaking may use information collected directly from counterparties in the upstream/downstream value chain, or estimates, depending on practicability and reliability considerations relating to the necessary input.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	65.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	The sentence "With reference to metrics, in many cases (…) the undertaking may be able to comply with the reporting requirements by using an estimate without collecting data from the actors in its upstream and downstream value chain" should be redrafted (or even deleted ?) to be consistent with the fact that new § 62 allows for the use of information collected directly from counterparties in the upstream and downstream value chain or estimates, depending on practicability and reliability considerations related to the necessary input, for the reporting on all metrics. Current wording seems to implicity refer to a "two-steps approach" (first try to collect direct data with reasonable effort, then estimate) for certain metrics, whereas it no longer exists considering the amendments proposed to former § 69.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	67.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We regret EFRAG has not provided guidance to address the specificities of the definition of the value chain for the financial sector. We would indeed have welcome clarifications on the scope of the downstream value chain for financial institutions.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	68.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We note that former § 67 under ESRS 1 has been modified so that it now no longer covers joint ventures that are proportionally consolidated (as it is the case, for example, in the consolidated financial statements under French or Spanish GAAPs). Based on this redrafting and on the definition of own operations provided under § 59, we understand that such joint ventures are part of the own operations, but we recommend that EFRAG further clarify this. This clarification would also be helpful for joint operations that are accounted for using a similar method under IFRS 11, consistently with the clarifications made by EFRAG in IG 2.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	69.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We strongly recommend that EFRAG provide illustrations in the MNIG, in particular with respect to the reporting of GHG emissions under ESRS E1, to further explain: "This means that the undertaking considers both its relationship as investor and its supply/customer relationship in calculating the relevant metrics, while avoiding double counting."	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	69.
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We recommend clarifying that the exception provided for leases is applicable to all DRs in the topical standards and to the reporting of GHG emissions in ESRS E1 in particular, as this implies a difference with the GHG Protocol on which ESRS E1 is based upon (when the financial control approach is applied).	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	70.
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We note the "disconnection" that the relief introduces with the financial reporting perimeter but also acknowledge the difficulties in preparing sustainability information with respect to disposals / acquisitions which occur in the course of the reporting period. With respect to disposals, we recommend clarifying that residual risks may still be identied at group level, after control has been lost, therefore possibly affecting the outcome of the DMA of the group. Besides, considering this relief, we believe it is important EFRAG clarify what are the consequences on the presentation of comparative information when an acquisition is included in the sustainability statement for the first time (i.e. in the reporting period that follows the reporting period when the acquisition has taken place). Shall prior year figures be restated taking into account the acquired company from the date of acquisition? What contextual information shall be provided when the acquired company is included in the sustainability statement for the first time?	ESRS1	ESRS 1 - 5.4 Relief for acquisitions and disposals	72.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	Contextual information will be key to users to understand the consequences of major acquisitions / disposals when the relief is applied. We recommend adding a distinct datapoint to require at least a brief description of the business model of the acquired entity and of the expected additional material sustainability topics/sub-topics in relation to the acquired company (if any), together with key metrics (such as the number of employees).	ESRS1	ESRS 1 - 5.4 Relief for acquisitions and disposals	73.
Excels	Forvis Mazars Group	Auditor	Belgium			I disagree	We strongly recommend deleting this § given that joint operations require, overall, further investigation from EFRAG. Besides, the concept of operational control on which this § relies on still lacks clarity in the ESRS. Finally, the way the relief is drafted seems to imply that the additive approach is still required in the revised ESRS, which is not the case based on the proposed ESRS E1 (and no other standard refers to operational control in the proposed revised set of ESRS).	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	92.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	The draft revised ESRS 1 still requires to restate comparatives when the undertaking has identified new information relating to the estimated figures disclosed in the preceding period and the new information provides evidence of circumstances that existed in that period. The revised standard further precises that this a "change in estimate". Since the preparation of the sustainability statement implies to use estimates frequently, requiring systematic restatement when changes arise is in our view not relevant, in particular for the financial sector that prepares its sustainability information based on prior year figures provided by the non-financial sector. We therefore encourage EFRAG to refine § 94(b) to better define situations where restating comparative figures is mandatory and to clarify that the filter of materiality also applies to this information. Finally, we also recommend specifying that comparatives shall not be restated as a result of acquisitions/disposals when the relief for acquisitions and disposals proposed under § 72 has not been applied in the reporting period when the undertaking acquires a subsidiary/business or loses control over a subsidiary/business.	ESRS1	ESRS 1 - 7.6 Changes in the preparation or presentation of sustainability information	94. (b)
Excels	Forvis Mazars Group	Auditor	Belgium			I disagree	As new reliefs have been introduced with respect to the preparation of value chain information (see in particular para 87 (c) on "undue cost or effort"), we believe there is no need to keep such transitional provision.	ESRS1	ESRS 1 - 10.1 Transitional provision related to Chapter 5 Value chain	123. (a)
Excels	Forvis Mazars Group	Auditor	Belgium			I disagree	Regarding EU Taxonomy disclosures, former § 113 in ESRS 1 indicated that "These disclosures are not subject to the provisions of ESRS, with the exception of this paragraph and the first sentence of paragraph 115 of this standard." We note that such sentence has been deleted in the revised ESRS 1 therefore questionning whether the presentation of EU taxonomy disclosures are still to be dealt with regardless of the principles governing the presentation of ESRS disclosures on material IROs listed in ESRS 1. It is critical to clarify whether ESRS general principles (e.g. fair presentation, the materiality filter, the "undue cost or effort" general relief, etc.) apply to EU Taxonomy information or not. Given that EU Taxonomy disclosures are covered by specific regulations / FAQs and due process, we believe it is important that the sentence quoted above be kept in the revised version of ESRS 1 to avoid misinterpretations. This beig said, and as indicated under question 34, we encourage the EC to align ESRS and EU Taxonomy reporting frameworks as much as possible in particular with respect to reliefs granted to companies.	ESRS1	ESRS 1 - 8.1 General presentation requirement, structure and content of the sustainability statement	106.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	§ 110 seems to implicitly indicate that using appendices or separate sub-parts in the sustainability statement does not make any difference and it is therefore equivalent to use either of the two presentation options. As indicated under Part 2 of this survey, we believe that a reader might interpret that information presented in a dedicated appendix is less important than that presented in the main body of the statement. We therefore encourage EFRAG to make a clearer distinction between the two presentation options, and to clarify the situations in which it would be appropriate to use appendices so as not to obscure material information.	ESRS1	ESRS 1 - 8.3 Options in presenting information across parts of the sustainability statement	110.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	AR 36 is wrongly referenced to § 109 whereas it relates to § 110.	ESRS1	ESRS 1 - 8.3 Options in presenting information across parts of the sustainability statement	AR 36
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	AR 37 is wrongly referenced to § 109 whereas it relates to § 110.	ESRS1	ESRS 1 - 8.3 Options in presenting information across parts of the sustainability statement	AR 37
Excels	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany			I agree	We very welcome this clarification.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	70.
Excels	Triodos Bank N.V.	Bank	Netherlands			I agree	For simple understanding of relation between IROs and topics, require a simple mapping table once per topic: list the material IROs driving the topic, or (if reporting at IRO level) the topic each IRO rolls into.	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	22.
Excels	Triodos Bank N.V.	Bank	Netherlands			I partially agree and partially disagree	Please clarify whether entity-specific impacts can be reported under the ESRS topics, or whether they automatically form their own topic. Also more guidance or requirements of how to align the ESRS reporting with the undertaking's own impact reporting topics. I.e. 5 transition themes vs. ESRS topics	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	23.
Excels	Triodos Bank N.V.	Bank	Netherlands			I partially agree and partially disagree	For transparency, suggest to add that undertakings shall disclose what triggered changes in the results of the materiality assessment from previous periods (acquisitions, regulatory changes, etc.)	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	29.
Excels	Triodos Bank N.V.	Bank	Netherlands			I partially agree and partially disagree	Agree with it in the materiality assessment, this requirement should also apply to the reporting of various impacts (either in this requirement or under the reporting requirements).	ESRS1	ESRS 1 - 3.3 Double materiality assessment	36.
Excels	Triodos Bank N.V.	Bank	Netherlands			I disagree	This paragraph contradicts the general paragraph regarding the stakeholder engagement (33), Suggest for financial undertakings to require engagement on topics where there have been negative impact breaching laws and regulations aligning with paragraph 33.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	AR 11
Excels	Triodos Bank N.V.	Bank	Netherlands			I partially agree and partially disagree	Add suggestion that undertakings clarify when qualitative information was used and when quantitative information was used. If no information available, provide an explanation. For financial institutions specify if they are compliant with IFRS S2. Clearer guidance from EFRAG on how the ESRS comply to the IFRS S2 and increase alignment is needed.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	AR 19
Excels	Triodos Bank N.V.	Bank	Netherlands			I partially agree and partially disagree	Include that undertakings must report in their sustainability statements topics that do not have any policies, actions, targets or metrics. For clearer comparison across organisations.	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	AR 20
Excels	Triodos Bank N.V.	Bank	Netherlands			I disagree	Add that if there are negative material impacts recognised with one of the undertaking's stakeholders during the due diligence process, that engagement actions are required to be formulated.	ESRS1	ESRS 1 - 4. Due diligence	56.
Excels	Triodos Bank N.V.	Bank	Netherlands			I partially agree and partially disagree	Suggestion to add: The undertaking shall disclose (i) the rationale for the chosen value-chain boundary, (ii) the coverage of value-chain information per material topic, and (iii) a brief data-quality grading (e.g., direct data, modelled, proxy, spend-based) for key metrics and comparability across undertakings.	ESRS1	ESRS 1 - 4. Due diligence	60.
Excels	Triodos Bank N.V.	Bank	Netherlands			I partially agree and partially disagree	Where due-diligence processes inform the assessment, the undertaking shall summarise which steps (stakeholder engagement, identification, action, tracking) informed the value-chain scoping and prioritisation.	ESRS1	ESRS 1 - 4. Due diligence	61.
Excels	Triodos Bank N.V.	Bank	Netherlands			I partially agree and partially disagree	Propose to add a second sentence: If the value-chain cap constrained information requests, the undertaking shall (i) state this explicitly, (ii) indicate the affected topics/tiers, and (iii) describe alternative approaches used (e.g., sector averages) and residual limitations.	ESRS1	ESRS 1 - 4. Due diligence	63.
Excels	Triodos Bank N.V.	Bank	Netherlands			I partially agree and partially disagree	Suggest to add: where policies/actions/targets do not extend into the value chain for a material IRO, the undertaking shall state this plainly and explain constraints and intended forms of leverage (e.g., codes, contract clauses, engagement, industry initiatives) and time-bound plans to extend coverage.	ESRS1	ESRS 1 - 4. Due diligence	67.
Excels	Triodos Bank N.V.	Bank	Netherlands			I disagree	We strongly advocate for a 'net' approach in the DMA and advise against the proposed 'gross' basis for potential impacts. The fundamental purpose of sustainability reporting under CSRD is to provide stakeholders with decision-useful information on an undertaking's actual material IROs. Assessing potential negative impacts before considering significant, ongoing mitigation and prevention actions - the 'gross' approach - fundamentally misrepresents this reality. This method forces companies to report on theoretical, pre-control scenarios, making the reporting exercise academical and unpractical for day-to-day application. This approach will inevitably lead to excessive reporting on well-managed topics, particularly in highly regulated industries. For example, a company with robust, industry-leading safety protocols would still have to report on health and safety as if these controls didn't exist. This buries the truly material, residual (net) risks in a sea of hypothetical information, undermining the goal of providing clear and concise insights to stakeholders. The objective is to report on the most important impacts that remain after effective controls are taken into account. To ensure CSRD reporting remains relevant, practical, and truly informative, materiality must be determined on a net basis. This provides a true and fair view of the undertaking's most significant sustainability matters.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	3.
Excels	BDO	Auditor	Belgium			I partially agree and partially disagree	We support allowing a' top-down' approach as an option, which we think will simplify the DMA process as it is more in line with how the business is managed. We support the guidance provided in ESRS 1, section 3.5. We believe that in most cases all material IROs will be identified also using a 'top-down' approach. However, we think it would be useful to have some non-mandatory guidance on expected IROs for different industries to avoid overlooking material IRO/(sub-)topics.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	28.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	BDO	Auditor	Belgium			I partially agree and partially disagree	Regarding the materiality assessment of the upstream and downstream value chain, it should be clarified that the phrase "may be conducted without direct information from counterparts" does not imply that existing information can be disregarded. It could be clarified that any relevant data already available must still be taken into account.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	65.
Excels	BDO	Auditor	Belgium			I partially agree and partially disagree	The current wording allows for potentially indefinite exclusions of metric data from metric calculations without requiring a mechanism to ensure progressive inclusion and improvement of the quality of the metric data, should the metric data become significant to the metric in the future reporting periods. This wording appears to be overly permissive.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	90.
Excels	BDO	Auditor	Belgium			I partially agree and partially disagree	The current wording allows for potentially indefinite exclusions of metric data from metric calculations without requiring a mechanism to ensure progressive inclusion and improvement of the quality of the metric data, should the metric data become significant to the metric in the future reporting periods. This wording appears to be overly permissive.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	92.
Excels	BDO	Auditor	Belgium			I partially agree and partially disagree	AR 21 states 'When a material impact, risk or opportunity relates to a particular sub-topic, the undertaking needs only to report the material information related to that sub-topic within the relevant topical standard.' This wording would benefit from clarification as the above wording can be interpreted such as reporting is required for all DR related to a material sub-topic, which includes also those which includes those IROs which are not material.	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	AR 21
Excels	UNEP-WCMC	NGO	United Kingdom			I agree	We strongly recommend maintaining a double materiality approach – without this, many significant impacts and risks on nature will not be required to be reported, which will reduce the benefit from implementation of ESRS reporting.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21.
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	Add to the application requirements an explanation that "users of general purpose sustainability statements" include "the undertaking's investors, business partners, trade unions and social partners, civil society and non-governmental organisations, governments, analysts and academics". Without this clarification, the term "users of general purpose sustainability statements" could be interpreted by some companies in a narrower sense, and used to justify exclusions of information that falls under double materiality.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21. (a)
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	Allowing companies to merge topics within the reports makes sense. Recommend adding a requirement to reference relevant topics and disclosures. This could be similar to the information presentation guidance in the GRI Standards.	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	22.
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	Definition of financial materiality is included. Propose to add definition of impact materiality, which is aligned with GRI, i.e. "The organisation prioritises reporting on those topics that represent its most significant impacts on the economy, environment and people, including impacts on their human rights." see GRI 1.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	25.
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	Recommend more clearly aligning the wording to the definition of impact materiality in GRI Standards.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	30.
Excels	UNEP-WCMC	NGO	United Kingdom			I agree	Definition of affected stakeholders - important to keep this point	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	30.
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	This is helpful and agree with both cases that these are connected with the reporting company. In (b), recommend defining these in more general terms, as explaining this through examples only may lead to some companies claiming that the example does not apply in their case.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 6
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	In addition to "affected communities" add "individuals and groups whose human rights have been affected". As in some cases, persons are not negatively affected themselves but their human rights are affected.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 10
Excels	UNEP-WCMC	NGO	United Kingdom			I agree	The requirement to reported expected outcomes from mitigation measures is helpful to avoid sustainability report users assuming that negative impacts have been fully mitigated when the mitigation measures redress issues only partially.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	UNEP-WCMC	NGO	United Kingdom			I agree	Agree with the proposed definition of positive impacts. Agree with the decision to not include philanthropic impacts.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	36.
Excels	UNEP-WCMC	NGO	United Kingdom			I disagree	Strongly recommend clarifying in the second sentence that information available "without undue cost and effort" includes new information that companies may need to collect to strengthen their understanding and management of impacts, risks and opportunities, which can be obtained with proportionate investment and effort. The current wording of the sentence implies information available "without undue cost and effort" is only the information that companies are already collecting. It is important to revise this to ensure ESRS drive improvements in how impacts, risks and opportunities are assessed and reported over time. IFRS definition of "undue cost and effort" also acknowledges that new information obtained in ways where cost and efforts of the company are balanced out by the benefits of improved information, is still considered as obtained "without undue cost and effort". Given ESRS double materiality approach, the benefit of obtaining new information should be considered as benefit to company as well as people and nature.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	47.
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	Agree with the option of using bottom-up or top-down approach. Recommend asking companies to specify what approach was followed, as this will support the report users in understanding of limitations and assurance.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 17
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	Agree on the use of reported data or estimates. Recommend adding the provision that companies should specify what approach was used.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	62.
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	Companies should be encouraged to improve understanding of their upstream and downstream value chain, as for many, that is where the most significant biodiversity impacts, risks and opportunities are found.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	63.
Excels	UNEP-WCMC	NGO	United Kingdom			I disagree	This AR could be interpreted as contradicting earlier provisions, which specify that companies should report on their value chain impacts, risks and opportunities. Strongly recommend adding a clarification that companies should still report on their value chain impacts, risks and opportunities, even where the specific metrics in topical ESRS are not available, i.e. by using qualitative descriptions. This may require going beyond the minimum requirement of EU law and regulation.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	AR 28

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	UNEP-WCMC	NGO	United Kingdom			I agree	We welcome the specification that "balanced effort" is based on costs and efforts for the undertaking and the benefits of the resulting information for all users, i.e., also users of sustainability reporting, like civil society and local communities. This is in line with the ESRS' double materiality approach, which is critical to driving change to more sustainable business action.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	89.
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	Consolidating information improves readability and comprehensibility. It also allows for streamlining (more compact presentation) of the necessary information in the report. However, in our view, some simplifications will result in a loss of comparability and consistency between companies and their reports. In our interpretation, an imbalance will arise if companies decide for themselves in future whether to report at IRO level or topic level, as disclosure at IRO level would reveal more information than at topic level. Some companies could take this as an opportunity to report at the topic level.	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	22.
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	Depending on the type of stakeholder different views prevail regarding the assessment of the gross-versus-net-perspective on potential negative impacts. We welcome the differentiation between "gross-versus-net"-impacts. However, the dis-closure of impacts regarding "significant ongoing mitigation and/or prevention ac-tions" requires a more nuanced description. We expect diverse interpretations of the term "significant" and potential loss of material information. While illustrations are provided, companies will need to exercise careful judgment, which could lead to incon-sistencies. We suggest providing a decision tree/flowchart in addition to the explana-tion and providing concrete evaluation examples. Additionally, we suggest a better alignment between Appendix C and the main text. The incorporation of the ISSB TIG-approach might be useful to ensure no material in-formation is omitted for net-considerations. From preparers' perspective, a gross approach would lead to disclosures including hy-pothetical risks which are already effectively managed and therefore inflated disclosures and obscure truly material issues. Furthermore, Appendix C brings complexity into the DMA process. Therefore, the IRO-assessment should be done on net-basis and Appen-dix C removed. From auditors' perspective, the new guidelines provide clearer instructions for the in-corporation of remediation, mitigation, and prevention actions into the DMA. This con-tributes to more relevant and comparable reporting across entities.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	The guidance in paragraph 48 (a) is clear; however, the description of the approach in AR 17 is confusing with regard to the methodology for the materiality assessment. It states that the undertaking may assess, on the basis of topics, whether reporting on a given topic is required. Only thereafter are the corresponding IROs to be identified, which must then be reported on. We view this approach critically, as it could lead to a premature exclusion process on the part of undertakings, whereby areas are excluded at the topic level before a more in-depth analysis has been carried out on the basis of the IROs (which then, by applying defined thresholds, determine whether an IRO leads to a material topic or sub-topic). It is understandable that certain topic areas can be excluded at the outset where there are genuinely no points of contact. However, once the undertaking does have points of contact, the assessment of materiality should not be made at the topic level, but rather at the IRO level, in order to avoid overlooking material IROs. This process of reflection is a strength of the materiality assessment from which undertakings can derive significant benefit.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	48. (a)
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	Further specification would be beneficial, as according to prior practice the threshold was determined based on the individual assessments of scale, scope, and, where applicable, irremediability. Under the proposed approach, the methodology would effectively change, as the severity could be established based on any one of these three dimensions alone. The weighting of likelihood, however, would continue to remain at the discretion of the undertaking.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 18
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	We recommend expanding ESRS 1.50b for all 6 capitals according to IR Frame-work: financial, manufactured, intellectual, human, social and relationship, natural.	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	50. (b)
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	We recommend specifying that due-diligence procedures serve to inform the assessment of potential material impacts but do not, by themselves, predetermine materiality outcomes.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	58.
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	Previously 1.62 and 1.63 have been amended but do still not clarify the appropriate treatment of leased assets. We recommend amending it accordingly. To make it clear for the preparer, clarification needs to be streamlined with E1 requirements as well (i.e. former ESRS E1-6).	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	58.
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	Previously 1.62 and 1.63 have been amended but do still not clarify the appropriate treatment of leased assets. We recommend amending it accordingly. To make it clear for the preparer, clarification needs to be streamlined with E1 requirements as well (i.e. former ESRS E1-6).	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	60.
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	ESRS 1.81 currently requires an annual reassessment of materiality for all quantitative metrics, regardless of whether there have been any changes in material topics. We recommend either removing this requirement or clarifying that reassessment should only be conducted when there are material changes.	ESRS1	ESRS 1 - 7.1 Presenting comparative information	81.
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	We miss clear guidance regarding the handling for DMA and the presentation of changes in the scope of consolidation (comparative information, targets ...) not only for the first but following years; 84b only stipulates guidance for the first year.	ESRS1	ESRS 1 - 7.1 Presenting comparative information	84. (b)

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Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	The simplification efforts concerning the double materiality analysis process (DMA-process) strike a balance between simplification and robustness. The increased practice-oriented structure and process descriptions included within chapter 3 concerning the DMA-process is appreciated. In particular, the newly introduced illustrative list of internal and external sources of evidence of information that an undertaking might refer to in the process of its materiality assessment (e.g., external ratings and risk management processes) provides valuable guidance for practitioners. However, while flexibility is beneficial, determining which sources are "sufficient" for a robust materiality conclusion could be subject to interpretation. Companies might need to ensure that their selected sources are comprehensive enough to avoid overlooking material impacts, risks, or opportunities (IROs), and that the evidence gathered is of sufficient quality and reliability. EFRAG could, hence, include via a separate application requirement, examples of what is deemed as "sufficient" – in particular against the background of the newly introduced "undue cost and effort" approach.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	91.
Excels	Anthesis Group	Consultant (including software vendor)	United Kingdom			I disagree	It may create more work to include remediation actions as part of assessing severity for actual negative impacts. Along with identifying and scoring impacts, companies would need to also provide a list of actions in place to mitigate those actions including dates of when those actions were initiated. This feels like it would create extra work to provide this and apply to scoring.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Henkel partially agrees that the proposed amendments improve interoperability and support simplification objectives, particularly through the emphasis on fair presentation and materiality; however, we see room for improvement in clarifying the fair presentation principle and refining the definition of materiality (e.g. users) to avoid overly broad or unclear disclosure requirements. Otherwise it may lead to too much interpretation and discussions with auditors.	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	19.
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Henkel supports the deletion of the sub-sub-topics in Appendix A. However, especially for S- and G-standards, the former sub-sub-topics are now being listed in brackets. It remains unclear how this list should be treated: just examplary or binding? We propose to treat them as examplary and hence, to start the lists in brackets with an "e.g.".	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	AR 17
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Any evaluation of potential negative impacts must be done taking into consideration ongoing mitigation and prevention actions which are considered as "standard" for a specific industry or sector. Otherwise topics undertakings would need to report on topics which in reality are not material.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Financial risks related to employee benefit funds (defined benefit plans) are reported as part of risk management. Any other ESG related risks are hard to quantify due to constant changes in investments. Moreover, the sentence is hard to understand and leaves room for interpretation. We suggest to delete the requirement for non-financial undertakings as the information has no decision making value to stakeholders.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	71.
Excels	Kirchhoff Consult	Consultant (including software vendor)	Germany			I disagree	It is completely impractical to link every single policy, action and target verbally to at least one IRO. Often, this link is already apparent from the context of the information contained. There are various companies that have identified 100-200 IROs as material. This paragraph therefore leads to a situation that can only make auditors happy. We propose that the data point should be amended to stipulate that the IRO reference must be clear, but does not need to be explicitly mentioned again.	ESRS1	ESRS 1 - 9. Connected information and linkages with other parts of corporate reporting	113.
Excels	Royal Hollway University of London	Academia	United Kingdom			I partially agree and partially disagree	Paragraph 21 states that material impacts are the same as "principal" impacts. Then there is a similar sentence about thresholds: 'Some existing standards and frameworks use the term "most significant impacts" when referring to the threshold used to identify the impacts that are described in ESRS as "material impacts".' Since this sentence is about impacts, we can interpret the other "existing standards and frameworks" as referring to GRI rather than to IFRS. Indeed, GRI 3 does define "material" as "most significant". I conclude that ESRS 1 appears to be calling for disclosures about the most significant impacts rather than about all significant impacts. Incidentally, it is not useful to put words in inverted commas without explaining which document they are quoting from. [continued below.]	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21.
Excels	Royal Hollway University of London	Academia	United Kingdom			I partially agree and partially disagree	It is useful here to compare the words "material" and "significant" which are used extensively in all the sets of standards. In IFRS, "material" is a technical term, defined in relation to the effects of information on economic decisions. By contrast, "significant" is not a technical term, being used to describe events or changes. An event might be small (e.g. the theft of 0.5% of a company's assets by its finance director) but still be relevant for investors' decisions, not least when voting on board appointments. [continued below.]	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21.
Excels	Royal Hollway University of London	Academia	United Kingdom			I partially agree and partially disagree	Many disclosures under IFRS do not involve numbers. However, when expressing materiality in terms of percentages, some auditors refer to 5% of profit. By contrast, "significant", when defined numerically in IAS 28, means a 20% threshold. Thus, "material" appears to mean something smaller than "significant" when numbers are involved. It would be perverse if this did not also apply for non-numerical disclosures under IFRS. [continued below.]	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21.
Excels	Royal Hollway University of London	Academia	United Kingdom			I partially agree and partially disagree	So, under IFRS, small things and perhaps things that are not "significant" can still be material and therefore require disclosure. By contrast, GRI and then ESRS state the opposite: only the "most significant" impacts are material and therefore require disclosure. This implies that an entity should rank its impacts under the separate themes of environment, human rights and so on, which is what GRI 3 requires (in its Section 2.2). The ranking might help to operationalise the concept. However, should the entity then disclose its two largest impacts per theme, its six largest impacts or some other number of them? [continued below.]	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21.
Excels	Royal Hollway University of London	Academia	United Kingdom			I partially agree and partially disagree	A contrast can be made to the procedure for financial materiality. Even the largest impact in a particular theme might still not be financially material, because it is not expected to affect the decisions of primary users. Alternatively, the ten largest impacts might all be financially material. That is, financial materiality does not require the ranking of impacts. The entity should disclose the ones that it expects to affect the decisions of primary users, which might be no impacts or might be very many.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21.
Excels	Royal Hollway University of London	Academia	United Kingdom			I disagree	In conclusion, I cannot tell from the words in this ESRS how much to disclose. Especially as the purpose of the reporting is not clear.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Royal Hollway University of London	Academia	United Kingdom			I partially agree and partially disagree	The purpose of impact reporting is not explained here or in para. 16. The absence of a purpose makes it hard for preparers, auditors and regulators to know what is material.	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	20.
Excels	Royal Hollway University of London	Academia	United Kingdom			I partially agree and partially disagree	IG 1 (para. 140) claims that ESRS 1's financial materiality is aligned with that of IFRS S1 (and therefore with IAS 1). However, this seems to be contradicted because ESRS also states that its financial materiality is "an expansion of the scope of materiality" used when preparing financial statements (para. 38) because it includes risks and opportunities of relationships beyond the consolidated statements. This is confusing because IFRS financial materiality does include the effects of such external forces on the entity if they would affect primary users' decisions.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	38.
Excels	Royal Hollway University of London	Academia	United Kingdom			I partially agree and partially disagree	IAS 1 (para. 30A) states that an entity "shall not reduce understandability …". This is a clearer instruction than ESRS's reference to "obscuring" (in para. 37 or 21). I would copy IAS 1 here.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	37.
Excels	Royal Hollway University of London	Academia	United Kingdom			I partially agree and partially disagree	There is no clear guidance in ESRS to match that in IFRS S1 that distant impacts are less likely to be material. ESRS 1 (e.g. para. 32) does require assessment of materiality to include the "likelihood" of impacts. However, likelihood and time-distance are different issues (though sometimes connected), and they are mentioned separately in S1. Under IFRS, a time-distant outflow or impact is still discounted even if it is highly likely.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	32.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I agree	There is a typo "The undertaking shall make every dt to ensure..."	ESRS1	ESRS 1 - 7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	101.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	AR 35 should deleted. New provisions of CSRD amended will be transposed in national legislation. AR 35 is not useful and cannot require additional disclosure.	ESRS1	ESRS 1 - 7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	AR 35
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	Para. 40 seems to introduce some form of unnecessary guidance rather a disclosure requirement, considering in particular indent c). It should be deleted.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	40.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	The last sentence of AR 22 is confusing considering new flexibility given to preparers to determine the appropriate level of aggregation/disaggregation. "not obscuring" is a principle included in the definition of materiality. No need to repeat it here.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	AR 22
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	The second part of para. 116 ("to support the understanding…") introduces a new requirement that is not clear (what is the level of consistency ?). This provision should be deleted.	ESRS1	ESRS 1 - 9.2 Direct/indirect connectivity with financial statements and consistency of assumptions	116.
Excels	ETUC	Trade union	Belgium			I agree	This is crucial for understanding impact materiality assessment	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 10
Excels	ETUC	Trade union	Belgium			I agree	This is crucial for understanding impact materiality assessment, in particular the point on reporting on the opinion of workers' representatives	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 11
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I disagree	Comment related to Appendix A: In the subtopics listed for ESRS E4 the expression in brackets "(terrestrial and marine habitat change, invasive species)" should be deleted, as this list is not consistent with the five drivers mentioned in E4 and recommended by IPBES.	ESRS1	ESRS 1 - Objective	9.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Comment related to Appendix A: To provide preparers with more certainty which topics need to be assessed and to increase the comparability of materiality assessments and reported information, the list of sustainability topics in Appendix A (former AR 16) should be a mandatory starting point instead of non-binding guidance. The second part of the first sentence introducing Appendix A ("and provides non-binding guidance to support the application of provisions in this Standard.") should be deleted. Paragraphs 9 and 23 of ESRS 1 should explicitly state that it is expected from undertakings to consider the list in Appendix A when conducting the materiality assessment.	ESRS1	ESRS 1 - Objective	9.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Para. 27 lists usual internal and external sources of evidence and information that the undertaking may use in conducting a materiality assessment. Environmental managementsystems (e.g. ISO 14001 or EMAS) provide a useful basis for conducting the impact materiality assessment for environmental topics and should therefore be explictly listed here.	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	27.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Glossary: The definition of "actual impacts" should not only those that have already occured but also those that are currently occuring. Change definition to: "Impacts that have already occured in the reporting period or in prior years or those that are currently occuring in the repporting period."	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Feedback submitted as part of the online questionnaire.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	30.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Para. 47 lists information sources that are deemed to be available without undue cost and effort. This list should not be exhaustive. Change second sentence to: "At a minimum, information…is considered available to undertaking without undue cost and effort"	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	47.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Feedback submitted as part of the online questionnaire.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	90.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I agree	An important part of EFRAG's mandate to revise the ESRS is to increase consistency with other pieces of EU legislation. For this reason, we urge EFRAG to maintain the possibility to incorporate information by reference from EMAS environmental statements (Regulation (EU) No. 1221/2009). ESRS 1 para. 119 should clarify that, in line with the FAQ issued by the European Commission in August 2024 (para. 71), that the validation of environmental information provided by EMAS Environmental Verifies can be considered to be at least at the same level of assurance as the CSRD limited assurance requirement.	ESRS1	ESRS 1 - 9.3 Incorporation by reference	119.
Excels	FBF	Association of financial institutions	France				Positive impacts should emerge from the business model of the undertaking (goods and services only), but they should not depend on the concept of "philanthropy" in order to be disclosed. A member from the French Banking Federation suggests that it should be allowed to highlight sponsoring actions as part of the unique engagement of the undertaking beyond its own business model. Therefore, it should be allowed to consider sponsoring from the double-materiality assessment to the disclosure of information."	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	36.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	§ 59 currently indicates that: "In the case of group reporting, the reporting undertaking usually considers as part of its own operations (…)." We believe that the term "usually" should be further explained / justified as it opens the door to very different interpretations of what own operations cover, therefore leading to divergence in practice and lengthy debates between preparers and auditors.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	59.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	With respect to the first sentence of this paragraph, we suggest adding explanations regarding "assets and liabilities" recognized in the balance sheet. For example, those recognized in accordance with IFRS 9 or a similar standard might not be considered as own operations but as value chain (consistently with the financial statements). We also note that activities of the reporting undertaking may be conducted under various schemes without having recognized any asset. We therefore recommend that EFRAG provide NMIG to consider various situations such as service concession arrangements, operation and maintenance contracts, etc. We also suggest adding explanations regarding "income and expenses" as this indication seems not sufficient, particularly in the service industry, to conclude if the activity is related to the own operations of a group or to its value chain.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	59.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	We recommend clarifying that the removal of the systematic preference for direct data in calculating value chain metrics does not mean undertakings are exempt from reporting altogether when direct data is unavailable. Companies should still be expected to report by make estimates using available information. This ensures that metrics remain meaningful and comparable, even when obtaining direct data is not practicable.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	62.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	The reference to the value chain cap needs to be more specific than a reference to "the relevant EU law and regulation" and aligned with the Recommendation issued by the European Commission on 30th July 2025 on a voluntary sustainability reporting standard for small and medium-sized undertakings. The latter includes a reference, in Recital 14, that the value chain cap "would be defined by the voluntary reporting standard for use by undertakings with up to 1000 employees, to be adopted by the Commission by means of a delegated act and based on the VSME standard developed by EFRAG." We therefore suggest replacing "relevant EU law and regulation" with "voluntary reporting standard to be adopted by the Commission by means of a delegated act".	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	63.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	The absence of specifications regarding the treatment of the value chain for the financial sector will lead to inherent difficulties for auditors. Further clarification and specifications will be needed to address this question notably regarding the considerations or not of "investee companies in case of management on behalf of third parties" (off-balance sheet assets).	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	68.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I agree	We note that former § 67 under ESRS 1 has been modified so that it now covers only joint ventures that are accounted for under the equity method. It therefore no longer covers joint ventures that are proportionally consolidated (as it is the case in France under local GAAP). Based on the definition of own operations provided under § 59, we understand that joint ventures which are proportionally consolidated are own operations. New § 69 therefore seems to have been redrafted consistently with this definition. We recommend EFRAG further clarify in ESRS 1 that joint ventures accounted for under the proportionate consolidation method are own operations. Considering joint operations (which is an IFRS concept) that are accounted for using a similar method, clarifying that JOs are also own operations under ESRS would be helpful as well (consistently with the clarification in IG 2).	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	69.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	We believe it is necessary to clarify that the exception provided for leases is applicable to all the disclosure requirements in the topical Standards and to the reporting of GHG emissions in ESRS E1 in particular, as this is a difference with the GHG Protocol on which ESRS E1 builds (when the financial control approach is used).	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	70.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	The question of long-term employee benefit funds needs to be refined and clarified. In most cases, it is employees that own the shares of the fund and there is nothing on the undertaking's balance sheet. Moreover, the undertaking does not choose the investments of the fund. Therefore, those assets should not be considered as business relationships of the undertaking. Regarding accounting practices, in cases when the undertaking holds the shares of the fund (such shares being accounted for in its balance sheet), these assets should be classified as non-controlled investments (according to IFRS 9 for example) and those assets will be considered as value chain. Several fact patterns exist in practice, with distinct accounting implications. It is to date unclear what fact pattern EFRAG is considering through this paragraph. We would therefore request EFRAG to pursue this clarification.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	71.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	EFRAG should clarify under § 72 that there might still be remaining material IROs related to a disposed entity (e.g. past pollution event with remaining risks for the entity that disposed of the subsidiary).	ESRS1	ESRS 1 - 5.4 Relief for acquisitions and disposals	72.

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Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	EFRAG should clarify under § 73 what is meant by "major" acquisitions (disposals) as this notion is not defined in the ESRS. Should EFRAG want to consider only a subset of transactions, we recommend aligning with the wording used in the current IASB's project on business combinations where additional disclosures would be required only for "strategic" business combinations. This concept should therefore be clearly defined in the glossary of terms.	ESRS1	ESRS 1 - 5.4 Relief for acquisitions and disposals	73.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	We recommend that EFRAG add under § 73 a data point to briefly describe the business model of the acquired entity highlighting, for example, key financials indicators (e.g. the number of employees) and obviously material sustainability topics/sub-topics related to this entity. The objective is to provide a general indication of the outcome of the acquisition even if the DMA has not yet been performed.	ESRS1	ESRS 1 - 5.4 Relief for acquisitions and disposals	73.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	We recommend clarifying that, under § 90, the analysis of "non-materiality" could be conducted at a more granular level than at "activity" level (e.g. at subsidiary or site level), in consistency also with AR 24 which refers to "subsidiaries or activities", and that excluding from the calculation of metrics several activities (or subsidiaries, sites, etc.) that are not a significant driver of IROs should not lead, on an aggregated basis, to exclude overall a material contribution to a given metric.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	90.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I disagree	We strongly recommend deleting § 92 as the treatment of joint operations is complex and requires further investigation from EFRAG. Besides, this paragraph builds on the concept of operational control which still lacks clarity in the proposed revised set of ESRS.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	92.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	The revised Standard would still require that comparatives be restated when the undertaking has identified new information relating to the estimated figures disclosed in the preceding period and the new information provides evidence of circumstances that existed in that period. This represents a difference with IFRS S1 which considers restating comparatives only when material prior period errors have been identified. Since the use of estimates is frequent, we believe it is not relevant to require systematic restatement when changes arise. In particular, the financial sector prepares its sustainability information based on prior year figures provided by the non-financial sector. Restating comparatives extensively and very frequently would oblige the financial sector to consider the restatements of the non-financial sector. We recommend differentiating between changes in estimates and changes in methodologies. Like in the financial statements, changes in estimates should not lead to restatements. Conversely, a change in methodologies should lead to such restatement when it has a significant impact on the comparative metric, to ensure consistency. We also recommend providing guidance on how to differentiate between a change in methodology / estimate and clarifying that comparatives shall not be restated as a result of acquisitions / disposals.	ESRS1	ESRS 1 - 7.6 Changes in the preparation or presentation of sustainability information	94.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I disagree	We note that in the course of the streamlining of ESRS 1, an important sentence under previous paragraph 113 has been deleted: "These disclosures are not subject to the provisions of ESRS, with the exception of this paragraph and the first sentence of paragraph 115 of this standard." This sentence was key to explicit that ESRS requirements (notably the principle of materiality of information) do not apply to EU Taxonomy disclosures, such disclosures being covered by specific regulations and FAQs issued by the EC, which may contradict some ESRS principles or reliefs (e.g. the proposed relief on acquisitions / disposals in ESRS 1 contradicts FAQ 152 of the EC published in March 2025). We note that having deleted this sentence from ESRS 1 will inevitably raise many questions in practice on whether ESRS 1 general principles such as fair presentation, the reliefs granted, etc. also apply to the EU Taxonomy information. We therefore believe that it is of the utmost importance to keep this sentence in the revised ESRS 1.	ESRS1	ESRS 1 - 8.1 General presentation requirement, structure and content of the sustainability statement	106.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	ESRS 1.AR 26 in reference to ESRS 1 3.7 may result in a high number of new datapoints depending on its interpretation by auditors. EFRAG should clearly state that the disaggregation of data is voluntary ("may...") or delete the AR completely. Furthermore, this disaggregation does not provide any added value for the users of the information; instead, it leads to information overload and unjustified burdens for the disclosing company (information may not be available or only with high effort).	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	51.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	This requirement might be very complex as the undertaking has to agree with the external auditor which are these significant event, considering this entity is a new acquisition and we don't even know it.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	73.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	We support fair presentation. Please consider guardrails to avoid subjective overreach and ensure auditability. Clarify the interaction with materiality and the scope of permissible management judgement. This will reduce legal uncertainty and support robust assurance. processes.	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	16.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	ANSWER PROVIDED IN PART 2	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	34.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	ANSWER PROVIDED IN PART 2	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	35.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I agree	Par. 30 and AR 5. Equinor supports a DMA approach. We welcome the proposed simplifications to the DMA process, including the top-down approach and the ability to derive materiality conclusions based on business model, peer analysis, and other relevant factors. This represents a positive shift away from the overly prescriptive and compliance-driven requirements of the current ESRS, which made the DMA process unnecessarily resource-intensive.	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	AR 5
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I agree	AR 17 for para. 31 Support for explaining what is scope in terms of environmental impact - "the scope may be understood as the extent of environmental damage or a geographical perimeter."	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	17.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I agree	Para. 45 We support increased flexibility in the materiality assessment of the broader value chain. To further enhance legal clarity and operational feasibility, we recommend that the standard explicitly state that the materiality assessment of value chain impacts should be risk-based. This would ensure a proportionate approach, focusing efforts on areas where impacts, risks, and opportunities are most likely to arise, and is consistent with international due diligence frameworks. The following para. 46 ("The undertaking is not required to assess every possible impact, risk and opportunity across all areas of its operations and upstream and downstream value chains to identify the topics to be reported." would then be redundant.	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	45. (a)
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I agree	Para. 47and 48 (including AR17, 18, 19) Equinor supports the relief on undue cost and effort in the DMA.	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	47.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I agree	Para. 72 Equinor supports introduced flexibility regarding treatment of acquisitons and disposals in the year when they occur.	ESRS1	ESRS 1 - 5. Reporting undertaking and value chain	72.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I agree	Para 87-89. We support the new relief on using available information available without undue cost or effort.	ESRS1	ESRS 1 - 7. Preparation and presentation of sustainability information	87.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I agree	Para. 91 Equinor supports a relief for allowing disclosure of only part of the scope for the corresponding metric of an IRO when the metric can currently only be partially estimated.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	91.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I agree	ANSWER PROVIDED IN PART 2	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	92.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I agree	Sub-chapter 8.2 and 8.3 (para. 106-110) Equinor welcomes the opportunity for flexibility in including additional disclosures stemming from other legislation which requires the undertaking to disclose sustainability information, additional disclosures that do not relate to a topic, the EU Taxonomy, executive summary and including detailed informaton about the calculation of its reported GHG emissions in appendices.	ESRS1	ESRS 1 - 8.2 Presentation of additional information included in the sustainability statement	106.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I agree	Equinor supports the relief allowing exclusion of certain activities based on materiality if they are not expected to impair the relevance or faithful representation of the reported information.	ESRS1	ESRS 1 - 7. Preparation and presentation of sustainability information	90.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I agree	Equinor supports the opportunity to refer to other parts of the reports instead of having to repeat contents several places in the report.	ESRS1	ESRS 1 - 9.1 Connected information	112.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	Para. 113 The current wording seems too prescriptive. While the objective of ensuring clear linkage between material impacts, risks and opportunities and the related policies, actions and targets is understandable, the concern is that the requirement, as drafted, risks being interpreted too narrowly. It could be read as requiring IROs and policies/actions/targets to be presented together, rather than allowing preparers to structure disclosures flexibly and simply provide explicit cross-references. This may reduce flexibility without adding real value to users. I suggest clarifying that explicit cross-referencing or mapping is an acceptable means of compliance.	ESRS1	ESRS 1 - 9.1 Connected information	113.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I agree	To avoid duplication of financial information from financial statements in the sustainability statement Equinor supports the opportunit to cross-reference to the financial statements for financial disclosures.	ESRS1	ESRS 1 - 9.1 Connected information	114.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	Note: This comment is to Appendix A, but appendicies were not listed in drop down menu. It is referred directly in ESRS1 para. 9 While we support removal of examaples from sub-sub-topic level, we still belive that the proposed division of biodiversity and ecosystem topics in Appendix A to ESRS 1 for E4 Biodiversity and Ecosystems - separating drivers of change, state of species, ecosystem condition, and ecosystem services - creates challenges for materiality assessment and reporting. While the first element concerns the causes of biodiversity loss, the others reflect its consequences, effectively requiring undertakings to assess both sides of the same issue. Boundaries between species state and ecosystem condition are often unclear, and ecosystem services depend on both, making separate disclosures potentially redundant. This structure complicates double-materiality assessments by forcing preparers to evaluate pressures and outcomes simultaneously, increasing the risk of double counting, omissions, and inconsistent prioritisation. It also blurs accountability in reporting and hampers the development of a clear, decision-useful sustainability narrative. Although inspired by scientific "pressure–state–impact" models, the approach is difficult to operationalise in corporate reporting, and the challenges observed in the 2023 standard remain in the 2025 draft.	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	9.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	The aggregation/disaggregation requirements contradicts an information materiality approach and could result in reporting non-material information (thus obscuring the truly material information). We propose that undertakings have the flexibility to define the correct level of disaggregation.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	51.
Excels	UGT-ESPAÑA	Trade union	Spain			I agree	This is crucial for understanding impact materiality assessment	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 10
Excels	UGT-ESPAÑA	Trade union	Spain			I agree	This is crucial for understanding impact materiality assessment, in particular the point on reporting on the opinion of workers' representatives	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 11
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree Non-financial users should be limited to business partners, trade unions, social partners and NGO's representing interest common to society	ESRS1	ESRS 1 - Objective	4.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	The section on entity-specific information is not clearly delimited, only entity-specific information that is necessary for decision-making and understanding by the primary user groups, based on clear criteria for what to consider for users' decision-making and understanding (see comment to ESRS1-21), shall be included. Entity-specific disclosures should be limited to potential new sub-topics or additional disclosures on defined ESRS topics/sub-topics	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	10.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree To illustrate our comments in part 2, we suggest replacing para. 11 with the following: "While the standards will generally, provide a complete set of decision-useful information for the primary user groups, additional entity-specific information will usually only be relevant when the reporting entity needs to provide information on specific sub-topics beyond the requirements in the AR. If relevant, when developing its entity-specific disclosures, the undertaking shall consider without undue cost and effort comparability over time and with other undertakings that operate in the same sector(s)." In addition, we highlight, that it is important to delete the refence to IFRS industry-based guidance and GRI Sector Standards, as the paragraph would otherwise indirectly require compliance with those. We suggest addressing this I basis for conclusion or the NMIG instead.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	11.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially agree It should be added and made absolutely clear that the AR's do not add extra datapoints.	ESRS1	ESRS 1 - 1.2 Drafting conventions	15.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree It should be clarified that considerations on capital providers' decision-making shall focus on information essential to protect and evaluate prospects of their assets, while strategic or ethical preferences of investors in their decision-making need not be considered, e.g. an investor's zero-tolerance on certain ESG-matters. A criterion should emphasize that understanding is about getting a general impression of a subtopic and the related IRO and should be no more than what can be considered necessary by the undertaking to initiate a qualified dialogue. The level of aggregation and disaggregation shall be proportionate to the degree of severity of impacts.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree The text is an explanation of the term "general purpose" and should therefore be moved to definitions.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	AR 3
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree The text concerning the different terms should be clearer on the fact that "material impacts", "principal impact" and "most significant impacts" are synonyms, hence the second para just creates confusion and should be deleted or rewritten. We suggest that the following part should be deleted: "…Some existing standards and frameworks also use the term 'most significant impacts' when referring to the threshold used to identify the impacts that are described in the ESRS as 'material impacts'".	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	AR 4
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	ESRS1, paragraph 26, has the characteristics of being a guide and should therefore be moved to non-binding guidance. Using the terms "in general" and "may" underline the fact that the text is guidance. ESRS1, paragraphs 40+41, is sufficient in covering the topic.	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	26.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	The AR contains two examples, which should be moved to non-binding guidance.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 6
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree It should be clarified that the results 'may' provide a critical input. 'Will' should therefore be changed to 'may'. We suggest amending the text to: (Change marked with capital letters) "If the undertaking engages with affected stakeholders as part of its due diligence process to identify, assess and address negative impacts, the results of this engagement MAY provide a critical input to its materiality assessment, without necessarily putting in place a separate engagement process for the materiality assessment…"	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 11
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially agree Guidance is needed as to what 'evidence' can encompass, i.e. on the level of certainty, when assessing severity levels and likelihoods of impacts, and the magnitude and likelihood of risks and opportunities. Also necessary to explain the reason for using different wording in ESRS 1, paragraphs 45b and 47, i.e. reasonable and supportable evidence/information.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (a)
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially agree Guidance is needed as to what 'evidence' can encompass, i.e. on the level of certainty, when assessing severity levels and likelihoods of impacts, and the magnitude and likelihood of risks and opportunities. Also necessary to explain the reason for using different wording in ESRS 1, paragraphs 45b and 47, i.e. reasonable and supportable evidence/information.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (b)
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially agree In our opinion the top-down and bottom-up approach should have equal footing and that the reporting entity can choose which of these between them without having do document that the result of the one not-used would not have been different from the method used as this would in reality require entities to apply both methods. Therefore, it should be added in the last sentence that ", although documentation is not required". In addition, EFRAG should add to the Basis for Conclusion that the two methods are deemed to result in the same outcome.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 17
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially agree AR27 should be moved to sub-chapter 6.1 as an AR to paragraph 74.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	AR 27
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially agree AR 28 is difficult to understand. Is it a relief option ('do not require') or a requirement to exclude ('limited to own operations') up-/downstream data from mentioned DRs?	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	AR 28
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree Risks and opportunities in associates and joint ventures should not be automatically determined based on the supply/customer relationship but need to take into consideration the extent to which financial effects of risks and opportunities can or will be transferred to the undertaking. Goods may be traded at prices quoted in an active market, e.g. oil or crops, in which case financial effects related to IROs in the associate or joint venture will be carried by the owners in proportion to their equity share, i.e. not transferrable through a price adjustment on the goods.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	69.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree Risks and opportunities associated with leased assets should reflect the contractual terms, i.e. the extent to which financial effects can or will be transferred from the lessor (asset owner) to the lessee. The agreed lease payment may be fixed, only adjusted by inflation, or driven by market price of similar assets, which in combination with a short lease term or cancellation rights, can influence the extent to which financial effects, related to impacts from the leased asset, will be transferred to the lessee.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	70.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially agree ESRS1-71 should be more clearly demarcated to assets in defined benefit plans, as an undertaking has no relationship to pension assets in defined contribution plans	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	71.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree The standard should specify, that entities do not need to change the base line, i.e. the comparable numbers provided for the base year, when it in future years change the accounting policies for metrics. This might be practically impossible without applying hindsight. Applying new accounting policies prospectively should be stated. Retrospective application should be possible on a voluntary basis.	ESRS1	ESRS 1 - 6.1 Reporting period and base year	76.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially agree It creates confusion that paragraph 86 and AR32 are not aligned with the relief for quantifying anticipated financial effects.	ESRS1	ESRS 1 - 7.2 Judgement, measurement uncertainty and outcome uncertainty	86.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially agree In ESRS 1, paragraph 89, it must be acknowledged that there will be cases where data will not be available. It should be clarified that 'undue cost or effort' shall not be misused to omit material information. Different views can be expected on what undue cost or effort is, why more clarity is needed to prevent misuse.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	89.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree The requirement in ESRS 1, paragraph 108b – requiring the non-material information to provide a faithful representation – should be deleted. The key element is in ESRS 1, paragraph 108a (non-obscuring) and any information will anyhow have to meet the qualitative characteristics as outlined in ESRS 1, paragraph 107.	ESRS1	ESRS 1 - 8.2 Presentation of additional information included in the sustainability statement	108. (b)
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree The AR has the characteristics of being a guide and should therefore be moved to non-binding guidance. Using the terms "may" underline the fact that the text is guidance.	ESRS1	ESRS 1 - 8.3 Options in presenting information across parts of the sustainability statement	AR 36
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I agree	While we agree with the transitional provision whereby comparable information is not required for the first year of preparation of the sustainability statement, we suggest to add – or make it clear – that this also apply in the first year of adopting the amended ESRS standards if/where the amended standard change definitions or disclosure requirements compared to those set by the standards in Set 1.	ESRS1	ESRS 1 - 10.2 Transitional provision related to Section 7.1 Presenting comparative information	126.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	Sub-subtopics have been removed and instead transferred into brackets under the respective subtopics. It is unclear how this restructuring should be understood in the context of performing the double materiality assessment, and how auditors are expected to verify such an assessment. Clarification would be needed to ensure consistent application and assurance. If we have three issues in brackets and one of them is material in the DMA process, should the entity report only that one – the material one – or all three? In our opinion, Table AR 16 has not been simplified, but made even more complicated.	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	9.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	It is unclear how to interpret the difference in wording. Under the "Business conduct" topic, the subtopic is described as "Corporate culture (including anti-corruption and bribery, protection of whistle-blowers and animal welfare)," whereas for social topics (ESRS S1–S4), the parentheses do not start with the word "including." It is therefore uncertain whether subtopics introduced with "including" are meant to be illustrative (non-exhaustive), while those without "including" should be understood as exhaustive. Clarification is needed, as this distinction may affect how undertakings perform the double materiality assessment and how auditors verify it.	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	9.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I disagree	The use of the same word "subject" in different meanings, where the meaning is interpreted by the ESRS user based on the type of highlighting used in the text (bold + italics) or without any highlighting, greatly complicates and hinders work with standards. We have not encountered such a construction in other standards before. We recommend using two separate words to distinguish between the different meanings and applications of sustainable development.	ESRS1	ESRS 1 - Objective	2.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	Given the European Commission's withdrawal from the preparation of sectoral standards, the provision in point 11, which reads "may use available best practices and/or available frameworks or reporting standards, such as IFRS industry-based guidance and GRI Sector Standards," means that many entities will not use alternative sectoral standards. Thus, sustainable development reporting will not be reported to a greater extent than the basic ESRS. We recommend changing the word "may" to "shall."	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	11.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I disagree	In many Application Requirements (AR), the word "may" is still used (e.g., ESRS 2 AR19, AR24, AR25). This is inconsistent with the provisions of paragraph 15 of ESRS1. It is unclear whether ARs using the word "may" are mandatory for reporting by the entity/application by the entity or voluntary. This contradicts the general assumption that there are no voluntary disclosure points in ESRS. We recommend replacing the word "may" with "shall consider."	ESRS1	ESRS 1 - 1.2 Drafting conventions	15.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	In the sentence: 'the undertaking may use in conducting a materiality assessment:' the word 'may' is used. In our opinion, this construction will result in the listed sources being used selectively, while dialogue with stakeholders is a mandatory element of the DMA process, which derives from the due diligence process. We recommend a different sentence construction, indicating that the listed sources constitute a mandatory but not exhaustive list for use in the DMA process.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	27.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	We welcome the harmonization of the approach to determining the materiality of impacts, with or without the inclusion of mitigation measures. This is extremely important, as each entity approaches this differently (there are no relevant provisions in the current wording of the ESRS). We take a negative view of the proposal in the simplified ESRS. It is necessary to reach a uniform agreement on how to consider corrective actions taken in previous years. Point 34 of ESRS 1 of the simplified ESRS indicates that they should be taken into account when determining material issues in the DMA (applies to actual impacts). This contradicts the EFRAG guidelines of May 2024 (Question ID 350 – Gross risk), in which the guidance for companies was that actions taken in previous years should not be taken into account (gross risk): The assessment of material climate-related impacts, risks, and opportunities is performed looking at the gross risk, i.e., before any mitigating actions. Therefore, it is necessary to define a uniform approach to both impacts and risks, with a possible division into actual and potential impacts. The current proposal is very complicated and will be difficult to apply.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	The phrase "if the undertaking needs to maintain significant ongoing mitigation" is ambiguous and will be interpreted differently by different entities. It is a judgment call by the entity's management—very difficult for an auditor to verify and immeasurable. We recommend changing the wording of the point and standardizing it without separating it into significant mitigation or prevention actions and not significant mitigation or prevention actions.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I disagree	The definition of what constitutes a positive impact is material. We take a negative view of EFRAG's attempt to define what constitutes a positive impact. The description refers only to environmental issues and is difficult to transfer to the social or governance areas. We believe that the definition should be included in the glossary (Annex II), and examples of positive impacts should be provided for each ESRS topic (as AR). Otherwise, we will continue to see reporting of positive impacts on health and safety while fatal accidents occur in the organization.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	36.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I disagree	Very important information on what dialogue with a silent interested party entails has been removed. I view this change negatively. The alternative dialogue methods described in IG1 DMA (point 206) are very important and should be transferred to AR in ESRS 1.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 10
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	Very important information on how to identify material entities in the value chain that may be a source of material impacts, risks, and opportunities should be transferred from IG2 VC (point 28) to ESRS 1 as a supplement to the AR for this point. Many entities are not familiar with and do not apply the IG guidelines, considering them to be non-binding. However, the ESRS in its current wording leaves many ambiguities that have been clarified in the IG.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	64.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	Please note that it has not been possible to include the entire DMA in ESRS 1 without referring to thematic ESRSs. The scenario analyses, necessary for climate risk analysis, are included in ESRS E1 and also apply to the DMA process. We recommend referring to ESRS E1 (DR E1-2) in order to fully demonstrate what analyses should be performed in the DMA process.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	AR 15
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I disagree	We take a negative view of the transfer of the list of physical and transformational risks for ESRS E1 (Climate Change) to NMIG. We take a negative view of the removal of the list of physical and transformational risks relating to other thematic environmental ESRSs from both ESRS and NMIG. We believe that these risk lists should constitute AR for mandatory analysis by the organization. In our opinion, not having a reference point (such as the aforementioned risk lists) is a hindrance rather than a simplification for the organization. In the first version of ESRS, entities knew what they had to analyze.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	AR 15
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	We welcome the clarification contained in AR 18 (a) regarding time horizons. We view the information contained in (b). We believe it is necessary to supplement when it is not necessary to analyze all parameters of the severity of the impact (in which situations) and to refer to scientific consensus. This should be done in the same way as in IG 1 DMA. Otherwise, entities will abandon the assessment based on severity parameters and rely on unverified assumptions (the judgment of the entity's manager). This will cause difficulties during verification by the auditor.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 18
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	The absence of the word "governance" when referring to impacts could cause confusion	ESRS1	ESRS 1 - Objective	3.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	What about employees, non-employees, workers in the value chain, end users/consumers, customers? Perhaps "affected stakeholders" could be mentioned here as wel	ESRS1	ESRS 1 - Objective	4. (b)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Minor comment. I would suggest to slightly change the para, The ESRS 1 General requirments sets out general requirements for the basis of the preparation of a sustainability statement. It also sets out general requirements for identification of the undertaking's material impacts, risks and opportunities, as well as for preparing and presenting information about the topics related to them.	ESRS1	ESRS 1 - Objective	6.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Reference to ARs to be deleted according to the standars new version and presentation	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	7.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	We would suggest to change this as follow: Amended ESRS 2 General disclosures establishes Disclosure Requirements (DRs) on the information that the undertaking shall provide at a general level across all material sustainability topics on the reporting areas governance, strategy, impact, risk and opportunity management, and for topics related to material impacts, risks and opportunities on policies, actions, targets and metrics. Additionally, should be reported financial effects for entity specific related matters? in this case, should this be specified?	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	8.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Just to bear in mind, in case you consider it appropriate, topical ESRS can include specific requirements that complement the general level Disclosure Requirements of ESRS 2.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	9.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	In this case, the AR 1 introduces shall reporting requirements while par 11 introduces "may/voluntary" disclosure requirements. To avoid confusion, I would suggest to change the order by including in pag 11 mandatory requirements and AR voluntary ones, as follows: 11. When developing its entity-specific disclosures, the undertaking shall consider comparability over time and with other undertakings that operate in the same sector(s). The undertaking shall ensure they meet the qualitative characteristics of information as set out in Chapter 2; and include material information related to the reporting areas of governance, strategy, impact, risk and opportunity management (i.e. policies and actions), and metrics and targets (see [Draft] Amended ESRS 2 - GDR -P, GDR-A, GDR-M, GDR-T). AR 1 for para 11: For this purpose, it may use available best practices and/or available frameworks or reporting standards, such as IFRS industry-based guidance and GRI Sector Standards. AR 2 for para 11:	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	11.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	It could be useful to specify if the GDR-P, GDR-A, GDR-M, GDR-T shall be used to report about entity specifics material IROs.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	AR 1
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	To compensate the differences between par a) and b), while explaining impacts, risks and opportunities, we would suggest to: i) amplify the description of impacts in paragraph a) or ii) simplify the description of risks and opportunities in paragraph b)	ESRS1	ESRS 1 - 1.2 Drafting conventions	12. (a)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	As may disclosures are still included, we would suggest to mantain the following: may disclose' – indicates voluntary disclosure to encourage good practice.	ESRS1	ESRS 1 - 1.2 Drafting conventions	14.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	For clarification purposes, we would suggest to add: The information shall be presented either at topical level or at impacts, risks and opportunities level, depending on what provides the most relevant information, "when the related identified material IROs are managed in the same way (i.e. same policies, actions, metrics and targets)	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	22.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	We would suggest to delete this paragraph, as it seems redundant	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	23.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	We would suggest to use the word "and", not "including". connected with its own operations, products, or services, AND through business relationships in its upstream and downstream value chain. Business relationships are not limited to direct contractual relationships.	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	30.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Should a reference to the due diligence be reincorporate? At least, from a voluntary perspective: When available, the materiality assessment of a negative impact may be informed by the due diligence process defined in the international instruments of the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	31.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Due diligence is mentioned here but not previously (para 31). Pls, consider the comment above	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	33.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Actual impacts are already mentioned in par 31. we would suggest to move the clarification related to actual impacts (those that ocurred during the reporting year or in prior years) above	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	This approach introduces important additional burdens as undertakings shall go through the different actions, classify them as prevention, mitigation, remediation, etc actions, and after that, evaluate the severity. These efforts seems to be even worst when we move through par 35 as it seems we also need to differentiate between ongoing actions	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	The new version of standars seems to have a predominant negative approach. Positive impacts are less represented. We would suggest to consider and incorporate the following :"Nevertheless, organizations can create positive impacts by carrying out initiatives that extend well beyond what is required by law and regulation."	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Does this interpretation mean that positive impacts linked only to the undertaking own activities, not influencing on third parties, should not be considered as such? For instance, what about that are linked to the social dimension? We strongly recommend to avoid this negative approach	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	36.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	To ensure alignment and consistency with para above, AR9 (b)should be also included "and their related actions...."	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 5
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Considering the example proposed in AR12(a), does it mean that it shall be demonstrated that even though the undertaking uses cobalt in its product, they are not mined by using children labour?	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 6
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Why the word "grave"has been replaced by "serious"?	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 7
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Should "workers in the value chain" be included?	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 10
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Please ensure that the mention to "workers representative" is adapted and clarified for multinational organizations with a large number of legal entities. Specifically, it is important to specify which legal entity is responsible for involving workers' representatives to fulfill reporting obligations.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 11
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Does it mean that policies should also be identified while carrying out the DMA? This will include additional reporting requirements within the process	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 12

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Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	A mention to ESRS 2 para 30 should be also included to cover also the possibility of not having actions in place/ planned (62 amended) If the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 13
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	We would suggest to include a mention to current events in the last sentence as follow: risks and opportunities may derive from past, current or future events.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	39.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	A mention to the reputational, operational and legal effects of the risks could be incorporated, as they could also have financial effects. For instance: (51) The materiality of risks and opportunities is assessed based on a combination of the likelihood of occurrence and the potential magnitude of the financial effects. Reputational, operational and legal effects may be considered as they use to have financial effects	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	42.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	What about the positive approach? it could be the case in which positive impacts or opportunities are generated as well. Should them be mentioned/included?	ESRS1	ESRS 1 - 3.4 Material impacts or risks arising from actions to address other topics	43.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	This approach appears to be at odds with the new standard proposal, especially in light of the approaches to prevention, mitigation, and remediation actions.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	46.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	This approach could add subjectivity to the process. Additionally, it could make more difficult to implement an homogeneous and coherent assessment among undertakings	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 18
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Please clarify the concept of "entity-specific basis"	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	49.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	When an IRO originates from a specific sector, subsidiary, country, location, or similar subdivision, it should be possible to report on how that IRO is managed within that particular context, rather than being required to describe how the undertaking manages the IRO across the entire organization.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	24.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	We would suggest to join this para 65 to para 62, as their content is quite similar	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	65.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Clarification included in para 68 should be moved to para above, when business relationships are mentioned first time	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	68.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	this should be aligned with the provisions established for rfinancial statements. if not, inconsistencies could raise	ESRS1	ESRS 1 - 5.4 Relief for acquisitions and disposals	72.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	The following could be impracticable "it shall also disclose comparative information for narrative disclosures". We would suggest to include the following optio: "a reference to the previous sustainability statements could be made "	ESRS1	ESRS 1 - 7.1 Presenting comparative information	81.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	A mention to the uncertainty linked to risks and opportunities should be also included	ESRS1	ESRS 1 - 7.2 Judgement, measurement uncertainty and outcome uncertainty	86.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	We are not sure how this (Reasonable and supportable information includes information about past events, current conditions and forecasts of future conditions) could be consistent with "without undue cost of effort"	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	88.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	In line 5, we would suggest to include "if any" as follows; the undertaking shall disclose the actions it has taken, if any, to increase…	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	91.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	In line 7, "shall also assess" should be replaced by "may also assess"	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	91.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Bear in mind that strategies are updated from time to time. In the framework of new strategies in place, target could be replaced. Consequently, consistency could not always be guaranteed. These circumstances should be also considered	ESRS1	ESRS 1 - 7.6 Changes in the preparation or presentation of sustainability information	94.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	The following sentence should be removed as it is not fully aligned with paragraphs above: "corresponding to intellectual property, know-how or the results of innovation"	ESRS1	ESRS 1 - 7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	100.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I agree	Minor typo: The undertaking shall make every dt to ensure that	ESRS1	ESRS 1 - 7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	101.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	In line 5, a reference to administrative, management and supervisory bodies' delegated bodies should be incorporated, as follows: the members of the administrative, management and supervisory bodies or their delegated bodies. Additionally, the following sentence should be removed "acting within the competences assigned to them by national law and having collective responsibility for that opinion, the"	ESRS1	ESRS 1 - 7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	AR 35
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Why only GHG emissions have been mentioned and not others?	ESRS1	ESRS 1 - 8.3 Options in presenting information across parts of the sustainability statement	AR 36
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain				Appendix A ; Consumers and end users - it is important to clarify whether and how the ESRS S4 standard applies to B2B companies. In this regard, it would be helpful for the ESRS to provide clear guidance and examples for B2B companies, acknowledging that their "customers" are often other companies. The ESRS should offer straightforward guidance and examples specifically for B2B companies, recognizing that their customers are usually other businesses. To give a complete and accurate overview, ESRS should also let B2B companies report on their impacts, risks, and opportunities related to these business customers, as well as how they address them.	ESRS1		
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Redundant information. Suggestion: (11) If the undertaking concludes that a topic related to one or more material sustainability-related impacts, risks or opportunities is not covered, or not covered with sufficient granularity by an ESRS, it shall provide additional entity-specific disclosures on that topic. This may be the case due to sectorial specificities and/or other facts and circumstances relevant to the undertaking itself. Depending on the undertaking's facts and circumstances, there may be topics other than those covered in ESRS topical requirements that the undertaking shall cover, following its materiality assessment, such as where its business model and strategy are associated with material impacts, risks and opportunities that do not correspond to the ESRS topics.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	10.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Is this paragraph needed? The concept that disclosures must be specific to the undertaking and not boilerplate is covered in Appendix B, QC 17. Suggestion: It appears reasonable to delete this paragraph.	ESRS1	ESRS 1 - 7.9 Reporting on opportunities	102.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	The provision shall either be deleted or rephrased to ensure that the structure of the Sustainability Statement is consistent with the principle of fair presentation and permits the undertaking to present a clear and comprehensive account of its material sustainability-related impacts, risks, and opportunities, together with the measures by which these are managed.	ESRS1	ESRS 1 - 8.1 General presentation requirement, structure and content of the sustainability statement	105.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	The disclosure of information pursuant to Regulation (EU) 2020/852 is governed by other legislative acts. Accordingly, the wording "include them in its sustainability statement" should be amended to "it may," in order to reflect the optional nature of such inclusion.	ESRS1	ESRS 1 - 8.1 General presentation requirement, structure and content of the sustainability statement	106.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	The underlying rationale of the NMIG is understood. However, its implementation and integration into the sustainability report are not clearly described. Binding references to the NMIG or to other non-binding frameworks are considered burdensome, unnecessary, and superfluous, as they would unduly increase the length of the report. No obligation should be implied with respect to the implementation of non-binding guidance.	ESRS1	ESRS 1 - 8.2 Presentation of additional information included in the sustainability statement	107. (a)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: If data and assumptions used in preparing the sustainability statement shall be consistent to the ones used in preparing the financial statements, there is no point in explaining the level of consistency. Suggestion: Amend as follows: Data and assumptions used in preparing the sustainability statements shall be consistent to the extent possible with the corresponding data and assumptions used in preparing the financial statements; to support the understanding of significant data and assumptions, the undertaking shall explain the level of consistency.	ESRS1	ESRS 1 - 9.2 Direct/indirect connectivity with financial statements and consistency of assumptions	116.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	The formulation "shall disclose" may give rise to misunderstandings, as information is not necessarily available for all data points. In the relevant standards, the disclosure obligation is frequently qualified by the principle that the absence of data does not require separate reporting. In accompanying comments or explanations, this is typically justified by the objective of simplification, thereby avoiding the need for "nil reports." This approach, however, stands in some tension with the literal interpretation of "shall disclose." It therefore appears appropriate to clarify in §14 that the absence of a data point does not in itself trigger a disclosure obligation, and that disclosure is required only where the relevant information is in fact available.	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	14.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	The use of the formulation "shall consider" is commonly explained as "must take into account," while in other instances the wording "may be provided" is used. This inconsistency remains confusing. Pursuant to paragraph 15, certain presentation options are set out in the Application Requirements (AR). It is important that each such option is expressly identified as optional and does not give rise to the impression of being mandatory in all cases. With respect to the formulation "shall consider," it should further be clarified that the outcome of such consideration may also be that no reporting requirement arises.	ESRS1	ESRS 1 - 1.2 Drafting conventions	15.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	In ESRS 1, paragraph 21(b), the wording "necessary for users ... to understand" introduces a new and unclear standard. The wording of 21(b) is broadly framed and not further defined, which may significantly expand the scope of reporting.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21. (b)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	The provision appears excessively complex, as evidenced by the fact that the amendment note is longer than paragraph 22 itself.	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	22.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	It provides clarification on entity-specific topics and refers to AR 21, which, however, addresses subtopics within a standard rather than entity-specific IROs. It is therefore suggested that AR 21 be formulated more broadly in order to adequately cover entity-specific IROs, which may reasonably be understood as falling within the scope of a given standard.	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	23.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	The paragraph should explain or provide an example of a sustainability-related risk that is not related to an undertaking's negative impact respectively a sustainability-related opportunity that is not related to an undertaking's sustainability-related positive impact.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	26.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: This statement is inconsistent to the reporting areas mentioned in other sections of ESRS 1 and ESRS 2 and should be made consistent across all ESRS: An ESRS sustainability statement covers governance, strategy, policies, actions, targets and metrics for topics related to material impacts, risks and opportunities. Suggestion: An ESRS sustainability statement covers the reporting areas of governance, strategy, impact, risk and opportunity management (i.e., policies, actions), targets and metrics for topics related to material sustainability-related impacts, risks and opportunities.	ESRS1	ESRS 1 - Objective	3.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: The draft paragraphs do not seem to sufficiently address the challenge that materialized when looking at 2024 Sustainability Statements, i.e., the large diversity in practice whether an impact is positive or negative (even if the gross approach was applied). Suggestion: Provide additional guidance that makes the distinction between positive and negative impacts much more pronounced so that the concept is applied consistently by all undertakings. (Applys to points 30-36)	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	30.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	See related comment on paragraph 21(b); a consistency check is required.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	37.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: This pronouncement is misleading in light of the clarification that the scope of consolidation for the sustainability statement is the same as for financial statement. The financial materiality of a topic is not constrained to topics that are within the control of the undertaking but includes information on material risks and opportunities attributable to business relationships beyond the scope of consolidation used in the preparation of financial statements. Suggestion: Consider amending as follows: The financial materiality of a topic is not constrained to topics that are within the control of the undertaking but includes information on material risks and opportunities attributable to business relationships beyond the scope of consolidation used in the preparation of financial statements material risks and opportunities in the undertaking's own operations and includes information on material risk and opportunities attributable to business relationships in the upstream and downstream value chain.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	38.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Delete the second sentence because it is not needed if it is stated beforehand that civil society, etc. are other users Suggestion: Civil society, non-governmental organisations and trade unions as users are proxies for affected stakeholders	ESRS1	ESRS 1 - Objective	4. (b)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: What is the difference between (b) dependencies and (c) other factors? Are exposures to climate hazards not in essence a result of the dependency on natural resources in a certain condition? Are changes in regulation not actually a dependency on complying with regulations? Suggestion: Either provide a definition of other factors, not restricting it to examples or consider deleting (c) in case it is concluded that these are actually a facet of (b)	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	40.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	It does not provide a clear clarification of the meaning of "undue cost or effort" in the comment recorded in the log of amendments.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	46.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	The concept of "undue effort" should mean activities beyond regular business processes. However, since sustainability due diligence is itself defined as part of those processes, the notion becomes circular. For example, §47 states: "To identify material impacts, risks and opportunities, the undertaking shall […] use information prepared […] in conducting its sustainability due diligence […]". This reference does not clarify what constitutes undue effort; instead, it reinforces the loop. In practice, external auditors often suggest that due diligence should also cover indirect value chain relationships. If not, companies must document that a reasonable effort was made. This could imply gathering data from suppliers of suppliers or financed counterparts. Proof might simply be showing outreach attempts (e.g., email requests), but what counts as sufficient evidence remains highly debatable. §47 provides no guidance here. A clearer approach would be to explicitly state that tier 2+ relationships in the value chain must be considered in AR5.(a) and AR5.(b), while direct outreach to such entities is optional unless required by law. This clarification should be added in a new paragraph, and §47 should avoid referencing due diligence in defining undue effort.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	47.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	The newly adopted chapter on the DMA provides additional information that supports an understanding of both the process and the meaning of the standard. However, the possibilities for substantive simplification in financial institutions must be regarded as limited. Given the thematic breadth, which is heavily dependent on the respective portfolio, a blanket exclusion of individual subject areas in advance can hardly be considered reliable. Consequently, an increased need for coordination with the auditor is to be expected. The extent of the documentation required for a clear categorization as material or immaterial will become apparent in practice.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	48.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	When the undertaking is reporting at a consolidated level, it shall perform its assessment of material impacts, risks and opportunities for the PERSPECTIVE OF THE entire consolidated group ACCORDING TO FINANCIAL STATEMENT regardless of its group's legal structure. It shall ensure that all CONSOLIDATED subsidiaries are covered in a way that allows for the unbiased identification of material impacts, risks and opportunities at group level.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	53.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	According to ESRS 1 paragraph 58, the consolidation perimeter shall correspond to the consolidation perimeter applied in the financial statements. However, ESRS 1 paragraph 59 requires that the consolidation perimeter for the sustainability statement be reviewed annually. The review of each non-consolidated subsidiary at every reporting date does not lead to simplification. For the sake of comparability, disclosures relating to "own operations" should not extend beyond the group of entities that are financially consolidated. A non-consolidated subsidiary may only be considered as part of the value chain. We therefore propose to delete the last half-sentence of the paragraph: "unless there are specific facts and circumstances that expose the group to material impacts, risks and opportunities arising from such subsidiary" and to delete the word "usually" in paragraph 59.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	59.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	Paragraphs 60–73 serve as guidance for value chain. However, this guidance, in particular with regard to the treatment of joint ventures, associates and special purpose vehicles (SPVs), does not provide sufficient clarity.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	61.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	The definition of undue effort remains unclear, leading to unnecessary discussions with external auditors.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	60.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	The amendment is a welcome improvement, yet it does not address the core issue. The wording that information "may" be based on estimates or directly collected raises a critical ambiguity: does it also imply that no information at all could be acceptable? Even when estimates are used, they must remain verifiable; thus, the problem is not removed but merely shifted. Moreover, grouping data for due diligence with data for metrics is problematic. Due diligence may reasonably rely on management's experience and judgment, while metrics must rest on concrete evidence, even if estimated. Combining these two types of information blurs their distinct purposes and audiences, creating confusion rather than clarity.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	62.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Requires clarification because it is not understandable what this is meant to tell.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	63.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	The reference to "only the inclusion of material upstream and downstream value chain information" remains problematic, as the definition of materiality itself is unclear. We explicitly welcome the specification in ESRS 1-64 regarding which actors within the value chain must be included. This is an important foundation for consistent and transparent sustainability reporting. However, for financial institutions, further clarification is needed. In particular, it should be made clear that the value chain does not extend to the activities of financed or insured clients, unless the institution itself bears ownership risks and opportunities. Such a clarification would significantly facilitate the delineation of responsibilities. We therefore propose a new paragraph in section 5.3 (para. 72): "Financial institutions are not required to evaluate the full value chain "	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	64.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Seems to be redundant to Paragraph 62. Please check what can be merged or if something should be deleted in either of the paragraphs.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	65.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Seems to be redundant to Paragraph 62, 65 and 67 when talking about estimates and proxies	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	67.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: The term business relationships already showed up various times beforehand and now it is defined out of a sudden with respect to the specific facet of associates or joint ventures. Suggestion: Provide an all-encompassing definition in the glossary and then paragraph 68 can be deleted.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	68.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	In principle, we agree with the position set out in ESRS 1 paragraph 70, according to which the impacts, risks and opportunities arising from the use of a leased asset exist irrespective of whether the asset is legally owned by the undertaking or leased. The lessee causes and contributes to the impact of the leased asset and must therefore report on such impacts in the course of its own operations during the lease term (e.g., Scope 1 and 2 emissions). However, we wish to point out that, in our view, the perspective of the lessor and the act of leasing itself has thus far been insufficiently addressed in this paragraph. In practice, the distinction between leasing and rental is often blurred, particularly in the case of operating leases with short durations or limited control. We therefore recommend that the lessor's perspective be explicitly incorporated into ESRS 1 paragraph 70, in order to ensure consistent and transparent reporting across the entire value chain.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	70.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	The clarification is welcome. However, it remains unclear whether the reference applies only to pension funds directly owned by the company, or also to those owned by beneficiaries but consolidated within the company's accounts. The treatment of trust structures requires particular attention. In cases where administration is carried out by the company, but ownership and decision-making rights lie entirely with the beneficiaries, the company has no influence over investment or management choices. In such circumstances, these funds are more appropriately assimilated to the private property of employees rather than to the company's own operations or supply chain. Therefore, it would not be appropriate to consider such trust-based pension assets as part of the company's value chain. The same reasoning applies to their treatment in GHG calculations. Unless the company has decision-making power or bears risks related to ownership, these structures should not be included in the company's GHG boundary. A clarification on this point would help avoid inconsistent reporting and unnecessary discussions with auditors.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	71.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Inconsistent wording in comparison to other paragraphs within ESRS overall. Amended ESRS 2 General disclosures establishes Disclosure Requirements (DRs) on the information that the undertaking shall provide for topics related to material impacts, risks and opportunities on the reporting areas of (i) governance, strategy, impact, risk and opportunity management, as well as (ii) policies, actions, targets and metrics. Suggestion: Amended ESRS 2 General disclosures establishes Disclosure Requirements (DRs) on the information that the undertaking shall provide for topics related to material sustainability-related impacts, risks and opportunities on the reporting areas of (i) governance, (ii) strategy, (iii) impact, risk and opportunity management (i.e., policies, actions), as well as (ii) policies, actions, targets and metrics.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	8.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	This disclosure should be required only where data for the prior period has not been reported. Where prior-period data has been reported, it must be presumed to be comparable. If such data has not been reported, this is evidently due to the absence of comparable information. Accordingly, the purpose of paragraph 82 is unclear. If the intention is to require disclosure in cases where data is not comparable, such disclosure should be subject to a materiality threshold. A comparability deviation of 5–10% may still be acceptable for certain metrics.	ESRS1	ESRS 1 - 7.1 Presenting comparative information	82.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	The current drafting leaves too much uncertainty. For example, a company with a particularly efficient cost–income ratio could argue that any expenditure above zero, such as the purchase of external datasets, constitutes an undue cost. Without further guidance, such interpretations risk undermining comparability across the industry. Additional clarification is therefore necessary to ensure consistent application and to prevent overly subjective thresholds of what qualifies as undue cost.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	89.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	By consolidating sub-topics and sub-sub-topics at the sub-topic level, the sub-sub-topics are effectively eliminated. In particular with regard to governance, this has implications for the materiality assessment. It should be permissible for the undertaking to determine an appropriate level of aggregation on an individual basis.	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	9.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: How was the conclusion derived that the data for E1-6 can be derived without undue cost and effort? Since the whole topic about undue cost and effort is addressed in general in the previous section 7.3 it appears to make sense to delete Paragraph 91. Suggestion: Consider deleting.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	91.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Paragraph 99 remains insufficiently delineated in scope. Within the financial industry, certain information may not qualify as intellectual property but nevertheless possesses material value and justifies non-disclosure. During the first CSRD reporting cycle, discussions with auditors revealed divergent interpretations of what constitutes sensitive information that may be legitimately withheld. A particular concern arises in relation to targets: groups may refrain from publishing local targets in order to preserve flexibility for reallocation. Such information is of value, though not within the meaning of paragraphs 99(a) or 99(b), and therefore is not clearly protected under the current provisions of ESRS 1. Consequently, the decision not to disclose such targets or metrics is left subject to auditor interpretation. In this context, it would be preferable to require undertakings that withhold available targets or metrics to provide an explicit explanation. The scope of confidentiality should not be restricted solely to trade secrets but should also extend to other forms of sensitive information where disclosure would be inappropriate.	ESRS1	ESRS 1 - 7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	98.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Redundant information that is sufficiently covered in ESRS 1 re/ qualitative characteristics and in ERSS 2 re/reporting areas. This applies to all sustainability-related disclosures. Suggestion: Delete AR 1 for para. 11 in its entirety.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	AR 1

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	The definition of "common categories of affected stakeholders" in AR 10, employees and/or workers' representatives, suppliers, consumers or end-users, affected communities, persons in vulnerable situations, and nature, raises two concerns. First, previously identified relevant stakeholders do not necessarily fit into these categories, which restricts flexibility. An "other" category or clarification that additional categories are permissible would therefore be appropriate. Second, the term "persons in vulnerable situations" is not defined and requires further explanation. In addition, AR 10 and AR 11 are inconsistent. AR 10 includes workers' representatives within the list of affected stakeholders, whereas AR 11 distinguishes between affected stakeholders and their representatives. To resolve this, two options exist: Option 1: Amend AR 10 only, leaving AR 11 unchanged. Option 2: Amend both AR 10 and AR 11, clarifying that affected stakeholders may be represented by intermediaries. For example: AR 10: "…affected communities and persons in vulnerable situations and/or their representatives." AR 11, sentence 2: "However, the undertaking may also seek direct input into its materiality assessment from affected stakeholders or their representatives (such as employee representatives or trade unions)."	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 10
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: The statements have nothing to do with the materiality assessment but relate to Governance procedures. It is crucial that these sentences are deleted here. Suggestion: Delete paragraph AR 11.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 11
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	This can be made clearer. A policy prescribes certain behaviour or actions, and therefore the policy itself can be considered an "action". In this case, it is unnecessary to describe the expected actions under a policy twice, both in GDR P and in GDR A. In this context, references to actions taken shall also be understood to cover aspects of the corresponding implemented policies, since policies are realized through actions; therefore, it is suggested to delete paragraph AR 12.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 12
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	According to AR 14 of ESRS 1, paragraph 41, resources outside the balance sheet must also be taken into account when determining financial effects. This is methodologically complex and may entail considerable analytical effort, particularly in identifying such resources.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	AR 14
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	AR15 highlight, once again, how problematic is the definition of anticipated financial effects. It is written "[…]its contribution to financial effects in the short,[…] scenarios/forecasts that are deemed likely to materialise[…] do not yet lead to the recognition of assets/liabilities, or income/expenses" The combination – exemplificative- shown above is particularly critical in the boundary with financial accounting and potentially leading to minimal/no disclosure or litgation risks.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	AR 15
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	The optional use of the top-down process for the materiality assessment is, in principle, to be welcomed. However, in the absence of illustrative guidance as to when a topic may be excluded in advance as immaterial through the application of the top-down approach, both preparers and auditors are faced with challenges. A clarification or the inclusion of examples in the NMIG would therefore be helpful.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 17
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	The provisions do not specify when the use of quantitative information is required. While it is positive that the materiality assessment process may be adapted to individual circumstances, examples in the NMIG would provide greater clarity as to when quantification is appropriate and when it is not. The formulation "a qualitative analysis may be sufficient" appears too weak and stands in contrast to the requirement for reliable information. It would be more appropriate either to permit a clear top-down decision by management or to state explicitly that, for example, a competitive benchmarking exercise based on published sustainability reports constitutes an acceptable form of qualitative analysis.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 19
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	The statement is wrong. Example S1-13 §40.(b).i clearly specifies that death cases must be reported when they occur on the undertaking's premises and involve workers. Furthermore, it would be reasonable to make explicit that metrics for company-specific topics may also include the value chain, provided these aspects are considered material. In addition, references to undue effort and similar considerations should be addressed to ensure clarity and proper application.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	AR 28
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Second sentence in AR 4 for para. 21 is misleading and should be deleted Suggestion: Delete paragraph AR 4.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	AR 4
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	This example is extreme and raises uncertainties. A "breach of agreed standards" does not necessarily constitute a violation of law. "Agreed" may refer to loan conditions set by a financial institution, yet where such standards go beyond legal requirements, a breach does not automatically amount to a negative impact. In the case described, the loan is granted in compliance with the law, environmental regulations apply and, by assumption, are not violated. It is also evident that any loan to a company with environmental impacts will inherently create impacts along the value chain. A breach related to a single loan does not in itself render a matter material, unless the loan is particularly significant for the overall portfolio. The example is flawed because it does not consider any materiality threshold of the loan, it assumes that contracts can enforce standards whereas they can only create incentives, and it disregards the constant shift between potential and actual impacts within a portfolio, which cannot be implemented at scale as suggested. Overall, the examples do not contribute any new perspective to the disclosure requirements, therefore it is proposed to move AR 6 for paragraph 30 into the NMIG.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 6

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	IMA-Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Seems that the company is now free to choose whether to report at the IRO level or simply just report at the topic level. If this is the case, what's the point of drilling down to the IRO level for all material topics? I might want to be more conservative and just disclose the topic that was material without necessarily detailing all the IROs that made the topic material. This also contradicts the IRO disclosures which require a disclosure of the descriptions of the IRO. If I choose to report at topic level, and not IRO, do I ignore the IRO level disclosure from ESRS 2? I guess this is what they mean by applying the materiality filter to ESRS 2 as well unless my interpretation is incorrect?	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	22.
Excels	IMA-Europe	Business association (other than association of financial institution)	Belgium			I agree	If this reads in the way I'm interpretting it, companies are not expected to report on every single IRO that results from the DMA in order to report on that topic, selecting a few IRO would be sufficient. Further clarity would be required.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	46.
Excels	IMA-Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Unclear on simplification. If you start at compiling evidence for 'obviously material topics' you can stop there and conclude that the topic is material and then do a more comprenhensive assessment at IRO for topics that are less obvious but you also still need to go back to the topics you originally flagged as 'obviously material' to then identify the material IROs (which is what the last sentence of then AR states), however, ESRS 1-22 seems to provide the flexibility to report either topic or IRO level. They seem to be contradicting themselves. If we want to save time and cut time resources, IRO level reporting shouldn't be necessary for 'obviously material topics'.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 17
Excels	IMA-Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It's now been stated that the materiality filter can be applied to ESRS 2 (see email - log of amendments) but it says the sustainability statement shall include general material information in accordance with ESRS 2. Is it mandatory or not? There are contradicting statments in both documents and here as well. I would find it hard to check the materiality of certain disclosures in ESRS 2, not clear to me how this could be done. If ESRS 2 disclosures have already been cut down significantly and were mandatory before, applying the materiality filter to these would undermine the usability of sustainability statements and there would be no bare minimum comparable information across all companies.	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	49.
Excels	IMA-Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Goes with above, fundamental in nature, therefore, don't apply the materiality filter to these as they form part of critical information and outline the requirements for policies, actions, metrics and targets	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	20.
Excels	IMA-Europe	Business association (other than association of financial institution)	Belgium			I agree		ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	AR 22
Excels	IMA-Europe	Business association (other than association of financial institution)	Belgium			I agree		ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	AR 23
Excels	IMA-Europe	Business association (other than association of financial institution)	Belgium			I agree		ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	AR 24
Excels	IMA-Europe	Business association (other than association of financial institution)	Belgium			I agree		ESRS1	ESRS 1 - 5.4 Relief for acquisitions and disposals	72.
Excels	IMA-Europe	Business association (other than association of financial institution)	Belgium			I agree		ESRS1	ESRS 1 - 7. Preparation and presentation of sustainability information	84. (b)
Excels	IMA-Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	typo in sentence	ESRS1	ESRS 1 - 7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	101.
Excels	IMA-Europe	Business association (other than association of financial institution)	Belgium			I disagree	In my opinion, not material information should not be in the sustainability statements. If the emphasis is on providing information relevant to the users of sustainability statements (users of general purpose financial reporting and other users of sustainability statements) adding not material information would obscure/distract these users from obtaining material information easily and reliably. Ultimately these additional stakeholders requesting this type of information might benefit from having this information reported in a medium that is more appropriate for them (not in the management report for example). That being said, I wouldn't use this clause, so if others feel strongly about keeping this provision with guidance in that's fine but I think we're deviating from the purpose of these statements which is clear material information only.	ESRS1	ESRS 1 - 8.2 Presentation of additional information included in the sustainability statement	108.
Excels	IMA-Europe	Business association (other than association of financial institution)	Belgium			I agree		ESRS1	ESRS 1 - 8.3 Options in presenting information across parts of the sustainability statement	109.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Allianz SE	Insurance	Germany			I disagree	We welcome the clarification that the ESRS are designed and already included a fair presentation principle which is being achieved by complying with the ESRS. However, discussions about the draft ED indicate that the proposed wording could lead to unintended consequences, misinterpretations and finally, new complexity which would contradict the intended goal of Omnibus. The current ESRS are generally perceived by auditors as a compliance framework. Auditors generally recognize that fair presentation frameworks involve more than mere compliance and often include additional requirements. The issue is the auditor's understanding of a 'framework': If the revised ESRS determine a fair presentation framework – in contrast to the current ESRS – this would very likely not result in a significant reduction of the reporting burden as intended by EFRAG. Auditors understand that omitting information under a fair presentation framework would require additional efforts for both preparers and auditors, which is clearly not intended by EFRAG. Therefore, the wording around fair presentation and EFRAG's intention behind it, which we fully support, should be further clarified. We deem such clarification necessary in in the legal wording of the standard itself the basis for conclusion, and as well as in existing FAQs relating to the concept of fair presentation. The wording should explicitly outline that fair presentation is embedded into the standards as a principle, not a framework. Fair presentation (in the meaning of the ESRS) might require both, omitting requirements due to the outcome of the double materiality analysis or applying the materiality of information filter, or adding e.g. entity-specific information in order to properly reflect the business model of the reporting undertaking. It should become clear that fair presentation will be achieved by complying with the ESRS and it is intended to simplify reporting and not add burden.	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	16.
Excels	Allianz SE	Insurance	Germany			I disagree	We welcome that the concept of information materiality has been strengthened. However, in its renewed form, we deem it still not sufficient to allow for a more principles-based view and application of the ESRS and creates interoperability issues with IFRS. Particularly, paragraph 21 (b) implements practical challenges. First, it is almost impossible to prove what kind of information 'is necessary' for users, as necessity generally is a subjective criterion. Some users may deem very detailed and highly granular information as necessary to understand the undertaking's impacts, risks, and opportunities and how it identifies and manages them, while other users may find overly detailed information to obscure relevant facts, therefore deeming it 'necessary' to provide crisp and to-the-point disclosures without granular details. The 'necessary' evidence will therefore prove impossible to justify in practice towards auditors. Second, the sub-paragraph (b) also introduces differences to IFRS, which complicates interoperability. We therefore suggest deleting paragraph 21 (b) and keeping only 21 (a). Alternatively, we suggest to amend the wording as follows. 21(b) - It could reasonably be expected to be necessary for users of general purpose sustainability statements to understand the undertaking's material impacts, risks, and opportunities and how it identifies and manages them.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21. (b)
Excels	Allianz SE	Insurance	Germany			I partially agree and partially disagree	We appreciate the inclusion of the term "usually" in paragraph 65, as it acknowledges exceptions to the general rule that the financial consolidation scope aligns with the own operations of the reporting undertaking. Additionally, we express our gratitude to EFRAG for incorporating paragraph 70 on leased assets, which highlights one of these exceptions. To enhance clarity and prevent misinterpretations, we propose two minor amendments: 1) Clarify that the exceptions mentioned in paragraph 70 are not exhaustive. We recommend adding the phrase "leased assets and other fully consolidated investments in real assets held solely for investment purposes" to paragraph 70. Alternatively, this addition could be included in the recitals to prevent the misunderstanding that paragraph 70 offers a comprehensive list. 2) Emphasize that the principle introduced in paragraph 70 is a universal principle applicable across all topical standards. In particular, it should be explicitly stated that the lessor should report emissions from leased assets as Scope 3 emissions, while the lessee reports these emissions as Scope 1 and 2.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	59.
Excels	Allianz SE	Insurance	Germany			I disagree	The new guidelines introduce three additional assessment layers for the assessment of actual and potential impacts – (1) the need to perform an effectiveness test of actions, (2) the requirement to distinguish between significant ongoing vs. temporary actions, and (3) the necessary differentiation in the assessment and disclosures between current and future reporting years – all of which were not present in the set 1 ESRS. We expect a significant increase in reporting burden through these additional layers, as they require supportable evidence and will be subject to high auditor scrutiny. This would particularly penalize wave 1 companies that have already implemented a sophisticated and comprehensive materiality assessment process, methodology, and governance setup. As such, the introduction of the new guidelines is clearly against the European Commission mandate of simplification. Our suggestion is to completely remove the new guidelines on gross vs. net, i.e. paragraphs 34/35 and Appendix C of ESRS 1, and give the market practice time to evolve, which by itself will address currently existing divergence in practice. Regarding paragraph 36 and the clarification of positive impacts, we agree with the addition, as it provides helpful guidance on the matter of understanding positive impacts.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Allianz SE	Insurance	Germany			I disagree	The relief introduced through paragraph 91 of ESRS (note that paragraph 91 addresses the relief, not paragraph 92, which refers to the exclusion of joint operations over which the reporting undertaking does not have operational control) is per definition not applicable to GHG emissions. However, GHG emissions accounting and calculation is the one metric area generally most subject to high measurement uncertainties, often unavailable and unreliable direct or estimated data, and high cost and effort requirements. In the way paragraph 91 is phrased, the relief for metrics would not be possible for GHG emissions – as such full coverage would be required, irrespective of cost and effort considerations or the reliability of estimates. Regulation should emphasize accuracy and reliability of reported data, ensuring that the mandatory use of estimates is limited to where it enables enhancing the understanding of the company's activities. Paragraph 91 creates a misguiding incentive for GHG emissions to achieve 100% data coverage with very low-quality estimates, rather than prioritizing high-quality, verified data for management purposes, such as target setting. Using sector averages for low-quality data areas is simple, but investors need to differentiate companies to identify risks and opportunities. As such, we fully support the relief concept of paragraph 91 and strongly call for removing the exclusion of this concept for GHG emissions. -Paragraph 91 specifies that in certain cases the respective metric can only be "partially estimated". There might however also be cases where the metric cannot be estimated or needs to be estimated entirely, if no real data is currently available. We therefore suggest to rephrase the wording to "(…), but the corresponding metric can currently only be entirely, partially, or not estimated at all."	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	92.
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	deletion of sector-specific guidance (IFRS, GRI) in order to avoid mandatory sector-specific disclosures	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	11.
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	additional guidance necessary for what is a limited further assessment, how should such topic and impact relations be reported and documented?	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	48.
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	additional guidance regarding gross/net necessary (contradiction between and Appendix C – also actions after occurrence of impact possible)	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	additional guidance necessary regarding operational control (are all other entities with operational control included?)	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	92.
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	deletion of machine-readability necessary	ESRS1	ESRS 1 - 8.1 General presentation requirement, structure and content of the sustainability statement	104.
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	stand-alone readability should be deleted, furthermore, we recommend to allow additional references on documents without the same digital requirements, e.g. the remuneration report in order to avoid duplications and redundancies	ESRS1	ESRS 1 - 9.3 Incorporation by reference	120.
Excels	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland			I partially agree and partially disagree	There needs to be a timeframne, but a reasonable timeframe to improve data quality - maybe 5 years.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	90.
Excels	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland			I partially agree and partially disagree	RELATED TO APPENDIX - COULD NOT CHOOSE APPENDIX IN EXCEL TEMPLATE: ESRS 1, Appendix B, QC8: Our auditors used this as an argument that gross should be applied across DMA and disclosures. Because it mentions net and gross. Suggest amendment to make it clearer.	ESRS1	ESRS 1 - Objective	1.
Excels	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland			I partially agree and partially disagree	It is unclear whether other elements not mentioned here may go into appendices. For example, we would like to put the statement on sustainability due diligence into an appendix, but it is unclear whether it is allowed according to para 110b or wheter this DP refers only to additional tables and mappings.	ESRS1	ESRS 1 - 8.3 Options in presenting information across parts of the sustainability statement	110.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	Strong wording should be added against inclusion of unnecessary infromation in the sustainability statements to avoid lenghty and ambiguous disclosures: "The undertaking shall not provide information that is unnecessary to achieve faithful presentation." Alternatively, an additional AR should be added.	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	19.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	"Impact" in the last sentence should not be in bold.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	31.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	"Actual" should be in bold as "actual impact" is defined term.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 5
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	"Positive impacts" should not be in bold.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 7
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	"Actual" should be in bold as "actual impact" is defined term.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 9
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	"Impacts, risks and oportunities" should be put in bold in the first sentence and not in the part under letter (a). It should be clarified that once impacts, risks or opportunities are identified as material all time horizons should be analyzed for the purposes of drafting the sustainability statements.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 18
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	"risk" in the first line should be put in bold.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	AR 22

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	This sentence seems to partially repeat sentence in letter (b). It is difficult to understand a difference between letter (b) and (c).	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	87. (c)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	This should only be possible to an extent where insignificant drivers of IROs from various activities in aggregation may be significant.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	90.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	This should be possible, unless the undertaking reports on metrics in its value chain.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	92.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	"every dt to ensure" should be amedned (into "every effort to ensure"?)	ESRS1	ESRS 1 - 7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	101.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	This provision may be treated as a gate for disclosure of immaterial information. Therfore any such addtional information should begin with "Information not resulting from materiality assessment".	ESRS1	ESRS 1 - 8.2 Presentation of additional information included in the sustainability statement	108. (a)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	"and" at the end of the sentence should be deleted as it suggests cumulatitive condition with letter (b).	ESRS1	ESRS 1 - 8.2 Presentation of additional information included in the sustainability statement	110. (a)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	"location" should not be in bold as it refers to different concept.	ESRS1	ESRS 1 - 9.2 Direct/indirect connectivity with financial statements and consistency of assumptions	112.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	Paragraph 91 should apply in this case too.	ESRS1	ESRS 1 - 10.1 Transitional provision related to Chapter 5 Value chain	123. (b)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	This should not apply to own operations.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	91.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	To ensure clarity, in our opinion it should be specified that while an undertaking may indicate that it has not yet set specific targets, it should not be allowed to claim that no metrics have been established. The ESRS should explicitly state whether metrics related to material impacts, risks, and opportunities must be identified and disclosed, even if targets have not yet been defined.	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	AR 1
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	To align par 27 and par 33 on stakeholders (if engagement with stakeholders is mandatory) I would suggest changing wording in 27 to "shall" in relation to "engagement with affected stakeholders"	ESRS1	ESRS 1 - 3.3 Double materiality assessment	27.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	To align par 27 and par 33 on stakeholders (if engagement with stakeholders is mandatory) I would suggest changing wording in 27 to "shall" in relation to "engagement with affected stakeholders"	ESRS1	ESRS 1 - 3.3 Double materiality assessment	33.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	We would simplify the wording to emphasize that when judging the materiality of actual negative impacts, the undertaking should assess the severity before any mitigation or remediation is applied. Mitigation or prevention measures implemented before the impact occurred can be considered in the severity assessment. However, remediation actions taken after the impact has occurred do not reduce the assessed severity, although they must still be disclosed if the impact is material.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	34.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	Par. 36 of the draft attempts to define what a positive impact is ((...) "if its business activities, products and services mitigate or remediate negative impacts of another party, this is considered a positive impact of the undertaking)". We understand positive impact as value added, and something that helps to better the existing state of things. The example provided (remediating the impact of another party) is helpful and confirms this, but in our opinion it should be elaborated. Is having a supplier code of conduct enough? When does a company truly have a positive impact on eg. climate change? Do negative actions, such as producing emissions, counterbalance positive contributions, such as manufacturing energy-saving solutions? Overall, the definition of positive impact needs more guidance and clarification. This issue is also related to situations where there is no impact (and the lack of its clear definition), e.g., many companies claim that topics such as employing people with disabilities are not relevant to them because they do not hire from these groups. In our opinion, this is a negative impact, as the company is not creating an inclusive space for these groups, yet in the cases I have come across, this topic has almost always been assessed as 'not material.'	ESRS1	ESRS 1 - 3.3 Double materiality assessment	36.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	This point lacks sufficient guidance on practical implementation and last year, in our experience, it was overlooked in methodologies of many companies. In practice, companies often set thresholds, typically from 1 to 5, for each parameter and define a cut-off point above which a topic becomes material. For example, if for a given topic the scale and the scope are set at 1, and irremediable character is set at 5, but the cut-off point based on the sum of the three parameters is only higher than 7, the topic would not reach the threshold. Therefore, we believe this point needs additional guidance on how to implement it in practice.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	AR 8

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	In our experience, this sentence has been subject to different interpretations. It is clear that nature is indeed a silent stakeholder, as it cannot speak for itself. However, is it mandatory to consider its needs in the double materiality analysis for example by reviewing scientific reports and research findings? The wording “may be” leaves room for interpretation that it is not, which suggests that further clarification is needed.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	AR 10
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	The wording “The undertaking is not required to assess every possible impact, risk and opportunity” is very broad and creates a risk of misuse. Companies could interpret it as a possibility to simply declare certain topics “not material” without conducting a meaningful assessment or without providing supporting evidence to auditors. This undermines the integrity of the double materiality process, as it opens the door to excluding difficult topics.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	46.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	The provision allowing companies to conclude on the materiality of topics or sub-topics based solely on their business model, value chain, peer analysis, and strategic priorities is risks creating inconsistent practices. The ESRS should clarify where thresholds are expected to be set.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	AR 18
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	The provision allowing companies to conclude on the materiality of topics or sub-topics based solely on their business model, value chain, peer analysis, and strategic priorities is risks creating inconsistent practices. The ESRS should clarify where thresholds are expected to be set.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	AR 19
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	Using the top-down approach, it is impossible to identify significant impacts, risks and opportunities of a company-specific that do not belong to any of the topics	ESRS1	ESRS 1 - 3.3 Double materiality assessment	AR 16
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	Unclear which entities to include and how to treat them: should companies treat employee pensions funds in which they have no stakes as suppliers? Such approach includes in the scope of companies' operations matters that are beyond their operations, since the relation is established between employees and the 3rd party, omitting the company alltogether.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	71.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	What is specifically expected under the "level of consistency" mentioned here: "to support the understanding of significant data and assumptions, the undertaking shall explain the level of consistency."?	ESRS1	ESRS 1 - 9.2 Direct/indirect connectivity with financial statements and consistency of assumptions	116.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	In ESRS 1 paragraph 4 the users of general purpose sustainability statements are divided between primary users of general purpose financial reporting and other users of general purpose sustainability statements. Creating this division between users from a financial background and other primary users with different objectives is logical and helps interoperability. However, the description of the users of general purpose sustainabiltiy statements as "other users" implies that they are less important than the "primary" users of financial statements. We suggest to change the wording of paragraph 4b to primary users of general purpose sustainability statements.	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	7.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	strange to have the ability to exclude joint operations for which the company does not have operational control. These are assets/operations where a) the company has joint control and b) direct access to the benefits and obligations of such activities; if any exemption would be needed would expect “undue cost and effort”.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	92.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	DASB advises to add this information to the application requirements in analogy to the conceptual framework of financial reporting: The objective of general purpose sustainability reporting is to provide information on the material impacts, risks and opportunities related to sustainability matters that is useful to primary users in making decisions based on the material impacts risks and opportunities related to sustainability matters. The decisions described involve decisions about: : (a) buying, selling or holding equity and debt instruments; (b) providing or settling loans and other forms of credit; or (c) exercising rights to vote on, or otherwise influence, management’s actions that affect the entity’s material impacts, risks and opportunities regarding sustainability matters; (d) buying products from or selling products to the company, (e) working for the company as employee or subcontractor, (f) constructive (social) dialogue and engagement with the company on their negative or positive impacts on sustainability matters, (g) advocating for respecting human rights or environmental rights, (h) evaluate the main risks and opportunities due to sustainability matters that the entity is subject to. The aforementioned list is intended most common decisions but is not necessarily exhaustive. The primary users of general purpose financial reporting use sustainability reporting to better understand the risks and opportunities that sustainability issues pose for their investments and the impacts of those investments on people and the environment. The primary users of general purpose sustainability reporting use sustainability reporting to better hold undertakings to account for their impacts on people and the environment. However, general purpose sustainability reports do not and cannot provide all of the information that the primary users may need. Those users need to consider pertinent information from other sources as well. Individual primary users have different, and possibly conflicting, information needs and desires.The entity may therefor focus on common information needs. However, focusing on common information needs does not prevent the reporting entity from including additional information that is most useful to a particular subset of primary users.	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	A distinction is made between the materiality of information for primary users of general purpose financial reports and users of general purpose sustainabilty statements. In this distinction, primary users of general purpose financial reports use sustainabitliy information to make decisions based on these reports, and users of general purpose sustainablity reports only use sustainabitliy information to understand the undertaking's IRO's. This distinction is not true and leads to an unequal distinction between users of financial reports and sustainability statements. DASB believes that users of general purpose financial reports also use information on the undertaking's IRO's and users of general purpose sustainability statements also use sustainbility information for decision making. We suggest to use only primary users under 21 a) en 21b) instead of a distinction between primary users of general purpose financial reporting and general purpose sustainability statements.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ESMA	European supervisory authority	France			I partially agree and partially disagree	79.Par. 10 of ESRS 1: The first part of the amended notion of entity-specific disclosures in par. 10 of ESRS 1 refers to the need for an undertaking to provide additional disclosures when "a topic related to one or more material" IROs is not covered sufficiently or with sufficient granularity by an ESRS. This proposed change does not seem to fit well, as an undertaking shall limit the entity-specific disclosures to cases where one or more material IROs are not properly or fully depicted by applying an ESRS rather than referring generically to topic which may be perceived as requiring an undertaking to address a sustainability topic in its entirety rather than the specific concerned IROs. ESMA therefore recommends retaining the wording of ESRS Set 1. 80.This requirement should also be complemented by a clarification that, where due to the specificities of the undertaking's business, it is necessary to extend the information required by ESRS beyond the undertaking's own operations, this additional information is required as an entity-specific integration, for example for mandatory ESRS metrics. This clarification may be relevant for financial institutions.	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	10.
Excels	ESMA	European supervisory authority	France			I partially agree and partially disagree	81.Par. 18 of ESRS 1: This paragraph defines fair presentation based on the qualitative characteristics of information. However, another key element of a fair presentation framework is the mandatory integration of entity-specific information when this is necessary to provide material information. The revised ESRS 1 should reflect this fact.	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	18.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Differentiation between "(i) governance, strategy, impact, risk and opportunity management" and "(ii) policies, actions, targets and metrics" is an unnecessary complicated concept.	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	8.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	a mandatory reference to best practice or other reporting frameworks due to the absense of sector specific standards is not practicable to all industries and needs to be assessed on an individual basis.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	11.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Differentiation between "(i) governance, strategy, impact, risk and opportunity management" and "(ii) policies, actions, targets and metrics" is an unnecessary complicated concept.	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	8.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Define faithful represenation. Too vague. Leads to too much interprestation and is not auditable.	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	19.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Disaggregation on the level of "water basin" is far to much detail and does not fit in the concept of integrating financial and sustainability reporting	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	51.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Delete - not a a pragmatical disaggregation level	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	AR 23
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Contradictive messages in Pt 34 and 35. This will lead to multiple interpretations and will not be practicable.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	There appears to be an inconsistency between paragraph 35 of the Draft Amended ESRS 1 and the corresponding potential impacts table in Annex C. Paragraph 35 states that, when supportable evidence exists, mitigation or prevention actions is considered in assessing the materiality of potential impacts, with an exception only if significant ongoing actions are required to contain severity or likelihood below the materiality threshold. However, the Annex C table does not reflect this possibility at all and presents the assessment logic as if mitigation or prevention actions are not taken into account, which could lead to misinterpretation and inconsistent application of the standard.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	DELETE. By narrowing positive impacts down to business activities, products and services only, this would lead to an additional restriction for determining positive impacts (which is already hard to achieve).	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	36.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	CLARIFY. The described gross approach could lead to the assumption that (ongoing/existing) mitigation measures e.g. establishes safety management systems taken in the reporting year to minimize negative impacts must not be considered. This would lead to an increase of reported severe risks without an actual increase of risks and would thus lead to a false interpretation by main users of the report.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	With the removal of sub-sub-topics from Appendix A of ESRS 1, we seek clarification on how. in particular, top-down materiality assessment should be applied in such cases. For example, if a specific impact, risk, or opportunity that was previously captured under a sub-sub-topic (e.g., under ESRS S1) is now found to be material, should this lead to a disclosure at the sub-topic level (e.g., "Working conditions")? In other words, where the materiality of a sub-topic is determined based primarily on the materiality of one of its former sub-sub-topics, is it now expected that reporting should occur on the broader sub-topic level? Clarity on this point would help ensure that disclosures remain relevant and decision-useful, without introducing disproportionate reporting burdens. - CHANGE. Attaching the deleted sub-sub-topics in brackets after the sub-topics will effectively increase the reporting burden as it still necessitates considering all these in the DMA but makes it harder to apply materiality to exclude information	ESRS1	ESRS 1 - 3.3 Double materiality assessment	AR 17
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Undue Costs need to be specified and defined	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	47.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	DELETE. Currently, the external auditor does not validate each specific scoring of the DMA. The newly added requirement would increase the burden for external assurance by factor 4 - at least.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (b)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Disaggregation will lead to too much detail level and will increase reporting workload	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	AR 22
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	DELETE. This could require a proof of non-materiality at subsidiary level and vice versa lead to a significant increase of reporting burden by introducing another disaggregation level for metrics.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	AR 24
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	DELETE. Site- or even water basin/local ecosystem-based reporting does nnot make sense at all and would lead to a tremendous increase of reporting burden without adding additional value for main users of reports.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	AR 23
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	DELETE. Site- or even water basin/local ecosystem-based reporting does nnot make sense at all and would lead to a tremendous increase of reporting burden without adding additional value for main users of reports.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	AR 22
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	It is very complex to analyse impacts, risks and opportunities for funds due to constant changes. Funds should be obliged to disclose their sustainabilty impacts, risks and opportunities	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	71.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	IRO-mapping to specific policies, actions, targets is far too much detailed - and ESRS 2.0 offers to stay on topical level. topical level shall be mentioned	ESRS1	ESRS 1 - 9. Connected information and linkages with other parts of corporate reporting	113.
Excels	SZEF	Trade union	Hungary			I agree	This is crucial for understanding impact materiality assessment	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 10
Excels	SZEF	Trade union	Hungary			I agree	This is crucial for understanding impact materiality assessment, in particular the point on reporting on the opinion of workers' representatives	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 11
Excels	Finnwatch ry	NGO	Finland			I agree	Agree with the addition of fair presentation as an overarching principle and including qualitative characteristics of information more prominently in the standard. Our experience supports the view that currently the information provided is in some cases of little benefit for users, and giving qualitative characteristics of information stronger prominence could potentially address this shortcoming.	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	18.
Excels	Finnwatch ry	NGO	Finland			I disagree	We find it problematic that companies are given freedom to choose whether they report on topical level or at IRO level. The level of topics is too general to give a proper clarity and focus on the IRO level should be required.	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	22.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	Disagree with the inclusion of suppliers as "affected stakeholders". Whereas some suppliers, such as own-account workers, may be affected stakeholders, most suppliers are companies (including large companies) who are not similarly rights-holders (individuals or groups) as other affected stakeholders are. When they are included in the definition, it may give an impression to companies that it is sufficient to engage with their supplier companies for materiality assessments instead of e.g. suppliers' workers.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	10.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	Arguably, the most significant use of judgment is during the double materiality assessment and as such, companies should be specifically required to disclose their use of judgement when assessing whether certain topics are material or not material for them, at least if they decide that certain topics that are typically material for other companies in the same sector are not material to them.	ESRS1	ESRS 1 - 7.2 Judgement, measurement uncertainty and outcome uncertainty	85. (a)
Excels	Finnwatch ry	NGO	Finland			I disagree	We urge caution in introducing a relief on the basis of "undue cost and effort". Generally, sustainability should not come second to companies' cost and effort. This relief also gives companies a lot of discretion on information sources.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	87.
Excels	Finnwatch ry	NGO	Finland			I disagree	This is difficult to understand and should be edited for clarity. We would strongly oppose any relief which would allow companies to only consider part of their value chain on the grounds of "undue cost and effort". This kind of approach would be against international business and human rights standards such as UNGPs and OECD Guidelines.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	87. (b)
Excels	Finnwatch ry	NGO	Finland			I disagree	This is difficult to understand and should be edited for clarity. We would strongly oppose any relief which would allow companies to only consider part of their value chain on the grounds of "undue cost and effort". This kind of approach would be against international business and human rights standards such as UNGPs and OECD Guidelines.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	87. (c)
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	It should be required that the disclosure requirement codes are always used in the text to indicate where the relevant information is being reported.	ESRS1	ESRS 1 - 8.1 General presentation requirement, structure and content of the sustainability statement	104. (a)
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I disagree	Comment related to Appendix A: In the subtopics listed for ESRS E4 the expression in brackets "(terrestrial and marine habitat change, invasive species)" should be deleted, as this list is not consistent with the five drivers mentioned in E4 and recommended by IPBES.	ESRS1	ESRS 1 - Objective	9.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Comment related to Appendix A: To provide preparers with more certainty which topics need to be assessed and to increase the comparability of materiality assessments and reported information, the list of sustainability topics in Appendix A (former AR 16) should be a mandatory starting point instead of non-binding guidance. The second part of the first sentence introducing Appendix A ("and provides non-binding guidance to support the application of provisions in this Standard.") should be deleted. Paragraphs 9 and 23 of ESRS 1 should explicitly state that it is expected from undertakings to consider the list in Appendix A when conducting the materiality assessment.	ESRS1	ESRS 1 - Objective	9.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Para. 27 lists usual internal and external sources of evidence and information that the undertaking may use in conducting a materiality assessment. Environmental managementsystems (e.g. ISO 14001 or EMAS) provide a useful basis for conducting the impact materiality assessment for environmental topics and should therefore be explictly listed here.	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	27.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Glossary: The definition of "actual impacts" should not only those that have already occured but also those that are currently occuring. Change definition to: "Impacts that have already occured in the reporting period or in prior years or those that are currently occuring in the repporting period."	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Feedback submitted as part of the online questionnaire.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	30.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Para. 47 lists information sources that are deemed to be available without undue cost and effort. This list should not be exhaustive. Change second sentence to: "At a minimum, information…is considered available to undertaking without undue cost and effort"	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	47.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Feedback submitted as part of the online questionnaire.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	90.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I agree	An important part of EFRAG's mandate to revise the ESRS is to increase consistency with other pieces of EU legislation. For this reason, we urge EFRAG to maintain the possibility to incorporate information by reference from EMAS environmental statements (Regulation (EU) No. 1221/2009). ESRS 1 para. 119 should clarify that, in line with the FAQ issued by the European Commission in August 2024 (para. 71), that the validation of environmental information provided by EMAS Environmental Verifies can be considered to be at least at the same level of assurance as the CSRD limited assurance requirement.	ESRS1	ESRS 1 - 9.3 Incorporation by reference	119.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	Unclear how to interpret this paragraph in conjunction with proposed in ESRS E1 shift from operational control to financial approach. We believe that the operational control criterium should be maintained, as it will allow clear interpretation of business relationships, i.e. all entities out of operational control should be included in the value chain.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	68.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	This paragraph in conjunction with proposed paragraph 92 entail lack of consistency between metrics. We believe that the operational control criterium should be consistent across all material topics, as it will allow clear interpretation of business relationships, i.e. all entities out of operational control should be included in the value chain.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	69.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	Unclear which entities to include and how to treat them: should companies treat employee pensions funds in which they have no stakes as suppliers? Such approach includes in the scope of companies' operations matters that are beyond their operations, since the relation is established between employees and the 3rd party, omitting the company alltogether.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	71.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	This paragraph in conjunction with proposed paragraph 69 entail lack of consistency between metrics. We believe that the operational control criterium should be consistent across all material topics, as it will allow clear interpretation of business relationships, i.e. all entities out of operational control should be included in the value chain.	ESRS1	ESRS 1 - 5.4 Relief for acquisitions and disposals	92.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	Sensitive information are not limited to know-how, intellectual property and results of innovation. Current proposal only addresses a selected list of types of information, unjustifiably limiting the sensitive information relief. In the context of extensive obligations on disclosing financial data and risk-related information, either this paragraph should be re-worked to include all sensitive information, which if revealed would hinder the issuer's commercial or negotiation position, or all wuantitative datapoints on anticipated financial effects and risks should be voluntary.	ESRS1	ESRS 1 - 7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	98.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	Introducing a dependency on national authorities' and their decision to include the relief related to ongoing negotiations up to them. This too will make consolidation even more complicated and result in additional burden stemming only from this process, which goes against the goal set out by the Commission.	ESRS1	ESRS 1 - 7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	AR 35
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	Regarding the Net/gross approach, it is stated and defined for assessing impacts, but not clear in relation to risks and opportunities. We believe that a consistent approach should be clearly applied to all IROs to avoid unnecessary differences in interpretation and discussions during attestation.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	24.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	The word "manage" related to IROs is not precise and therefore unclear.	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	21. (b)
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	What is expected in terms of disclosure with regards to "dependencies" and the financial effects, especially those which are not recognised in the financial statements? Does the financial materiality apply to these financial effects?	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	14.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	Please be more specific on the "reasonable and supportable evidence to estimate the levels of severity and likelihood of impacts and the likelihood and magnitude of financial effects of risks and opportunities"	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	45. (b)
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	Please be more specific on this statement "a limited further assessment may be sufficient"	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	48. (b)
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	How do we have to interpret "the undertaking shall use reasonable and supportable information available at the reporting date without undue cost or effort"?	ESRS1	ESRS 1 - 7. Preparation and presentation of sustainability information	87.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	How do we have to interpret " The assessment of what constitutes undue cost or effort depends on the undertaking's specific circumstances and requires a balanced consideration of the costs and efforts for the undertaking and the benefits of the resulting information for users" ?	ESRS1	ESRS 1 - 7. Preparation and presentation of sustainability information	89.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	What is specifically expected under the "level of consistency" mentioned here: "to support the understanding of significant data and assumptions, the undertaking shall explain the level of consistency."?	ESRS1	ESRS 1 - 9.2 Direct/indirect connectivity with financial statements and consistency of assumptions	116.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	"presented at the end of each chapter" - not correct as this moved inside text	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	7.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	It is utmost important to clarify that the materiality assessment shall not be reperformed every year in case no significant changes in the assumptions/circumstances occurred. The way it is written could lead to confusion and it seems anyway the undertaking shall reperform the assessment every year. We recommend to align the formulation with the IG1 Materiality Assessment paragraphs 170 & 171 (frequence of DMA update) to highlight the need to refresh the DMA exercise only if there are material changes in the undertaking's organisational or operational structure, or material changes have occurred in external factors that could generate new or modify existing IROs, or affect the relevance of specific disclosures	ESRS1	ESRS 1 - 3.3 Double materiality assessment	29.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Remove "Business relationships are not limited to direct contractural relationships." and all references through out the ESRS to indirect business relationships. Leave value chain at direct suppliers, customers, and business relationships. This is not incompatible with the CSRD which refers to the undertaking's value chain as "its own operations, its products and services, its business relationships and its supply chains." Undertakings should spend their efforts and resources on direct business relationships where they have more influence and/or control.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	30.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	This further complicates the analysis, as the impacts would need to be assessed primarily for materiality (§31-32), and secondarily based on net versus gross effects.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	This further complicates the analysis, as the impacts would need to be assessed primarily for materiality (§31-32), and secondarily based on net versus gross effects.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	This further complicates the analysis, as the impacts would need to be assessed primarily for materiality (§31-32), and secondarily based on net versus gross effects.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	36.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	This further complicates the analysis, as the impacts would need to be assessed primarily for materiality (§31-32), and secondarily based on net versus gross effects.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 9
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The last phrase where the "workers' representatives opinion shall be communicated, where applicable..." is open for interpretation on where it is applciable and where not.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 11
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Financial materiality is asked to be assessed from "user" perspective who is not part of the stakeholders participating in the assessment overall (ie assessment is done by the affected stakeholders)	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	37.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Not clear what "unless not appropriate" means in the 3rd paragrpah, how do we judge / evaluate it?	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 17
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I agree	Documenting the two approaches gives flexibility and allows to avoid complexity	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	48.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	If peer analysis is used, further investigation is necessary to include or exclude a topic from the sustainability statement as an undertaking should only report on impacts, risks and opportunities related to its own business model and strategy.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	48. (a)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	ESRS 1.AR 26 in reference to ESRS 1 3.7 may result in a high number of new datapoints depending on its interpretation by auditors. EFRAG should clearly state that the disaggregation of data is voluntary ("may...") or delete the AR completely. Furthermore, this disaggregation does not provide any added value for the users of the information; instead, it leads to information overload and unjustified burdens for the disclosing company (information may not be available or only with high effort)	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	51.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The term "significant" in the first phrase is not defined, creating uncertainty about when disaggregation is required. In addition, AR24 is overly prescriptive: requiring disaggregated metrics could lead to excessively long reports that obscure relevant information, particularly for undertakings with many sites and varying material impacts, risks or opportunities. We recommend removing AR24 and replacing it with a requirement for qualitative information, which would ensure clarity without imposing disproportionate reporting burdens.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	AR 24
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Down to which level shall the investigation be done?	ESRS1	ESRS 1 - 4. Due diligence	54.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Last part of the paragraph refers to §31 (that addresses the materiality of impacts) when the current § talks about IROs in general, might be missing or wrong reference - makes a bit of a confusion.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	64.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The sustainability information is consolidated based on the financial consolidation, this § brings further confusion in this statement as it takes about potential minority shares that are not financial consolidated but would have to be considered in sustainability data as part of "business relationship".	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	68.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Remove DR. Long-term employee benefit funds are typically diversified and the undertaking has no influence or leverage over these companies.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	71.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	This requirement might be very complex as the undertaking has to agree with the external auditor which are these significant event, considering this entity is a new acquisition and we don't even know it	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	73.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The application of the term "significant" is not clear	ESRS1	ESRS 1 - 7.1 Presenting comparative information	84. (a)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The application of the term "significant" is not clear	ESRS1	ESRS 1 - 7.2 Judgement, measurement uncertainty and outcome uncertainty	85. (b)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	This paragraph requires adjusting the base year of the target following a major acquisition or disposal. Firstly, this constitutes a behavioral requirement, which contradicts Paragraph 5 stating that "the ESRS do not mandate behavior but set Disclosure Requirements[...]". Secondly, it is inconsistent with the possibility of investments or divestments being part of the business strategy to achieve the target	ESRS1	ESRS 1 - 7.1 Presenting comparative information	84. (c)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Not clear what the AR requirements are, looks more like a term that should be defined in the Glossary rather than an AR.	ESRS1	ESRS 1 - 7.2 Judgement, measurement uncertainty and outcome uncertainty	AR 29
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	This § makes a confusion with Appendix B where the characteristics of the information are already defined. We do not think an additional information like in §88 is required on top of Appendix B.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	88.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	"(b) could reasonably be expected to have been obtained....", we suggest that the previous used term "without undue cost of effort" to be used in here instead of reasonable.	ESRS1	ESRS 1 - 7.7 Reporting errors in prior periods	AR 33
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Not clear what "dt" means in the first line. In the old text §108 had a "reasonable" term there, we suggest that the previous used term "without undue cost of effort" to be used in here instead of reasonable (if this is the case).	ESRS1	ESRS 1 - 7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	101.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The application of the term "significant" is not clear (3rd line)	ESRS1	ESRS 1 - 9.2 Direct/indirect connectivity with financial statements and consistency of assumptions	116.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Not clear what "digitalisation requirements" refers to, no requirements to the main Sustainability statement can be found in ESRS 1	ESRS1	ESRS 1 - 9.3 Incorporation by reference	118. (e)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	We suggest that the previous used term "without undue cost of effort" to be inserted in here.	ESRS1	ESRS 1 - 10.1 Transitional provision related to Chapter 5 Value chain	122.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	This creates a disparity between companies reporting in different waves of CSRD reporting.	ESRS1	ESRS 1 - 10.1 Transitional provision related to Chapter 5 Value chain	123.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Not clear how this is aligned with EU Concil compromise on "Stop the clock" where the phase-in process is setup for Wave 1 companies differently. We believe it shall be aligned.	ESRS1	ESRS 1 - 10.3 Transitional provision: List of Disclosure Requirements that are phased in	127.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The mandatory use of estimates should be limited to the most relevant disclosure requirements, given their lack of reliability. For the remaining ones, companies should be able to provide qualitative data and an explanation of the difficulties to obtain the requested information instead.	ESRS1	ESRS 1 - 7.2 Judgement, measurement uncertainty and outcome uncertainty	AR 30
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The paragraph relating to incorporation by reference provides unclear indications and limits the possibility of using this tool. This provision should be simplified to enhance its usability, perhaps also providing the possibility of reporting the most detailed information on the company website.	ESRS1	ESRS 1 - 9.3 Incorporation by reference	1.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	The consideration of mitigation activities for actual negative impacts, should follow the same conditions as for potential negative impacts, i.e. 1) when supportable evidence exists of effectiveness of mitigation/preventitive actions and 2) allowance to not consider the actions to maintain ongoing actions to contain severity and likelihood of impact	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	There appears to be an inconsistency between paragraph 35 of the Draft Amended ESRS 1 and the corresponding potential impacts table in Annex C. Paragraph 35 states that, when supportable evidence exists, mitigation or prevention actions is considered in assessing the materiality of potential impacts, with an exception only if significant ongoing actions are required to contain severity or likelihood below the materiality threshold. However, the Annex C table does not reflect this possibility at all and presents the assessment logic as if mitigation or prevention actions are not taken into account, which could lead to misinterpretation and inconsistent application of the standard.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	This could require a proof of non-materiality at subsidiary level and vice versa lead to a significant increase of reporting burden by introducing another disaggregation level for metrics. This datapoint should streamlined or deleted.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	AR 24
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	It requires adjusting the base year of the target following a major acquisition or disposal. Acquisitions or divestments might be part of the business strategy to achieve the target, so the base year should not be changed. Some companies, by nature, need to undergo transformation in order to decarbonize. For them, divestments serve as a strategic lever: on one hand, they help reduce emissions, and on the other, they provide financial capacity to undertake the necessary investments. Adjusting the baseline year would mean losing this lever. Additionally, this is a behavioral requirement, which contradicts ESRS 1/Para 5 about not mandating behavior.	ESRS1	ESRS 1 - 7.1 Presenting comparative information	84. (c)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Overall, the summary of the sub-sub-topics at sub-topic level is welcomed. However, the addition in brackets and the naming of several topics indirectly maintains this fine distinction. The sub-topics should therefore be simplified	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	9.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	To support implementation, the sub-topics should be reflected in the respective topical reporting standards (e.g. in the respective headings for metrics) so that it can be identified more precisely which reporting requirements contribute to which sub-topic in order to be able to exclude non-essential topics more reliably. Alternatively, there should be a table showing which DRs relate to which sub-topic.	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	50. (b)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	The presentation gives the impression that the entire topic standard is to be reported when the topic (through at least one sub-topic) is material. This should be clarified at sub-topic level.	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	22.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	A reference to the undue cost of effort would be useful to avoid giving the impression that engagement with affected stakeholders is mandatory to conduct materiality assessment. The description should be aligned with ESRS 1 -5.2.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	33.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	Overall, the inclusion of the supply chain should be simplified and eliminated as far as possible. It should be made clear that the company reports on its own targets, actions, policies and metrics. The supply chain is only taken into account to the extent that the company has, for example, targets / measures for sustainable procurement and sustainable use of products. It should not be necessary to collect data from suppliers and/or customers for the purposes of the company's own sustainability reporting.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	62.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Data points for which phase-ins are planned should be omitted entirely or become voluntary.	ESRS1	ESRS 1 - 10.3 Transitional provision: List of Disclosure Requirements that are phased in	127.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	reasonable	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	36.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	A top-down approach makes sense, especially for companies that have structured their risk management in this way in order to exploit synergies	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	AR 5
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	The terms short-term, medium-term and long-term should be clearly defined. It remains unclear how to deal with impacts that exist throughout the entire duration of business activities but do not have long-term consequences in themselves, such as continuous water consumption.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	30.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	The materiality analysis should be limited to direct business relationships. Global supply chains are very complex, and only a few companies can influence or oversee the entire supply chain. -> Deletion	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	30.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Appropriate: Focus on areas of the value chain that the company can genuinely influence/that are influenced by the company.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (a)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	Within the framework of the double materiality analysis, a comprehensible and well-founded argument should suffice to substantiate the assessment of materiality. Formal evidence should not be mandatory. Since the analysis must be regularly reviewed and updated, a high level of documentation would not be practicable for companies in the long term.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (b)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplifies the scope of the analysis	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	46.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (a)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (b)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Estimates are essential when it comes to environmental issues, as concrete data is in many cases unavailable	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	67.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	useful approach, as it allows other obligations to be covered by the CSRD report (e.g. EMAS environmental statement). However, companies should also be able to include additional information in the report in order to fulfil other purposes if necessary (e.g. as evidence for portals such as EcoVadis).	ESRS1	ESRS 1 - 8.2 Presentation of additional information included in the sustainability statement	107.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	While the sentence "ARs also include text where the term 'shall consider' is used to indicate issues, resources or methodologies that the undertaking is expected to take into account or to use in the preparation of a given disclosure. " tries to specify the use of "shall consider", it is a contradiction ot para. 5 where it states that "The ESRS do not mandate behaviour [...]". A "if applicable" should therfore be added. Additionally, "shall consider" is not consistently applied as sometimes only "shall" is used (eg. ESRS E1 Ar 4 and 5).	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	15.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	It remains unclear who "primary users", "users of general purpose sustainability statements" refer to and at what point an information is considered "necessary". The proposed wordings risks an expansion of the information provided by companies as sustainability information might be interesting for a very broad group of users. "Decision-usefulness" should be key for sustainability information as well.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	"Where the impact is deemed material based on this assessment, the undertaking shall disclose the remediation actions undertaken and their expected or actual outcomes. " The wording indicates a disclosure requirement of remediation actions on level of each material impact. Deletion or rephrasing should be considered.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	"[...] if the undertaking needs to maintain significant ongoing mitigation and/or prevention actions". It is unclear how "significant ongoing mitigation actions" should be interpreted. Further clarification is needed.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	The examples are not very helpful as these are rather obvious connections. However, the supply chains of mulitnational companies are much more complex. Including examples should not be part of the disclosure requirements but could be part of the NMIG and should be deleted here.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	AR 6
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	The Appendix C should be deleted as it rather adds complexity to the topic and might require additional documentation effort as part of the audit procedures.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	AR 9
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	The part"Under the CSRD, the management of the undertaking shall inform the workers' representatives at the appropriate level and discuss with them the relevant information and the means of obtaining and verifying sustainability information. The workers' representatives' opinion shall be communicated, where applicable, to the relevant administrative, management or supervisory bodies." should be deleted. This is part of level 1 legislation. Additionally, it seems to indicate behavioural obligations going against para. 5.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	AR 11
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	Suggestion to delete Application Requirement as it does not add any additional value / insights to the reporting requirements.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	AR 28
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	It is unclear what is meant with "signficant events" and what exactly needs to be disclosed. Suggestion to either delete or further clarify paragraph.	ESRS1	ESRS 1 - 5.4 Relief for acquisitions and disposals	73.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	This requirement is not a relief but constitues a behavioural obligation. it should therefore be deleted and the initial paragraph 85 should be reintegrated: "Sometimes, it is impracticable to adjust comparative information for one or more prior periods to achieve comparability with the current period. For example, data might not have been collected in the prior period(s) in a way that allows either retrospective application of a new definition of a metric or target, or retrospective restatement to correct a prior period error, and it may be impracticable to recreate the information (see ESRS 2 BP-2). When it is impracticable to adjust comparative information for one or more prior periods, the undertaking shall disclose this fact."	ESRS1	ESRS 1 - 7.1 Presenting comparative information	84. (c)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Reasonable and supportable information is subject to the interpretation of auditors. A clear definition is missing otherwise it undermines the level playing field and will be applied unevenly.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	88.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	A "balanced consideration of the costs and efforts" is subject to companies and auditors interpretation. If at all, the relief might be helpful for wave 2 companies but at what point is a multinational company able to use this argumentation? Introducing this concept on a broad scale might also reduce the comparability and availability of sustainabiltiy data.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	89.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	Reporting only partial scopes without clear guidance risks to reduce the comparabiltiy and availability of sustainability of data.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	91.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	Providing a lit of references in the sustainability statement should be sufficient. No additional cross-referencing should be needed from other source documents to the sustainability statement. Deletion of requirement.	ESRS1	ESRS 1 - 9.3 Incorporation by reference	118. (a)

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Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	Increase from three to five years. Gathering information from upstream and downstream value chain is so complex.	ESRS1	ESRS 1 - 10.1 Transitional provision related to Chapter 5 Value chain	123.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	Starting from the sixth year of reporting instead of from the fourth year of reporting under ESRS.	ESRS1	ESRS 1 - 10.1 Transitional provision related to Chapter 5 Value chain	125.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	The new term 'general purpose' does not add so much clarification to the 'general filter'. Rather it might complicate assessments, if one is to consider more distinguished needs for different categories of users	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	Suggest to add clarity that the list is illustrative and not exlusive.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	27.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I agree	This is a better term, perceived to be less demanding, as is commented also by EFRAG.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	29.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	Statkraft has already provided Feedback on DR 34 & DR 35 & Appendix C as part of the "Gross vs net" fieldtest. We refer to our response to the survey as well as interview with EFRAG on the fieldtest for our more extensive comments	ESRS1	ESRS 1 - 3.3 Double materiality assessment	34.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	Statkraft has already provided Feedback on DR 34 & DR 35 & Appendix C as part of the "Gross vs net" fieldtest. We refer to our response to the survey as well as interview with EFRAG on the fieldtest for our more extensive comments	ESRS1	ESRS 1 - 3.3 Double materiality assessment	35.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	No need to add 'boileplate' as a word. But we would be positive that this definition is more clarified	ESRS1	ESRS 1 - 3.3 Double materiality assessment	36.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	Statkraft has already provided Feedback on DR 34 & DR 35 & Appendix C as part of the "Gross vs net" fieldtest. We refer to our response to the survey as well as interview with EFRAG on the fieldtest for our more extensive comments	ESRS1	ESRS 1 - 3.3 Double materiality assessment	AR 9
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I agree	It is it better/ a good change	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	47.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	The addition of "undue cost and effort" is a positive development. However, we see a challenge in the fact that fewer companies will fall under the scope of CSRD due to the Omnibus Directive, while at the same time, the value chain reporting requirement remains. This combination may make it significantly harder for companies still within scope of CSRD/ESRS to gather necessary information from their value chain. One possible solution to consider: Entities in scope of CSRD could be exempted from reporting on value chain elements where their suppliers or business partners are not themselves in scope of CSRD. This would create a more proportionate and practical approach, especially in the early years of implementation.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	60.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	The requirements for determining which entities within the Group must be included in sustainability reporting are complex and not fully aligned across the ESRS standards, nor with financial reporting standards. A particularly confusing area relates to investees, such as joint operations, joint ventures, and associates. One of the key challenges is that these entities are often not part of our governing structure, making it difficult to ensure accurate, consistent, and timely data collection. The complexity is further amplified in the case of joint operations, where the standards require recognition based on ownership share. According to the current ESRS requirements, only subsidiaries and joint operations are to be consolidated for social and governance metrics. As a result, entities classified as associates and joint ventures—which are not consolidated in any shareholder's annual report—are excluded from all undertakings' reports. This has significant implications: critical metrics such as Total Recordable Injuries (TRI), fatalities, and other incidents occurring within associates and joint ventures fall outside the reporting scope entirely, and are therefore not reported by any undertaking.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	58.
Excels	SAIM GmbH	Consultant (including software vendor)	Germany			I partially agree and partially disagree	In the log of ammendments, reasoning for this paragraph included the following: "Reference to "philanthropy" was considered but discarded. Only impacts that derive from business actvites, products and services qualify as positve impacts to be reported". This is not adequately clarified in the official standard or application requirements. Companies who sponsor and donate to others will likely want to report these as positive impacts. In paragraph 30, non-contractual business relationships are also mentioned and this leaves room for interpretation that could allow for philanthropy to be considered a form of business relationship (if argued that it is a form of partnership, creates reputational benefit or works towards communal goals).	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	36.
Excels	SAIM GmbH	Consultant (including software vendor)	Germany			I disagree	The description in this paragraph makes sense. The table provided in Appendix C is confusing and does not align. In paragraph 35, preventative / mitigation actions that are already implemented can be considered in assessing materiality, the table in appendix C however says that, in the reporting year, the potential impact should be considered before the action has been implemented.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland			I agree	This is crucial for understanding impact materiality assessment	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 10
Excels	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland			I agree	This is crucial for understanding impact materiality assessment, in particular the point on reporting on the opinion of workers' representatives	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 11
Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I agree	Recognition of existing internal processes: We welcome the clarification that companies may rely on structured stakeholder engagement already conducted (e.g., due diligence), avoiding duplication and reflecting the reality of embedded sustainability processes.	ESRS1	Simplification of the Double Materiality Assessment ('DMA')	1.
Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I agree	Flexibility in methodology: We support the option to adopt either a top-down or bottom-up approach, allowing alignment with companies' internal decision-making and governance structures.	ESRS1	Simplification of the Double Materiality Assessment ('DMA')	1.

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Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I agree	Proportionality and qualitative assessment: We agree that quantitative data or scoring should not always be required, and that qualitative analysis may be sufficient where metrics are difficult to obtain or less appropriate.	ESRS1	Simplification of the Double Materiality Assessment ('DMA')	1.
Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I agree	Freedom to choose between gross or net approach: We support the position that undertakings should be free to assess impacts on either a gross or net basis, depending on the maturity of their internal processes (especially Integrated Risk Management), thereby ensuring consistency with financial reporting.	ESRS1	Simplification of the Double Materiality Assessment ('DMA')	1.
Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I agree	Need for transparent documentation: Companies should systematically document sources, criteria, and decisions in the materiality process. This improves internal governance and provides external stakeholders (auditors, investors, regulators) with reliable evidence.	ESRS1	Simplification of the Double Materiality Assessment ('DMA')	1.
Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I disagree	Gross impact evaluation: We disagree with the complexity and ambiguity of the gross impact approach. In practice, assessing real gross impact is extremely difficult or nearly impossible, risks generating confusion, and may penalize companies that have already implemented sustainability principles. It also undermines recognition of actual progress and improvements.	ESRS1	Simplification of the Double Materiality Assessment ('DMA')	1.
Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I disagree	Separation of normative provisions and practical guidance: We disagree with the separation of standards from their practical implications, as this reduces usability and risks weakening effectiveness. Standards should integrate practical guidance into the core text.	ESRS1	Simplification of the Double Materiality Assessment ('DMA')	1.
Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I disagree	Ongoing reliance on external guidelines: We disagree with the reliance on external sources without clarity on whether they are prescriptive or supportive. This creates interpretative uncertainty. Essential elements for DMA should be included directly in the standards.	ESRS1	Simplification of the Double Materiality Assessment ('DMA')	1.
Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	Stakeholder engagement: We agree that existing structured engagement should be recognized, but we believe re-engaging stakeholders should not be required unless inputs are outdated or insufficient. Additional engagement should be encouraged only when strictly necessary.	ESRS1	Simplification of the Double Materiality Assessment ('DMA')	1.
Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	Financial materiality treatment: We agree that internal risk management processes can inform financial materiality, but the current text does not clearly state that a net approach can be applied. Greater clarity is needed to ensure alignment with existing financial reporting practices.	ESRS1	Simplification of the Double Materiality Assessment ('DMA')	1.
Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	Consistency and comparability: While we support flexibility, we are concerned that without stronger guiding criteria, companies may apply the DMA too differently, creating risks of inconsistency and arbitrariness. Minimum documentation requirements and clearer rules are needed to mitigate this.	ESRS1	Simplification of the Double Materiality Assessment ('DMA')	1.
Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I agree	General objective of the principle: We support the inclusion of the Fair Representation principle as a guiding concept, ensuring sustainability reporting moves beyond technical compliance toward a true, accurate, and meaningful portrayal of impacts, risks, and opportunities.	ESRS1	Principle of Fair Representation	1.
Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I disagree	Unclear link with materiality: The connection between Fair Representation and double materiality is not clearly defined. It is unclear whether DMA guarantees completeness of information or if it implies a second layer of materiality analysis. This ambiguity risks creating confusion.	ESRS1	Principle of Fair Representation	1.
Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I disagree	Presumption of fair representation: We disagree with the assumption that applying ESRS automatically results in fair representation. Such an approach weakens the principle's purpose and leaves preparers and assurance providers uncertain about expectations.	ESRS1	Principle of Fair Representation	1.
Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I disagree	Overly broad scope: If interpreted as requiring disclosure of all information potentially relevant to any stakeholder, the principle would create an open-ended and unrealistic disclosure obligation. This could overwhelm users, reduce focus, and weaken report quality.	ESRS1	Principle of Fair Representation	1.
Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I disagree	High subjectivity: Without concrete boundaries, companies may interpret Fair Representation inconsistently. This could lead to both selective omissions and overly extensive disclosures, undermining credibility and usefulness of sustainability reports.	ESRS1	Principle of Fair Representation	1.
Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I disagree	Risk to comparability: Because of subjective interpretations, the principle may reduce comparability across companies, especially in the absence of sector-specific standards, limiting stakeholders' ability to benchmark and assess companies effectively.	ESRS1	Principle of Fair Representation	1.
Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	Need for clarification within ESRS architecture: While we agree that the principle could play an important role, it requires explicit clarification of its interaction with double materiality, minimum disclosure requirements, and the current lack of sector-specific standards. Without this, it risks inconsistent or even opportunistic application.	ESRS1	Principle of Fair Representation	1.
Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I agree	Support for mandatory disclosure reflecting transversal relevance across organizations; promotion of consistency and comparability of sustainability information; contribution to ESRS objectives by driving measurable improvements; encouragement of prompt and effective implementation.	ESRS1	Transformation of six datapoints from "may" to "shall"	3.
Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I agree	Preference for Option 2, which prioritizes qualitative disclosure while allowing voluntary quantitative reporting; ensures flexibility for companies with diverse maturity and reporting capacity; enhances practical applicability and inclusiveness of ESRS; recognizes challenges in achieving full comparability of quantitative financial impact disclosures; reduces risk of inconsistent, misleading, or overly sensitive information; respects confidentiality while encouraging transparency through qualitative explanations.	ESRS1	Reliefs for Quantitative Information on Anticipated Financial Effects	2.
Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I agree	recognition that NMIG contains useful annexes for preparing the sustainability report, including mapping of sub-topics to disclosures in topical standards, flowchart for determining disclosures under ESRS, example of ESRS sustainability statement structure, and example of incorporation by reference.	ESRS1	Non-mandatory Illustrative Guidance (NMIG)	1.
Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I disagree	NMIG may create interpretative difficulties if drafted unclearly; overly generic or ambiguous formulations risk inconsistent application, divergences between organization and auditor, and increased effort to align interpretations.	ESRS1	Non-mandatory Illustrative Guidance (NMIG)	1.
Excels	Sustainability Makers	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	NMIG is valuable as guidance but should be cA16:D25arefully revised to minimize subjectivity while retaining practical annexes and examples.	ESRS1	Non-mandatory Illustrative Guidance (NMIG)	1.

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Excels	MEDEF	Business association (other than association of financial institution)	France			I agree	There is a typo "The undertaking shall make every dt to ensure..."	ESRS1	ESRS 1 - 7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	101.
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	AR 35 should deleted. New provisions of CSRD amended will be transposed in national legislation. AR 35 is not useful and cannot require additional disclosure.	ESRS1	ESRS 1 - 7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	AR 35
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	Para. 40 seems to introduce some form of unnecessary guidance rather a disclosure requirement, considering in particular indent c). It should be deleted.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	40.
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	The last sentence of AR 22 is confusing considering new flexibility given to preparers to determine the appropriate level of aggregation/disaggregation. "not obscuring" is a principle included in the definition of materiality. No need to repeat it here.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	AR 22
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	The second part of para. 116 ("to support the understanding...") introduces a new requirement that is not clear (what is the level of consistency ?). This provision should be deleted.	ESRS1	ESRS 1 - 9.2 Direct/indirect connectivity with financial statements and consistency of assumptions	116.
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	This provision is not clear and should be deleted. The term "connected" is not clear and what would be the consequences ? Does the undertaking have to report, for instance, on a non-signficant stake held in a company when the investment decision was not taken by the employees themselves but by an asset manager acting independently ?	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	71.
Excels	BDO Poland	Auditor	Poland			I disagree	The introduction of the materiality approach to ESRS 2 will disrupt our reporting process. ESRS 2 was intended to be a minimum requirement for all companies to report the information. Currently, if a company doesn't have something, it simply indicates that it doesn't have it/is not relevant to them. I don't know how a company can assess materiality in ESRS 2.	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	29.
Excels	BDO Poland	Auditor	Poland			I partially agree and partially disagree	Although this is a new and necessary point, it is still vague enough that it may lead to subjective interpretation.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I agree	Better clarity	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	22.
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I agree	Update instead of reassess = less burden ; no time limit gives flexibility	ESRS1	ESRS 1 - 3.3 Double materiality assessment	29.
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I agree	Input for materiality assessment is clearer	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	33.
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	Could you precise the last sentance of this paragraph ?	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	36.
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	Robustess of the methodology when qualitative scoring instead of quantitative scoring ?	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 19
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I disagree	Still need to clarify when metrics should include upstream and downstream value. Consistency with paragraph 123 a	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	AR 28
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	Even if it is a good thing to define the materiality with a general definition I think it would be fine to add in an AR some practical comments. As example : in old 34b we had the point on the possibility to exclude 1 DP in a DR if the DP was not significant. The appendice E was not so bad and maybe to reput on the simplified way.	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	21.
Excels	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium			I partially agree and partially disagree	The reference to users in relation to the concept of fair presentation is too broad. The sustainability statements shall include material information considering ESRS 1 Paragraph 21 (a) information used for decision making by primary users of financial statements and sustainability statements and (b) information to understand the material IROs for users of sustainability statements. Looking at the definition of users in ANNEX II it is a wide definition, referencing to all type of users. Although it might be expected that stakeholder managements, or at least the insights of stakeholder managements, is embedded in your double materiality assessment considerations, the situation can arise that individual users or user groups are not fully recognized in the information provided in the sustainability statements. E.g., specific users or user groups might have different expectations on what an organisation considers material.	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	16.
Excels	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium			I partially agree and partially disagree	Please clarify the reference to the calculation of metrics. For some metrics (e.g., environmental metrics), the information is not available for the period consistent with that of its financial statements. It needs to be clarified how the disclosure of this reporting period inconsistency in combination with the GDR-M, can be considered and disclosed.	ESRS1	ESRS 1 - 6.1 Reporting period and base year	74.
Excels	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium			I partially agree and partially disagree	Considering Paragraph 46, and the top-down approach as referred to in AR 17, please clarify in which circumstances Paragraph 46 would apply.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	24.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium			I partially agree and partially disagree	Please clarify the content of Paragraph 46 when adopting the top-down approach. Considering Paragraph 46, and the top-down approach as referred to in AR 17, please clarify in which circumstances Paragraph 46 would apply.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	46.
Excels	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium			I agree	We welcome the clarification that sustainability reporting is based on the consolidated financial statements (financial control approach). Accordingly, the last clause in ESRS 1 para. 59 must be deleted in order to ensure consistency between the financial and non-financial statements.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	59.
Excels	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium			I disagree	The requirements regarding the possibility of cross-referencing need to be reviewed, as they are currently impracticable.	ESRS1	ESRS 1 - 9.3 Incorporation by reference	118.
Excels	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium			I partially agree and partially disagree	ESRS 1 Chapter 3 Paragraph AR 11 for Paragraph 33, includes the following sentence: 'Under the CSRD, the management of the undertaking shall inform the workers' representatives at the appropriate level and discuss with them the relevant information and the means of obtaining and verifying sustainability information.' It needs to be clarified what type of information should be discussed with the workers' representatives and what the objective of this Requirement is.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 11
Excels	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium			I partially agree and partially disagree	When the use of quantitative information required is not specified. While it is welcome that the materiality assessment process can be adapted to individual circumstances, the inclusion of examples in the MIG could provide greater clarity as to when quantification is appropriate and when it is not.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 19
Excels	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium			I partially agree and partially disagree	Please clarify how to threat changes due to the updated Appendix A: List of topics. If an organisation originally assessed its double materiality assessment on a sub-sub-topic level rather than a sub-topic level, how should an organisation account for this update, considering the changed Appendix A: List of topics, in light of ESRS 2 Paragraph 26 (h)? E.g., sub-sub-topic land-use change falls under the sub-topic direct impact drivers of biodiversity loss in the original ESRS however, in the amended ESRS only the sub-topic drivers of biodiversity and ecosystem change is identified.	ESRS1	ESRS 1 - Objective	1.
Excels	ASSIREVI	Auditor	Italy			I disagree	We propose the following rewording: "Common categories of affected stakeholders may include: employees and/or workers' representatives (if applicable), suppliers, consumers or end-users, affected communities and persons in vulnerable situations."	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 10
Excels	ASSIREVI	Auditor	Italy			I disagree	We propose removing: - Letter a): seems inconsistent with par. 30. When not all time horizons are analysed, undertakings should explain how they choose the relevant period - Letter b) seems inconsistent with par. 31. If elements of severity are not analysed separately, this should be disclosed	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 18
Excels	ASSIREVI	Auditor	Italy			I disagree	The paragraph encourages excessive qualitative assessment of IROs reducing quality and weakening DMA improvement incentives, strengthening burdens for auditors since would require additional efforts to assess the sufficiency of the analysis performed by undertakings to reasonably conclude on IROs as material. Therefore, guidance is needed on when qualitative analysis alone is sufficient.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 19
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	The relief "use of reasonable and supportable information" is too generic in the context of DMA. It would require further explaination to avoid irrelevant details.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (b)
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	The relief "use of reasonable and supportable information that is available without undue cost or effort" is too generic in the context of DMA. It would require further explaination to avoid irrelevant details.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	47.
Excels	ASSIREVI	Auditor	Italy			I disagree	Appendix A: - We suggest considering "privacy" as a specific unique sub topic within S1 e S2 and to not include it within the sub-topic "other labour-related human rights" as it could not be related to human rights only, resulting therefore limited in its application.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	9.
Excels	ASSIREVI	Auditor	Italy			I disagree	We propose the following rewording: "The sustainability statement shall include general information in accordance with [Draft] Amended ESRS 2 and, when necessary, on an entity-specific basis", removing the term "material". The application of DMA to all datapoints of ESRS 2 would be hard to apply considering ESRS 2 sets out general disclosure requirements that apply across sustainability topics and defines the undertakings' reporting process for the ultimate identification of material information to be disclosed.	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	49.
Excels	ASSIREVI	Auditor	Italy			I disagree	We suggest remove this AR. If foundamental in nature as explained in this paragraph, datapoints in ESRS 2 should not be subject to DMA, considering ESRS 2 sets out general disclosure requirements that apply across sustainability topics and defines the undertakings' reporting process for the ultimate identification of material information to be disclosed.	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	AR 20
Excels	ASSIREVI	Auditor	Italy			I disagree	We suggest removing ESRS 1 para. 108 The content of non-material information is against the foundational principle of materiality which is the cornerstone of ESRS and corporate reporting as such. Inclusion of non-material information could result in obscuring of material information. In addition, it will even increase burden for undertakings, as bad practices of reporting non-material information will spread across preparers.	ESRS1	ESRS 1 - 8.3 Options in presenting information across parts of the sustainability statement	108.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ASSIREVI	Auditor	Italy			I disagree	The paragraph encourages excessive qualitative assessment of IROs reducing quality and weakening DMA improvement incentives, strengthening burdens for auditors since would require additional efforts to assess the sufficiency of the analysis performed by undertakings to reasonably conclude on IROs as material. Therefore, guidance is needed on when qualitative analysis alone is sufficient.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	48.
Excels	ASSIREVI	Auditor	Italy			I disagree	The paragraph encourages excessive qualitative assessment of IROs reducing quality and weakening DMA improvement incentives, strengthening burdens for auditors since would require additional efforts to assess the sufficiency of the analysis performed by undertakings to reasonably conclude on IROs as material. Therefore, guidance is needed on when qualitative analysis alone is sufficient.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 19
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We suggest to remove this AR, considering the suggestion removing Appendix C. In caso the Appendix would be amended the AR can remain. Please refer to response to Q 12 for details.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 9
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	Need for clarification in conjuction with Appendix C. Please refer to response to Q 12 for details.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We propose to remove the following provision: "It may also incorporate information by reference to an executive summary placed outside its sustainability statement, such as in another section of the management report, provided that it meets the conditions for incorporation by reference." The executive summary shall be an integral part of the sustainability statement; it shall support users in navigating within the sustainability statement.	ESRS1	ESRS 1 - 8.3 Options in presenting information across parts of the sustainability statement	109.
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We suggest including new application requirement in order to have a clear definition and detailed explanation of "undue cost or effort" by introducing practical considerations with specific examples	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	89.
Excels	ASSIREVI	Auditor	Italy			I disagree	We disagree with the provision provided in ESRS 1 - 91, which allows the undertakings to use reliable direct or estimated data only for part of the reporting boundary or value chain if material IROs are identified.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	91.
Excels	ASSIREVI	Auditor	Italy			I disagree	We propose to not modify the existing AR 15, therefore re-integrating from NMIG for ESRS 1 the "NMIG 3 for para. 42 (Identification of risks and opportunities, likelihood and magnitude) " in the main standard.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	AR 15
Excels	ASSIREVI	Auditor	Italy			I disagree	We propose to not modify the existing para. 52 (current para. 43), therefore re-integrating from NMIG for ESRS 1 the "NMIG 4 for para. 43 (Negative impacts or material impacts on other topics) " in the main standard.	ESRS1	ESRS 1 - 3.4 Material impacts or risks arising from actions to address other topics	43.
Excels	ASSIREVI	Auditor	Italy			I disagree	We propose re-integrating from NMIG for ESRS 1 the "NMIG 5 for para. 51 (Group and subsidiary level) " in the main standard as a new Application Requirement to ESRS 1 para 51.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	51.
Excels	ASSIREVI	Auditor	Italy			I disagree	We propose re-integrating from NMIG for ESRS 1 the "NMIG 7 for para. 70 (Leased assets)" in the main standard as a new Application Requirement to ESRS 1 para 70.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	70.
Excels	ASSIREVI	Auditor	Italy			I disagree	We propose re-integrating from NMIG for ESRS 1 the "NMIG 8 for para. 82 (Impracticability to adjust comparative data) " in the main standard as a new Application Requirement to ESRS 1 para 82.	ESRS1	ESRS 1 - 7.1 Presenting comparative information	82.
Excels	ASSIREVI	Auditor	Italy			I disagree	We propose re-integrating from NMIG for ESRS 1 the "NMIG 12 for para. 114 (Direct/indirect connectivity with financial statements and consistency of assumptions)" in the main standard as a new Application Requirement to ESRS 1 para 114.	ESRS1	ESRS 1 - 9.2 Direct/indirect connectivity with financial statements and consistency of assumptions	114.
Excels	ASSIREVI	Auditor	Italy			I disagree	We propose re-integrating from NMIG for ESRS 1 the section "Mapping of sub-topics to disclosures in topical standards" into the Chapter 3.6 of the ESRS 1 within the practical considerations considering that such part provides useful indication to the preparers in linking topic to material information. In addition we noted that in the current "Mapping of sub-topics to disclosures in topical standards" under the topic E1 – Climate Change the sub-topic Climate change adaptation should be added.	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	49.
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We suggest introducing specific provisions in relation to the timing of the acquisition/disposal (i.e. excluding an acquisition/disposal if occurred during the second half-year while including an acquisition/disposal if occurred during the first half-year).	ESRS1	ESRS 1 - 5.4 Relief for acquisitions and disposals	72.
Excels	ASSIREVI	Auditor	Italy			I disagree	We suggest deleting such paragraph as reintroduces the requirement excluded at par. 72.	ESRS1	ESRS 1 - 5.4 Relief for acquisitions and disposals	73.
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We suggest updated the ESRS 1 paragraph 21(b) to include the concept of "decision-usefulness". We believe that the concept of decision usefulness should apply equally to users of both general purpose financial reports and general purpose sustainability statements when determining what information is material.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21. (b)
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	ESRS 1 paragraph 36 is missing critical words which impact the meaning of what is not a positive impact . The sentence should be updated as follows, "The results of the undertaking's mitigation or remediation actions on negative impacts caused by or contributed to by the undertaking, and its compliance with law and regulation are not positive impacts"	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	36.
Excels	ASSIREVI	Auditor	Italy			I disagree	ESRS 1 AR 13 discusses potential impacts and the disclosure of "ongoing/implemented remediation actions". It is unclear how there could be remediation actions related to an impact that has not occurred.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 13

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	It appears that ESRS 1 paragraph 87 is intended to provide a complete list of the areas where the concept of undue cost or effort can be applied. ESRS 1 paragraph 87, however, does not include 'anticipated financial effects', although application of undue cost or effort to 'anticipated financial effects' is specifically mentioned in ESRS 2 AR 15. We recommend EFRAG update ESRS 1 para 87 to include 'anticipated financial effects'.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	87.
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	The disclosures required by ESRS 1 paragraph 91 related to the actions an entity has taken to increase the coverage and quality of reporting, the progress made during the reporting period, and the requirement to reassess the if new data or inputs have become available at each reporting date should be moved to ESRS 1 chapter 7.3 Use of reasonable and supportable information that is available without undue or effort. We believe these disclosures should be required when an entity applies the relief to omit a disclosure because reasonable and supportable information is not available without undue cost or effort.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	91.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Defining the long-term horizon as >5years, without limiting it to a certain number of years (e.g. >5-10 years) makes it very challenging to evaluate and estimate the severity and likelihood of Impacts, Risks and Opportunites. Due to the volatile nature of different factors that influence these IROs it is often very challenging to estimate the severity & likelihood of an impact, if the time period has an open end. We therfore recommend to limit the long-term horizon, e.g. to >5-10 years in order to generate meaningful outcomes.	ESRS1	ESRS 1 - 6.2 Time horizon: definition of short-, medium- and long-term for reporting purposes	78.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Please change the phrase "[...]over the short, medium or long term" to "[...] over the short, medium and/or long term" in order to make more clear, that impacts cannot only occurr, e.g. EITHER in the short OR in the medium/long term, but that impacts can occurr over several time horizons, e.g. over the short, medium, AND long-term.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	30.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Please amend and specifiy as follows: "The time horizon is intended to classify both when a material impact/effect occurs (or is expected to occur) and how long the effect is expected to last. If it can be assumed that the impact will decrease or disappear completely in a future time horizon (e.g. due to the implementation of certain actions/policies) and this impact therefore falls below the materiality threshold in the assessment, then the respective time horizon does not apply. Only the period in which the impact is assessed as material must be declared externally."	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	30.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	In order to avoid misinterpretations of what is to be understood by "anticipated financial effects", please add a reference to ESRS 2 Disclosure requirement SBM-3 (paragraph 23.) for the definition of the term.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	AR 15
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Please add "opportunities" after "[...] of risks [...]" -> "[...] materiality assessment of risks and opportunities."	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	AR 16
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	This statement is inconsistent with the reporting areas mentioned in other sections of ESRS 1 and ESRS 2 and should be made consistent across all ESRS: "An ESRS sustainability statement covers governance, strategy, policies, actions, targets and metrics for topics related to material impacts, risks and opportunities." This should be changed to: "An ESRS sustainability statement covers the reporting areas of governance, strategy, impact, risk and opportunity management (i.e., policies, actions), targets and metrics for topics related to material sustainability-related impacts, risks and opportunities."	ESRS1	ESRS 1 - Objective	3.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	This 'new' paragraph refers to useful information. Other paras refer to material information. In order to aid simplification, all references to material/useful should be reviewed and streamlined so that the 'standard' is consistent and clear to all stakeholders.	ESRS1	ESRS 1 - Objective	4.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Delete the second sentence ("Civil society, non-governmental organisations and trade unions as users are proxies for affected stakeholders") because it is not needed if it is stated beforehand that civil society, etc. are other users.	ESRS1	ESRS 1 - Objective	4. (b)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The wording is inconsistent with other parapgraphs in the ESRS. This should be changeed to: "Amended ESRS 2 General disclosures establishes Disclosure Requirements (DRs) on the information that the undertaking shall provide for topics related to material sustainability-related impacts, risks and opportunities on the reporting areas of (i) governance, (ii) strategy, (iii) impact, risk and opportunity management (i.e., policies, actions), as well as (iv) targets and metrics."	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	8.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Remove the last sentence as this is redundant information and change what is left to: "If the undertaking concludes that a topic related to one or more material sustainability-related impacts, risks or opportunities is not covered, or not covered with sufficient granularity by an ESRS, it shall provide additional entity-specific disclosures on that topic. This may be the case due to sectorial specificities and/or other facts and circumstances relevant to the undertaking itself."	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	10.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	To aid simplification, we consider that the provision should be replaced with a requirement to draft the dislcosure in accordance with the new GDRs. Move the last sentence of the DR into NMIG. The blending of "may" and "shall" in this DR is slightly awkward wording in that it merges a compulsory action with voluntary outcome and risks becoming a compliance exercise.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	11.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	AR 1 for para. 11 is redundant. So, delete it in its entirety. This information is sufficiently covered in ESRS 1, qualitative characteristics of information, and in ESRS 2, reporting areas.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	AR 1
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	If all terms are defined in the Glossary as explained by Paragraph 13, Paragraph 12 could be deleted. Furthermore, the content in Paragraph 12 does not have anything to do with drafting conventions. The first line e.g. (a) should refer to to the impact assessment, in the same way that (b) refers to the financial materiality assessment	ESRS1	ESRS 1 - 1.2 Drafting conventions	12.

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Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	There are too many concepts at play. Further work needs to be done to simplify the presentation requirements	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	16.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The majority of members support the emphasis on fair presentation as an overarching principle, altough additional clarity on the definition is essential. Please see our response to Part 2 Q25.	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	18.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	We support the extension of the filter of information materiality for all datapoints, including the ESRS 2 datapoints	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The concept of material information should not only apply to primary users, but to all users, and the description of when information is material should be aligned with the one in IFRS S1. If this is amended, it would also be important to make other paragraphs, such as ESRS – 37, consistent.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21. (a)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The second sentence is misleading and should be deleted.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	AR 4
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The paragraph should explain or provide an example of a sustainability-related risk that is not related to an undertaking's negative impact and a sustainability-related opportunity that is not related to an undertaking's sustainability-related positive impact.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	26.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	The following is the second part of our response to question 12 in part two of our response: Members have the following specific concerns about the new guidance: 1. Definitional Ambiguity: The framework fails to provide clear criteria for distinguishing "significant ongoing actions" from standard business compliance practices which are consistent with regulation. The framework also fails to clarify the distinction between positive and negative impacts. This ambiguity will lead to inconsistent application across companies and industries, undermining the comparability objective that EFRAG seeks to achieve. Additionally, the supportable evidence requirements introduce definitional ambiguity and increase the reporting disclosure burden while the disclosure of expected effects of remediation actions for potential negative impacts remains highly speculative. It may also lead to long exchanges with auditors.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	The following is the third part of our response to question 12 in part two of our response: 2. Implementation Complexity: The scenario-based framework in Appendix C requires companies to navigate multiple assessment pathways for different combinations of impacts, actions and timeframes. Companies must distinguish between: - Actual vs. potential impacts - Actions taken before vs. after impact occurrence - Significant ongoing vs. standard mitigation measures - Current vs. future reporting period treatment Appendix C is also very difficult to follow. It is also important to consider how the "gross vs. net" issue is impacted by other simplifications introduced in the DMA –the practical considerations introduced in Chapter 3.5 provide sufficient guidance on the gross vs. net issue. The ability to use a top-down approach counteracts the need to identify and assess impacts which are not material.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Remove "workers' representatives" from the list of common categories of affected stakeholders.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 10
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Sentences 4 and 5 have nothing to do with the materiality assessment but relate to governance procedures. These should be deleted. Sentence 4 would still need to be clarified. We would suggest explaining more clearly what is meant by "discuss with them the relevant information and the means of obtaining and verifying sustainability information".	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 11
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Change the wording to simply reference GDR-A as opposed to descibing what "actions" are. Change to: "In this context the reference to actions taken shall be understood as described in ESRS 2 GDR-A"	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 12
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	This paragraph is misleading given the clarification that the scope of consolidation for a sustainability statement is the same as for a financial statement. Consider amending it to: "The financial materiality of a topic is not constrained to material risks and opportunities in the undertaking's own operations and includes information on material risk and opportunities attributable to business relationships in the upstream and downstream value chain."	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	38.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	Provide a definition of "other factors" that is distinct from "dependencies" or consider deleting. The examples of "other factors" listed are just "dependencies".	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	40. (c)

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Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	For existing preparers, it should be clarified what types of disclosures are required when preparers update the DMA in line with the practical considerations introduced in Chapter 3.5. It is helpful that Chapter 3.5 is not designed to trigger a re-assessment of the DMA for existing preparers, but paragraph 45 seems to be in tension with the disclosure requirements under paragraph 28-29.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (a)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The amendments help undertakings avoid disproportionate evidence-gathering while still producing meaningful disclosures.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	47.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The changing of the former AR16 table from mandatory to illustrative provides greater flexibility in the DMA. One member has noted that as a result of the removal of sub-sub-topics, for existing preparers, the DMA methodology may need to be adapted, since materiality can no longer be evaluated at the sub-sub-topic level.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 17
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	We support the flexibility offered to perform the DMA using either the top-down or bottom-up approach. This clarification enables firms to focus on decision-useful information and reduces the burden of documenting the immateriality of long lists of topics and datapoints.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 17
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The changes made provide helpful clarification that i) there is no need to evaluate all the material impacts, risks and opportunities for each time horizon and ii) for purposes of the impact assessment, there is no need to evaluate every characteristic of severity depending on specific circumstances.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 18
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The changes made provide helpful clarification that a quantitative scoring is not required in all cases.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 19
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	The last sentence does not fit with the general statement that the scope of consolidation for the Sustainability Statement should be the same as for Financial Statements. Furthermore, the statement gives the impression that a re-assessment of the DMA is necessary. This should be changed to: "If a subsidiary is not included in the scope of the consolidated financial statements because it is not financially material, but the subsidiary exposes the group to material sustainability-related impacts, risks and opportunities which otherwise would not be captured because they are unique to this subsidiary, these material sustainability-related impacts, risks and opportunities must be reported in the Sustainability Statement." Conversely, subsidiaries that are deemed immaterial for the scope of financial statements should be excluded from sustainability reporting without any additional assessment.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	59.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The statement is incorrect. Subsidiaries must be included in reporting, but specific provisions apply with respect to how to deal with the situation if the reporting period of a subsidiary deviates from the reporting period of the group. Amend as follows: The undertaking must include subsidiaries with different reporting periods in the consolidated report, by adopting the applicable accounting provisions.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	AR 27
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The newly added paragraph 63 advances regulatory coherence. This provision explicitly adds the "value chain cap" principle, which recognises the limitation to data collection allowed under relevant EU law and regulation and establishes clear boundaries: "the information required by the ESRS to be obtained from undertakings in the upstream and/or downstream value chain shall not exceed the limit set by the relevant EU law and regulation". To achieve optimal international applicability and reduce regulatory fragmentation, this framework (paragraph 63) should be broadened to also encompass global law and regulations. Given due diligence approaches and expectations vary, broadening the paragraph to would give maximum flexibility in a fragmented regulatory environment. This measured approach would balance stakeholder information needs with practical implementation realities, ensuring that sustainability reporting remains both comprehensive and operationally viable across diverse regulatory landscapes. Such an expansion would reduce conflicting obligations that may arise from overlapping international frameworks, enhance cross-border compliance efficiency by recognising diverse regulatory environments, and better support multinational enterprise reporting.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	63.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	This seems to be redundant to Paragraph 62. Please check what can be merged or if something should be deleted in either of the paragraphs.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	65.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	This seems to be redundant to Paragraph 62 and 65 when talking about estimates and proxies.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	67.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	The term business relationships already showed up various times beforehand and now it is defined all of a sudden with respect to associates or joint ventures. Provide an all-encompassing definition in the glossary and then paragraph 68 can be deleted.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	68.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	There should be flexibility for the reporting year for financed emissions to differ. Given the challenges with data collection from thrid parties, it is not operationally possible to report this for the same year.	ESRS1	ESRS 1 - 6.1 Reporting period and base year	74.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	We support the changes made as they allow different definitions for time horizons so that they can be consistent with internal processes and provide better information.	ESRS1	ESRS 1 - 6.2 Time horizon: definition of short-, medium- and long-term for reporting purposes	79.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	In ESRS 1, remove disclosures aggregating low-probability, high-impact outcomes. Whilst banks do consider low-probability, high-impact outcomes, mandating firms to disclose such information in every case could lead to misstatements or overstatements. We recommend removing this expectation from ESRS 1 (and any related AR) to protect the reliability of disclosures.	ESRS1	ESRS 1 - 7.2 Judgement, measurement uncertainty and outcome uncertainty	AR 32
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Overall comment on metrics: The position regading metrics is unnecessarily complicated. We question what the simplificaiton rationale is for continuing to treat metrics treated diferently from other PATs. If the distincition is maintained between metrics and PATs, it is essential from a simplification perpsecptve that EFRAG provide a flow chart to show how all the concepts/releifs/thresholds regarding metrics fit together in practice. EFRAG have noted in their earlier progress report on implementation that a large group of people across a company are involved in preparing the CSRD disclosures, as such, the provisions need to be readily understandable and accessible to all.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	90.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	In ESRS 1-90, preparers should be able to exclude from the calculation of metrics any subsidiaries that are not a significant driver of IROs. The relief proposed in ESRS 1-92 with respect to joint operations should refer to financial control as opposed to operational control.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	90.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	We recommend re-wording this relief for clarity as follows: §91 "When the undertaking cannot provide (using reliable direct or estimated data) a metric related to a material IRO in its own operations or value chain without incurring undue cost or effort, the undertaking can disclose the metric on a partial reporting boundary or for a subset of the value chain."	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	91.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The relief proposed in ESRS 1-92 with respect to joint operations should refer to financial control as opposed to operational control.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	92.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	We support the changes as they allow for the inclusion of additional information when needed for specific users, e.g., ratings agencies.	ESRS1	ESRS 1 - 8.2 Presentation of additional information included in the sustainability statement	108.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	If data and assumptions used in preparing the sustainability statement are to be consistent to the ones used in preparing the financial statements, there is no point in explaining the level of consistency. Amend as follows: Data and assumptions used in preparing the sustainability statements shall be consistent to the extent possible with the corresponding data and assumptions used in preparing the financial statements.	ESRS1	ESRS 1 - 9.2 Direct/indirect connectivity with financial statements and consistency of assumptions	116.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	We support the provision inserted to clarify that only the information specifically incorporated by reference is subject to assurance and not the entire referenced document. We propose to evaluate the possibility to introduce further reliefs with respect to some disclosure requirements.	ESRS1	ESRS 1 - 9.3 Incorporation by reference	118.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The new addition is helpful a clarification for preparers in jurisdictions who are dependent on the timely transposition in national law.	ESRS1	ESRS 1 - 10. Transitional provisions	121.
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We respectfully request that EFRAG provide a clearer definition or illustrative guidance on what constitutes a "limited further assessment."	ESRS1	ESRS 1 - Objective	48. (b)
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Would it be possible for EFRAG to provide a clearer definition or illustrative guidance on what constitutes a "major" acquisition or disposal under paragraph 84(c)? In particular, how should entities justify their decision to update or not update targets in such cases? Without further clarification, the requirement seems to risk contradicting the principles-based methodology by obliging companies to reset targets unnecessarily, without sufficient guidance on what "major" entails.	ESRS1	ESRS 1 - Objective	84. (c)
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	While the sentence "ARs also include text where the term 'shall consider' is used to indicate issues, resources or methodologies that the undertaking is expected to take into account or to use in the preparation of a given disclosure. " tries to specify the use of "shall consider", it is a contradiction ot para. 5 where it states that "The ESRS do not mandate behaviour [...]". A "if applicable" should therfore be added. Additionally, "shall consider" is not consistently applied as sometimes only "shall" is used (eg. ESRS E1 Ar 4 and 5).	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	15.
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	It remains unclear who "primary users", "users of general purpose sustainability statements" refer to and at what point an information is considered "necessary". The proposed wordings risks an expansion of the information provided by companies as sustainability information might be interesting for a very broad group of users. "Decision-usefulness" should be key for sustainability information as well.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21.
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	"Where the impact is deemed material based on this assessment, the undertaking shall disclose the remediation actions undertaken and their expected or actual outcomes. " The wording indicates a disclosure requirement of remediation actions on level of each material impact. Deletion or rephrasing should be considered.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	"[...] if the undertaking needs to maintain significant ongoing mitigation and/or prevention actions". It is unclear how "significant ongoing mitigation actions" should be interpreted. Further clarification is needed.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The examples are not very helpful as these are rather obvious connections. However, the supply chains of mulitnational companies are much more complex. Including examples should not be part of the disclosure requirements but could be part of the NMIG and should be deleted here.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	AR 6

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Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The Appendix C should be deleted as it rather adds complexity to the topic and might require additional documentation effort as part of the audit procedures.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	AR 9
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The part"Under the CSRD, the management of the undertaking shall inform the workers' representatives at the appropriate level and discuss with them the relevant information and the means of obtaining and verifying sustainability information. The workers' representatives' opinion shall be communicated, where applicable, to the relevant administrative, management or supervisory bodies." should be deleted. This is part of level 1 legislation. Additionally, it seems to indicate behavioural obligations going against para. 5.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	AR 11
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Par. 51/52 and AR 22/23 could be interpreted to require companies to dive even deeper into their materiality assessment than originially and stands in contradiction to 3.3.1 which strengthens the top-down approach. The newly added examples (e.g. water basin, site, asset or other appropriate level) should therefore be removed to avoid ambiguity in the interpretation.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	51.
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Suggestion to delete Application Requirement as it does not add any additional value / insights to the reporting requirements.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	AR 28
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	It is unclear what is meant with "signficant events" and what exactly needs to be disclosed. Suggestion to either delete or further clarify paragraph.	ESRS1	ESRS 1 - 5.4 Relief for acquisitions and disposals	73.
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	This requirement is not a relief but constitues a behavioural obligation. it should therefore be deleted and the initial paragraph 85 should be reintegrated: "Sometimes, it is impracticable to adjust comparative information for one or more prior periods to achieve comparability with the current period. For example, data might not have been collected in the prior period(s) in a way that allows either retrospective application of a new definition of a metric or target, or retrospective restatement to correct a prior period error, and it may be impracticable to recreate the information (see ESRS 2 BP-2). When it is impracticable to adjust comparative information for one or more prior periods, the undertaking shall disclose this fact."	ESRS1	ESRS 1 - 7.1 Presenting comparative information	84. (c)
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Reasonable and supportable information is subject to the interpretation of auditors. A clear definition is missing otherwise it undermines the level playing field and will be applied unevenly.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	88.
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	A "balanced consideration of the costs and efforts" is subject to companies and auditors interpretation. If at all, the relief might be helpful for wave 2 companies but at what point is a multinational company able to use this argumentation? Introducing this concept on a broad scale might also reduce the comparability and availability of sustainabiltiy data.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	89.
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Reporting only partial scopes without clear guidance risks to reduce the comparabiltiy and availability of sustainability of data.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	91.
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Providing a lit of references in the sustainability statement should be sufficient. No additional cross-referencing should be needed from other source documents to the sustainability statement. Deletion of requirement.	ESRS1	ESRS 1 - 9.3 Incorporation by reference	118. (a)
Excels	Leaseurope	Business association (other than association of financial institution)	Belgium			I agree	Leaseurope welcomes this clarification. We consider the definition of 'leased asset' should be provided, for example is this based on IFRS 16, and if so it is based on the IFRS 16 lease definition before or after any voluntary use of exemptions (short-term assets, low value assets)? We suggest it should include all leases under IFRS 16 for IFRS users, regardless of whether the preparer has opted to make any voluntary use of exemptions. We shall be pleased to provide a suggested definition.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	70.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	This requirement on entity-specific disclosures can bring additional burden on companies	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	10.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is necessary to clarify further the wording "faithful representation"	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	19.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I agree	Not mentioning any time limit for the update of the conclusions of the materiality assessment gives companies more flexibility	ESRS1	ESRS 1 - 3.3 Double materiality assessment	29.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	More clarity is needed to avoid contradictions between Paragraphs 34 and 35, specifically, regarding the consideration of remeddiation actions when assessing impact materiality.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	In addiiton, requiring the inclusion of mtitigation and prevention actions in the materiality assessment, the process can become more rigid and complex.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I agree	The definition of stakeholders looks clearer	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 10
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I agree	The process to engage with stakeholders in the materiality assessment is more streamlined	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 11
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	Including information on material risks and opportunities from business relationships beyond the scope of consolidated financial statements is an additional burden	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	38.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I agree	Streamlined and simplified	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	46.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The possibility of using reasonable and supportable information is a positive amendment, but more clarity is needed for "undue cost or effort".	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	47.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I agree	Streamlined to avoid unnecessary complexity	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	48.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I agree	Streamlined to avoid unnecessary complexity	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 18
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	Including disaggregation can increase the reporting burden	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	AR 22
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is positive that the assessment of undue cost or effort depends on the company's circumstances. However, a definition of "undue cost or effort" is needed	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	89.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I agree	Excluding joint operations helps streamline the calculation scope of environmental metrics	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	92.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I agree	Flexibility in where to include information in the sustainability statement reduces burden	ESRS1	ESRS 1 - 9.1 Connected information	112.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I agree	The option for companies to cross-reference the financial statements when reporting on monetary amounts is positive	ESRS1	ESRS 1 - 9.2 Direct/indirect connectivity with financial statements and consistency of assumptions	114.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The clearer wording is appreciated. However, the practical application of using materiality as a general filter (section 3.1) remains challenging, particularly in light of concerns raised by assurance specialists regarding these amendments.	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	20.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	Aligns with the undue cost and effort principle.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	91.
Excels	Afep	Business association (other than association of financial institution)	France			I agree	There is a typo "The undertaking shall make every dt to ensure..."	ESRS1	ESRS 1 - 7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	101.
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	AR 35 should deleted. New provisions of CSRD amended will be transposed in national legislation. AR 35 is not useful and cannot require additional disclosure.	ESRS1	ESRS 1 - 7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	AR 35
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	Para. 40 seems to introduce some form of unnecessary guidance rather a disclosure requirement, considering in particular indent c). It should be deleted.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	40.
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	The last sentence of AR 22 is confusing considering new flexibility given to preparers to determine the appropriate level of aggregation/disaggregation. "not obscuring" is a principle included in the definition of materiality. No need to repeat it here.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	AR 22
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	The second part of para. 116 ("to support the understanding...") introduces a new requirement that is not clear (what is the level of consistency ?). This provision should be deleted.	ESRS1	ESRS 1 - 9.2 Direct/indirect connectivity with financial statements and consistency of assumptions	116.
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	This provision is not clear and should be deleted. The term "connected" is not clear and what would be the consequences ? Does the undertaking have to report, for instance, on a non-signficant stake held in a company when the investment decision was not taken by the employees themselves but by an asset manager acting independently ?	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	71.
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I agree	Nokia supports this clarification.	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	22.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I disagree	Nokia supports the clarification that mitigation and preventive actions taken reduce the severity/likelihood of potential negative impacts. However, the effect of ongoing mitigation and/or prevention actions, such as existing due diligence processes or procedures already in place and continuously followed, should be also considered in assessing the materiality of the impacts (i.e. the severity and likelihood is assessed on net / post-mitigation basis). The same requirements should be added to also apply in assessing risks.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I disagree	The concept of "reasonable and supportable evidence" is not clear and should be removed. The level of evidence and documents should not be defined in standards but left to the assessment of undertakings. Nokia sees that defining and requiring "reasonable and supportable evidence" in the standard, could increase the efforts and uncertainty for preparers and assurance providers when determining the sufficient level.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (b)
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I disagree	This requirement is impossible to comply with for large international undertakings (impossibility to assess). It should be deleted. See comment to ESRS 1 - 51.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	AR 24
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I disagree	In its current form, this new or amended paragraph would require significant effort and resources, if not impossible, to assess and provide evidence on variations (or lack of variations) for these factors to determine level of aggregation / disaggregation for large, global undertakings. Nokia proposes to amend the wording significantly, either by bringing back the existing requirements or completely removing this paragraph with reference to variations.	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	51.
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	Nokia welcomes the introduction of the relief "undue cost or effort" and focus on IFRS interoperability (ESRS 1, paragraph 60). However, it is not really clear what "undue cost or effort" means, how it should be computed and how deep in the supply chain the assessment should run. We call for the introduction of practical boundaries for this concept and how to calculate and demonstrate that required efforts and costs have been met to exercise this relief.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	60.
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	This is a good clarification. However, estimates should not be required when no sufficient information is available to compute robust estimates.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	62.
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	Clarity is needed on what could be considered as a boundary for data collection. Nokia calls upon EFRAG to provide a list of relevant EU legislation creating reporting boundaries (GDPR, competition law, rules over trade secrets, etc.) to improve legal certainty for Wave 1 and value chain partners. This value chain cap should be aligned and workable with level 1 changes, foreseeing necessary reliefs.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	63.
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I disagree	This paragraph needs to be simplified: estimates should not be required when no sufficient information is available to compute robust estimates. The metrics related requirement / clarification also seems repetitive with the other paragraphs including information about estimates.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	67.
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I disagree	The concept of "reasonable and supportable evidence / information" is not clear and should be removed. Estimates should not be required when no sufficient information is available to compute robust estimates.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	87.
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I disagree	The concept of "reasonable and supportable evidence / information" is not clear and should be removed. Estimates should not be required when no sufficient information is available to compute robust estimates.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	88.
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I disagree	Nokia welcomes the introduction of the relief "undue cost or effort" and focus on IFRS interoperability (ESRS 1, paragraph 60). However, it is not really clear what "undue cost or effort" means, how it should be computed and how deep in the supply chain the assessment should run. We call for the introduction of practical boundaries for this concept and how to calculate and demonstrate that required efforts and costs have been met to exercise this relief. Estimates should not be required when no sufficient information is available to compute robust estimates.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	89.
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I agree	These reliefs are important and should be extended to full reliefs (not only partial reliefs).	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	90.
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I agree	These reliefs are important and should be extended to full reliefs (not only partial reliefs).	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	91.
Excels	Group Caisse des Dépôts	Asset manager/Investor	France			I disagree	YK comment applicable to all amended ESRS : the distinction between the new Application requirements (AR) and the mandatory requirements is not clear. Elmements in the AR seems to be datapoint in themselves. In addition, in the way it is presented in a table, the AR is highlighted compared to the element in body of the text	ESRS1	ESRS 1 - 1.2 Drafting conventions	15.
Excels	Group Caisse des Dépôts	Asset manager/Investor	France			I disagree	YK Moreover, the fact that non mandatory presentation options are also encapsuled with mandatory requirements is misleading.	ESRS1	ESRS 1 - 1.2 Drafting conventions	15.
Excels	Group Caisse des Dépôts	Asset manager/Investor	France			I agree	YK the appendix B provides a clear (altough theoretical) definition of fair representation	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	18.
Excels	Group Caisse des Dépôts	Asset manager/Investor	France			I disagree	YK The definition of when information is material is very subjective and whould be amended with a more objective definition relating to the importance of associated impact (actual or potential), risk and opportunity	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	21.
Excels	Group Caisse des Dépôts	Asset manager/Investor	France			I disagree	YK to avoid different interpretations and increased burden for the most strict interpretation, the paragraph should clearly state : no update is required unless there is a change in circumstances, with a revision at least every 5 year.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	29.
Excels	Group Caisse des Dépôts	Asset manager/Investor	France			I disagree	Yk the paragraph seems to impose a scoring based on several parameters depending to whether to impact is actual or potential ; severity (scale, scope irremediability of impact), likelihood.. This seems opposed to the aim to simplify the DMA	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	31.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Group Caisse des Dépôts	Asset manager/Investor	France			I disagree	YK the paragrph should be further explicited as regards whether engagement with stakeholders is mandatory or not (and what engagement with stkeholders means)	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	33.
Excels	Group Caisse des Dépôts	Asset manager/Investor	France			I disagree	YK The paragraph explicits that the severity of impact should be evaluated considering the outcomes of mitigation and prevention measures but accounting for the remediation measures already implemented. If remediation should indeed not be accounted in the impact assessment, integrating mitigation in the assessment could be misleading For example, it could mean that for a real estate company that has energy retroffited all its buildings, energy and GHG emission is no longer an issue since the impact has been mitigated, and the company could consider the topic is no longer material. More broadly, any company could state that as long as it has a mature mitigation policy, the impact is no longer material. This seems contrary to the initial objective of sectoral comparability and transparency on the mitigation policy, action and measure.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	Group Caisse des Dépôts	Asset manager/Investor	France			I disagree	YK The paragraph explicits that the severity of impact should be evaluated considering the outcomes of mitigation and prevention measures but accounting for the remediation measures already implemented. If remediation should indeed not be accounted in the impact assessment, integrating mitigation in the assessment could be misleading For example, it could mean that for a real estate company that has energy retroffited all its buildings, energy and GHG emission is no longer an issue since the impact has been mitigated, and the company could consider the topic is no longer material. More broadly, any company could state that as long as it has a mature mitigation policy, the impact is no longer material. This seems contrary to the initial objective of sectoral comparability and transparency on the mitigation policy, action and measure.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	Group Caisse des Dépôts	Asset manager/Investor	France			I partially agree and partially disagree	Nature may be considered a silent affected stakeholder	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 10
Excels	Group Caisse des Dépôts	Asset manager/Investor	France			I partially agree and partially disagree	"the management of the undertaking shall inform the worker's representatives at the appropriate level and discuss with them the relevant innformation and the maans of obtaining and verifying sustinability informaition : the workers 'respresentatives ' opinion shall be communicated to the relevant admnistrative management of supervisory bodies" : does it correspond to a change with previous text?	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 11
Excels	Group Caisse des Dépôts	Asset manager/Investor	France			I disagree	when ajusting a target after an acquisition or a cession, the text should mentions more boardly adjusting the reference base rather than the base year which may not always change in case of a acquisition of a cession. (a strict interpretation of the initial amended paragraph could result in requiring company to change their base year of their target even for the disposal of a small subisidiary, although only the base reference could have been changed.	ESRS1	ESRS 1 - 7.1 Presenting comparative information	84. (b)
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree Non-financial users should be limited to business partners, trade unions, social partners and NGO's representing interest common to society	ESRS1	ESRS 1 - Objective	4.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	The section on entity-specific information is not clearly delimited, only entity-specific information that is necessary for decision-making and understanding by the primary user groups, based on clear criteria for what to consider for users' decision-making and understanding (see comment to ESRS1-21), shall be included. Entity-specific disclosures should be limited to potential new sub-topics or additional disclosures on defined ESRS topics/sub-topics	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	10.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree To illustrate our comments in part 2, we suggest replacing para. 11 with the following: "While the standards will generally, provide a complete set of decision-useful information for the primary user groups, additional entity-specific information will usually only be relevant when the reporting entity needs to provide information on specific sub-topics beyond the requirements in the AR. If relevant, when developing its entity-specific disclosures, the undertaking shall consider without undue cost and effort comparability over time and with other undertakings that operate in the same sector(s)." In addition, we highlight, that it is important to delete the refence to IFRS industry-based guidance and GRI Sector Standards, as the paragraph would otherwise indirectly require compliance with those. We suggest addressing this I basis for conclusion or the NMIG instead.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	11.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially agree It should be added and made absolutely clear that the AR's do not add extra datapoints.	ESRS1	ESRS 1 - 1.2 Drafting conventions	15.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree It should be clarified that materiality should always be assessed in the light of being indispensable and decisions-useful for the primary users. It should be clarified that considerations on capital providers' decision-making shall focus on information essential to protect and evaluate prospects of their assets, while strategic or ethical preferences of investors in their decision-making need not be considered, e.g. an investor's zero-tolerance on certain ESG-matters. A criterion should emphasize that understanding is about getting a general impression of a subtopic and the related IRO and should be no more than what can be considered necessary by the undertaking to initiate a qualified dialogue. The level of aggregation and disaggregation shall be proportionate to the degree of severity of impacts.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree The text is an explanation of the term "general purpose" and should therefore be moved to definitions.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	AR 3
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree The text concerning the different terms should be clearer on the fact that "material impacts", "principal impact" and "most significant impacts" are synonyms, hence the second para just creates confusion and should be deleted or rewritten. We suggest that the following part should be deleted: "…Some existing standards and frameworks also use the term 'most significant impacts' when referring to the threshold used to identify the impacts that are described in the ESRS as 'material impacts'".	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	AR 4

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	ESRS1, paragraph 26, has the characteristics of being a guide and should therefore be moved to non-binding guidance. Using the terms "in general" and "may" underline the fact that the text is guidance. ESRS1, paragraphs 40+41, is sufficient in covering the topic.	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	26.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	The AR contains two examples, which should be moved to non-binding guidance.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 6
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree It should be clarified that the results 'may' provide a critical input. 'Will' should therefore be changed to 'may'. We suggest amending the text to: (Change marked with capital letters) "If the undertaking engages with affected stakeholders as part of its due diligence process to identify, assess and address negative impacts, the results of this engagement MAY provide a critical input to its materiality assessment, without necessarily putting in place a separate engagement process for the materiality assessment…"	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 11
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	We suggest amending the requirements, making it clear that the outset of the materiality assessment of actual impacts should be based on the business as established and as it is operating throughout its normal operating businesses (e.g. including environmental approvals/rights to produce, H&S measures and other procedures and controls in places). We are specifically uncertain about how to assess the severity and likelihood of potential negative impacts, especially those where mitigating actions are ongoing. It is difficult to assess and report on an impact/situation before mitigation actions are taken, when the actions are implemented, crucial for the operation and part of business as usual. Preparers would essentially have to assess a hypothetical situation. Similarly, potential impacts, risks and opportunities should be assessed taking preventive and remediating actions into consideration when such are established and the entity has the ability and intention to activate those if/when relevant (for instance an internal fire brigade or a well-established system to quickly deal with minor oil-spills). Where mitigation has successfully taken place there is no real risk and thus, nothing to report on	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	In addition to the comments provided to paragraph 34, er note that it is impossible to separate the mitigation from "maintained significant ongoing mitigation and/or prevention actions" when these are embedded in the day-to-day operation and needs to be in place for the operation to run, e.g. in the food and beverages, pharmaceutical and similar sectors	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially agree Guidance is needed as to what 'evidence' can encompass, i.e. on the level of certainty, when assessing severity levels and likelihoods of impacts, and the magnitude and likelihood of risks and opportunities. Also necessary to explain the reason for using different wording in ESRS 1, paragraphs 45b and 47, i.e. reasonable and supportable evidence/information.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (a)
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially agree Guidance is needed as to what 'evidence' can encompass, i.e. on the level of certainty, when assessing severity levels and likelihoods of impacts, and the magnitude and likelihood of risks and opportunities. Also necessary to explain the reason for using different wording in ESRS 1, paragraphs 45b and 47, i.e. reasonable and supportable evidence/information.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (b)
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially agree In our opinion the top-down and bottom-up approach should have equal footing and that the reporting entity can choose which of these between them without having do document that the result of the one not-used would not have been different from the method used as this would in reality require entities to apply both methods. Therefore, it should be added in the last sentence that ", although documentation is not required". In addition, EFRAG should add to the Basis for Conclusion that the two methods are deemed to result in the same outcome.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 17
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially agree AR27 should be moved to sub-chapter 6.1 as an AR to paragraph 74.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	AR 27
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially agree AR 28 is difficult to understand. Is it a relief option ('do not require') or a requirement to exclude ('limited to own operations') up-/downstream data from mentioned DRs?	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	AR 28
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree Risks and opportunities in associates and joint ventures should not be automatically determined based on the supply/customer relationship but need to take into consideration the extent to which financial effects of risks and opportunities can or will be transferred to the undertaking. Goods may be traded at prices quoted in an active market, e.g. oil or crops, in which case financial effects related to IROs in the associate or joint venture will be carried by the owners in proportion to their equity share, i.e. not transferrable through a price adjustment on the goods.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	69.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree Risks and opportunities associated with leased assets should reflect the contractual terms, i.e. the extent to which financial effects can or will be transferred from the lessor (asset owner) to the lessee. The agreed lease payment may be fixed, only adjusted by inflation, or driven by market price of similar assets, which in combination with a short lease term or cancellation rights, can influence the extent to which financial effects, related to impacts from the leased asset, will be transferred to the lessee. Specifically – and as an exemption to the general requirements – it should be possible for the entities to apply the definitions in the GHG-protocol when reporting on GHG according to E1.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	70.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially agree ESRS1-71 should be more clearly demarcated to assets in defined benefit plans, as an undertaking has no relationship to pension assets in defined contribution plans	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	71.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree The standard should specify, that entities do not need to change the base line, i.e. the comparable numbers provided for the base year, when it in future years change the accounting policies for metrics. This might be practically impossible without applying hindsight. Applying new accounting policies prospectively should be stated. Retrospective application should be possible on a voluntary basis.	ESRS1	ESRS 1 - 6.1 Reporting period and base year	76.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially agree It creates confusion that paragraph 86 and AR32 are not aligned with the relief for quantifying anticipated financial effects.	ESRS1	ESRS 1 - 7.2 Judgement, measurement uncertainty and outcome uncertainty	86.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	We are deeply concerned about the requirement to disclose anticipated financial effects. Such information is highly dependent on estimates and a large variety of possible developments and outcome, which cannot be reliably projected and for this reason subject to significant uncertainty. Anticipated financial effects would therefore not provide reliable insights for investors or other users, due to their potential variability. Disclosing premature information on matters that are not yet actively incorporated in the entity's financial planning may involve a measurement uncertainty and thus lead to unprecise or even unreliable information that may not only mislead stakeholders but also expose companies to reputational and legal risks associated with misinterpretation. Furthermore, the Market Abuse Regulation (MAR) would require that the issuer continuously, upon any change discloses updated information to the market, leading to excessive and disproportionate burdens. We suggest removing the requirement on anticipated financial effects and leave regulation on expected financial development of the entity to other EU regulation. If the requirement to disclose anticipated financial effects remains, then Option 2 (qualitative information) is highly recommended	ESRS1	ESRS 1 - 7.2 Judgement, measurement uncertainty and outcome uncertainty	86. (a)
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially agree In ESRS 1, paragraph 89, it must be acknowledged that there will be cases where data will not be available. It should be clarified that 'undue cost or effort' shall not be misused to omit material information. Different views can be expected on what undue cost or effort is, why more clarity is needed to prevent misuse.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	89.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree The requirement in ESRS 1, paragraph 108b – requiring the non-material information to provide a faithful representation – should be deleted. The key element is in ESRS 1, paragraph 108a (non-obscuring) and any information will anyhow have to meet the qualitative characteristics as outlined in ESRS 1, paragraph 107.	ESRS1	ESRS 1 - 8.2 Presentation of additional information included in the sustainability statement	108. (b)
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree The AR has the characteristics of being a guide and should therefore be moved to non-binding guidance. Using the terms "may" underline the fact that the text is guidance.	ESRS1	ESRS 1 - 8.3 Options in presenting information across parts of the sustainability statement	AR 36
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I agree	While we agree with the transitional provision whereby comparable information is not required for the first year of preparation of the sustainability statement, we suggest to add – or make it clear – that this also apply in the first year of adopting the amended ESRS standards if/where the amended standard change definitions or disclosure requirements compared to those set by the standards in Set 1.	ESRS1	ESRS 1 - 10.2 Transitional provision related to Section 7.1 Presenting comparative information	126.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Suggest switching order of paragraphs to improve readability. "Topic" is defined too early , ie before paragraph 3 which more explicitly relates to the objective of the standard. Suggest moving current paragraph 2 to after current paragraph 4.	ESRS1	ESRS 1 - Objective	2.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Reference to asterisk note after the table in Appendix A: The note on assessment of workers in the value chain reads like AR guidance and should be included in the main body of the standard if it is intended to be binding guidance in an appendix that is otherwise non-binding.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	9.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	First of all, we welcome the permanent reference to available frameworks and/or reporting standards, such as IFRS industry-based guidance and GRI Standards. However, the drafting would be better if it referenced IFRS/SASB/GRI and relevant industry practice as non-mandatory sources of guidance to identify material information, following IFRS S1:58.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	11.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	What is meant by 'excessive number' and 'unknowns'? This is not terminology companies are used to.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	AR 2
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Paragraph text should be amended to include 'shall include/shall report/shall describe/shall explain' in addition to 'shall disclose' as all these formulas are used to introduce datapoints (or the approach used throughout the standards should be further streamlined).	ESRS1	ESRS 1 - 1.2 Drafting conventions	14.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Some existing standards' - include an example of which standards follow this approach (eg GRI).	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	AR 4
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Amend drafting: 'Impacts are captured by the impact materiality perspective irrespective of whether or not they are also financially material'.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	25.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Reference to Glossary: Does not reference the concept of material information.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	25.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Reference to Glossary: There is a typo in the definition as the word 'financial' is missing from: ' … two dimensions: impact materiality and financial materiality'.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	25.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	If Appendix C is not deleted: Definition of "significant ongoing mitigation and/or prevention actions" could cause challenging discussions. In practice, in most cases would we expect any actions to be above this threshold and therefore not to be considered in the materiality assessment, if not clearly inconsequental? We believe that in some cases the treatment of the scenarios in the appendix C are inconsistent with our understanding of the ESRS 1 paragraph 34 and 35.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	We recommend to clarify the principle to avoid divergence in practice so that it is clear that any policy/action implemented/taken to address the undertaking's own negative impacts should not be considered as a positive impact. In addition, we recommend guidance as to whether actions to remediate negative impacts/risks of the undertaking that are not in compliance with laws or that go beyond compliance with laws would be considered a positive impact.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	36.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	If Appendix C is not deleted: AR9 as drafted is a cross-reference to Appendix C - so it is not really an AR. It also refers to an 'overview' but Appendix C is an integral part of the standard. Better cross-referencing from the main requirements of the standard is needed.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 9
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Reference to Appendix C if it is not deleted: On page 32, second row in the middle column 'Assess and report the potential impact before the actions and report actions'. This does not seem to be consistent with ESRS 1.35 in the case of the first and last row : 1:35 states that the effect of the actions shall be considered in the materiality assessment, if there is supportable evidence that mitigation or prevention actions taken reduce the severity and/or likelihood of potential negative impacts.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 9
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	We suggest the following change in AR 10 to para. 33 (in bold): Common categories of affected stakeholders are may include: employees and/or workers' representatives (if applicable), suppliers, consumers or end-users, affected communities and persons in vulnerable situations.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 10
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Consider if this better belongs with the ESRS 2 GDR-A content as this is what the AR is referring to. Also ESRS 1 AR 13 discusses potential impacts and the disclosure of ongoing/implemented remediation actions'. It is unclear how there could be remediation actions related to an impact that has not occurred.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 13
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Reference to Glossary: Not aligned with the revised wording of the standards - in particular 'material topic' is not used.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	38.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Update 'supportable evidence' in 45(b) to 'supportable information' to align with Section 7.3.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (b)
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	The phrase 'likely to result in material information for all undertakings' seems to be at odds with the overall principal of materiality of information. We think this should be deleted so that the materiality of information principle is consistently applied.	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	AR 20
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	AR24 states "Where the undertaking identifies significant differences between material impacts, risks or opportunities at group level and material impacts, risks or opportunities of one or more of its subsidiaries…' – This might imply that a materiality assessment is also required at the level of a sub – but para 53 states that the level of assessment is at group level. We are not clear how ESRS 1:53 and AR24 are meant to interact - it is not clear how 'materiality at group level' and 'material at the subsidiary level but not the group' is meant to be applied in practice, and more importantly where to draw the line. This is inconsistent with the approach in financial reporting where group materiality is assessed at group level. If this is intended as a trade-off for subsidiaries to use an exemption from reporting, it should be made clear (and presumably then should only apply to subsidiaries that otherwise would be in scope of CSRD).	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	AR 24
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	In the case of group reporting, the reporting undertaking usually considers as part of its own operations: the assets and liabilities, income and expense of the parent undertaking and its subsidiaries, located in or outside the EU, as determined in accordance with the applicable accounting requirements." We suggest adding explanations regarding : 1) "assets and liabilities on balance sheet", for example those classified in IFRS 9 or in a similar standard might not be considered as own operations but as value chain (consistently with financial statements) 2) "income and expenses", this seems not sufficient, particularly in the service industry, to conclude if the activity is related to the own operations of a group or its value chain.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	59.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Value chain is key in the DMA process. Hence, we agree with the introduction of the definition of business relationship, but recommend the wording should be updated in the glossary as well for 'business relationship'. However, downstream value chains can be very different from one industry to another and further clarification is still needed. For example, it is unclear whether asset under management on behalf of a third party would be considered as a business relationship of the reporting entity (for example whether a the investments held by a fund are business relationships of the fund manager, which often has no shareholding interests in the fund. We also encourage EFRAG to consider the effect of the IFRS S2 revisions in respect of financed emissions currently being finalised by the ISSB The definition of business relationship is welcome, however, for some sectors such as private equity/ third-party asset management sector, It is still unclear what a business relationship is. For example whether a the investments held by a fund are business relationships of the fund manager (which often has no shareholding interests in the fund). This wording should be more aligned with definition of Business relationships in Appendix II to avoid confusion	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	68.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Considering long-term employee benefit fund, in most cases, employees own shares in the fund and there is nothing on the undertaking's balance sheet. Moreover, the undertaking does not choose the fund investments. Therefore, those assets should not be considered as business relationship of the undertaking. Regarding accounting practices, in cases when undertaking holds the fund's shares (in its balance sheet), these assets should classified as non controlled investments (IFRS 9 for example) and those assets will be considered as part of the value chain.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	71.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	We disagree with the way the proposed relief has been introduced at ESRS 1:73. However if the approach is retained, we have the following comments: Relief for acquisitions and disposals 72- Clarify that there might still be remaining IRO related to a disposed entity (e.g., past pollution event with remaining risks for the entity that disposed of the subsidiary). 73 - Major acquisitions should be 'significant acquisitions' 73 - Disclosure of 'significant event' should require a brief description of the business model and key characteristics of the acquired undertaking and high-level sustainability topics related to the entity, to provide a general indication of the effects of the integration even if the DMA has not yet been performed (for example adapting existing ESRS 2:17).	ESRS1	ESRS 1 - 5.4 Relief for acquisitions and disposals	72.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Guidance would be helpful related to: a) 'may exclude': for metrics associated with own operations, or in total (i.e. also for value chain)? b) 'may exclude ... over which it does not have operational control': If operational control exists, then the joint operation needs to be included in own operations? Is there a general requirement? c) Reference is made to E2-E4. How would joint operations be addressed in the context of S Standards?	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	92.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	This disclosure requirement should clearly be included in ESRS 2 eg ESRS 2:5	ESRS1	ESRS 1 - 9.2 Direct/indirect connectivity with financial statements and consistency of assumptions	116.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Presumably this paragraph has been included to clarify that the reliefs are "consumed" only if there is a (legal) reporting requirement (in line with the respective EFRAG Q&A). However, the way the requirement is phrased, would suggest that transitional provisions could only be applied in mandatory reporting; i.e., undertakings that prepare 'full ESRS' reports on a voluntary basis could not make use of the transitional provisions, which might not be the intended outcome.	ESRS1	ESRS 1 - 10. Transitional provisions	121.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	The paragraph erronously refers back to itself	ESRS1	ESRS 1 - 10.1 Transitional provision related to Chapter 5 Value chain	124.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL on para 1 to 6 - ESRS consistently use "topic"; it seems sufficient to explain in the glossary that "topic" is also understood as factor (i.e., wording of CSRD); but that reference to a term otherwise not used does not seem to add any information in ESRS 1, par. 2 (suggestion: delete reference to "factor", but include in glossray for understanding) - could add abbreviation to "impact, risks and opportunitites"? (IRO) (par. 3)	ESRS1	ESRS 1 - Objective	1.
Excels	DRSC	(National) standard setter	Germany			I disagree	- the purpose of par 4 is to lay out who the users of general purpose sustainability statements are. The last sentence in par 4(b) does not add to this objective, but explains (insufficiently) "proxies for affected stakeholders". Par 4 is about the users, not the (affected) stakeholders. Also the term "affected stakeholders" is (more appropriately) explained in the Glossary. Therefore, this reference to (some of the) proxies of affected stakeholders should be deleted here.	ESRS1	ESRS 1 - Objective	4.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL - suggestion to align wording from (sometimes used) "topical standards" to generally using "topical ESRS" (e.g. par 7 vs. par 9)	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	7.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL Note: DRSC agrees with and supports the concept of "entity-specific disclosure requirment" (see consideration to embedd in other principles of ESRS sustainability reporting, i.e. fair presentation). par 10 could be streamlined as basically first sentence and last sentence both - with different intentions - address the aspect of "topics which are not covered by an ESRS requirement"	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	10.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL - par 8 and par 11 are contradictory: par 11 refers to "IRO management (i.e. policies and actions)" whereas par 8 states " (i) ... IRO management, as well as (ii) policies, actions, targets ..." - the latter (par 8) implies that there is a difference between IRO management on the one side and "policies and actions" on the other side, when in fact "IRO management" is (i.e.) policies and actions. So the wording should be adjusted consistently to depict understanding currently laid out in AR 1 for para 11	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	AR 1
Excels	DRSC	(National) standard setter	Germany			I disagree	- overall: AR 2 seems to provide room for further streamlining as it does not seem to add relevant information for preparing the sustainability statements in accordance with ESRS; AR 2 seems to rather refer to qualitative charcterstics in general which apply to all information in ESRS (not just entity-specific metrics) - a specific AR is not needed for that (e.g. (b)) - in addition: (a) refers to "performance metrics" when AR 2 addresses "metrics" in general (suggestion: delete reference to "performance metrics" and include reference to "metrics" only)	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	AR 2
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	suggestion to include in (a) "as identified through impact materiality assessment" (to align with (b) which refers to "as identified through financial materiality assessment" - or delete that reference in (b) as well)	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	12. (a)
Excels	DRSC	(National) standard setter	Germany			I disagree	par 15 includes explanation regarding the term "shall consider" (which is included in AR). DRSC considers this term still too vague as to sufficiently clarify what preparers are asked to do; therefore DRSC has a preference for deletion of this term	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	15.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	DRSC	(National) standard setter	Germany			I agree	The DRSC has been in support of including a specific reference to the fair presentation principle early on.	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	16.
Excels	DRSC	(National) standard setter	Germany			I disagree	Nevertheless, DRSC believes that there are adjustments necessary to the current amendment to the ESRS with regard to fair presentation. Please see our cover letter on the exposure draft for revised ESRS.	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	16.
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG The DRSC supports the added emphasis on the "Materiality of information" filter and agrees that this will be very helpful in effectively supporting the focus on material information in the sustainability statements; nevertheless the DRSC does not agree with the current understanding /wording of the "Materiality of information" in par 21. In the view of the DRSC the concept of the "materiality of information" is clearly and sufficiently described in par 21(a) if this were to include all users. In the view of the DRSC the reporting should have the objective of decision usefulness only; which is a well established concept to address the needs of users and which should - of course - be enhanced to include all users of general purpose sustainability statements (not just users that are interested in the financial impact perspective); The currently used concept of information that is "necessary for users... to understand" the IROs is too vague and does not fulfill the objective of the "materiality of information" concept (which is to provide an additional explicit filter for materiality). [continues in box below]	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	21.
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG [continued from box above] Instead it can lead to an expansion of the information that has to be considered material and therefore has to be provided (in order to address various possibly "necessary" information needs); this will extend information towards a "compliance exercise" even more due to the wide scope of any kind of information that any user might find necessary, The DRSC sees the risk of undertakings needing to prove that information is not "necessary for ... understanding" (when exactly is an information "necessary"?) Therefore, the DRSC objects to par 21 (b) and instead suggests to expand the concept of decision usefulness (in (a)) to all users or define the objective for users under (b) identical to (a) (i.e. decision usefulnes), (b) in its current form is seen as loophole to have to include all sorts of (non material) information and should therefore be deleted. Also: see comment on par 37, second sentence - this is a duplication of par 21(a). It is important that this sentence is deleted in par 37 as it could otherwise seem to be referencing to financial materiality.	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	21.
Excels	DRSC	(National) standard setter	Germany			I agree	agree with reference to "groups of users" for understanding of general purpose	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	AR 3
Excels	DRSC	(National) standard setter	Germany			I disagree	DRSC does not consider reference to a selected terminology of another standard (here: "most significant impacts") helpful. This coudl raise the question if ESRS should address other terminology. Also, it would make an amendment neceessary in case of changes to other existing standards and frameworks.	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	AR 4
Excels	DRSC	(National) standard setter	Germany			I agree	The DRSC agrees with and supports the clarifications regarding interaction between topics to be reported and material IRO. It has asked for such clarifications as the former level at which undertakings seemed to be required to report posed burden and challenges to preparers and other stakeholders. The connection to the level of information either on topic or IRO level depending on what provides most releant information seems to provide an appropriate anchor for the sustainability reporting. The DRSC further supports including the explicit reference to the information "reflecting their nature or the way they are managed" as this is seen as an explicit reference to the management approach.	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	22.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL "par 10 of this standard" - is there a reference needed to ESRS 2?	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	23.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL Note to EFRAG: DRSC agrees that it is important to clarify - throughout the ESRS - that RO can have different origins / other origins than just impacts. While this is addressed here in par. 26 it needs to be clear throughout ESRS. (see par. 40)	ESRS1	ESRS 1 - 3.3 Double materiality assessment	26.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL It is important to add that par 27 does not include a final list, but examples for internal and external sources. Wording should be amended by "such as" or "The following are usual examples of internal and external sources...". Otherwise, par 27 could imply that all these sources have to always be included independed of the specific circumstances of an undertaking. It could also be considered if the wording should be "internal or external sources"	ESRS1	ESRS 1 - 3.3 Double materiality assessment	27.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	DRSC	(National) standard setter	Germany			I disagree	REF FLAG [Refers to para 34 et seq] Most importantly, DRSC is very much in favour of the amended ESRS addressing the topic of "gross vs. net" as undertakings have had difficulties understanding the concept of ESRS in this regard. The DRSC also welcomes EFRAG's further efforts on this topic, especially the field tests that are currently conducted. In it's current version, however, ESRS 1 does still not sufficiently clarifiy the expected outcome of the consideration of "gross vs. net" for the undertakings. For example, with regard to potential negative impacts (par. 35) it could be read as either a "net approach" (first sentence) or a "gross approach" (second sentence). ESRS 1 needs to clearly define the underlying concept. This concept needs also to be consistenly applicable throughout the ESRS standards (e.g. what would be the approach to disclosure on anticipated financial effects). [continues in box below]	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG [Refers to para 34 et seq] [continued from box above] But also, there is no consistency between ESRS 1.34-35 and the examples in Appendix C. For example, for potential negative impacts, why would Appendix C need to differentiate between reporting period and future reporting periods. If there are no changes in the underlying assumptions then it should be expected that potential negative impacts are assessed and reported consistenly (as they are always the same potential negative impacts). Overall, Appendix C is not considered helpful in clarifying the principles in par 34 and 35, as many of the DRSC's constituents confirm. While some find examples generally helpful, the DRSC proposes to delete Appendix C to reduce the inconsistencies which decrease the understanding of the general, underlying principles in ESRS 1. Otherwise, the link between DR (par 34 et seq) and the Appendix needs to be clarified and free of inconsistencies.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG [Refers to para 34 et seq] Additionally, the current wording in ESRS 1 is not yet clear enough. The current wording may therefore lead to significant documentation burden and interpretive uncertainty and discussions between individual undertakings and their auditors. Par 34 refers to actual impacts being evaluated after mitigation / prevention measures - however, this wording seems superfluous and obvious, as otherwise it would not be "actual" impacts. Furthermore, in par. 35 the wording is still not very clear as to how to interpret "significant ongoing mitigation action" and this wording would very likely result in different interpretations. In this context it would be helpful to clarify that impacts which are addressed by a policy (establishing structures to exclude this impact for their business model) are not considered to be reportable due to "signficiant ongoing mitigation". This would result in unnesseary complexity and documentation burden.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	DRSC	(National) standard setter	Germany			I disagree	„Where the impact is deemed material based on this assessment, the undertaking shall disclose the remediation actions undertaken and their expected outcomes." This new wording indicates a disclosure requirement on the level of each material impact which would lead to a significant increase in the reporting obligations. Deletion or re-phrasing of the sentence should be considered to ensure that the general section on the methodology of the IRO assessment does not directly contain datapoints for disclosure.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL Clarification needed. The described gross approach could lead to the assumption that (ongoing/existing) mitigation measures e.g. established safety management systems which are taken in the reporting year (and recurring in every reporting year) to minimize negative impacts are not to be considered as mitigation measures (as they were "taken.. during the reporting year"). This would lead to an increase of reported severe risks without an actual increase of risks and would thus lead to a false interpretation by main users of the report. It would be more appropriate to refer to actions that have been "initiated" during the reporting period (this would, however, not exclude annual measures, e.g. annual compliance or security training, annual / recurring safety measures)	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	DRSC	(National) standard setter	Germany			I disagree	While the DRSC generally supports helpful examples, the AR should be - just like the DR - kept as straightforward and concise as possible; excluding unnecessary requirements. AR 6 however includes examples that seem to reiterate the concept rather than adding new aspects to connectivity. Since examples do not seem to add to ESRS DR laid out in the ESRS they could be part of the NMIG, but do not need to be part of the ESRS. Otherwise, there is a risk of raising further questions instead of providing clarifications.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 6
Excels	DRSC	(National) standard setter	Germany			I disagree	ESRS 1, AR 11 for para 33, last sentence seems to establish a requirement regarding the communication of workers' representatives' opinions - this is indeed (as a requirement directed at the management) part of the CSRD (see recital (52) as well as Art. 19a, 5. / Art. 29a, 6) - however: this is not a disclosure / reporting requirement for the undertaking and should therefore not be an explicit part of ESRS. It also seems to dictate behaviour rather than prescribe a disclosure requirement.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 11
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL Para 37, 2nd sentence: This is a duplication of the sentence in par 21(a). It is important that this sentence is deleted here in par 37 as it could otherwise seem to be referencing to financial materiality (because in the current wording of par 21(a) it refers to users of financial reports only).	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	37.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	Note to EFRAG: DRSC agrees that it is important to clarify - throughout the ESRS - that RO can have different origins / other origins than just impacts. While this is addressed here in par. 26 it needs to be clear throughout ESRS.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	40.
Excels	DRSC	(National) standard setter	Germany			I disagree	AR 14 refers to "resources not recognised in the financial statements" ("shall consider its dependencies ... either in terms of CF or in terms of resources not recognised in financial statements") - in current ESRS the current AR 13/14 refer to "changes in capital not recognised in f/s"... In the view of the DRSC it is too difficult to define and determine such resources. Generally the intention seems to be to address future cash flows. The DRSC consideres the reference to CF as sufficient and suggests to delete the reference to "resources not recognised".	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	AR 14
Excels	DRSC	(National) standard setter	Germany			I agree	agree to stronger reference to internal management approach.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	AR 16

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	DRSC	(National) standard setter	Germany			I agree	[refers to para 45 et seq] general agreement to the clarification of the concept of focusing the DMA; avoiding an unnecessary level of detail and easing the use of (non-primary) information / "undue cost or effort" as a relief to gathering information	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (a)
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL "use of reasonable and supportabe evidence to estimate the levels of severity and likelihodd of impacts and the likelihood and magnitude of financial effects of RO" -the wording could be (mis)understood to require "evidence" for every specific scoring of the DMA. So far it is not required (and not audited) to provide evidence for every scoring. Furthermore, undertakings do not necessarily have a connection of one specific "evidence" to one specific "IRO".	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (b)
Excels	DRSC	(National) standard setter	Germany			I agree	agree to top-down approach to DMA	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	48.
Excels	DRSC	(National) standard setter	Germany			I agree	agree with practical considerations for DMA (i.e., not every time horizon separately, not every characteristic of severity to be assessed separately)	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 18
Excels	DRSC	(National) standard setter	Germany			I agree	qualitative analysis is sufficient for DMA	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 19
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL Para 49 and 50 do not seem very concise yet and do not seem to fit to the heading of ch. 3.6. The heading suggests that the para will address how information that will have to be reported is to be determined. However, par 49 merely states that the undertaking needs to provide information acc. to ESRS 2 and entity specific information. par 50 adds that (various) topical information is neeeded. The actual information on how to determine the information is provided in the earlier chapter on the DMA. Could be clarified what these paras are meant to add to the ESRS here. From the current wording it seems that they do not add new aspects.	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	49.
Excels	DRSC	(National) standard setter	Germany			I disagree	The information of this AR is that the DRs in ESRS 2 (incl. GDR-P, GDR-A, GDR-M and GDR-T) are all fundamental in nature and therefore likely to result in material information for all undertakings. This does not add any new information regarding ESRS 2 (as ESRS 2, especially GDR should be expected to be constructed as to contain fundamental requirements). Unless, there is another meaning intended (i.e., all these information WILL always be material for all undertakings, which would have to be clearly stated in the DRs). However, ESRS 2 is also subject to materiality assessment. Therefore, this AR should be deleted.	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	AR 20
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL par 51 references - among others - to "location" and "site", both are added but were not supposed to change the current concept which included both (according to log of amendments); however, the explanation (see log of amendments) refers to "key sites" --> which wording was intended? currently, the last sentence in par 51 refers to the materiality assessment, but "key sites" would be more specific	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	51.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL, par 51 in connection with AR 23 for par 51 par 51 lists "locations, water basin, site, asset... " as though they are all different aspects to consider; in AR 23 the term "by location" is specfified as "by location - such as by site, water basin or local ecosystem", as though if you differentiate by location, it can be one of the following - if that is the understanding it seems not necessary to include "location" in the list in par 51.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	51.
Excels	DRSC	(National) standard setter	Germany			I disagree	the level of disaggregation for the disclosures (e.g. water basin, site) is too granular. In addition, unclear what is meant by the example "landscape" in this context. Furthermore, this granular approach does not fit with the approach to integrate financial and sustainability reporting as financial reporting does not address this granular level.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	AR 22
Excels	DRSC	(National) standard setter	Germany			I disagree	reporting on site-level / by location is too granular. It addition, AR 23 is unclear as to what undertakings have to disclose (shall consider) and it is expected that AR 23 could introduce a requirement as IROs typically are "highly dependent on local context". It is important that undertakings will always consider the materiality at group level; the materiality is not assessed at such a granular level.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	AR 23
Excels	DRSC	(National) standard setter	Germany			I disagree	AR 24 could be read as suggesting that undertakings disclose a "proof of non-materiality at subsidiay level". This would lead to a significant increase in reporting burden. Reporting undertakings do not necessarily know for which subsidiaries the IROs are not material (the result that an IRO is material at the group level is sufficient for the undertaking to report on it - undertaking would usually not analyse for which subsidiaries the IROs is not material. The general understanding should be that differences across the undertaking which the undertaking detects during the DMA should be reported on. However, undertakings are not required to assess at the level of subsidiaries etc. and will always have the group materiality as the relevant benchmark.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	AR 24

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	DRSC	(National) standard setter	Germany			I agree	[Refers to para 54 et seq] Note: basically unchanged from DA; "mapping" / "description" is moved to NMIG (and - as before - part of ESRS 2, GOV-3, para 13)	ESRS1	ESRS 1 - 4. Due diligence	54.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL The DRSC considers it important to state that own operations "usually" include the assets and liabilities, income and expense of the parent undertaking and its subsidiaries. However, the structure and wording of ESRS 1 ch. 5.1. in connection with ch. 5.3 could imply that the exceptions listed in ch. 5.3 are the only exceptions to "own operations". For the DRSC it is important to clarify that "usually" (in par 59) can refer to other circumstances beyond those addressed in ch. 5.3 (par. 70 and 71).	ESRS1	ESRS 1 - 5. Reporting undertaking and value chain	59.
Excels	DRSC	(National) standard setter	Germany			I disagree	DRSC would like to flag especially par. 59 last sentence which states: "The undertaking may exclude from the sustainability reporting boundary a subsidiary that has been excluded from the scope of the consolidated financial statements due to its non-materiality from a financial perspective, unless there are specific facts and circumstances that expose the group to material impacts, risks and opportunities arising from such subsidiary." The DRSC supports the intention of this par. which is a stronger alignment between financial and sustainability consolidation scope for the identification of the IRO. [continues in box below]	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	59.
Excels	DRSC	(National) standard setter	Germany			I disagree	[continued from box above] However, the DRSC believes that there is further clarification needed that the intention of ESRS 1.59 last sentence is that the undertaking needs to consider for inclusion in the sustainability reporting boundary only those non-material subsidiaries for which there is a specific reason to reconsider their materiality assessement for purposes of the sustainability reporting. E.g. there are obvious circumstances such as the number of employees which result in a different materiality assessment. However, the undertaking would not be expected to reassess every non-consolidated subsidiary regarding their (non-)materiality for sustainability. The current wording could suggest that this would be necessary, however, this would not result in a burden reduction. As the current wording can be misunderstood as having to re-assess every non-material subsidiary (in order to come to the conclusion whether there are / are not specific facts and circumstances re/ IROs) a clarification is needed.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	59.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL "may" include reads as if this is optional; however, only the relief is optional; wording could be something like: "When consolidating subsidiaries with different reporting periods the undertaking may..." (to clarify need to consolidate)	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	AR 27
Excels	DRSC	(National) standard setter	Germany			I agree	Par 62 lays out that undertakings, "when reporting on metrics that comprise of upstream and downstream value chain information, may use information collected directly from counterparties in the upstream and downstream value chain, or estimates, depending on practicability and reliability considerations related to the necessary input." During the discussion for the revision of the ESRS the DRSC had explicitly asked that ESRS would expand the use of non-primary data, estimates, and other measurment techniques. With this proposal the undertakings can choose to either use direct information or estimates, there is no longer a hierarchy for determining the metrics in the VC. The DRSC believes that this will effectively reduce the reporting burden due to the existing limits of data availability and data quality. In addition, not only will the reporting undertakings benefit from this burden reduction, but also the numerous undertakings (incl.) SMEs along the VC which will often not be subject to the ESRS reporting requirements. This is therefore a very effective measure to reduce a possible trickle-down-effect. Therefore, the DRSC welcomes this amendment.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	62.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL "as informed by any DD process in place"; wording difficult (understandable that it is worded this way as to not imply requirement re/ DD), but not necessary; just refer to the paragraphs on the materiality assessment	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	61.
Excels	DRSC	(National) standard setter	Germany			I disagree	Generally support that estimates are permitted, but this paragraph 62 contradicts ESRS 1 par. 122 (transitional provision related to Chapter 5 Value chain) which limits the relief to the first 3 years. Clarify that the general provision in par 62 applies.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	62.
Excels	DRSC	(National) standard setter	Germany			I disagree	Par 63 seems to be a requirement to the ESRS standardsetting itself ("information required by ESRS ... shall not exceed"... there is nothing the undertaking can do / has to do about it - it is not a disclosure requirement). Clarification of the intention of par 63 needed.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	63.
Excels	DRSC	(National) standard setter	Germany			I agree	this new para better reflects current practice	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	65.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL duplication to par 61--66 before in regard to "not having to collect data from actors in VC, especially SMEs" etc. This could probably be streamlined with other para.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	67.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL "Business relationship" seems like a definition at this point; but this wording is not included in the glossary. Should be included in the glossary and also should be embedded more in the context fo this ch. 5.2 - which specific disclosure requirements does par. 68 refer to? E.g. how is this relevant for par. 62. In short: par. 68 seems a bit random in the middle of ch. 5.2.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	68.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL clarify wording to say that these might be material for some entities, depending on DMA and result for entity-specific topics	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	AR 28

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIA Also see remarks above re/ par. 59. DRSC generally agrees to the explanation for these exceptions to determine "own operations" (leasing, longterm employee benefit); however: (1) see connection to par. 59 regarding the broader understanding of own operation "usually" including... (e.g. par 70 not being the only exceptions). Furthermore, consider connection to ESRS E1: While leasing is sufficiently addressed here in par. 70 the DR in ESRS E1 does not include the reference to this exception (but only the reference to financial control concept in GHG) and thereby does not (yet) include this exception in the concept. As a result the current issues for some leasing (e.g. lessor, local GAAP) remain.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	70.
Excels	DRSC	(National) standard setter	Germany			I agree	Supporting the relief provision for disposals as it provides more relevant information to the users in relation to the remaining company and its further development.	ESRS1	ESRS 1 - 5.4 Relief for acquisitions and disposals	72.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL Throughout ch. 5 the term "reporting boundary" is used several times. However, it is not yet included in the Glossary. Furthermore, there is a need to very clearly state that "reporting boundary" includes own operations and the VC. At some times the wording could imply that the reporting boundary is limited to own operations. Note: Annex II Glossary includes a reference to reporting boundaries only in reference to the GHG emissions; it should generally be defined.	ESRS1	ESRS 1 - 5.4 Relief for acquisitions and disposals	72.
Excels	DRSC	(National) standard setter	Germany			I agree	alignment to IFRS SDS by incorporating a reference to "judgements and uncertainties" (in addtion to ESRS with "estimates and uncertainties"), but only in part (e.g. par 85(b) rightly refers to estimates)	ESRS1	ESRS 1 - 7.2 Judgement, measurement uncertainty and outcome uncertainty	85.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL second part of that para needs to be flagged as an example? (i.e. example re/ upstram value (supply) chain)	ESRS1	ESRS 1 - 7.2 Judgement, measurement uncertainty and outcome uncertainty	AR 32
Excels	DRSC	(National) standard setter	Germany			I agree	Agree in general to the reliefs for metrics laid out in ch. 7.4.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	90.
Excels	DRSC	(National) standard setter	Germany			I disagree	The exception for GHG emissions (ESRS E1-6) from the relief provided for metrics has been highly debated by German constituents as this metric is one (of the few) metrics for which the relief would actually be helpful.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	91.
Excels	DRSC	(National) standard setter	Germany			I disagree	One of the concepts of the ESRS-simplification is to clarify that ESRS use the organisational boundaries as defined in ESRS 1 par. 58 and 59 (i.e. the equivalent to the financial control boundary), in particular for ESRS E1. See BfC, par 145 (Note: the reference in par. 145 needs to be corrected to ESRS 1.58, instead of par 60). Par. 92 states that "The undertaking may exclude joint operations over which it does not have operational control from the calculation scope of environmental metrics...". This can be read as the undertaking being allowed to ONLY exclude joint operations over which it has no operational control for the metrics in E2, E3, E4 and E5, BUT (conversely) to have to include all other entities (i.e. joint operations, but also non-consolidated subsidiaries) over which it has operational control. [continues in box below]	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	92.
Excels	DRSC	(National) standard setter	Germany			I disagree	[continued from box above] This is clearly not the intention as the fallback concept is the financial control boundary. Therefore, this relief for metrics should clarify that this is an additional "relief for metrics" for this particular scenario for joint operations. In addition, it is questionable, if this underlying concept (financial control = mandatory; operational control = optional) should not be explained as a general concept, rather than having this relief here.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	92.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	Agree with content, but wording is somewhat off - does not read well (word missing before (a)?)	ESRS1	ESRS 1 - 7.5. Updating disclosures about events after the end of the reporting period	93.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	Which "that period" is meant here? Reporting period or preceding period?	ESRS1	ESRS 1 - 7.6 Changes in the preparation or presentation of sustainability information	94.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	It seems that the second sentence is not needed. There is typically no comparative amount provided for "periods before the first year of ESRS application" - therefore the relief from error correction for those periods does not seem necessary and rather confusing	ESRS1	ESRS 1 - 7.7 Reporting errors in prior periods	95.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	Why does par 96 refer to "potential errors" are corrected... they can only be corrected if they are "errors" (otherwise it would imply that "potential errors" were corrected - is this the intention?).	ESRS1	ESRS 1 - 7.7 Reporting errors in prior periods	96.
Excels	DRSC	(National) standard setter	Germany			I disagree	Additional para is needed: Section 7 or 8 should include in section on allowing the undertaking to choose the unit (separately for each metric) which the undertaking believes to be most appropriate.	ESRS1	ESRS 1 - 7.7 Reporting errors in prior periods	96.
Excels	DRSC	(National) standard setter	Germany			I disagree	Generally, par 105 is not changed in the amended ESRS. However, the intention of this par. is still questionable. Especially with the current discussion of a more prominent inclusion of the management's view, the business model and the sustainbility statement being more focused on the material information there does not seem to be room left for par 105. There is no need to provide a specific order for the information in the sust statement. The general requirement to include all parts is needed, but the order of (especially) E / S / G does not have to be prescribed by ESRS. CSRD does not provide a specific order requirement for the presentation of ESG.	ESRS1	ESRS 1 - 8. Presentation requirements and structure of the sustainability statement	105.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	DRSC	(National) standard setter	Germany			I disagree	[relates to 107 and 108] It should be clarified in the heading and the paragraphs that this is "non-material" information (i.e. has not been identified as material in the undertaking's DMA)	ESRS1	ESRS 1 - 8.2 Presentation of additional information included in the sustainability statement	107.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL [relates to 107 and 108] Both, additional information according to par 107 (other legislation / other frameworks etc.) and information according to par 108 (needed by a specific user) should be provided under the general concepts of the ESRS (e.g. faithful representation; qualitative characterstics) - why is there a difference between 107 (b) and 108 (b)?	ESRS1	ESRS 1 - 8.2 Presentation of additional information included in the sustainability statement	107.
Excels	DRSC	(National) standard setter	Germany			I agree	German constituents have advocated for possibility to provide executive summary as it allows an easier access to the information provided.	ESRS1	ESRS 1 - 8.3 Options in presenting information across parts of the sustainability statement	109.
Excels	DRSC	(National) standard setter	Germany			I agree	Agree with differentiation between internal references (within Sustainability Statement) and incorporation by reference (to outside information)	ESRS1	ESRS 1 - 8.3 Options in presenting information across parts of the sustainability statement	AR 37
Excels	DRSC	(National) standard setter	Germany			I agree	[relates to chapter 9.1] agree to presentation of connected information	ESRS1	ESRS 1 - 9. Connected information and linkages with other parts of corporate reporting	111.
Excels	DRSC	(National) standard setter	Germany			I disagree	DRSC believes that the consistency between financial and sustainability statements data and assumptions should be the rule. Therefore, there is no need to "explain level of consistency" with data / assumptions (this term is also not clear / not used; therefore, would also be difficult to define - differences among the understanding of this term are not unlikely). Therefore, par 116 should instead ask for any explanations of any (remaining) differences in the data and assumptions.	ESRS1	ESRS 1 - 9. Connected information and linkages with other parts of corporate reporting	116.
Excels	DRSC	(National) standard setter	Germany			I agree	["agree" related to chapter 9.3] no comment	ESRS1	ESRS 1 - 9. Connected information and linkages with other parts of corporate reporting	117.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL see par. 62: contradicts the relief for data from counterparties (estimates only) in par. 62	ESRS1	ESRS 1 - 10. Transitional provisions	122.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL should read "para 122 and 123" (not "123 and 124");	ESRS1	ESRS 1 - 10. Transitional provisions	124.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL The current wording could be mis-interpreted in a way that the protection of SMEs applies only for the first three years	ESRS1	ESRS 1 - 10. Transitional provisions	124.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	The section on entity-specific information is not clearly delimited, only entity-specific information that is necessary for decision-making by the primary users shall be included. If this is not clearly stated, we fear that it could result in information overload and an unnecessarily large burden for companies. To limit entity-specific information better, we suggest adding: "If the undertaking concludes that a topic related with one or more material impacts, risks or opportunities is not covered, or not covered with sufficient granularity by an ESRS and the entity-specific information is necessary for decision-making by the primary users, it shall provide additional entity-specific disclosures on that topic…" In para 11 it should be added that the consideration of comparability should be done without undue cost and effort.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	10.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	The section on entity-specific information is not clearly delimited, only entity-specific information that is necessary for decision-making by the primary users shall be included. If this is not clearly stated, we fear that it could result in information overload and an unnecessarily large burden for companies. To limit entity-specific information better, we suggest adding: "If the undertaking concludes that a topic related with one or more material impacts, risks or opportunities is not covered, or not covered with sufficient granularity by an ESRS and the entity-specific information is necessary for decision-making by the primary users, it shall provide additional entity-specific disclosures on that topic…" In para 11 it should be added that the consideration of comparability should be done without undue cost and effort.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	11.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	The chapter conflates 'topics' with 'IROs'. A reporting undertaking may have a single IRO in a broader topical area without the whole topic being material for that undertaking. Conflating both terms can increase reporting effort through additional auditor scrutiny. Therefore, more consistent and clearer segregation between 'topics' and 'IROs' is necessary.	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	1.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	The text concerning the different terms "material impacts", "principal impact" and "most significant impacts" should be clearer on the fact that are synonyms, hence the second para just creates confusion and should be deleted or rewritten.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	AR 4
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	Clarification is necessary that financial materiality arises only from risks and opportunities, not from impact.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	25.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	It should be clarified that undertakings may start their materiality assessment from either impact or financial perspective, depending on existing processes. Using the terms "in general" and "may" underline the fact that the text is guidance and should therefore be moved to non-binding guidance. Para 40 and 41 is sufficient in covering the topic.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	26.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	Proposed amendment: ""The undertaking shall update the conclusions of the materiality assessments conducted in the previous reporting periods to take into account any material changes in the undertaking's organisational or operational structure, or material changes in external factors that could generate new or modify existing IRO have occurred. Because of changes in its individual circumstances or in the external environment, some types of information included in its ESRS sustainability statement for prior periods might no longer be material; conversely, some types of information not previously disclosed might become material."	ESRS1	ESRS 1 - 3.3 Double materiality assessment	29.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	We suggest that the criteria of scale, scope and irremediability serve as optional tools to assist in identifying material matters. These criteria should not be mandatory, and the use of "may" rather than "shall" would preserve flexibility for undertakings.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	31.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	We suggest that the criteria of scale, scope and irremediability serve as optional tools to assist in identifying material matters. These criteria should not be mandatory, and the use of "may" rather than "shall" would preserve flexibility for undertakings.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	32.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	We recommend revising §34 to better reflect the practical challenges associated with separating the assessment of actual negative impacts before and after mitigation or remediation measures. In practice, this distinction is highly complex and often difficult to operationalize, particularly when impacts evolve over time or when mitigation is embedded in ongoing processes. The current wording may lead to significant documentation burden and interpretive uncertainty, especially in audit contexts.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	We welcome the proposed reliefs regarding the double materiality assessment. However, the requirement to report potential impacts subject to "significant ongoing mitigation or prevention efforts" in its current form leaves interpretive uncertainty that may lead to disproportionate complexity in application as well as difficulties in audit contexts. Given that alignment with auditors on materiality assessments has been a key implementation challenge, the ESRS simplifications should explicitly address this issue to achieve meaningful burden reduction.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	EFRAG indicates in the log of amendments for this paragraph that it was intended here to (a.o) define positive impacts: "Reference to "philanthropy" was considered but discarded. Only impacts that derive from business activities, products and services qualify as positive impacts to be reported." However, as this definition has not been included in §36, discussions are expected when reporting positive impacts (should or should we not use the definition contained in the log of amendments?). Furthermore, this definition is not clear: would (voluntary) work for the society organised by the company or societal sponsorship by the company be considered part of business activities or services?	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	36.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	It should be clarified if it is sufficient to reference the risk and opportunity report to meet the requirement of addressing materiality beyond consolidation scope, as this report typically also covers business relationships.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	38.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	Proposed amendment: "Material risks and opportunities derive, e.g., from the undertaking's: (a) material impacts, as identified through the impact materiality assessment; (b) dependencies on natural, human and social resources; and (c) other factors, such as exposure to climate hazards or changes in regulation that address systemic risks. Entities subject to prudential supervisory regulation can rely on the existing methodologies to assess financial materiality." Additionally, risks management frameworks are already prescribed for insurers by prudential regulation (from EIOPA), that can be used for DMA. Therefore, we propose to add: "Entities subject to prudential supervisory regulation can rely on the existing methodologies to assess financial materiality".	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	40.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	The AR should also include opportunities.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	16.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	The choice between a top-down and bottom-up approach to MA should not be subject to additional burden such as the requirement that "is expected to lead to the same outcome as the bottom-up approach". This requirement may prompt auditors to request validation of this assumption, potentially undermining the intended simplification and therefore it should be deleted	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	AR 17
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	It should be clarified that specifications described under 3.3.1 are to be read in conjunction with 3.5 to make clear that e.g. paragraph 31 only ap-plies for impacts that the undertaking did not identify as material in the first step.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	1.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	Internal expert judgment should be recognized as a valid source of "reasonable and supportable information".	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	47.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	The wording in AR19 is ambiguous regarding necessary or expected usage of quantitative information or scoring. To ensure clarity and consistent application, we recommend revising the text as follows: "The use of quantitative information or quantitative scoring is not a prerequisite. A qualitative analysis may be sufficient for the undertaking to reasonably conclude that the impacts, risks and opportunities related to a given topic are material or not material."	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 19
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	Proposed amendment: "Where the undertaking identifies significant differences between material impacts, risks or opportunities at group level and material impacts, risks or opportunities of one or more of its subsidiaries, the undertaking shall provide an adequate description of the impacts, risks and opportunities, as appropriate, of the subsidiary or subsidiaries concerned. Conversely, if a material impact, risk or opportunity determined at group level is not relevant for all subsidiaries or activities in a group, the information can be provided at a disaggregated level reflecting only the activities for which the impact, risk or opportunity is relevant"	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	AR 24
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I disagree	We suggest deleting this datapoint to reduce complexity and unnecessary reporting burden.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	53.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	Paragraph 58 still directly links due diligence processes to the identification of negative material impacts. This formulation risks suggesting that the existence of due diligence automatically results in material disclosures. We recommend clarifying that due diligence processes inform the assessment of material impacts but do not predetermine materiality outcomes. In addition, although this paragraph has been amended, it still does not clarify the treatment of leased assets. We recommend aligning it with paragraph 70 of ESRS 1 to ensure consistency and prevent over-interpretation in reporting practices.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	58.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	We suggest the following rewording: In the case of group reporting, the reporting undertaking usually, as defined by its business model, considers as part of its own operations: the assets and liabilities, income and expense of the parent undertaking and its subsidiaries, located in or outside the EU, as determined in accordance with the applicable accounting requirement. Paragraphs 60 to 73 provide further provisions and exceptions for determining the reporting boundaries of own operations and upstream and downstream value chain. The undertaking may exclude from the sustainability reporting boundary a subsidiary that has been excluded from the scope of the consolidated financial statements due to its non-materiality from a financial perspective, unless there are specific facts and circumstances that expose the group to material impacts, risks and opportunities arising from such subsidiary. The undertaking is not expected to reassess every non-consolidated subsidiary for sustainability purposes but should consider only those cases where there are indications that the group may be exposed to material impacts, risks, or opportunities arising from such subsidiaries.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	59.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	This paragraph has been amended but do still not clarify the appropriate treatment of leased assets. We recommend amending it accordingly by referring to paragraph 70 of ESRS 1, to ensure consistency and avoid over-interpretation in reporting practices. Clarifications also need to be aligned with the E1-8 requirements.	ESRS1	ESRS 1 - 5.4 Relief for acquisitions and disposals	60.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	Paragraph 79 permits alternative definitions for medium- and long-term horizons in certain cases. These cases are equally relevant to short-term horizons. We therefore propose extending paragraph 79 to allow different definitions for the short term as well.	ESRS1	ESRS 1 - 6.2 Time horizon: definition of short-, medium- and long-term for reporting purposes	79.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	In para 89 it must be acknowledged that there will be cases where data will not be available.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	89.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	Section 7.4 should be moved to 3.7 and clearly set out aggregation and disaggregation criteria for PATs, including metric reliefs, clarifying that a policy covering only the affected subsidiary is sufficient	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	1.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	In order to align the wording with the CSRD requirement, we strongly recommend replacing "sustainability statement" with "sustainability report".	ESRS1	ESRS 1 - 8.1 General presentation requirement, structure and content of the sustainability statement	103.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Table of Content: Appendix C should be before Appendix B since "assessing impacts" are part of DMA and thus more related to App. A.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	7.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Why linkage to ESRS 1.21 instead of including the definition of materiality of information as core element of a faithful presentation under ESRS 1.19?	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	19.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Option for reporting on IRO level or topical level. However, ESRS 1.AR17 states out that the reporting should be done on a topic level while ESRS 1.AR21 permits to report a material IRO on a sub-topic level. Given the general permission and flexibility of a bottom-up approach on IRO Level, the mapping between IROs, topics and disclosure requirements should be flexible in the same way. So far no further guidance is integrated for mapping IROs/sub-topics to DRs (only in the NON-MANDATORY implementation guidance). Thus, complexity for implementation is not decreasing and dependent on companies' auditor alignment the results of DMA will probably be not comparable between companies.	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	22.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Engagement process with affected stakeholders are essential. However, users of sustainability information are missing. This group represents the same relevance for a company than affected stakeholders.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	33.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Why should mitigation measures not be accounted for in the assessment of actual negative impacts that have been occured in previous periods? Some companies have might set up lots of efforts and mitigation measure to reduce impacts in the past resulting in no material impacts for the company in the current period. Why should a company report on an impact that it manages well on a company level, maybe since several years? This would not represent a material information anymore for their stakeholders. Example: water pollution on the own activity level. A company have faced water pollution some decades ago, however due to successful mitigation measures in the past, this impact does not exist anymore in its own operations level since decades.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	A common framework/benchmark for "significant" actions is missing and very specific for each company and sector. We do not want EFRAG or other reporting bodies to define "significant". This should remain as a term that the company can identify based on their experience and business. The way of operationalization is unclear. e.g. a mitigation measure that equals to current legal requirements would lead to an on-going reporting about this specific impact while a company fufills all legal requirements that are stipulated to avoid this negative impact.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	The way of operationalization is totally unclear. The risk for incomparable results of DMAs related to different companies still remain. Furthermore, all measures that are decided and implemented in a company during the reporting period should be included in the assessment of an impact. Similiar to financial reporting, a provision has also to be evaluated including counter measures that influence the provision at the end of a reporting period.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 9

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	ESRS 1.45-47 could be more linked to ESRS 1.87-89. Firstly, the requirements are a bit doubled regarding undue cost and efforts principle. Secondly, examples are given under ESRS 1.47 but under ESRS 1.89 there is only a general explanation without reference to ESRS 1.47. These sections could be more coherent.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	See remarks related to ESRS 1.22	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	AR 21
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	ESRS 1.AR 26 in reference to ESRS 1 3.7 may result in a high number of new datapoints depending on its interpretation by auditors. EFRAG should clearly state that the disaggregation of data is voluntary ("may…") or delete the AR completely. Furthermore, this disaggregation does not provide any added value for the users of the information; instead, it leads to information overload and unjustified burdens for the disclosing company (information may not be available or only with high effort).	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	51.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	ESRS 1.51 stipulated different level for aggregation and "other appropriate level". The segment approach (which is based on a management approach under IFRS) could be highly relevant category for aggregation and should be added as an explicit category.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	51.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	This amended requirement will help for faithful presentation and comparable information to stakeholders generated by the reporting of different reporting undertakings.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	59.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	This new requirements will increase the faithful presentation and comparable information in particular for the automotive industry. However, the NMIG 7 is not referenced under ESRS 5.3 and no further specification is given as AR.xx. It could worthwhile to have more practical hints for implementation.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	70.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The general goal of this new requirements will increase the faithful presentation and comparable information reported by different companies. However, it is not clear why to report on "significant events" in relation to the "Subsidiary's or business's exposure to material IROs". In our opinion, significant events should only be considered in case that they might the overall evaluation of material IROs on group level. We would recommend to further review this requirement.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	73.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	In this context, a reference to ESRS 1.87 could be integrated to avoid discussions about the term "impracticable".	ESRS1	ESRS 1 - 7.1 Presenting comparative information	82.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	While we support the general relief for metrics related to ESRS E2 to E5 in case of a joint operation, it remain unclear in which case a parent company may not have (partially) operational control over a joint arrangement although it should have financial control (otherwise this would not represent a joint operation). In addtion, the relief could be also extended to ESRS Sx and G1 since the data gathering for metrics related to these standards may also be burdensome and complicated within a joint operation. We would recommend further specification.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	92.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We can follow the approach under ESRS 1.94. Nevertheless we would recommend to integrate ESRS 1.94 with ESRS 1.81-84, e.g. as "changes related to sustainability information and presenting comparative information". Both requirements describes the process for comparative figures and other sustainability information.	ESRS1	ESRS 1 - 7.6 Changes in the preparation or presentation of sustainability information	94.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We support the explanation about the reporting on material opportunities. We would highly recommend to precise that this requirement only affects "material" opportunities. So far this term is missing in ESRS 1.102 and in the sub-headline "Reporting on opportunities".	ESRS1	ESRS 1 - 7.9 Reporting on opportunities	102.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We highly support this increasing flexibility for additional disclosures that are not related to material IROs but relevant information items for specific stakeholder needs. However it could be worthwhile to align the requirements with ESRS 1.107 (b). Otherwise we would expect different levels of qualitative characteristics of information within the sustainability statement.	ESRS1	ESRS 1 - 8.2 Presentation of additional information included in the sustainability statement	108.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Defining the long-term horizon as >5years, without limiting it to a certain number of years (e.g. >5-10 years) makes it very challenging to evaluate and estimate the severity and likelihood of Impacts, Risks and Opportunites. Due to the volatile nature of different factors that influence these IROs it is often very challenging to estimate the severity & likelihood of an impact, if the time period has an open end. We therfore recommend to limit the long-term horizon, e.g. to >5-10 years in order to generate meaningful outcomes.	ESRS1	ESRS 1 - 6.2 Time horizon: definition of short-, medium- and long-term for reporting purposes	78.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Please change the phrase "[…]over the short, medium or long term" to "[…] over the short, medium and/or long term" in order to make more clear, that impacts cannot only occurr, e.g. EITHER in the short OR in the medium/long term, but that impacts can occurr over several time horizons, e.g. over the short, medium, AND long-term.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	30.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Please amend and specifiy as follows: "The time horizon is intended to classify both when a material impact/effect occurs (or is expected to occur) and how long the effect is expected to last. If it can be assumed that the impact will decrease or disappear completely in a future time horizon (e.g. due to the implementation of certain actions/policies) and this impact therefore falls below the materiality threshold in the assessment, then the respective time horizon does not apply. Only the period in which the impact is assessed as material must be declared externally."	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	30.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	In order to avoid misinterpretations of what is to be understood by "anticipated financial effects", please add a reference to ESRS 2 Disclosure requirement SBM-3 (paragraph 23.) for the definition of the term.	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	AR 15

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	Please add "opportunities" after "[...] of risks [...]" -> "[...] materiality assessment of risks and opportunities."	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	AR 16
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	"124. Paragraphs 123 and 124 apply irrespective of whether the relevant actor in the upstream and/or downstream value chain is an SME." Text should be "124. Paragraphs 122 and 123 apply irrespective..."	ESRS1	ESRS 1 - 10.1 Transitional provision related to Chapter 5 Value chain	124.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	The DR refers to "primary users of general purpose financial reports...., incl financial statements and the sustainability statement". This wording seems to imply as if the sustainability statement is a general purpose financial report. This contradicts with that the sustainability statement is part of the management report. The purpose of the DR is agreed.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21. (a)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	It states that the "practical considerations" of scale, scope and irremediable character needs to be "taken into account". It is not clear how these three relate to each other to determine severity. Should they be aggregated or multiplied? Also as it states in AR 8 that any of these three characteristics can make a negative impact severe. Is this then professional judgement how to assess and "weigh" them? I believe concrete guidance on how to determine severity would be helpful towards a more streamlined DMA process.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 7
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Would a policy be considered to be a continuous action (hence impact needs to be reported in year after, if all other things are ceteris paribus), or could an effective policy leads to a reduction in a risk and therefore becoming non-material in the year after (e.g. effective health & safety policies)?	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 12
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	The DR refers to "shall not exceed the limit set by the relevant EU laws and regulations". Is this referring to the value chain cap that is proposed as part of Omnibus? The description is currently rather vague and could refer to all kinds of EU laws and regulations. Revised (and more concrete) wording could help the interpretation & understanding of this DR.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	63.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	The FR refers to "...and to determine the scope of its value chain..."? Is this not a duplication with ESRS 1- 87(b), which also refers to that?	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	87. (c)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	So effectively Wave 2 reporters have much more time to prepare value chain disclosures than Wave 1 reporters. Wave 1 reporters would be obliged to start reporting on the value chain as of FY27 (3 years after CSRD reporting started), and immediately once the revised ESRSs become available. Wave 2 reporters first get a 2 year extended relief on CSRD reporting + 3 year transitional provision and therefore only need to start reporting by FY30. Originally Wave 2 also would have needed to report on the value chain by FY28.	ESRS1	ESRS 1 - 10.1 Transitional provision related to Chapter 5 Value chain	122.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	We support the clarification on leased assets, and that the lessee should include the impacts of leased assets in its reporting. This aligns with the financial consolidation scope. To further strengthen the consistency with financial reporting, we suggest aligning the definition of leases with IFRS 16 definitions (e.g., this only applies to 'on balance' leases). Especially in outsourcing or co-manufacturing agreements, assets can be used by third parties that classify as a lease in financial reporting. With the current definitions, there is room for interpretation how to deal with these kind of 'embedded' lease contracts.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	70.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Current wording leaves room for interpretation. Stating that 'any of the three characteristics can make an impact severe', can be explained twofold; first, based on the average of the three characteristics, one characteristic may raise the average in such a way it becomes severe. Or, secondly, regardless of the average, when either scale, scope or irremediability is high, the impact automatically is severe, regardless of the assessment of the other characteristics. We noticed different approaches in practices, and also noted that the second approach could result in undesired outcomes. E.g. when all sites globally do have minor impact on a certain topic, the scope is high (= severe in the second interpretation), but scale and irremediability would make the topic immaterial /not severe in the first interpretation.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 11
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	We support this relief to exclude business activities with insignificant impact on metrics. This will help focussing on those business activities with the most impact. The term significant however leaves room for interpretation. We propose to incude some guidance how to interpret this, e.g. a threshold of roughly 10% in line with financial reporting	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	90.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	This comment refers to Appendix A. While I support removing sub- and sub-subtopics, the current grouping is overly broad. For example, under S1, the subtopic "working conditions" now includes adequate wages, work-life balance, working time, secure employment, and social protection. It is unclear how this affects metric application: if only work-life balance is material, must all metrics under "working conditions" be disclosed, including those unrelated such as adequate wages? See also comment in S1 with respect to this item.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	9.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Issues with level of aggregation/disaggregation required not being principles-based, potentially leading to obscured information - Undertakings should present aggregated information in the first instance and disaggregate by exception when needed; Remove “such as” examples (e.g., water basins) from para 51; Remove AR22. Make AR23 (NEW requirement) a “may consider” (voluntary) rather than a “shall consider” (mandatory) requirement; Revise AR25 to include “an inappropriate level of aggregated or disaggregated information” and “to understand the undertaking’s material impacts”.	ESRS1	3.7 Level of aggregation, disaggregation and group reporting	51-52, AR22-23
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Definition has changed from the process by which undertakings.... “account for how they address” to “remediates and brings an end to...” negative impacts, introducing unrealistic standards of performance - Revert to the previous text.	ESRS1	4. Due diligence	54
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Issues with presentation of PATs alongside IROs will result in complex and unnecessary mapping which detracts from the conciseness and understandability of the disclosure – Remove 113.	ESRS1	9. Connected information and linkages with other parts of corporate reporting	113

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Issues with identifying information incorporated by reference as addressing the relevant DR or datapoint, which increases reporting burden and renders this information less accessible for users – Remove "clearly identified in the source document" from this paragraph.	ESRS1	9. Connected information and linkages with other parts of corporate reporting	118(a)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	(a). Issue with value chain information on PATs and need to clarify/specify this requirement further – add "may limit… value chain information to reasonably supportable and available information…"; (b). Issue with value chain information on metrics and the requirement to disclose datapoints derived from EU Regulation – Remove or revise to specify as "derived from and required to be collected and reported as part of another EU Regulation"	ESRS1	10. Transitional provisions	123(a)-(b)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	"124. Paragraphs 123 and 124 apply irrespective of whether the relevant actor in the upstream and/or downstream value chain is an SME." Text should be "124. Paragraphs 122 and 123 apply irrespective…"	ESRS1	ESRS 1 - 10.1 Transitional provision related to Chapter 5 Value chain	124.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Unclear what is meant by 'does not mandate behaviour' and why this is needed when the CSRD already sets out how the ESRS should be adopted	ESRS1	ESRS 1 - Objective	5.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Although we are aligned it make sense to consider comparability with other undertakings within the same sector, it is unclear from the standard how to do this in practice. Our view is it would make sense to add this as part of ESRS1. 27. as a data source consideredwhen conducting the materiality assessment	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	11.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Although we are aligned that the ESRS have retained the concept of double materiality, we are concerned the wording of this paragraph creates even wider divergence with IFRS S1 and S2 as it places unnecessary prominence on impacts	ESRS1	ESRS 1 - 3.3 Double materiality assessment	26.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Unclear what this data point adds. More beneficial to provide clearer guidance as to how the materiality principle should be included and make explicit if data points cannot be excluded basis this filter	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	AR 20
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	From the wording of the requirement it is unclear how the value chain cap should be applied and what thresholds / timelines if any should be applied	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	63.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Although we agree this is a useful clarification, in practice this data may still not be available in the next reporting period therefore requirement should be amended to allow for organisations to provide explanation if they are still not able to report on the acquisition in the following period	ESRS1	ESRS 1 - 5.4 Relief for acquisitions and disposals	72.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Time intervals should be fully aligned with the IFRS S1 and S2 as this will enable greater comparability longer term	ESRS1	ESRS 1 - 6.2 Time horizon: definition of short-, medium- and long-term for reporting purposes	77.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	The revised ESRS clarify that the standards are intended to support a fair presentation framework, rather than serving merely as a compliance checklist as sometimes interpreted in practice. This shift encourages companies to focus on materiality and relevance in their disclosures, potentially reducing the reporting burden by allowing more judgment and flexibility. However, it may also slightly increase the burden due to the need for other assessments and justifications. A related potential risk is that voluntary or previously mandatory datapoints now moved to the NMIG (non mandatory implementatin guidance) and the extent they would need to be considered and justified under a fair presentation framework, including evidencing towards (external) assurance providers. Despite this, we agree with the explicit amendment toward a fair presentation framework, as it better aligns with the principles of materiality and relevance in sustainability reporting. This approach supports more meaningful disclosures and allows companies to tailor reporting to their specific context, rather than following a rigid checklist.	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	16.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	This revised ESRS (AR 11) requires management to inform and consult workers' representatives on sustainability information, including how it is obtained and verified. Their opinion should be communicated to relevant governance bodies where applicable. Although we believe that most of the companies that are in scope do this, we do not agree with this addition. It imposes procedural obligations that go beyond the scope of reporting and leans toward enforcing internal behaviors. This should remain at the discretion of the company and does not belong in the ESRS framework, which is intended for disclosure.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 11
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The ESRS now requires undertakings to consider disaggregating reported information by location (e.g., site, water basin, local ecosystem) when material impacts, risks, or opportunities are highly dependent on local context. We recommend moving this requirement to non-mandatory implementation guidance. In our view, paragraph 52 of ESRS 1 already sufficiently covers the need for location-specific disclosures when material. Making this a mandatory consideration adds complexity and increase the documentation burden without clear value add.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	AR 23
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	Paragraphs 87–88 and AR 29 introduce new requirements for disclosing key judgments, including related significant uncertainties, significant assumptions, and significant limitations that affect reported sustainability information. Examples of these include judgments made during materiality assessments and topic selection. We support this addition, as it ensures interoperability with IFRS S1 par. 74 and IFRS standards for financial reporting and enhances transparency for users .	ESRS1	ESRS 1 - 7.2 Judgement, measurement uncertainty and outcome uncertainty	85.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The revised ESRS requires companies to disclose metrics that can only be partially estimated due to limited data availability, along with actions taken to improve coverage and quality, and progress over time (interepreted from the final sentence in the new paragraph 'the undertaking shall assess at the subsequent reporting dates whether reliable data has become available and if so adjust the estimates accordingly'). We do not support this requirement. Partially estimated metrics risk misrepresenting actual performance and reduce comparability and understandability across companies. A clear explanation of efforts to obtain reliable data should suffice, without requiring incomplete disclosure of metrics.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	91.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Expanded paragraph - The ESRS require data and assumptions used in sustainability statements to be consistent, where possible, with those used in financial statements. A new addition now also requires companies to explain the level of consistency to support user understanding. We do not support the new requirement to always explain the level of consistency. We prefer the previous approach (former paragraph 127), where explanatory disclosures are only required if inconsistencies exist as well as the original requirement (from paragraph 90) to ensure consistency should be retained without mandating disclosure of how consistent the data is. This adds unnecessary reporting burden.	ESRS1	ESRS 1 - 9.2 Direct/indirect connectivity with financial statements and consistency of assumptions	116.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	This comment regards former paragraph 131a that has been deleted (and can therefore not be selected in column B). This paragraph previously provided flexibility in providing entity specific disclosures that were reported in prior periods. The explanation given for the deletion seems misplaced as it centers on sector standards. The previous paragraph should be retained to ensure consistency between previous (voluntary) reporting and CSRD reporting. In addition, we do not agree with new paragraph 121: The transitional provisions should apply as from the first year that the revised ESRS have come into effect, instead of the first year the sustainability statement as required by EU Directive 2013/34/EU, to allow use of transitional relief described in the revised ESRS.	ESRS1	ESRS 1 - 10. Transitional provisions	121.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The statement in paragraph 125 'Starting from the fourth year of its reporting under the ESRS, the undertaking shall include upstream and/or downstream value chain information' seems inconsistent with AR 28 'Metrics in topical ESRS do not require inclusion of upstream and downstream value chain data, with the exception of GHG emissions Scope 3.' Clarification is needed.	ESRS1	ESRS 1 - 10.2 Transitional provision related to Section 7.1 Presenting comparative information	125.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	There are a number of metrics that change due to revision of ESRS definition and calculation and will not be 100% comparable to prior period reporting. It is unclear how EFRAG suggest address these transitional changes with comparative information in prior periods based on the delegated ESRS. Guidance is needed for reporters under the existing ESRS when new or revised parameters are introduced through the revised ESRS. This guidance should clarify that any new or amended datapoints resulting from the revision may be omitted for comparative years.	ESRS1	ESRS 1 - 10. Transitional provisions	126.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Clarify the term "relevant information" by modifying the 2d sentence like this: "The information shall be presented either at topical level or at impacts, risks and opportunities level, depending on what best depicts their nature or the way they are managed (refer to the general requirement on level of disaggregation in Chapter 3.7)."	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	22.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	ANC supports the overall reduction of list of topics in appendix A (previous AR 16) but we do not agree with the idea of merging topics for S1 & S2 and regrouping animal welfare subtopics under G1 "corporate culture". Social topics for value chain workers should be grouped in one or two subtopics such as working conditions (incl. health & safety) and human rights to be aligned with the remediation actions that are often limited to responsible purchasing practices and due diligence activities. The footnote on water and sanitation should be deleted as this level of granularity is irrelevant compared to the ability of the undertaking to influence water & sanitation issues in its supply chain. As regards animal welfare that is listed in the CSRD, it should be mention as a simple footnote relating to Business Conduct (Add *Animal welfare may be one of the business conduct subtopics material for some specific sectors).	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	23.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Change drafting to avoid insinuating that DMA has to be performed each year: "The undertaking shall update the materiality assessment process and its conclusions where significant events or material changes in circumstances occur, such as changes in its activities or structure, in the activities or structure of its value chain(s), in calculation methodologies, or in the discovery of errors."	ESRS1	ESRS 1 - 3.3 Double materiality assessment	29.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	- Relocate methodological or illustrative elements specific to the bottom-up approach, which are secondary in nature, to the AR: factors related to severity – to avoid implying the need for separate scoring of each factor; precedence of severity over likelihood for potential human right impacts – limited to specific cases - Specify that the material assessment "shall be assessed based on [criteria]", rather than "shall be based on"	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	31.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	- Relocate methodological or illustrative elements specific to the bottom-up approach, which are secondary in nature, to the AR: criteria for assessing positive impacts – minor differences with negative impacts - Specify that the material assessment "shall be assessed based on [criteria]", rather than "shall be based on"	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	32.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Clarify that thresholds serve to determine and prioritise material topics, without implying the need for separate scoring of each criterion or severity characteristics	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 5
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Clarify that the assessment of severity should not necessarily lead to scoring each characteristic separately (scale, scope, irremediable character) but may be linked to threshold-based prioritisation	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 7
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Reflect that "workers' representatives have a right to be consulted for the purpose of performing the materiality assessment" in line with CSRD Art. 19a§5 instead of current wording in AR 11	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 11
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Relocate methodological or illustrative elements specific to the bottom-up approach, which are secondary in nature, to the AR: material risks and opportunities deriving from undertaking's a) material impacts, b) dependencies on resources, and c) other factors (e.g., exposure) – methodological details	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	40. (a)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Relocate methodological or illustrative elements specific to the bottom-up approach, which are secondary in nature, to the AR: considerations regarding dependencies – methodological details	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	41.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	"In conducting its DMA, the undertaking is expected to (…) use reasonable and supportable evidence [deletion of "to estimate the levels of severity and likelihood of impacts and the likelihood and magnitude of financial effects of risks and opportunities"]"	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (b)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Clarify cases for consolidated sustainability reporting: Specify whether (i) an EU intermediate parent exempted from consolidated financial statements should still prepare consolidated sustainability reporting, and (ii) an IFRS 10 investment entity, which does not prepare consolidated financial statements, is also exempt	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	58.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	High Priority. Some drafting elements on data collection remain confusing: §62 states that direct information from value chain may be used by undertakings to conduct their DMA where §65 states that DMA may be conducted without direct information from value chain. §65 states that an undertaking may need to obtain additional information from VC actors when materiality is uncertain. This seems inconsistent with earlier provisions allowing undertakings to rely on estimates. Clarify the general principle in the main body (not only in the AR28): VC information is required only for identifying material IRO (DMA), not for reporting on metrics. This identification of impacts in the VC is important to support initiatives led by the undertaking (PAT) to reduce the impacts of the products and services along the lifecycle, not for reporting purposes. It should be made clear in the main body that VC data is not required for standardised metrics, except for Scope 3 GHGemissions. As currently drafted, §62 refers to undertakings reporting metrics that include value chain information, while AR28 specifies that standardised metrics do not cover the value chain – creating a potential inconsistency. However, it could be explained that entity-specific metrics (not standardised) may require value chain data.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	62.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Nuance the principle about direct data collection from value chain counterparts in light of the possibility of using estimates (e.g., §65 states that the undertaking may need to seek additional information from value chain actors when materiality is unclear, whereas earlier paragraphs allow the use of estimates based on practical considerations, this may appear inconsistent)	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	65.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	- Joint operations (JO) should be explicitly covered, as their treatment in E2-E5 metrics remains unclear when §92 is not applied. - It should be clarified that when associates, joint ventures, or joint operations are also part of the value chain, they must be "accounted for proportionally to contractual rights and obligations (arrangements), so as to reflect the impacts connected with the undertaking through supply relationships"	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	69.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Long-term employee benefit funds: add "subject to materiality filter" as these funds seem to be less material than leasing contracts.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	71.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Delete the specification of "including for the calculation of metrics" when requiring consistency between the reporting period of the sustainability statement and that of the financial statements. Certain information, which may be difficult to obtain within the publication deadlines, may be drawn from different or lagged periods if this does not impair comparability over time or with peers, provided no significant events or changes occurred in the interim up to the reporting date	ESRS1	ESRS 1 - 6.1 Reporting period and base year	74.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Retain the four required parts of the sustainability statement and provide flexibility in the format of presentation while requiring undertakings to directly reference the disclosure requirement (DR) numbers (e.g., in section headings or paragraph titles), without requiring a separate mapping table; this "visual tagging" approach is already used by many companies and facilitates comparability for users	ESRS1	ESRS 1 - 8.1 General presentation requirement, structure and content of the sustainability statement	105.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Clarify that non-material information, when disclosed in the sustainability statement under §108, falls under the overall verification of the sustainability statement and is subject to the same level of assurance, ensuring equivalent quality	ESRS1	ESRS 1 - 8.2 Presentation of additional information included in the sustainability statement	108.
Excels	Ernst & Young	Auditor	United Kingdom			I agree	We would suggest replacing the last sentence of this paragraph with the following wording, aligned with ESRS 1.8.: "An ESRS sustainability statement covers (i) governance, strategy, impact, risk and opportunity management, as well as related (ii) policies, actions, targets and metrics related to material impacts, risks and opportunities."	ESRS1	ESRS 1 - Objective	3.
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	We are concerned that inconsistencies in wording between §4, §21, AR 3 and the Glossary on the terms "users", "sustainability statement" or "general purpose sustainability statement" create confusion. We urge EFRAG to harmonise and clarify the use of these terms across the different paragraphs relating to materiality and fair presentation assessments (see related comment on §21-b). Currently, the proposed wording include the following inconsistencies: •§4 refers to "users of general purpose sustainability statements" which include "primary users of general purpose financial reporting" and "other users, such as the undertaking's business partners etc." •§21 refers to "sustainability statement", §21-a refers to "users (in bold) of general purpose financial reports" while §21-b refers to "users (not in bold) of general purpose sustainability statements". •Definition of "users" in the Glossary refers to "users of sustainability statements" (not "general") and include "primary users of general purpose financial reporting" and "other users, including the undertaking's business partners etc.". •AR 3 for paragraph 21 mentions that "general purpose" refers to interests and viewpoints assessed based on groups of users. Log of Amendments indicates that the term limits the scope of necessary information.	ESRS1	ESRS 1 - Objective	4.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Ernst & Young	Auditor	United Kingdom			I agree	Regarding (b), we have the same suggestion as shared for ESRS 1 – 3 above, so as to replace it with the following wording: "include material information related to the reporting areas of (i) governance, strategy, impact, risk and opportunity management, as well as related (ii) policies, actions, targets and metrics related to material impacts, risks and opportunities (see [Draft] Amended ESRS 2)."	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	AR 1
Excels	Ernst & Young	Auditor	United Kingdom			I agree	The following is added in relation to fair presentation: "To achieve faithful presentation, the undertaking shall provide information (...) necessary for a complete, neutral and accurate depiction of its material impacts, risks and opportunities." We recommend to include in §19 a reference to Appendix B where the qualitative characteristic of Faithful representation is further developed. This would clarify that the fair presentation is based on the same general qualitative characteristics that applies to any individual disclosure and would strengthen the consistency and connectivity of the ESRS 1 principles.	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	19.
Excels	Ernst & Young	Auditor	United Kingdom			I agree	We agree with the new materiality filter covering the whole of an undertaking's sustainability information, as we consider this provides welcome flexibilities to undertakings and upholds the quality of disclosed information.	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	21.
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	As mentioned in relation to §4, we are concerned that inconsistencies in wording between §4, §21, AR 3 and the Glossary on the terms "users", "sustainability statement" or "general purpose sustainability statement" create confusion. We urge EFRAG to align the wording of these paragraphs and clarify how different terms impact the materiality and fair presentation assessments. In particular, ESRS 1 should: •Either consistently use the term "sustainability statement" (and not "general purpose sustainability statement"), •Or clearly explain what the difference with "general purpose sustainability statement" is and how this impact the materiality and fair presentation assessments.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21. (b)
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	As commented for ESRS 1 par 21(b), the term "general purpose" remains unclear in this context. While AR 3 states it refers to "interests and viewpoints assessed based on groups of users", the term could be interpreted as linked to financial reporting concepts rather than sustainability reporting. To avoid confusion, we suggest either: •Replacing "general purpose" with "sustainability statement" for consistency, or •If the reference to "general purpose" is meant to limit the scope of users to be considered for the materiality and fair presentation assessments, add clarifications in AR, for example: "General purpose refers to sustainability information intended to meet the needs of identified groups of users, rather than tailored to specific or individual users."	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	AR 3
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We agree with the intent of §22 to link reporting explicitly to material IROs and to allow presentation either at topical level or at IRO level . However, further clarification is necessary regarding what is meant by reporting at the level where IROs are managed in the form of examples in AR to avoid reporting on a level that is insufficiently granular to understand the IROs and how they are managed. Our current understanding is that "the way they are managed" would most probably refer to the level where policies and actions are defined and implemented i.e the operational level at which IROs are actively managed. Please refer to our comments on ESRS 2 §28 and AR 23. In addition, it is critical to stress that the level of reporting (topic vs. IRO vs. grouped IROs) should meet the qualitative characteristic of comparability described in QC10 of Appendix B. This is critical to reduce the risk of a lack of comparability across periods and across entities associated with a more principle-based approach to the level of reporting.	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	22.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	"Human rights" (ESRS 1, ESRS S1, ESRS S2, ESRS S3, ESRS S4) issues are not defined in the standards, even if reference is made to external texts such as UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. According to ESRS 1.31, the materiality assessment of potential negative human rights impact is conducted differently from other impacts as the severity of the impact takes precedence over likelihood. The boundaries of topics related to "human rights" should be clearly delineated /defined, as based on international texts, this concept has a very broad scope and can practically encompass any type of issue covered by S1 § 4 – beyond other labour-related human rights (child labour, forced labour, privacy and adequate housing). It would be useful to have a clarification of which sub-topic of Appendix A of ESRS 1 is deemed to be related to human rights.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	31.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	It is mentioned that severity takes precedence over likelihood for potential negative human rights impacts. However, it is not fully clear which rights require differentiated treatment as well as practical application of this. Although this is unchanged compared to Set 1, we suggest EFRAG to provide further clarification.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	31.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	ESRS 1 draft has introduced a new and restrictive definition of "positive impact" EFRAG explains that reference to "philanthropy" was considered but discarded. Only impacts that derive from business activities, products and services qualify as positive impacts to be reported. Many stakeholders view community investments (e.g., donations to schools, hospitals) as integral to community engagement. The NMIG 13 for § 13 of S3 refer to "positive impacts" illustrated by "social investment and development programme" – which seems contradictory with the new definition. We ask EFRAG to clarify the boundaries of the concept in ESRS 1 and its interaction with NMIG 13 for S3. Including guidance in the NMIG on reporting such activities, as entity-specific information, would help undertakings with significant community programs position these activities within the ESRS framework.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	36.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	Regarding the expectation that the top-down approach is expected to lead to the same outcome of the materiality assessment as the bottom-up approach, we see the risk that a top-down approach (i.e. reasoning from the topic level) can result in the omission of material IROs that are not identifiable at the level of the overall business model or strategic and business priorities. We consider it is critical to mitigate this risk by including within the standard, a requirement to consider a bottom-up approach if the top-down approach could fail to reflect the undertaking's specific situation and characteristics, including, for example, aspects relating to the sector, value chain and geographies in which it operates.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 17
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We ask EFRAG to change the wording "general material information" into "material general disclosures" to align wording used with ESRS 2.	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	49.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	In our view, EFRAG should consider deleting AR 20 of Section 3.6. We consider that it may lead to confusion regarding the application of this principle (which applies to the whole of sustainability information) by introducing a presumption of materiality of some selected pieces of information (ESRS 2 GDRs).	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	AR 20
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	This paragraph could be misinterpreted as suggesting that the limitation on requesting information from other companies, as defined by EU law and regulation, implies that the related value chain information does not need to be reported. It is important to clarify that, despite the limits on information requests, the obligation to report value chain information still exists. Companies should pursue alternative methods, such as estimation, to fulfil their reporting requirements. In addition, it is unclear to which specific laws and regulation is referred to with the text "the relevant EU law and regulation". We would propose to specify the EU law and regulation in the glossary.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	63.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	EFRAG should clarify whether associates or joint ventures that are NOT accounted for under the equity method (such as proportionate consolidation applicable under certain local GAAP) are part of the undertaking's own operations or rather part of upstream and downstream value chain similar to associates or joint ventures accounted for under the equity method.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	69.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We welcome EFRAG's clarification brought to the treatment of leased assets. However, it is unclear whether it is an exception limited to leased assets or rather an illustration of the general principle applicable to identify when an IROs relates to own operations or to value chain relationships. The rationale provided in ED ESRS 1 and the NMIG based on the connection between the lessee and its usage of the leased asset to conclude that the lessor reports corresponding IROs as part of its downstream value chain could be considered as equally applicable to similar contractual relationships. These may include, for example, operation and maintenance (O&M) contracts as well as management mandates, where the operator / proxy is also directly connected to the IROs related to the relevant facility / entity subject to this contract. It is therefore critical that EFRAG clarifies whether this guidance is only applicable to leased assets or extends to similar contractual relationships. Also, please refer to our comment on ESRS E1 AR 18. The approach in ESRS 1 paragraph 70 diverges from the GHG Protocol (hybrid approach of financial and operational control is proposed), leading to interoperability issues.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	70.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We ask EFRAG to clarify the fact pattern considered in this DP, namely that it is referring to the case where the employer contributes to an employee pension fund and represent the underlying assets on its balance sheet (possibly on a net basis with the related pension liability). It should be clarified if this guidance means that the underlying invested assets are not to be considered part of the undertaking's downstream value chain (in contrast to other loans and other investments). Also, similar to our comment on §70, it is critical that EFRAG clarifies if this is meant to be a limited exception or rather an illustration of the general principle applicable to identify when an IROs relates to own operations or to value chain relationships.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	71.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	The relief for acquisitions and disposals is not based on the "undue cost or effort relief" (UCE). This might lead to information not being reported even when available and this will create a new difference with ISSB standards. We suggest making reporting on acquisitions conditional upon UCE. Similarly, IROs and data related to disposed activities during the reporting period shall not be excluded in that reporting year if available without UCE. We recommend separate presentation of material "disposed activities" from continuing operations, inspired by IFRS 5. We also suggest reminding some impacts/risks might remain relevant post disposal. We ask EFRAG to clarify what "major acquisitions" refers to (compared "significant" or material") Instead of disclosures on "significant events occurring between acquisition or disposal date and the end or beginning of the reporting period", we suggest requiring summarized information on the related business and its material ESG topics. Finally, we recommend that EFRAG clarifies how to define the reporting scope used for comparative information for the year after the acquisition/disposal.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	73.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We welcome the inclusion of "undue cost or effort" (UCE) but further clarification is essential to ensure consistent application and avoid loss of relevant information. UCE is a proportionality principle on the level of sophistication of data and models used to report the information – not a justification to omit information as clarified in the IASB educational material released in August 2025 ("The mechanism does not exempt a company from disclosing information."). Its broader use in sustainability reporting, a less mature field, requires guidance. EFRAG should clarify how UCE compares with the criteria on "reasonable efforts" for value chain data provided by the Commission's July 2024 FAQ. EFRAG should also strive to align with how the concept is clarfieid and used in ISSB standards. We recommend clarifying that use of UCE to "prepare information on metrics" (§87-d) affects "how the information is prepared" rather than "whether it is reported on". UCE relief may accommodate first years of application, with decreasing use over time as practices evolve. This dynamic assessment should be further clarified. We also have concerns regarding the interplay between §91 and §87 on "undue costs or efforts". See our comments on §91 in Part 2.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	87.
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	It is unclear how "not impair the relevance or faithful representation of the reported information" compares with "non-material". Clarification should be added, possibly with an example.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	90.
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	We recommend EFRAG to remove §92. The concept of joint operations is GAAP specific and this relief will introduce some differences in reporting boundaries which will be complex for users to apprehend and compare. Furthermore, this relief paragraph relies on the notion of operational control, which is not clearly defined in ESRS and would require further guidance.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	92.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	While we agree with the relief consisting in allowing undertakings to not restate comparative amounts if it is "impracticable" for them to do so, we consider that such a term requires clarification. We suggest to include a definition in the Glossary and align the term with IFRS S1 which relates impracticability to the situation where the undertaking cannot apply a requirement after having made every reasonable effort to do so. This comment is also relevant for Appendix D where the term is used in relation to anticipated financial effects.	ESRS1	ESRS 1 - 7.7 Reporting errors in prior periods	95.
Excels	Ernst & Young	Auditor	United Kingdom			I agree	We signal a typo to EFRAG. The current paragraph states: "The undertaking shall make every dt to ensure…". We believe "dt" should be replaced by "effort".	ESRS1	ESRS 1 - 7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	101.
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	The statement currently included in ESRS Set 1 under ESRS 1.113 that the disclosures related to each of the environmental objectives defined in the Taxonomy Regulation are not subject to the provisions of ESRS is deleted. We suggest EFRAG to include it again.	ESRS1	ESRS 1 - 8.1 General presentation requirement, structure and content of the sustainability statement	106.
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	Given the inconsistency between the possibility to add additional information not related to the materiality assessment with the requirement to include material information in the sustainability statement (§21) we suggest to include a requirement to ESRS 2 IRO-2 to require the inclusion of a list that specifies which additional information has been disclosed and its location within the sustainability statement in order to ensure that this is clearly identified and does not obscure material information.	ESRS1	ESRS 1 - 8.2 Presentation of additional information included in the sustainability statement	108.
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	Please refer to our response to question 13 for our comments on the revisions to requirements pertaining to cross-references to financial statements when reporting on monetary amounts or other quantitative information presented in the financial statements, making such referencing voluntary (§114). We disagree with this change and consider that §114 should maintain a mandatory requirement to cross-refer to financial statements.	ESRS1	ESRS 1 - 9.2 Direct/indirect connectivity with financial statements and consistency of assumptions	114.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Table of Content: Appendix C should be before Appendix B since "assessing impacts" are part of DMA and thus more related to App. A.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	7.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Why linkage to ESRS 1.21 instead of including the definition of materiality of information as core element of a faithful presentation under ESRS 1.19?	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	19.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Option for reporting on IRO level or topical level. However, ESRS 1.AR17 states out that the reporting should be done on a topic level while ESRS 1.AR21 permits to report a material IRO on a sub-topic level. Given the general permission and flexibility of a bottom-up approach on IRO Level, the mapping between IROs, topics and disclosure requirements should be flexible in the same way. So far no further guidance is integrated for mapping IROs/sub-topics to DRs (only in the NON-MANDATORY implementation guidance). Thus, complexity for implementation is not decreasing and dependent on companies' auditor alignment the results of DMA will probably be not comparable between companies.	ESRS1	ESRS 1 - 3. Double materiality as the basis for sustainability reporting	22.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Engagement process with affected stakeholders are essential. However, users of sustainability information are missing. This group represents the same relevance for a company than affected stakeholders.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	33.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Why should mitigation measures not be accounted for in the assessment of actual negative impacts that have been occured in previous periods? Some companies have might set up lots of efforts and mitigation measure to reduce impacts in the past resulting in no material impacts for the company in the current period. Why should a company report on an impact that it manages well on a company level, maybe since several years? This would not represent a material information anymore for their stakeholders. Example: water pollution on the own activity level. A company have faced water pollution some decades ago, however due to successful mitigation measures in the past, this impact does not exist anymore in its own operations level since decades.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Who and how should define "significant ongoing mitigation and /or prevention actions"? This will lead to discretionary rules since a common framework/benchmark for "significant" actions is missing and very specific for each company and sector. The way of operationalization is unclear. e.g. a mitigation measure that equals to current legal requirements would lead to an on-going reporting about this specific impact while a company fufills all legal requirements that are stipulated to avoid this negative impact.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The way of operationalization is totally unclear. The risk for incomparable results of DMAs related to different companies still remain. Furthermore, all measures that are decided and implemented in a company during the reporting period should be included in the assessment of an impact. Similar to financial reporting, a provision has also to be evaluated including counter measures that influence the provision value at the end of a reporting period.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 9
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	ESRS 1.45-47 could be more linked to ESRS 1.87-89. Firstly, the requirements are a bit doubled regarding undue cost and efforts principle. Secondly, examples are given under ESRS 1.47 but under ESRS 1.89 there is only a general explanation without reference to ESRS 1.47. These sections could be more coherent.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	See remarks related to ESRS 1.22	ESRS1	ESRS 1 - 3.6. Determining the information to be reported in accordance with ESRS 2 and topical standards	AR 21
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	ESRS 1.AR 26 in reference to ESRS 1 3.7 may result in a high number of new datapoints depending on its interpretation by auditors. EFRAG should clearly state that the disaggregation of data is voluntary ("may...") or delete the AR completely. Furthermore, this disaggregation does not provide any added value for the users of the information; instead, it leads to information overload and unjustified burdens for the disclosing company (information may not be available or only with high effort).	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	51.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	ESRS 1.51 stipulated different level for aggregation and "other appropriate level". The segment approach (which is based on a management approach under IFRS) could be highly relevant category for aggregation and should be added as an explicit category.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	51.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	This amended requirement will help for faithful presentation and comparable information to stakeholders generated by the reporting of different reporting undertakings.	ESRS1	ESRS 1 - 5.1 Reporting undertaking and own operations	59.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	This new requirements will increase the faithful presentation and comparable information in particular for the automotive industry. However, the NMIG 7 is not referenced under ESRS 5.3 and no further specification is given as AR.xx. It could worthwhile to have more practical hints for implementation.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	70.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The general goal of this new requirements will increase the faithful presentation and comparable information reported by different companies. However, it is not clear why to report on "significant events" in relation to the "Subsidiary's or business's exposure to material IROs". In our opinion, significant events should only be considered in case that they might the overall evaluation of material IROs on group level. We would recommend to further review this requirement.	ESRS1	ESRS 1 - 5.3 Provisions and exceptions for determining the respective reporting boundaries of own operations and value chain	73.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	In this context, a reference to ESRS 1.87 could be integrated to avoid discussions about the term "impracticable".	ESRS1	ESRS 1 - 7.1 Presenting comparative information	82.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	While we support the general relief for metrics related to ESRS E2 to E5 in case of a joint operation, it remain unclear in which case a parent company may not have (partially) operational control over a joint arrangement although it should have financial control (otherwise this would not represent a joint operation). In addtion, the relief could be also extended to ESRS Sx and G1 since the data gathering for metrics related to these standards may also be burdensome and complicated within a joint operation. We would recommend further specification.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	92.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	We can follow the approach under ESRS 1.94. Nevertheless we would recommend to integrate ESRS 1.94 with ESRS 1.81-84, e.g. as "changes related to sustainability information and presenting comparative information". Both requirements describes the process for comparative figures and other sustainability information.	ESRS1	ESRS 1 - 7.6 Changes in the preparation or presentation of sustainability information	94.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	We support the explanation about the reporting on material opportunities. We would highly recommend to precise that this requirement only affects "material" opportunities. So far this term is missing in ESRS 1.102 and in the sub-headline "Reporting on opportunities".	ESRS1	ESRS 1 - 7.9 Reporting on opportunities	102.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	We highly support this increasing flexibility for additional disclosures that are not related to material IROs but relevant information items for specific stakeholder needs. However it could be worthwhile to align the requirements with ESRS 1.107 (b). Otherwise we would expect different levels of qualitative characteristics of information within the sustainability statement.	ESRS1	ESRS 1 - 8.2 Presentation of additional information included in the sustainability statement	108.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Throughout Chapter 1, ARs and Glossary. Increases clarity and consistency in terminology and structure, but does not reduce the number or complexity of disclosures. The structural changes improve readability but do not materially reduce the reporting burden. The elimination of "may" disclosures clarifies what is mandatory, but the volume and granularity of required disclosures remain high.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	7.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Change "it shall provide additional entity-specific disclosures" to "it may provide additional entity-specific disclosures"	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	10.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Change "When developing its entity-specific disclosures, the undertaking shall consider" to "When developing its entity-specific disclosures, the undertaking may consider" - Moving the last sentence of the DR into NMIG. The blending of "may" and "shall" in this DR is slightly awkward	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	11.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I agree	Appreciate the clarity on needing to also review and reference the Application Requirements when determining disclosure requirements and format.	ESRS1	ESRS 1 - 1.2 Drafting conventions	15.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Chapter 2, paragraphs 16-19. Clarifies expectations for fair presentation but does not but does not reduce the scope or depth of required disclosures. The clarification is helpful for preparers but does not simplify the underlying reporting requirements or reduce the need for extensive materiality assessments.	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	16.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I agree	Like the ability to report at an aggregated topic level as compared to individual IROs.	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	22.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Clarify that the list of referenced types of information is non-exhaustive	ESRS1	ESRS 1 - 3.3 Double materiality assessment	27.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Change "The undertaking shall update the conclusions of the materiality assessments conducted in the previous reporting periods to take into account changed circumstances and/or assumptions" to "The undertaking may update the conclusions of the materiality assessments conducted in the previous reporting periods to take into account changed circumstances and/or assumptions, as needed..." Chapter 3.3, AR 5, AR 17 - Offers flexibility in approach, but still requires comprehensive assessment and documentation; annual update adds to ongoing workload. The option for a top-down approach could reduce complexity for some undertakings, but the requirement to justify thresholds and update assessments annually maintains a high compliance burden. The change does not go far enough to reduce the effort required for materiality analysis.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	29.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Chapter 3.3.1, paragraphs 34-36 & Appendix C. Increases specificity and may require more granular disclosures, especially regarding timing and effectiveness of remediation. The additional detail may improve comparability but increases the complexity of reporting, especially for ongoing or remediated impacts. Annual reporting should only focus on that reporting yer without additional look back. Remove explicit requirement to reports on impacts before remediation. This does not simplify obligations and increases the reporting burden.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Unless "supportable evidence" is intended to mean something different, should conform to "reasonable and supportable information." The first sentence also should clarify that the relevant "reasonable and supportable" evidence or information is such that is "available to the undertaking at the reporting date without undue cost or effort." Given that the first sentence relates to potential negative impacts and the existing mitigation or prevention actions may not yet have been tested if the underlying event potentially giving rise to the negative impact has not occurred, "are reasonably expected to" should be inserted between "taken" and "reduce." In the second sentence it is not clear what is meant by "significant." Consequently, the sentence should be revised to provide that the impact shall be assessed without considering the mitigation and/or prevention actions only if such actions themselves are material.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Given that it is not clear what "significant" means in relation to remediation actions, this AR should be revised to provide that remediation actions only need to be disclosed if they are material.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 13
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I agree	Appreciate the attempt at interoperability and connection with IFRS and financial materiality definitions.	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	37.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I agree	Appreciate the tops down approach	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (a)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Unless "reasonable and supportable evidence" is intended to mean something different, should conform to "reasonable and supportable information." The paragraph should also clarify that the relevant "reasonable and supportable" evidence or information is such that is "available to the undertaking at the reporting date without undue cost or effort."	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	45. (b)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Chapter 3.5, paragraphs 45-48. The language on "undue cost or effort" is welcome, but the lack of clear thresholds or safe harbors means preparers must still document and defend scoping decisions, limiting the practical simplification.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	46.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The first sentence should clarify that the relevant "reasonable and supportable information" is such that is "available to the undertaking at the reporting date without undue cost or effort."	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	47.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	- Tying the level of aggregration/disaggregation to level at which "significant" variation arises is problematic given that "significant" is undefined. Consequently, it would be better to require aggregation or disaggregation to the extent necessary ensure the fair presentation of the reported information consistent with the requirements of paragraph 19 of ESRS 1. This change would simplify the process given that "fair presentation" is the over-arching requirement in any event.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	51.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	- Tying the ability to aggregate information related to specific locations to the requirement that the underlying activities must affect the same ecologicial area is problematic given that the requirement presupposes that the related IRO must relate to an environmental matter. As material IROs can also relate to social or governance matters, but still have a specific geographic nexus, we would suggest deleting "and the activities to which they are associated with affect the same ecological area - such as water basin, region, ecosystem, or landscape" from the first sentence. Retaining this language would also multiply undertakings' disclosure burdens with respect to IROs with vast actual or potential geographic reach across a multitude of "specific" locations, notwithstanding the fact that such IROs may be subsantially similar in nature. AR 23 already provides sufficient guidance on when dissaggregation should occur on the basis of differences in local conditions.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	AR 22
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Revise the second sentence to clarify that the relevant "reasonable and supportable" information is such that is "available to the undertaking at the reporting date without undue cost or effort." The guidance seems to contradict itself throughout ESRS 1 if we should be including value chain information even if it is burdensome to collect. We would like to see more specific and direct guidance here.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	60.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	To maintain consistency with the information requirements used elsewhere in this ESRS, the first sentence should be revised to read "The materiality assessment regarding upstream and downstream value chain may be conducted without direct information from counterparts, using average regional or sector data, or other information available to the undertaking at the reporting date without undue cost or effort." Given the Omnibus' potential restrictions on the ability of undertakings to obtain information from value chain entities, the second sentence should clarify that the obligation to seek additional information from such entities does not apply to the extent that it is prohibited by law or would require undue cost or effort on the part of the undertaking.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	65.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	ESRS 1 Chapter 5.4 identifies that acquisitions or disposals occurring within the year may be deferred to the following year. This would give a range of relief between 24 months and 12 months. An adjustment to the ESRS language should be made indicating the number of months for acquisition adjustment in line with international financial accounting standards.rior period error was identified.	ESRS1	ESRS 1 - 5.4 Relief for acquisitions and disposals	72.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I agree	appreciate the ability to use the company time horizons.	ESRS1	ESRS 1 - 6.2 Time horizon: definition of short-, medium- and long-term for reporting purposes	77.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The term "reasonable and supportable," particularly "supportable," needs to be clarified as it could be interpreted as requiring a level of validation or the implementation of governance and control processes (see, e.g., https://kpmg.com/xx/en/our-insights/ifrg/2024/issb-reasonable-supportable-information.html) that would defeat the term's intended purpose of providing relief to undertakings in situations where the available data is imperfect (see IFRS's Sustainability Reporting Standards FAQs). This is important because the use of assumptions and estimates is integral to an undertaking's underlying processes used to identify material IROs, scope its value chain, and otherwise conduct its materiality assessment. As these processes, unlike the quantitative disclosures for which the term was originally employed (i.e., IFRS 9 and 17), rely heavily on qualitative information, which may be anecdotal or come from third parties or be limited in nature, due to restrictions on obtaining value chain information or the fact that obtaining additional information would entail undue cost or effort, using the term here requires clarification of its meaning. Consequently, assumptions and estimates should be deemed supportable to the extent that they represent the undertaking's reasonable, good faith analysis of the information available to it as of the reporting date without undue cost or effort.	ESRS1	ESRS 1 - 7.2 Judgement, measurement uncertainty and outcome uncertainty	AR 30
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Requiring the use of "reasonable and supportable information" in relation to the activities specified in clauses (a) and (b) is problematic given that "supportable" can be interpreted as requiring a level of validation or the implementation of control processes that are unlikely to be possible in practice given the nature of the information that is often available to an undertaking in connection with such activities that underlie the materiality assessment process. For example, when an undertaking seeks to identify its material IROs or scope its value chain it will need to consider information that often is imperfect (e.g., anecdotal, contains assumptions or estimates, is difficult to validate since it comes from third-parties, or limited given that complete information would require undue cost or effort). In such cases, an undertaking should instead be required to perform the specified activities by considering the relevant information available to it as of the reporting date without undue cost or effort and applying its reasonable good faith judgement, which is how undertakings typically make determinations in other business contexts with imperfect or limited information.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	87.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	In this clause, delete "and to determine the scope of its value chain, including its breadth and composition, in relation to material impacts, risks and opportunities" as such activity is already covered in the preceding clause (b). In relation to the activity covered by this clause (c), the term "reasonable and supportable," particularly "supportable," needs to be clarified as it could be interpreted as requiring a level of validation or the implementation of governance and control processes (see, e.g., https://kpmg.com/xx/en/our-insights/ifrg/2024/issb-reasonable-supportable-information.html) that would defeat the term's intended purpose of providing relief to undertakings in situations where the available data is imperfect (see IFRS's Sustainability Reporting Standards FAQs). Since this clause relates to the inclusion of information in the sustainability statement, "reasonable and supportable information" in this context should mean that the information is relevant and satisfies the fair presentation and qualitative characteristics of information requirements specified elsewhere in this ESRS. Such an approach is consistent with the acknowledgement in Section 7.2 of ESRS 1 that disclosed information is subject to the application of judgement, as well as measurement and outcome uncertainty.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	87. (c)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	In relation to the activity covered by this clause (d), the term "reasonable and supportable," particularly "supportable," needs to be clarified as it could be interpreted as requiring a level of validation or the implementation of governance and control processes (see, e.g., https://kpmg.com/xx/en/our-insights/ifrg/2024/issb-reasonable-supportable-information.html) that would defeat the term's intended purpose of providing relief to undertakings in situations where the available data is imperfect (see IFRS's Sustainability Reporting Standards FAQs). Since this clause relates to the inclusion of information in the sustainability statement, "reasonable and supportable information" in this context should mean that the information is relevant and satisfies the fair presentation and qualitative characteristics of information requirements specified elsewhere in this ESRS. Such an approach is consistent with the acknowledgement in Section 7.2 of ESRS 1 that disclosed information is subject to the application of judgement, as well as measurement and outcome uncertainty.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	87. (d)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I agree	Relief further acknowledge the burden of reporting companies and provide company with broader control in determining the appropriate level of materiality, detail, transparency, completeness, and accuracy, granted the transparency and disclosure must continue to be useful to the user of the report as noted in Chapter 3.1 Paragraph 21	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	90.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Practicable" is not solidly defined and is not clearly understood. "Practicable" should be better identified, potentially with examples, to allow for reporting entities to understand the extent of effort required in these restatements. This may include noting that restatement only applies for material errors and values included in comparative tables for the year being reported when the prior period error was identified.	ESRS1	ESRS 1 - 7.7 Reporting errors in prior periods	95.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I agree	There is more leniency on evidencing connectivity with changes of requirements from "Shall" to "May" which allows business to determine the appropriate level of disclosure for connected info and linkages.	ESRS1	ESRS 1 - 9.2 Direct/indirect connectivity with financial statements and consistency of assumptions	114.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree.	Firms, which are parents that have subsidiary undertakings in scope of CSRD and which are unable to rely on an exemption from CSRD reporting, are restricted from incorporating data by reference (from the subsidiary's CSRD report) into the parent consolidated CSRD report due to the restrictive nature of the ESRS 'incorporation by reference' provisions which envisage only being able to incorporate from a specific selection of the parent undertaking's own documents. This creates frictions where differences in reporting approach on particular DRs (between the parent and a subsidiary) arise and the simplest method is to incorporate by reference CSRD-reported data of the subsidiary into the parent CSRD report to outline delineations (which is not presently permitted, and therefore leads to duplicative reporting of data in the parent CSRD report).	ESRS1	ESRS 1 - 9.3 Incorporation by reference	9.3 Incorporation by reference
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	This will lead to more complexity and a big reporting burden. The benefit is questionable in face of already transparent reporting	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	10.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	a mandatory reference to best practice or other reporting frameworks is not practicable to all industries and needs to be assessed on an individual basis.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	11.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Define faithful representation otherwise it is too vague. Leads to too much interprestation and is not auditable.	ESRS1	ESRS 1 - 2. Fair presentation and qualitative characteristics of information	19.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I agree	Not mentioning any time limit for the update of the conclusions of the materiality assessment gives companies more flexibility	ESRS1	ESRS 1 - 3.3 Double materiality assessment	29.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	In addiiton, requiring the inclusion of mtitigation and prevention actions in the materiality assessment, the process can become more rigid and complex.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I agree	The definition of stakeholders looks clearer	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 10
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I agree	The process to engage with stakeholders in the materiality assessment is more streamlined	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	AR 11
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	Including information on material risks and opportunities from business relationships beyond the scope of consolidated financial statements is an additional burden	ESRS1	ESRS 1 - 3.3.2 Financial materiality assessment	38.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	Contradictive messages in Pt 34 and 35. This will lead to multiple interpretations and will not be practicable.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The possibility of using reasonable and supportable information is a positive amendment, but more clarity is needed for "undue cost or effort".	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	47.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	Streamlined to avoid unnecessary complexity	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	AR 22
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I agree	Streamlined to avoid unnecessary complexity	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 18
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	The proposed disaggregation will lead to too much detail level and will increase reporting workload	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	AR 22
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is positive that the assessment of undue cost or effort depends on the company's circumstances. However, a definition of "undue cost or effort" is needed	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	89.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I agree	Excluding joint operations helps streamline the calculation scope of environmental metrics	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	92.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I agree	Flexibility in where to include information in the sustainability statement reduces burden	ESRS1	ESRS 1 - 9.1 Connected information	112.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I agree	The option for companies to cross-reference the financial statements when reporting on monetary amounts is positive	ESRS1	ESRS 1 - 9.2 Direct/indirect connectivity with financial statements and consistency of assumptions	114.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The definitions of classified and sensitive information are very narrow and cover only a limited subset of information. They fail to account for the fact that companies also possess other types of information, namely trade secrets, which cannot be disclosed freely. Therefore, in paragraph 98, we recommend including an explicit reference to trade secrets as defined in Article 2, point (1), of Directive (EU) 2016/943. This supports the proposal made by the European Parliament's Special Rapporteur, who has also called for such an addition in the context of the CSRD. While we acknowledge that "secret information" is addressed in para 99 ESRS 1, we do not consider this to be sufficient as para 99 only applies to information on strategy and action plans. However, companies should not be obliged to disclose any "secret information" / trade secrets. The amendment to para 98 should read as follows: "The undertaking is not required to disclose classified information, sensitive information information on intellectual capital, intellectual property or know how, business information or technological information which constitutes trade secrets as defined in Article 2, point (1), of Directive (EU) 2016/943, even if such information is considered material."	ESRS1	ESRS 1 - 7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	98.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	Please refer to comment above - para 99 ESRS 1 to be deleted if trade secrets are included in para 98 ESRS 1.	ESRS1	ESRS 1 - 7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	99.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Please refer to comment above - to be aligned with proposed changes to para 98 ESRS 1, i.e. to include trade secrets. "If the undertaking omits classified information, sensitive information or a specific piece of information corresponding to intellectual property, know-how or the results of innovation which constitutes trade secrets as defined in Article 2, point (1), of Directive (EU) 2016/943, it shall comply with the DR in question by disclosing all other required information."	ESRS1	ESRS 1 - 7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	100.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Please refer to comment above - to be aligned with proposed changes to para 98 ESRS 1, i.e. to include trade secrets. "The undertaking shall make every reasonable effort to ensure that beyond the omission of the classified information, sensitive information, or of the specific piece of information corresponding to intellectual property, know-how or the results of innovation which constitutes trade secrets as defined in Article 2, point (1), of Directive (EU) 2016/943, the overall relevance of the disclosure in question is not impaired."	ESRS1	ESRS 1 - 7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	101.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	Para 10 ESRS 1 determines that where a topic is not covered or not covered with sufficient granularity by an ESRS, the company shall provide additional entity-specific disclosures on that topic.Further, this disclosure requirement states that these may be topics not covered by the ESRS. However, this imposes high legal undertainty for companies as (i) it is not clear for companies which further topics qualify as "suatainability topics" as the definition provided for in the CSRD is very vague and (ii) it is also not clear which information shall be disclosed for such additional sustainability topics.Thus, we urge EFRAG to limit the disclosures under the ESRS to the topics defined in the ESRS. Consequently, para 10 ESRS 1 shall be deleted.	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	10.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	See comment above re entity-specific disclosures. Thus, para 11 ESRS 1 shall be deleted.	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	11.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	See comment above re entity-specific disclosures. AR 1 ESRS 1 to be deleted.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	AR 1
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	See comment above re entity-specific disclosures. AR 2 ESRS 1 to be deleted.	ESRS1	ESRS 1 - 1.1 ESRS standards, reporting areas and entity-specific disclosures	AR 2
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I agree	We welcome the clarification that companies are not required to assess every possible IRO across all areas of its operations and upstream and downstream value chains to identify the topic to be reported on. This gives companies more leeway when conducting the DMA and saves valueable resources.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	46.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I agree	We welcome the clarification that qualitative information may be sufficient to conclude that an IRO is material or not as the collection of quantitative information in certain cases constitutes an undue burden for companies.	ESRS1	ESRS 1 - 3.5 Practical considerations in determining the material impacts, risks and opportunities and their associated topics to be reported	AR 19
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	While we welcome EFRAG's clarification that it is up to the companies to decide on the appropriate level of (dis-) aggregation, we sugegst removing the examples for potential (dis-) aggregation as this still gives the impression that disaggregation at certain level is required. This holds in particular true for the disaggregation by location, water basin, site, asset etc. The CSRD report is intended to give the users of the CSRD report an understanding on the company's material IROs - We do not see the necessity to provide information diaggregated to a location or water basin level. We disagree with EFRAG's conclusion that this does not add any further buden on companies and therefore suggest keeping the current language. The same applies to the corresponding AR which recite this language.	ESRS1	ESRS 1 - 3.7 Level of aggregation, disaggregation and group reporting	51.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	While the sentence "ARs also include text where the term 'shall consider' is used to indicate issues, resources or methodologies that the undertaking is expected to take into account or to use in the preparation of a given disclosure. " tries to specify the use of "shall consider", it is a contradiction ot para. 5 where it states that "The ESRS do not mandate behaviour [...]". A "if applicable" should therfore be added. Additionally, "shall consider" is not consistently applied as sometimes only "shall" is used (eg. ESRS E1 Ar 4 and 5).	ESRS1	ESRS 1 - 1. ESRS Standards, reporting areas and drafting conventions	15.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	It remains unclear who "primary users", "users of general purpose sustainability statements" refer to and at what point an information is considered "necessary". The proposed wordings risks an expansion of the information provided by companies as sustainability information might be interesting for a very broad group of users. "Decision-usefulness" should be key for sustainability information as well.	ESRS1	ESRS 1 - 3.1 Materiality of information as a general filter for reported information	21.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	"Where the impact is deemed material based on this assessment, the undertaking shall disclose the remediation actions undertaken and their expected or actual outcomes. " The wording indicates a disclosure requirement of remediation actions on level of each material impact. Deletion or rephrasing should be considered.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	34.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	"[...] if the undertaking needs to maintain significant ongoing mitigation and/or prevention actions". It is unclear how "significant ongoing mitigation actions" should be interpreted. Further clarification is needed.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	The examples are not very helpful as these are rather obvious connections. However, the supply chains of mulitnational companies are much more complex. Including examples should not be part of the disclosure requirements but could be part of the NMIG and should be deleted here.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	AR 6
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	The Appendix C should be deleted as it rather adds complexity to the topic and might require additional documentation effort as part of the audit procedures.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	AR 9
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	The part"Under the CSRD, the management of the undertaking shall inform the workers' representatives at the appropriate level and discuss with them the relevant information and the means of obtaining and verifying sustainability information. The workers' representatives' opinion shall be communicated, where applicable, to the relevant administrative, management or supervisory bodies." should be deleted. This is part of level 1 legislation. Additionally, it seems to indicate behavioural obligations going against para. 5.	ESRS1	ESRS 1 - 3.3 Double materiality assessment	AR 11
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	Suggestion to delete Application Requirement as it does not add any additional value / insights to the reporting requirements.	ESRS1	ESRS 1 - 5.2 Inclusion of value chain information	AR 28
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	It is unclear what is meant with "signficant events" and what exactly needs to be disclosed. Suggestion to either delete or further clarify paragraph.	ESRS1	ESRS 1 - 5.4 Relief for acquisitions and disposals	73.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	This requirement is not a relief but constitues a behavioural obligation. it should therefore be deleted and the initial paragraph 85 should be reintegrated: "Sometimes, it is impracticable to adjust comparative information for one or more prior periods to achieve comparability with the current period. For example, data might not have been collected in the prior period(s) in a way that allows either retrospective application of a new definition of a metric or target, or retrospective restatement to correct a prior period error, and it may be impracticable to recreate the information (see ESRS 2 BP-2). When it is impracticable to adjust comparative information for one or more prior periods, the undertaking shall disclose this fact."	ESRS1	ESRS 1 - 7.1 Presenting comparative information	84. (c)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Reasonable and supportable information is subject to the interpretation of auditors. A clear definition is missing otherwise it undermines the level playing field and will be applied unevenly.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	88.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	A "balanced consideration of the costs and efforts" is subject to companies and auditors interpretation. If at all, the relief might be helpful for wave 2 companies but at what point is a multinational company able to use this argumentation? Introducing this concept on a broad scale might also reduce the comparability and availability of sustainabiltiy data.	ESRS1	ESRS 1 - 7.3 Use of reasonable and supportable information that is available without undue cost or effort 18	89.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	Reporting only partial scopes without clear guidance risks to reduce the comparabiltiy and availability of sustainability of data.	ESRS1	ESRS 1 - 7.4 Reliefs for metrics	91.
Excels	Exponential Roadmap Initiative	Other - please specify (required)	Sweden			I disagree	From the proposed wording we see a risk that companies would not be required to disclose the baseline and base year for their ghg targets, which we consider essential information for stakeholders. We recognise that a target to reach a particular level (eg 100% renewable energy) does not need a baseline or base year, but we think "where applicable" needs some clarification to ensure it's not mis-interpreted or mis-used. We see two options to remedy this: 1. use a general clarification in ESRS-2, that would be suitable for targets in all sustainability topic areas by clarifying in ESRS-2 para 43(d) what is meant by where applicable eg "disclosure of baseline value and base year is applicable where a target is a % change, but may not be applicable where a target is to reach a defined level of threshold." 2. clarify this point specifically for ghg targets in ESRS E1 by reinstatging part of para 34 (c) in the current version. Specifically reinstate the following text (c) the undertaking shall disclose its current base year and baseline value.	ESRS2	ESRS 2 - General for targets - GDR-T	43. (d)
Excels	Exponential Roadmap Initiative	Other - please specify (required)	Sweden			I partially agree and partially disagree	There is no mention in the exposure draft of targets with different time horizons. Climate targets, and most other types of sustainability targets, can be set for short-, medium- or long-term, with each time horizon serving a useful but different purpose. We note that short/medium/long-term are mentioned in AR16 regarding financial performance and cashflows, and that target period dates are required in para 43 (e). However we think the expectation to set and disclose targets with all time horizons should be noted in the chapeau text in para 43, to signal that targets over all time periods are important. We propose adding "for the short-, medium- and long-term" at the end of the first sentence. Alternatively, this point could be addressed by adding "short-, medium- and long-term" with reference specifically to climate/ghg targets into ESRS E1. For reference: see mapping of transition plan guidance and frameworks by Exponential Roadmap Initiative (https://exponentialroadmap.org/wp-content/uploads/2024/02/Transition-plan-elements-mapping-ERI.pdf) which shows that all the frameworks analysed required short-, medium-, and long-term absolute CO2 emissions reduction targets.	ESRS2	ESRS 2 - General for targets - GDR-T	43.
Excels	ASD					I disagree	Board's gender diversity ratio should be calculated as percentage of female members over total board members, instead of average ratio of female to male board members.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	AR 2.
Excels	ASD					I agree	We called to align reporting of strategy and IRO's to be treated in the same way for all topics, clarify/simplify structure, harmonize requirements, avoid double requests (in ESRS 2 and topical standard). Structure has been simplified, with IROs (policies and actions) left for topical standards. In addition, E1 requires to report on climate strategy. IROs (description of impacts, risks and opportunities) can be disclosed in the same location as related policies, actions, targets and metrics. This alignment avoids duplications and improves readability. We welcome EFRAG proposed change.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	8.
Excels	ASD					I partially agree and partially disagree	Datapoint 37.b (on the time horizons under which the undertaking intends to complete each key action) was amended, but it only specifies that the timeframe is the reporting year. We suggest to make it voluntary	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	37.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	This rationale seems to be included to manage (IG3) perception. It does not have a real implication, except in the case of none of the provisions applying. To be meaningful the list under (ii) will need to be tagged individually in any case. Just providing a "list" does not allow for explanations (for example, current para. 9) "Please note that each of the elements in this list is not considered as a separate datapoint. Each of them is conditional to the undertaking being in the relevant fact pattern. At aggregated level they constitute one piece of information, i.e. the basis for preparation."	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	This part of the phrase seems to be repeating the same thing: "including the reasonably expected time horizons for those effects, including the time horizons (short, medium or long term) for which those effects could reasonably be expected to occur". To be consistent, this explanation should also apply to datapoint 23b: ESRS E1 paragraphs 66 and 67 do not require a breakdown of monetary amount figures by the three time horizons. It rather requires the disclosure of a monetary amount that is the result of cumulative financial effects assessed for each of the time horizons (short-, medium- and long-term). EFRAG Q&A ID 422 Suggested wording: the cumulative anticipated effects of the undertaking's material risks and opportunities on its financial position, financial performance and cash flows over the short-, medium and long-term, including the reasonably expected time horizons for those effects (short, medium or long term),	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (b)
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	The obvious choice is Option 1 since this is a key information for investors, a key component of the Green Deal (to redirect capital) and a key prerequisite to help companies to increase awareness and resilience. Given the phase-in provisions, the option to report either single amounts or ranges (AR 18 for para. 23), and the possibility to explain why the information has not been provided, the burden is proportionate. In addition, there is now AR 15 for para. 23. In preparing disclosures about its anticipated financial effects, an undertaking shall use reasonable and supportable information available to it at the reporting date without undue cost or effort (see paragraphs 88, 89 and 90 of ESRS 1).	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (b)
Excels	CLEERIT	Consultant (including software vendor)	France			I disagree	I disagree not to provide the option to state the "lack of skills" as a reason to omit quantitative information. It would be better to let the preparer be transparent and provide the real reason. The explanation "when there is no reasonable and supportable information derived from its business plans to be used as input in the calculation of anticipated long-term financial effects" could potentially be used too broadly and also disguise a lack of skills as a reason to omit quantitative information. Tranparency would be enhanced if the two choices were provided and accounted for.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (b)
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	Does the addition of "which interact" mean that material IROs can sometimes not interact with business model or strategy, and therefore not require addressing? The same question goes for the rationale for the new DP 24 - "Better specified that the related information should be disclosed only in relation to material risks with implications with strategy and business model (not in relation to all risks), in line with the provision of CSRD art. 19 (a). This is to support more focused reporting and avoid unnecessary details." In which circumstances would a material risk not have implications for business model?	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 14
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	There is a need to clarify the object of decision-making procedures - it's currently to vague and could potentially imply any decision-making in the company. Suggested wording: "a description of the decision-making procedures related to the process through which the undertaking identifies impacts, risks, opportunities, and the related topic and assesses their materiality, as the basis for determining the disclosures to be made in its sustainability statement; and"	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	26. (g)
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	So, what exactly is different when disclosing para 26 (d), compared to IRO-1 and SBM-2 and ESRS S1-S4?	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 21.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	By including a description, not only of WHERE but also HOW IROs are connected to its business model, its own operations and its upstream and downstream value chain, the information overlaps the information asked for in SBM-3 (new DP 22) "high-level description of the interaction of the material impacts, risks and opportunities with its business model, value chain". Suggestion: take out "and how" from this paragraph.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (a)
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	Suggested wording: "if the undertaking is connected through its own operations or upstream and downstream value chains to material impacts, risks and opportunities related to forced or compulsory labour or child labour, serious security violations related to workers, use of undeclared labour, serious violations related to environmental laws and regulations as well as serious violations related to corruption and bribery, it shall disclose this exposure to the heightened risk of incidents by type of operations (such as manufacturing plant), or by countries or geographies with operations, with a clear reference to the corresponding actual or potential negative material impacts, risks and opportunities reported under 28a." This is a very useful addition as it prevents greenwashing by shedding light on the most important IRO related facts, without having to go through the entire report. In my opinion it should extend a bit further than child and forced labour, to reflect serious viotations accross S, but also E and G, to avoid seriously misleading sustainability statements such as that of the group LVMH in Italy for FY 2024. It's not compatible with the underlying values of the Green Deal to leave it up to law enforcement in MS only to deal with this.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (e)
Excels	CLEERIT	Consultant (including software vendor)	France			I disagree	The rationale to merged all provisions if the undertaking has not adopted PAT, will complicate reporting for companies managing on IRO or groups of IROs level. Very often there are actions but not articulated policies and targets for example. So the option to separate policies, actions and targets is needed.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	30.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	This should be an AR ("the way disclosures are structured and presented may reflect this approach"), the preparer likely would not know what specific information to put here if it is a separate datapoint.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	31.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	The current wording implies that PATs would only address impacts to address risks (not to address stand-alone impacts, should they exist). Suggested wording: "its policies, actions and targets which address the prevention, mitigation and remediation of actual and potential material impacts, and/or to address material risks and/or to pursue material opportunities; or"	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	32. (a)
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	IROs as such cannot progress. Outcome in relation to targets set in relation to IROs can progress. Suggested wording: "the metrics to assess progress over time in relation to prevention, mitigation and remediation of its material impacts, and/or management of risks and/or pursuit of opportunities."	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	32. (b)
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	34f, "if relevant, whether and how the undertaking makes the policy available to potenpally affected stakeholders, and stakeholders who need to help implement it" should not be deleted. If an affected stakeholder is not able to understand if the policy is effectively communication, how can it consider that the policy can be respected? CSRD explicitly spells out that an accountability deficit could lead to lower levels of citizen trust in businesses, which in turn could have negative impacts on the efficient functioning of the social market economy (14), and that (18) disclosing on sustainability matters is justified by concerns about the impacts and accountability of the undertaking (18).	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	34.
Excels	CLEERIT	Consultant (including software vendor)	France			I disagree	A boolean DP (whether) will complicate the structure of a generic GDR-P. Suggestion: transform the instruction on how to disclose into an AR for paragraph 34, and create a separate datapoint 9 in G1-1 to disclose whether such an overarching human rights policy exists or not. Suggested wording: AR for paragraph 34: If the undertaking has an overarching human rights policy committing to implement the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises, it shall disclose the information according to the provision defined in paragraph 34. The human rights policy shall specify which groups of affected stakeholders are covered (for example, own workforce and workers in the value chain being distinct from consumers and endusers). And change AR 30. for para. 35 to AR 30. for para. 34	ESRS2	ESRS 2 - General for policies - GDR-P	35.
Excels	CLEERIT	Consultant (including software vendor)	France			I disagree	Create a separate datapoint 9 in G1-1: "In addition to the information required by [Draft] Amended ESRS 2 GDR-P, the undertaking shall disclose whether it has an overarching human rights policy committing to implement the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises."	ESRS2	ESRS 2 - General for policies - GDR-P	35.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	This information should not be deleted: "(e) information regarding the progress of key actions underway and disclosed in prior periods and, if relevant, key actions taken in the reporting year ". Not disclosing on progress, especially for policy goals and key actions without metrics (which is a very common scenario), would result in descreased accountability and increased risk of greenwashing. Just reporting action information, without referens to qualitative progress and/or success, does not give enough information. You can take action, but if the intended outcome is not there, information on the action is much less meaningful. The rationale to reduce granularity is not a priority for this information. CSRD explicitly spells out that an accountability deficit could lead to lower levels of citizen trust in businesses, which in turn could have negative impacts on the efficient functioning of the social market economy (14), and that (18) disclosing on sustainability matters is justified by concerns about the impacts and accountability of the undertaking (18).	ESRS2	ESRS 2 - General for actions and resources - GDR-A	37.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	Does this apply separately for each scope 3 category and pollutant, for example?	ESRS2	ESRS 2 - General for metrics - GDR-M	AR 37.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	Suggestion: add "or desired outcome" for qualitative targets, as a target can be to conduct an audit within a certain time frame, or similar (that will be tracked with action status progress). Suggested wording: "the defined target value (or level or desired outcome when qualitative) to be achieved, including, where applicable, whether the target is absolute or relative and in which unit it is measured;"	ESRS2	ESRS 2 - General for targets - GDR-T	43. (b)
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	Suggestion: add "where applicable," to potentially exclude qualitative targets that will be fullfilled by carrying out actions (see comment above on 43b). Suggested wording: "where applicable, the methodologies, significant assumptions used to define targets, whether the target is required by law, the selected scenarios on which it is based, the key data sources and the level compatibility with national, EU or international policy goals"	ESRS2	ESRS 2 - General for targets - GDR-T	43. (f)
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	See ESRS 1-22 Suggested wording: "The description of the interaction of impacts, risks and opportunities with the undertaking's business model, value chain, strategy and decision-making shall be provided at the appropriate level of aggregation, either for groups of negative impacts, positive impacts, risks or opportunities levels, or at individual negative impact, positive impact, risk or opportunity level, depending on the nature of the impacts, risks and opportunities to reflect the level at which the undertaking manages them."	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 12.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	See ESRS 1-22 Suggested wording: "The description of its material impacts, risks and opportunities shall be provided at the appropriate level of aggregation, either for groups of negative impacts, positive impacts, risks or opportunities levels, or at individual negative impact, positive impact, risk or opportunity level, depending on the nature of the impacts, risks and opportunities and reflecting the level at which the undertaking manages them."	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 23.

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Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	There is no choice for para. 2, so I chose the closest to suggest this wording: 2. This standard refers to disclosing on material impacts, risks and opportunities and disclosing on the topics related to them. In accordance with ESRS 1, the undertaking is expected to focus on the disaggregation that provides the most relevant information, i.e. at individual impact, risk and opportunitie level, or at groups of negative impacts, positive impacts, risks or opportunities level, reflecting their nature and how the undertaking manages them." See comment for ESRS 1-22 for rationale.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	3.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	Suggested wording: "The objective of this DR is to provide an understanding of the interactions between the undertaking's material impacts, risks and opportunities, and its strategy and business model, at the appropriate level of aggregation, i.e. individually or aggregated at groups of negative impacts, positive impacts, risks or opportunities level, including financial effects." See comment for ESRS 1-22 for rationale.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	22.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	Suggested wording: "The undertaking shall apply the requirements provided in this section, when it discloses either in accordance with a topical standard or on an entity-specific basis, on policies, actions, targets and metrics related to material impacts, risks and opportunities, either individually or at a higher level (i.e. aggregated at groups of negative impacts, positive impacts, risks or opportunities),". See comment for ESRS 1-22 for rationale.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	32.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	DP 34 specifies that "information about policies adopted to manage material impacts, risks and opportunities" (not topics), which is correct. The aggregation level should reflect this. See comment for ESRS 1-22 for further rationale. Suggested wording: "(i.e. aggregated at groups of negative impacts, positive impacts, risks or opportunities)"	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	33.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	DP 37 specifies that "then the undertaking implements key actions to manage material impacts, risks and opportunities". The aggregation level should reflect this. See comment for ESRS 1-22 for further rationale. Suggested wording: "(i.e. aggregated at groups of negative impacts, positive impacts, risks or opportunities)"	ESRS2	ESRS 2 - General for actions and resources - GDR-A	36.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	DP 40 specifies that "the undertaking shall disclose the metrics … in relation to material impacts, risks and opportunities". The aggregation level should reflect this. See comment for ESRS 1-22 for further rationale. Suggested wording: "(i.e. aggregated at groups of negative impacts, positive impacts, risks or opportunities)"	ESRS2	ESRS 2 - General for targets - GDR-T	38.
Excels	Chamber of Labour, Austria	Trade union	Austria			I partially agree and partially disagree	The ESRS 2 GOV1 provides: "(…) composition of its administrative, management and supervisory bodies, (…) where it exists, the representation of employees and other workers, and the percentage by gender and by other aspects of diversity that the undertaking takes into account". With regard to the last half-sentence ("percentage by gender"), it should be noted that legally binding quotas for women have been set in several EU MS, and if such a quota exists in concrete terms, this fact should also be mentioned in the report.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	9. (a)
Excels	Chamber of Labour, Austria	Trade union	Austria			I disagree	Information on "(…)whether and how stakeholders have been involved in target setting for each material sustainability matter; (…)" have been moved from ESRS 2 to social issues. The BAK cannot understand this consideration, as the goal-setting process includes not only purely social issues, but also environmental and sustainability issues. Therefore, this regulation must be revised.	ESRS2	ESRS 2 - General for targets - GDR-T	43.
Excels	Chamber of Labour, Austria	Trade union	Austria			I agree	The data point on "stakeholder engagement", especially for employee representatives, must remain at all costs, especially since it is also provided for in the CSRD.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (c)
Excels	Chamber of Labour, Austria	Trade union	Austria			I agree	From the BAK's point of view, it is essential to report on how the positions of the employee representatives have been taken into account by the decision-making bodies of the companies.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 21.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Redundant regarding SBM and PAT (it is expressed in the topical standards) => to be simplified.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	7. (c)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Redundant regarding SBM and PAT (it is expressed in the topical standards) => to be simplified.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	7. (d)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Lack of a common methodology: It is proposed to eliminate the disclosure of information about representation of employees and other workers, as this figure does not exist or is not legally recorded in several European Union countries, meaning that it is meaningless in comparative terms and does not provide any useful information to the user. The disclosure of the percentage of independent board members is not feasible. Given that this is not a generalised obligation for all companies subject to the CSRD, and taking into account that the comparability of the indicator is limited, maintaining this datapoint would not provide homogeneous value to the analysis. For this reason, it is proposed that it be eliminated. Also redundany with possible remuneration and corporate governance reports should be taken into account. The disclosure of Board's gender diversity ratio ist redundant with Directive 2022/2381 (article 7). More flexibility should be granted depending on the legal form and the associated company structure	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	9. (a)

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Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Redundant: Usually the annual corporate governance (management) report has this information. More flexibility should be granted depending on the legal form and the associated company structure	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (c)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Too granular information partially covered by other DPs; There is also an element of redundancy (management report); Concerns on added value of the disclosure (suggestion of taking a broader view and merging different indicators). More flexibility should be granted depending on the legal form and the associated company structure	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (d)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Redundant with the remuneration report requirements in listed companies under the Shareholders Rights Directive (articles 9a and 9b).	ESRS2	ESRS 2 - GOV-2 - Integration of sustainability-related performance in incentive schemes	11.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Redundant with the remuneration report requirements in listed companies under the Shareholders Rights Directive (articles 9a and 9b).	ESRS2	ESRS 2 - GOV-2 - Integration of sustainability-related performance in incentive schemes	11. (a)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Business sensitive information; Redundancy with Supervisory Board Report (part of Management Report).	ESRS2	ESRS 2 - GOV-2 - Integration of sustainability-related performance in incentive schemes	11. (b)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Check redundancy with remuneration report obligations under the Shareholders Right Directive.	ESRS2	ESRS 2 - GOV-2 - Integration of sustainability-related performance in incentive schemes	11. (c)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Still redundancy or contradictions with other DRs/DPs, disproportionate costs and lack of a common methodology. Instead of an overarching disclosure obligation, topic-related due diligence disclosures should be anchored.	ESRS2	ESRS 2 - GOV-3 - Statement on due diligence	13.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Important improvements. Information on the value chain of companies is currently very limited and there is a lack of a clear methodological basis for doing and publishing this exercise. The requested breakdown is not a problem, the problem is the different workload required depending on the extent of the value chain covered.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	18.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Data points for which phase-ins are planned should be omitted entirely or become voluntary.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	6.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	The reporting requirement makes the stakeholder engagement indirectly binding. This should be avoided, as the CSRD does not usually define implementation obligations but reporting obligations. The option of reporting that no dtructured engagement takes place should be introduced.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	The information should be summarized with ESRS 2 -SBM-1 to avoid duplication.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	22.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	The reporting requirement makes the implementation of a resilience analysis indirectly binding. This should be avoided, as the CSRD does not usually define implementation obligations but reporting obligations. The option of reporting that no resilience analysis has been carried out should be introduced - A reference to ESRS E1-3should be introduced.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	24.
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Against simplification. This new requirement would impose a disproportionate burden on companies, particularly when impacts extend across multiple geographic areas. Climate change-related impacts, for example, can span thousands of locations. Gathering this information would represent an excessive workload, and we do not believe the value it might provide to report users justifies the effort involved.	ESRS2	ESRS 2 - General for metrics - GDR-M	41. (b)
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	E2.IRO-1 §11(a), AR 1-8 – Methods & tools to identify pollution impacts/risks/opportunities Allow incorporation by reference to existing site selection/screening methodologies and risk tools documented for regulatory permits (IED) or Taxonomy DNSH. It cuts duplication; leverages audited/regulated files; keeps ESRS narrative focused.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	11. (a)
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	E2.IRO-1 §11(b) – Stakeholder consultation (pollution) Accept a short process statement with a pointer to formal permitting consultations or public inquiries where applicable; no need to repeat minutes/verbatim. Reduces redundancy; relies on formal processes already conducted for permits.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	11. (b)
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	Add an AR under IRO-2 (or in "General PAT" section) expressly allowing incorporation by reference to: (a) EU Taxonomy evidence (TSC/DNSH/MS), (b) IED/E-PRTR registers, (c) other competent-authority portals—provided the report includes a content index. (ESRS 2 already allows a content index and co-location; this simply makes the regulatory link explicit.)	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	26. (e)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	Add an AR under IRO-2 (or in "General PAT" section) expressly allowing incorporation by reference to: (a) EU Taxonomy evidence (TSC/DNSH/MS), (b) IED/E-PRTR registers, (c) other competent-authority portals—provided the report includes a content index (page/paragraph/URL) and a note on any perimeter differences. (ESRS 2 already allows a content index and co-location; this simply makes the regulatory link explicit.)	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	27.
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	Insert a short, standardised "PAT→KPI (Article 8 Taxonomy)" bridge requirement in GDR-A/GDR-T (or by reference from topical standards), with permission to reuse the Article 8 KPI tables and CapEx Plan schedules, and to note the OpEx non-material situation (numerator = 0 + explanation) exactly as in Article 8.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	29.
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	Disclose once; cross-reference thereafter: if a topic (e.g., Pollution E2) is developed in its topical section (policies, actions, targets, metrics), ESRS 2 should not require re-stating the same policy narrative. Proposal : add new AR under GDR-P and a sentence in IRO-2 / PAT section) "Where a policy applies to multiple topics (e.g., pollution and water), the undertaking shall disclose it only once in the sustainability statement, at the place where it is most decision-useful (typically the topical section), and shall cross-reference it from ESRS 2 and any other relevant locations via the content index. ESR 2 should not require policy repetition if a full disclosure is provided later in the report." Aligns with the NMIG (policies can cover several topics and be disclosed once). Uses ESRS 2 AR 24/26 (aggregation/co-location) and AR 22 (content index) that already enable cross-reference.	ESRS2	ESRS 2 - General for policies - GDR-P	33.
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	To enhance assurance and decision-usefulness, we propose a short PAT→KPI (Article 8) bridge in ESRS 2 GDR-A/GDR-T. Undertakings would map key actions/resources/targets to Taxonomy KPIs (turnover/CapEx/OpEx) and, where applicable, the CapEx Plan; they would also be allowed to indicate the OpEx non-material situation with the explanation required by Article 8 Creates a single line-of-sight from actions/targets to regulated KPIs.	ESRS2	ESRS 2 - General for targets - GDR-T	42.
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	Issue : scope should follow financial statements; going beyond is hard to operationalise. Proposal : Keep financial-control perimeter as default; where a different perimeter is used, require a short reconciliation note (why, direction, magnitude) and explicit cross-reference to the affected topical disclosures. Allow a one-row "options used" table (phasing, omissions, confidentiality, events after reporting date) rather than narrative. Draft wording: "Where the sustainability statement reporting boundary differs from the consolidated financial statements, provide a concise explanation and reconciliation; present ESRS 1/2 in a tabular index rather than narrative."	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5. (i)
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	Where climate-related information is already evidenced through files prepared to demonstrate conformance with the Climate/ENvironmental Delegated Act's technical screening criteria (for example, for real-estate and construction activities in the climate mitigation annex), explicitly allow incorporating those by reference, instead of reproducing the same calculations in ESRS 2. When sustainability information is derived directly from EU Taxonomy Delegated Act evidence, explicitly allow referencing rather than recreating parallel computations in ESRS 2. This is consistent with the C/EDA's role and with the Official Journal amendment to 2021/2178 on specific public disclosures. Why: Avoids double work between ESRS and E/C DA files; keeps the sustainability statement anchored to official EU thresholds/criteria.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	AR 1.
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	Where Board oversight and incentive linkages include Climate / Environmental Delegated Act-relevant topics (energy, water, circularity, pollution, biodiversity), allow a crisp cross-reference to the C/EDA evidence pack (e.g., a biodiversity no-go site checklist or a pollution-prevention DNSH protocol) rather than re-describing controls twice.	ESRS2	ESRS 2 - GOV-2 - Integration of sustainability-related performance in incentive schemes	29.
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	In the phased value-chain approach, allow the Phase-1 qualitative mapping to name which value-chain stages are already covered by Climate and Environmental Delegated Act TSC/DNSH procedures (e.g., hazardous-substance restrictions, end-of-life preparation for reuse/recycling, biodiversity-site exclusions) and point to the EDA files in the content index.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	18.
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	Where regulatory consultations or public participation processes linked to permitting (e.g. under IED, biodiversity or land-use regulations) have already gathered stakeholder input on topics relevant to the undertaking's material impacts, risks or opportunities, the undertaking should explicitly be allowed to refer to those processes and the corresponding public register or docket. In such cases, there is no need to duplicate the consultation outcomes or minutes under this Disclosure Requirement, provided that the process and relevance to the business model are clearly explained.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	21.
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	SBM-3 — Interaction with strategy and financial effects (§21–24; AR 12–18) Refine: When explaining anticipated financial effects of climate-related impacts, risks and opportunities, connect them through a single bridge table to: - Article 8 key performance indicators (turnover, capital expenditure, operating expenditure), and, where applicable, the "CapEx Plan"; - Climate/ENvironemental Delegated Acts activity as evidence that underpins the strategy or target (for example, capital programmes to meet technical screening criteria at handover).	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (a)
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I agree	If quantification is not decision-useful due to high measurement uncertainty, ESRS 2 already allows a qualitative path (Option 2), which we recommend keeping.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	4. (b)
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	IRO-1 — Process to identify and assess material impacts, risks and opportunities (§25–26; AR 19) Proposal : Name explicitly the Climate Delegated Act's adaptation workflow (the risk and vulnerability assessment steps for physical climate risk) as an accepted methodology for the identification and assessment of climate-related physical risks in the undertaking's own operations and value chain. Incorporate by reference to the underlying assessment document and any resulting adaptation measures.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (a)

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Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	RO-2 — Material IRO & Disclosure Requirement index (content index) (§27–28; AR 20–23; NMIG 11–13) Proposal : Add a dedicated "Taxonomy evidence" subsection that lists, side by side, Climate Delegated Act items (mitigation/adaptation) and Environmental Delegated Act items (water, circular economy, pollution, biodiversity): objective → activity → evidence location; and show which topical ESRS disclosures are satisfied via cross-reference to those files.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	28. (a)
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	GDR-P — Policies (§33–35; AR 28; NMIG 14–16) Proposal : Where a single policy covers multiple environmental topics that are also framed by the Climate Delegated Act (mitigation and adaptation) and/or the Environmental Delegated Act (water, circular economy, pollution prevention and control, biodiversity), disclose it once in the most relevant topical section and do not repeat it in ESRS 2. Include a cross-reference and list it in the content index. Where the policy's operative thresholds or tests are those of the EU Taxonomy delegated acts, refer to the official evidence file rather than copying thresholds.	ESRS2	ESRS 2 - General for policies - GDR-P	34.
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	GDR-A — Actions and resources (§36–38; AR 29–31) Proposal : Add the explicit reference bridge that maps: - action or resource to the relevant Article 8 indicator (turnover, capital expenditure, operating expenditure) ; and - the Taxonomy delegated act objective and activity, including a reference to the evidence type (for example, "energy performance test file for new building activity; adaptation risk and vulnerability assessment output").	ESRS2	ESRS 2 - General for actions and resources - GDR-A	36.
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	GDR-M — Metrics (§39–41; AR 32–33) For climate performance thresholds that are defined by the Climate Delegated Act (for example, energy performance thresholds for new buildings and related commissioning or testing steps), allow the sustainability statement to reference the evidence package and provide only the short method note that ESRS 2 requires (unit, method version, assumptions), rather than duplicating calculations	ESRS2	ESRS 2 - General for metrics - GDR-M	AR 34.
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	GDR-T — Targets (§42–44; AR 34; NMIG 18–19) When a target is intentionally calibrated to pass a Climate Delegated Act criterion (for example, achieving a specific primary energy demand level at handover, or implementing a set of adaptation measures identified by the risk and vulnerability assessment), permit a direct cross-reference to that file and a short note covering baseline, scope and timing. Where data are still maturing, keep the phased target option (method and baseline first, quantified target next), while ensuring the Article 8 linkage remains visible in the bridge.	ESRS2	ESRS 2 - General for targets - GDR-T	42.
Excels	BDEW	Other - please specify (required)	Germany			I disagree	It is unclear whether the requirement to carry out a LEAP assessment or a similar assessment of one's own locations remains for the DMA of topics E2-E4. The wording of AR 22, "when" and "useful reference," is not commonly used in ESRS 2.0 and is therefore open to interpretation. If a site-level analysis is not mandatory, AR 22 should be moved to the NMIG for consistency reasons	ESRS2	ESRS 2 - Objective	AR 22.
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	BDEW supports flexibilty (may) amendment to disclosure DR in form of a table.	ESRS2	GOV-3 - Statement on due diligence	AR5 for para 13
Excels	BDEW	Other - please specify (required)	Germany			I disagree	Risk management should not be part of GOV-4, as it is already adequately covered and disclosed via financial reporting if environmental risk assessment is integrated in company wide risk assessment. GOV-4 should NOT refer to IRO management (as IRO-1 already requires comprehesive disclosure on IRO management). BDEW supports reduction of scope of GOV-4 to ICS processes for quantitative disclosures for sustainability reporting.	ESRS2	GOV-4 - Risk management and internal controls over sustainability reporting	para 14 / 15
Excels	BDEW	Other - please specify (required)	Germany			I disagree	"undue cost or effort" exemption is not helpful and is unlikely for undertakings in the ESRS regime to be able to refer to this relief.	ESRS2		AR 15 for para 23
Excels	BDEW	Other - please specify (required)	Germany			I disagree	Future concept with a lot of unsecurity. ISSB did not consider critical feedback and recent training paper uses over-simplified examples. Feasibility for more complex companies is not given. In this aspect, the development should be rather focused on CSRD and not on ISSB.	ESRS2	SBM-3 - Interaction of material impacts risks and opportunities with strategy and business model, and financial effects	23
Excels	BDEW	Other - please specify (required)	Germany			I disagree	Clarification that no reporting obligations or more extensive evidence requirements at site/location level (e.g., specific listing/specification of analysis factors or variables per site/location) result for IRO-1.	ESRS2	IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22 for para 26(a)-(g)
Excels	Society for Corporate Governance	Business association (other than association of financial institution)	United States			I disagree	Eliminate the requirement that companies that determine climate change is immaterial provide "the basis for" such conclusion. As further detailed in our concurrently submitted comment letter, this requirement is inappropriate as it seeks disclosure regarding and justification of a lack of materiality and runs contrary to European (including the ESRS generally), US, and international regulatory reporting requirements and voluntary reporting standards that seek disclosure of company-specific material information. Climate change should be treated in the same manner as other sustainability topics – disclosure should not be necessary if the topic is not material to the company. This special treatment for climate change implies a presumption that climate change is a material topic for all entities reporting under the CSRD, effectively pressuring entities to conclude that climate change is material without regard to the reporting entity's specific facts and circumstances. In practice, the existing presumption under CSRD has resulted in companies defaulting to reporting, or planning to report, on climate change regardless of the outcomes of their internal materiality analysis. Assurance providers advising companies on their expected assurance approach have generally indicated an unwillingness to have climate change excluded from companies due to this default presumption of materiality.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28.

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Excels	Society for Corporate Governance	Business association (other than association of financial institution)	United States			I disagree	Eliminate the requirements to disclose CapEx and OpEx on actions taken by the reporting entity to manage material sustainability matters. The revised requirements continue to present the challenges for companies previously flagged by the Society. This information may be commercially sensitive and, if disclosed, could compromise a company's competitive position by providing insights into its cost structures and operational priorities – information that competitors could use unfairly to their advantage. Companies may also face significant challenges when seeking to quantify, produce, and maintain the requested level of financial disclosures, increasing their administrative burden. This detail is also unnecessary for stakeholders to understand a company's sustainability-related IROs, where the action is already described and the expenditures are not material, and would not provide meaningful insight into the effectiveness of actions taken. These challenges persist even when companies are able to disclose a range, as such detail can still share competitive information and may ultimately be unhelpful to stakeholders (e.g., where the disclosed range is so expansive it provides limited or no sense of scale). In the event EFRAG determines not to eliminate these disclosure requirements, we recommend alternatives in our concurrently submitted comment letter.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38.
Excels	Society for Corporate Governance	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	The term "reasonable and supportable," particularly "supportable," needs to be clarified as it could be interpreted as requiring a level of validation or the implementation of governance and control processes that would defeat the term's intended purpose of providing relief to undertakings in situations where the available data is imperfect (see IFRS's Sustainability Reporting Standards FAQs). Since these clauses relate to the inclusion of information in the sustainability statement, "reasonable and supportable information" in this context should mean that the information is relevant and satisfies the fair presentation and qualitative characteristics of information requirements specified in ESRS 1. Such an approach is consistent with the acknowledgement in Section 7.2 of ESRS 1 that disclosed information is subject to the application of judgment, as well as measurement and outcome uncertainty.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 15.
Excels	Materiality	Consultant (including software vendor)	Poland			I disagree	The current structure of the disclosure is overly complicated, with unclear sentence constructions that make it difficult to understand. It should be discarded or simplified.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	9.
Excels	Materiality	Consultant (including software vendor)	Poland			I disagree	This section, transferred from GOV-4, is simplified but fails to explain what due diligence entails. It also lacks a reference to ESRS 1 and presents unclear expectations compared to the current ESRS standards. Paragraph 13 should include a cross-reference to ESRS 1 for clarity and alignment	ESRS2	ESRS 2 - GOV-3 - Statement on due diligence	13.
Excels	Materiality	Consultant (including software vendor)	Poland			I disagree	It would be preferable to remove the phrase '…if the undertaking refers to this hierarchy in defining its actions' and instead require mandatory reporting according to the mitigation hierarchy for all actions related to the natural environment.	ESRS2	ESRS 2 - General for policies - GDR-P	37. (b)
Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	Suggest this is not may but shall for ease of comparability of the information	ESRS2	ESRS 2 - GOV-3 - Statement on due diligence	AR 5.
Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	Agree in substance but use of 'stakeholders', 'key stakeholders', 'affected stakeholders' and 'key affected stakeholders' is not consistent and needs an editorial check.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (a)
Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	informed by due diligence process should be 'whether and how' not just whether	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (c)
Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	Suggest turning into datapoint and amend text to highlight that social impacts eg on communities (s3) are also context / location specific	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	European Transport Workers' Federation (ETF)	Trade union	Belgium			I agree	Very important to keep reporting of workers' representatives, as in many Member States this is not a requirement to report in corporate governance statements	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (a)
Excels	European Transport Workers' Federation (ETF)	Trade union	Belgium			I agree	It is crucial to keep this datapoint in on reporting on stakeholder engagement, particularly for workers' representatives, as this is a requirement in CSRD	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (c)
Excels	European Transport Workers' Federation (ETF)	Trade union	Belgium			I agree	It is crucial to report how workers' representatives views have been taken into account by the undertakings' decision making bodies	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 21.
Excels	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy			I agree	The amount of information requested and the level of detail on stakeholder involvement in the formulation of policies, actions, and objectives was a very complex issue in the data collection and reporting processes. The elimination of several requests on this subject was a welcome change that simplifies the reporting process, eliminating a disproportionate workload.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	20.

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Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I disagree	We acknowledge that the financial effects disclosure requirement has been removed and consolidated under ESRS 2 SBM-3, which addresses financial impacts across all material topics in a cross-cutting manner. This consolidation allows for a more integrated and structured approach to financial risk management. However, it may reduce the visibility of pollution; water; biodiversity, Use of resources and waste specific financial effects, particularly in sectors with high environmental impacts and risk, and in the same way that have exposure to environmental regulations. While this change may simplify reporting, it limits users' ability to understand the potential financial risks associated with this environmental topics, such as regulatory liabilities, contamination-related costs, or opportunities linked to sustainable innovation. The absence of this requirement could weaken the connection between sustainability and financial performance, which was one of the core objectives of the ESRS. To preserve relevance and decision-usefulness, it may be helpful to recommend optional environmental specific financial disclosures, especially for high-impact sectors. This would ensure that critical risks and opportunities remain visible within the broader financial reporting framework.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23.
Excels	GKK Partners	Consultant (including software vendor)	Germany			I partially agree and partially disagree	Suggestion: 1) Presentation in a central tabular format - also for comparability. 2) If ESRS 1 "dilution" of "partial" metric disclosure is used by undertaking, an additional column in the 1) propsed table should be added. With this the user can see if a undertaking makes use of this "relief" and the danger to compare metrics of different sustainability statements (which have not the same basis: estimates/primary, full data) migh be lowered.	ESRS2	ESRS 2 - General for metrics - GDR-M	41.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	- In paragraph 9 (b) it is unclear to us, whether we have to disclose a process, the outcome of the process or both. Clarification would be needed.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (b)
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	- Paragraph 14 and 15 refer to the risk management for sustainability reporting (as in the original ESRS). However, as the risk management system and internal controls are usually two separate systems, a change in wording would be appreciated, to clearly state which system needs to be described.	ESRS2	ESRS 2 - GOV-4 - Risk management and internal controls over sustainability reporting	14.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	- Paragraph 20: it is unclear to us, why workers' representatives are explicitly mentioned as stakeholder group.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	- Paragraph 24: Disclosure requirements about the resilience analysis are mentioned here AND in ESRS E1. It should be located in one standard only.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	24.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	- AR 22 gives the impression that companies have to conduct the DMA on site level, please re-word to avoid misconceptions.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	22.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I agree	The revised PAT show, that EFRAG understood reporting reality (e.g., the now explicitly mentioned possibility to use qualitative targets, to disclose headcount as resource). Also the amount of negative statements (we do not have, etc.) was significantly reduced	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	29.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	With regards to the composition of the administrative, management and supervisory bodies, we deem it important to retain prior mandatory data points on executive vs non-executive members (former paragraph 21 a). This is important information for understanding the governance of impacts and is consistent with GRI 2-9-c-i. As pointed out in the Basis for Conclusions, ESRS 2 GOV DRs are not fully covered by other legal requirements and not all undertakings under the scope of the CSRD are legally required to publish corporate governance statements and remuneration reports.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	9. (a)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	With regards to the composition of the administrative, management and supervisory bodies, we deem it important to retain prior mandatory data points on member's experience relevant to sectors, products and geographic locations of undertaking (former paragraph 21 (c)) and how sustainability-related skills and expertise relate to material impacts, risks and opportunities (former paragraph 23 (b)). This is important information for understanding the governance of impacts. Proposed paragraph 9 b does not give information on the current competencies of members but only asks for information about the determination process. These two former data points could be merged and simplified in line with GRI 2-9-c-viii (member's competencies that are relevant to the impacts of the organization). A new AR could clarify that competencies relevant to the impacts of the undertaking include competencies relevant to impacts commonly associated with the undertaking's sectors, products, and geographic locations.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	9. (a)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	Paragraph 9 c asks for responsibilities in cases where responsibility for key decisions has not been delegated to another body. We deem it important to understand the process in cases where such responsibility has been delegated, in line with former paragraphs 22 (c), (c)i, and (c)ii and 26 (a). This is also in line with GRI 2-13. At a minimum, we suggest that this be retained in the NMIG.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (c)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We deem it important to retain prior mandatory data point on the purpose of stakeholder engagement (former paragraph 45 (a)iv). This is important information for understanding an organization's approach to meaningful stakeholder engagement and is consistent with GRI 2-29-a-ii.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (a)

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Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	AR 11 for para. 20(a) explains that key stakeholders refer to key categories of 'affected stakeholders' (as defined in ESRS 1 AR 10). This can be confusing as stakeholders are defined in the glossary as 'those who can affect or be affected by the undertaking'. If paragraph 20 (a) focuses only on affected stakeholders (and not other stakeholders that can affect the undertaking), this should be clarified within paragraph 20 (a) itself. In addition, the qualifier 'key' stakeholders is not clear and it is not explained in the ARs. We suggest paragraph 20 (a) be reworded to ask for the 'categories of stakeholders' the undertaking engages with, which is in line with the wording of ESRS 1 AR 10 and GRI 2-29-a-i.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (a)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We deem it important to retain prior standalone mandatory data point on the process to identify, assess, prioritise and monitor potential and actual impacts on people and environment, informed by due diligence process (former paragraph 53 (b)). The proposed simplification and aggregation has lost crucial specificity, and the description of the process to identify impacts risks getting lost within a general description of the double materiality process. Retaining former paragraph 53 b is also consistent with GRI 3-1-a-i.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (a)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We deem it important to retain prior standalone mandatory data point on whether the undertaking is involved with the material impacts through its activities or because of its business relationships, describing the nature of the activities or business relationships concerned (former paragraph 48 (c) iv). The proposed wording in paragraph 28 (a) 'how and where impacts, risks and opportunities are connected to its business model, its own operations and its upstream and downstream value chain' is more general and may lead to less specific information. Retaining former paragraph 48 (c)iv is also consistent with GRI 3-3-b.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (a)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	Punctuation is missing after 'material impacts', to clarify the distinction between policies, actions and targets for material impacts on one hand, and risks and opportunities on the other hand.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	32. (a)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	It may be useful to clarify that the human rights policy commitment does not need to be reported for each material impact; rather a consolidated description of the human rights policy commitment and the affected stakeholders covered should be provided.	ESRS2	ESRS 2 - General for policies - GDR-P	35.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We deem it important to retain prior standalone mandatory data point on key actions taken (along with results) to provide for and cooperate in or support the provision of remedy for those harmed by actual material impacts (former paragraph 68 (d)) within this DR. The inclusion of prevention, mitigation and remediation in paragraph 32(a) is not fully clear with regards to the status of these contents as data points in their own right. We suggest that actions to prevent and mitigate potential negative impacts on one hand, and to remediate actual negative impacts on the other, become standalone mandatory data points within paragraph 37, to ensure this information is not overlooked and can be easily identifiable by users and stakeholders. This would also support alignment with GRI 3-3-d.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	37. (a)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We deem it important to retain prior mandatory data point on reporting progress/performance against targets (former paragraph 80 (j)). The rationale for its removals is that this is covered in the objective of the DR. However, it is important that this is stated as an explicit data point requirement so that it is not overlooked. This is also consistent with GRI 3-3-e-iii.	ESRS2	ESRS 2 - General for targets - GDR-T	43.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	It should not be mandatory to report on current financial effects under CSRD, this will already be reported under financial reporting. Please avoid duplication of reporting efforts. Additionally, in the current Delegated Act, in the Exposure Drafts or NMIG- no guidance is given on how to calcute the financial effects. The DR in its current form should be clarified.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	We welcome the removal of the requirement referring to the next annual reporting period with respect to current financial effects, as this requirement was previously methodologically unclear and difficult to distinguish from anticipated financial effects. However, we continue to see conceptual challenges in the definition of "current financial effects" of material risks by combining financial effects and risks within a single disclosure requirement. By year-end, risks have either materialized and led to financial effects or have not. If they have materialized we are of the opinion that disclosures of material financial effects are covered by respective IFRS standards. Given the lack of guidance on this topic, it should be clarified that qualitative information should be accepted. Also, we recommend aligning the sustainability reporting requirements with existing risk reporting standards, which should serve as the basis for such disclosures for all risks and not only ESG-risks. In our opinion, sustainability reporting should not override or extend these principles through financial disclosure requirements in the sustainability statement. We recommend that this disclosure requirement should be removed entirely or made explicitly optional.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The reporting instructions for policies on impacts only cover efforts regarding negative impacts ("prevention, mitigation or remediation"), please also give possibility to report on positive impacts (for example, "management")	ESRS2	ESRS 2 - General for policies - GDR-P	33.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	We urge the removal of the implied mandatory disclosure requirement of all internal performance indicators (KPI) because the datapoint requests "shall disclose the metrics that it uses to evaluate its performance". This datapoint should only focus on the mandatory datapoints of the ESRS. The company has more KPI internally that are used for monitoring but these cannot all be made public.	ESRS2	ESRS 2 - General for metrics - GDR-M	40.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	This datapoint actually holds 6 mandatory datapoints inside (1 methodology, 2 assumptions, 3 requirement by law, 4 scenarios, 5 data sources, 6 compatibility with national or international policy goals). Please simplify this datapoint to request only 'methodology' and make the additional 5 elements illustrations of what the undertaking may include.	ESRS2	ESRS 2 - General for targets - GDR-T	43. (f)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The term "reporting boundary" seems to address under Par. 4 only the scope of consolidation but not the value chain. A definition of "reporting boundary" is both missing in ESRS 1 and the glossary. It would be helpful if a definition is provided to clarify what is meant by "reporting boundary".	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	4.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	We would propose to list the different deviations (ESRS 2 - 5.(a)-(k)) in the order of appearance in the ESRS 1. This would further align the strcuture of ESRS 1 and the disclosures under ESRS 2. It would increase readability for the preparer as the exemption could be easier traced.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	The AR should be moved to BP-1 to follow the structure that each AR sits next to the respective DR is covers.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	AR 1.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Unclear what is meant with "how the administrative, management and supervisory bodies determine whether appropriate skills and expertise are available". Is it sufficient to have a "competency profile" for the respective body/committee or is a descrpition of all sources for skills/expertise necessary (how can bodies leverage on existing expertise in- and outside of the company)? DR seems vague and not decision-relevant for users. Either delete the DR or replace it by a summary of the necessary skills and expertise necessary for the oversight of the strategies and other measures to respond to material IROs for each body.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	9. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	What is meant with "impacts' performance"? In the current Delegated Act, the DR focuses solely on "impact". Suggestion to delete "performance" to make the DR clearer.	ESRS2	ESRS 2 - GOV-2 - Integration of sustainability-related performance in incentive schemes	11. (c)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Datapoint should be deleted as a list of sectors does not provide any added value for external users (no decision-useful information). As there will be no sector-specific ESRS, details on significant sectors will not be provided by preparers (or only based on other frameworks such as SASB). If no clear provision on the use of a specific sector classification is given, the disclosures will be incomparable even within one industry (no added value for users). If NACE code as classification is used (as suggested by NMIG 5 for SBM-1) a reference to the financial reporting makes no sense as financial reporting is not based on NACE codes.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Datapoint should be deleted as a list of sectors does not provide any added value for external users (no decision-useful information). As there will be no sector-specific ESRS, details on significant sectors will not be provided by preparers (or only based on other frameworks such as SASB). If no clear provision on the use of a specific sector classification is given, the disclosures will be incomparable even within one industry (no added value for users). If NACE code as classification is used (as suggested by NMIG 5 for SBM-1) a reference to the financial reporting makes no sense as financial reporting is not based on NACE codes. Also EU Taxonomy might not fit properly in that classification.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 7.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	1. Deletion of the reference to sectors ("and on a sector") as there will be no sector-specific ESRS and the disclosure of a list of significant provides no added value for users (see comments on ESRS 2 Par. 17b and AR 7). 2. The order of the AR should follow the order of the DR. That means the AR 10 should be the first in the list. 3. In this paragraph is not clear if preparers need to report information also for group of products and services with less thank 10% revenues which could lead to overeporting; It would be better to restore the previous wording with an emphasis on "more than 10%".	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 10.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Not necessary to highlight "workers' representatives" as key stakeholders, as combination of datapoint and AR 11 clarifies the reporting on key affected stakeholders. "workers' representatives" should be deleted. Alternative: mention all categories of affected stakeholders as outlined in ESRS 1 AR 10.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	We support the deletion of the mandatory disclosure requirements on antifipated financial effects.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 17.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	Very useful to allow the reporting on quantitative information- to be either in single amounts or ranges. For reporting on planning figures ranges are preferred as single amounts do not reflect the uncertainty attached to planning figures.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 18.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The term "negative impacts" should be used instead of "adverse impacts".	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The application requirement should be deleted as this could lead to unnecessary discussions with auditors on the level of detail to be included. If the ESRS requirements are clearly described, this AR should be redundant. It seems as if EFRAG is aware of the fact that the reporting on Par. 26a-e will most likely lead in many cases to boilerplate reporting of mostly useless information for users of sustainability statements. A technical description of the DMA process seems not to be really relevant for users.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 20.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The DMA process does not require the inclusion of site-level / location-based analysis according to ESRS 1. Why is this AR required? Should it clarify that this is additional information on the DMA in case site-level / location has been considered? We suggest to clarify the role of this AR and the link to the disclosures on the DMA and the DMA prcess requirements themselves.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Useful option to limit the reporting volume and to clarify PAT disclosures. Editorial remark: This AR should be put last as it refers to Par. 30 whereas all other ARs refer to Par. 29.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 27.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Deletion of paragraph "When reporting on policies, actions and targets, the undertaking shall report relevant information, avoiding information that is boilerplate, and therefore not relevant for users for example when policies and actions have been implemented to comply with law and regulation, or when the necessary information is already provided in accordance with [Draft] Amended ESRS 2 SBM-1. " as this might lead to unnecessary discussions with auditors on what constitutes "boilerplate information" and whether a policy should be reported or not. Certain policies and actions relate to compliance risks (e.g. related to anti-corruption) which makes it difficult to distinguish at the end whether the policy is in scope of this limitation or not. Moreover, should wish to avoid disclosures that are boilerplate, Disclosure Requirement that lead to irrelevant reporting should be either deleted completely (as they provide no value for the user) or re-drafted to make them useful for users	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 28.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Unclear if action undertaken in previous years that still have an effect on material IROs in the reporting period can be reported. It should be made clear that action from previous years can be reported as well if still relevant.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	37. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	"significant resources" should be changed into "significant financial resources" as the reminder of the whole par. 38 is about financial resources. EFRAG should think about giving an indication what is meant by "significant". The term "significant resources" is not defined.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	"financial resources" should be changed into "significant financial resources" to align the wording within par. 38.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	"financial resources" should be changed into "significant financial resources" to align the wording within par. 38.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	"financial resources" should be changed into "significant financial resources" to align the wording within par. 38.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38. (c)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The wording should be aligned throughout the whole par. 38 including the connected AR. The wording "significant financial resources" should be used to align the wording within par. 38. "Resource allocation" and "resources" should be replaced accordingly. It should also be clarified that a disclosing a monetary range for the planned allocation of significant financial resources over the whole time period is sufficient.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	AR 35.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Deletion. This AR is not fully related to Par. 38. Par. 38 only refers to disclosures regarding current or future monetary resources. "Non-monetary resources" are not part of the disclosure requirements - there is only a mention of "other resources" under Par. 38a but not Par. 38c. It is therefore not understandable why "examples of other non-monetary resources" may be included if the requirement (Par. 38 in general) does not ask for it. The AR should be deleted. Moreover, this is a a "may" datapoint and might broaden the scope of resources to be disclosed and might lead to discussions with auditors	ESRS2	ESRS 2 - General for actions and resources - GDR-A	AR 36.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	This disclosure requirement doesn't add a lot of value for the user of the CSRD Report and can lead to boilerplate disclosures.	ESRS2	ESRS 2 - General for policies - GDR-P	34. (d)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	We think that in general that this DR will still provide a significant reporting burden as opposed to the value that's provided to the users of the sustainability statement.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The information required under this new Application Requirement is already covered in BP-2, making it redundant. We therefore request its removal. Repeating the same content adds unnecessary complexity to the report and may compromise its clarity and conciseness, without contributing additional value to the disclosure.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 14
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The information requested in this paragraph is already addressed in paragraph 22. Therefore, we request the removal of the repeated linkages, as they are redundant and do not contribute additional value to the disclosure.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The information requested in this paragraph is already addressed in AR 13. Therefore, we request the removal of the Application Requirement to avoid repetition.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 24.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We consider that, instead of requiring references to specific pages or paragraphs, the linkage should be made at the section level of the report. This approach would significantly ease the process for preparers when compiling the content table, as referencing individual pages or paragraphs is highly resource-intensive and time-consuming. Linking at section level would maintain traceability while improving efficiency and usability.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 25.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The requirement to report environmental conditions and specific characteristics of the area where environmental impacts occur should be removed. This level of detail is excessive and results in boilerplate disclosures, as it is not specific of the undertaking and it would be based on external information. In general, the location-based approach to environmental impacts proposed in the standards is disproportionate and should be entirely eliminated. It introduces unnecessary complexity, increases the reporting burden, and does not align with the principles of relevance and proportionality.	ESRS2	ESRS 2 - GOV-3 - Statement on due diligence	41. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Please see comment for ESRS 2 para. 30	ESRS2	ESRS 2 - General for targets - GDR-T	44.

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Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	This comment applies to the whole DR GOV-1. It would be recommended to clearly state that the whole information required under this DR is limited only to sustainiability related matters. This is specially relevant in the case of para 20.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	8.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	In line with what is established by Directive UE 2022/2381 of the European Parliament and of the Council on improving the gender balance among directors of listed companies, gender diversity should be reported as a percentage, and not as a ratio.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	AR 2.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Language should be reviewed in order to be clear about that the expertise refers to the whole body has, not the different individuals that compose it.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	AR 3.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	It has been added "for each metric the undertaking shall disclose, for environmental metrics, the specific environmental conditions and characteristics of the area where the impact is occurring" but it is not clead and could lead to very granular reporting. Furthermore, this provision cannot be applicable for Climate Change E1, since emissions are a transboundary phenomenon and their impact is not location-based, unlike biodiversity E4. Overall, the expressions "environmental conditions" and "characteristics of the area" lack clarity and should be reconsidered. It may be worth deleting as it does not provide any added value for external users (no decision-useful information).	ESRS2	ESRS 2 - General for metrics - GDR-M	41. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	In this paragraph is not clear if preparers need to report information also for group of products and services with less thank 10% revenues which could lead to overeporting; It would be better to restore the previous wording with an emphasis on "more than 10%"	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 10.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Deletion of mandatory requirement to disclose anticipated financial effects. While also a requirement of the IFRS Sustainability Disclosure Standards, (potential future) financial effects from risks and opportunities are already indirectly taken into account when preparing financial statements or are covered as part of the risk and opportunity report in the management report. Calculating sustainability-related anticipated financial effects related to individual sustainability-related risks and opportunities lack reliable and harmonized guidance and therefore provide little information value. Additionally, reporting on financial opportunities is not a requirement in preparing finanical reports and can reveal sensitive strategic information, leading to competitive disadvantages for European companies. It is recommended this is addressed in both ESRS and to collaborate further with the ISSB with the same objective. Voluntary reporting of qualitative information on anticipated financial effects for companies willing to disclose information could be contemplated.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	It is unclear what needs to be reported related to "disclose its exposure to the heightened risk of incidents related to child labour and forced or compulsory labour by type of operations (such as manufacturing plant), or by countries or geographies with operations. [...]". Further clarification on "exposure" needed by referring to existing frameworks such aus UN Guiding Principles or rephrasing	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (e)
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	We support option 2 of disclosing anticipated financial effects (qual. Information only). There is no valid and auditable quantitative information available. There is no guidance or assurance on the process of data collection for this disclosure.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (b)
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Cutting resilience disclosures form the topical standards (e.g. E4) but remaining the overall disclosure requirement in ESRS 2 makes it seem like there is no actual burden reduction but mere cutting of data points that still lead to the same result/required effort to fulfill the disclosure. Undertaking still has to analyse the risks arising from the topical standards, from our understanding. There is no guidance on how to conduct the process, no definition for the term of "resilience". It is very unlikely disclosures will result in comparable results. Add further guidance and simplifications or cut datapoint.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	24.
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	GDR-T 43. and and E1-1 - 13. cover the same topic and could be simplified in the same question. Moreover, more guidance is needed on the definition of ecological thresholds.	ESRS2	ESRS 2 - General for targets - GDR-T	43. (g)
Excels	UNICEF	NGO	United States			I partially agree and partially disagree	UNICEF welcomes the references to the UNGPs, ILO Declaration on Fundamental Principles and Rights at Work, and OECD Guidelines. However, Recital 49 of the CSRD (copied below) included a reference to the UN Convention on the Rights of the Child, as well as other international human rights instruments. Given that children (all persons below the age of 18) account for almost one third of the world's population, we believe it is important for their rights to be highlighted when referencing international human rights instruments. Recital 49 of the CSRD: "The sustainability reporting standards should also specify the information that undertakings should disclose with regard to the human rights, fundamental freedoms, democratic principles and standards established in the International Bill of Human Rights and other core UN human rights conventions, including the UN Convention on the Rights of Persons with Disabilities, the UN Declaration on the Rights of Indigenous Peoples, the UN Convention on the Rights of the Child, the ILO Declaration on Fundamental Principles and Rights at Work, the fundamental conventions of the ILO, the European Convention for the Protection of Human Rights and Fundamental Freedoms, the European Social Charter, and the Charter of Fundamental Rights of the European Union. "	ESRS2	ESRS 2 - General for policies - GDR-P	35.
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We recommend making it clear that the disclosure of the phase-in options applied by the undertaking is required through a distinct DP, beyond the reference in the objective of DR BP-1. In this context, EFRAG could consider adding an option to present such information along with the list of the DRs required under DR IRO-2, § 28 (d).	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	3.
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We invite EFRAG to clarify what kind of "differences" in reporting boundary from the consolidated financial statements could occur in order to restrict the "deviations" that would be acceptable from an ESRS perspective.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	4.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	The references to ESRS 1 are inexact and should be corrected (i.e. refer to § 82, 83 and 84 instead of § 83, 84 and 85). Besides, we understand that EFRAG's proposal no longer requires to provide the reason for the restatement of comparative figures. We believe this is information that is instrumental to the good understanding of the adjusted comparative figures. We would therefore recommend reintroducing this requirement.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5. (b)
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We note that this list is not consistent with the numbering of paragraphs in ESRS 1 (ED) and the presentation of the reliefs (some changes have indeed occured compared to the so-called v1.6). EFRAG should therefore modify the references to ESRS 1 to cover all applicable reliefs to metrics including the relief under § 90. Besides, it should be taken into account that § 91 considers a partial scope for metrics also in the value chain. Therefore this DP should be merged with § 5 (j).	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5. (d)
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	Starting from this datapoint and for the rest of § 5, the references to ESRS 1 are inaccurate and should be corrected (§95 - and not §94 - for the update of disclosures for events after the end of the reporting period , etc.)	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5. (e)
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We recommend limiting the ability to present information outside the General information section to the disclosures covered by § 5 and maintaining the information to be provided under § 4 on the reporting boundary and the value chain consideration within this section in order to preserve the integrity of DR BP-1.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	AR 1.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We believe the methodological specification provided by former para 21 (e) on the calculation of the percentage of independent Board members was useful and should be reintegrated in an AR related to para 9 (a) (similarly to what has been done for the board's gender diversity with AR 2).	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (a)
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	The inclusion of the following clarifications brought by EFRAG in ID 1013 could be considered by adding a paragraph to ESRS 2 ARs: "This metric shall be calculated as (a) a percentage of variable remuneration with the the proportion of the variable remuneration dependent on sustainability-related targets and/or impacts in the numerator and the variable remuneration in the denominator. Remuneration is the amount recognised in the current period, i.e. the amount recognised as an expense (i.e. regardless of whether or not it is paid out) under the applicable accounting GAAP in the financial statements."	ESRS2	ESRS 2 - GOV-2 - Integration of sustainability-related performance in incentive schemes	11. (c)
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	As the ESRS do not mandate any behaviour, we invite EFRAG to specify that this DP only applies when a due diligence process is in place.	ESRS2	ESRS 2 - GOV-3 - Statement on due diligence	13.
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	The inclusion of the following clarifications brought by EFRAG in ID 395 could be considered: "The term 'revenue' is to be understood as the amounts presented in the income statement of the undertaking's financial statements in accordance with the applicable legislation and/or accounting standards, i.e. IAS 1 paragraph 82 (a) (or any future standard superseding IAS 1) – if IFRS Standards are applied – or generally accepted national accounting principles (national GAAP)." This being said, an update will be necessary considering the new IFRS Accounting Standard for the presentation of financial statements (IFRS 18).	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (c)
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We invite EFRAG to leverage on ID 644 to clarify what "active in" refers to. According to this ID, the undertaking should indeed be considered active in the concerned sectors provided that it derives any revenues from the activities described in the definitions of the applicable EU regulations. This means also that a financial institution will not be considered "active in" the sectors it finances or allocates funding. This important clarification should be in our view included in the main body of the standard (in AR).	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (c)
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We recommend clarifying what EFRAG means by disclosing a "concise description" of the material IROs. 2025 reportings under the Set 1 have shown very different approaches in the granularity of the information that has been presented to meet former § 48(a). We therefore recommend EFRAG to provide illustrations in the NMIG to promote comparability.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (a)
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	As mentionned in Part 2 of the survey, we encourage EFRAG to further clarify that regardless of the approach adopted to perform the materiality assessment (i.e., top-down or bottom-up), the objective of the DMA is still to identify material IROs which is not clear under AR 23 in ESRS 2. Though aggregation was already possible under former AR 18 in SBM-3, we encourage EFRAG to reiterate that material information should not be obscured if the disclosure is not expressed in terms of a single IRO.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 23.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We recommend clarifying what level of information is expected in the justification that the undertaking shall provide when it did not deem climate change as material as it could otherwise lead to diverging interpretations. Illustrative wording in the NMIG would be useful.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (b)
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	Though we agree in principle with the possibility given to report information on PATs at a higher aggregation level than the material IROs, we recommend EFRAG clarifying the circumstances under which such aggregation would be relevant.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	29.
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We recommend clarifying whether the information can be presented in a centralized way instead of being duplicated in each topical section in relation to the material IROs, in view of what EFRAG states in question 10 of the FAQ accompanying the ED ("…indicate with a single datapoint for the list of material topics for which there are no PATs").	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	30.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	EFRAG has introduced in ESRS 2 para 31 a possibility to structure and present the information depending on how management priorities have been set regarding material IROs. ESRS 2 log of amendments indicate that this new paragraph "allows to have different level of details for different issues when they have different priorities in the way sustainability topics/IROs are managed." We believe para 31 should be clarified to avoid a "two-tier reporting system" depending on whether a material IRO is prioritized by management or not. Reporting information on material IROs that are not addressed or fully addressed through PATs is useful information (even though there will of course be less to say than for an IRO managed as a priority by management). The principle of information materiality equally applies to all pieces of information to determine what is the right level of details to be presented to cover a material IRO.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	31.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	The second paragraph of this AR implies that policies that have been put in place to comply with law and regulations are not relevant for the purpose of PAT reporting. We believe the description of such policies remains important when enabling a full understanding of how the undertakings manages the related material impacts, risks and opportunities. We therefore invite EFRAG to refine the wording of this AR to highlight such distinction.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 28.
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We note that this paragraph requires that a company that discloses amounts of financial resources allocated to the key actions in the reporting period indicate the corresponding line items and/or notes where they are included in the financial statements. We agree with this requirement but note that it is in contradiction with the revised principles on connected information in ESRS 1 under § 114 and 115. As indicated in Part 2 of this survey, we encourage EFRAG to maintain current requirements in the Set 1 regarding providing sufficient information to understand the direct or indirect connectivity with the financial statements.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38. (b)
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We recommend clarifying whether indicating if an action is part of a collaborative action is mandatory or voluntary (i.e. example of contextual information), as the "useful" qualification could be interpreted in both ways.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	AR 32.
Excels	University of Warwick, Coventry, United Kingdom	Academia	United Kingdom			I partially agree and partially disagree	Instead of "a concise description of its actual and potential, positive and negative material impacts" say "a concise description of its actual and potential, positive and negative material impacts including in each case the following details (a) the social/environmental issue identified (b) stakeholders affected (c) the location and (d) the extent and intensity of the impact." Reporting precisely on impacts is by far the most important part of the reporting process. We have recently written a 2 page policy brief which makes the case for the importance of this issue in more detail. See https://warwick.ac.uk/fac/soc/law/research/centres/chrp/publications/due_diligence_and_european_sustainability_reporting_standards_10.09.25.pdf	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (a)
Excels	University of Warwick, Coventry, United Kingdom	Academia	United Kingdom			I partially agree and partially disagree	It is vitally important that companies report individually on material impacts. Our research has identifed that this is absolutely vital to the credibility of corporate disclosure in due diligence processes. So please delete references to allowing companies to report "at the appropriate level of aggregation". We have recently written a 2 page policy brief which makes the case for the importance of this issue in more detail. See https://warwick.ac.uk/fac/soc/law/research/centres/chrp/publications/due_diligence_and_european_sustainability_reporting_standards_10.09.25.pdf	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 23.
Excels	UNEP-WCMC	NGO	United Kingdom			I agree	IRO-1 looks good and it makes sense to simplify like this, rather than repeat the assessment approach for every topic standard.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26.
Excels	UNEP-WCMC	NGO	United Kingdom			I agree	It is good that the AR emphasizes location-specific considerations and value chains. The reference to the LEAP approach developed by TNFD is useful.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	UNEP-WCMC	NGO	United Kingdom			I disagree	UNEP-WCMC recommends making categorization of actions according to the mitigation hierarchy mandatory for all environmental actions – it is not too difficult and significantly improves the ability of report users to understand the companies' current or planned actions.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	AR 33.
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	For report users to be able to correctly interpret the metrics reported, it would be useful if report preparers were asked to indicate where they are using estimates or proxies, rather than measurements (e.g. using site-level or remote sensing data). This will also help with assurance.	ESRS2	ESRS 2 - General for metrics - GDR-M	41.
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	We find that information on the significant risks and corresponding measures is lacking. This is particularly noteworthy because AR 6 also refers to individual risk factors.	ESRS2	ESRS 2 - GOV-4 - Risk management and internal controls over sustainability reporting	15.
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	We can imagine that the currently missing information (as examples) on what is to be described/reported will lead to very different results and thus poorer comparability.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	18.
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	In the interest of transparency, the use of this option should be accompanied by a mandatory disclosure. Under the current framework, the requirement for a description of the scope of the policy, or of its exclusions, in terms of the undertaking's own operations, upstream and/or downstream value chain is set out in ESRS 2.34b. ESRS 2.30, however, stipulates that in cases where no policies, actions or targets exist, the undertaking is only required to state their absence, without any further explanation. As a result, the disclosure obligation under ESRS 2.34b effectively ceases to apply. This creates a transparency gap, which should be addressed by introducing a clear requirement to disclose the use of the simplification provided under ESRS 1.91.	ESRS2	ESRS 2 - General for policies - GDR-P	34. (b)
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	We recommend to streamline 2.37a and c as both of them refer to the time horizon. This could be moved to 2.37 (before 2.37a starts).	ESRS2	ESRS 2 - General for actions and resources - GDR-A	37.
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	In ESRS 2.43, we recommend a rewording from IROs to topics: The undertaking shall disclose the measurable, time-bound, outcome-oriented and qualitative or quantitative targets it has set related to its material impacts, risks and opportunities (change to topics) either individually or at a higher level (i.e. groups of impacts, risks and opportunities or related topics).	ESRS2	ESRS 2 - General for targets - GDR-T	43.
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Delete; the information is not decision making useful for external stakeholders	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	AR 4.

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Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Adapt. This should be sufficiently covered in annual report; a high-level summary of sustainability-related governance could be included here and the rest in the annual report	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (a)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Delete as this refers to the "how"; the outcome of managing sustainability topics is relevant for stakeholders, not the "how"	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (b)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Delete as this refers to the "how"; the outcome of managing sustainability topics is relevant for stakeholders, not the "how"	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (c)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Delete as this refers to the "how"; the outcome of managing sustainability topics is relevant for stakeholders, not the "how"	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (d)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Delete as this refers to the "how"; the outcome of managing sustainability topics is relevant for stakeholders, not the "how"	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (e)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Delete. This is covered in the compensation report, and only relevant to stock listed companies.	ESRS2	ESRS 2 - GOV-2 - Integration of sustainability-related performance in incentive schemes	11.
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The information about significant group of products and markets are typically part of other parts of the management report and hence, should not be repeated in the Sustainability Statement.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	17. (a)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The information about "how" stakeholders interest are brought to the attention of AMSB should be deleted. This information is related to internal reporting processes and does not provide any decision usefulness. The outcome of managing sustainability topics is relevant to stakeholders, not the "how".	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	19.
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Delete; it refers to a description of the internal information procedures about material IROs which is not an information considered to be decision making useful for any stakeholder.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (c)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Disclosing a qualitative analysis of its resilience to the material risks should be part of the materiality analysis and should not be disclosed in ESRS 2 as a duplicate.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	24.
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Delete. Recommendation to report the outcome and not the process; it would be an option to disclose the process in a separate publication (voluntarily)	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	25.
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Delete. Recommendation to report the outcome and not the process; it would be an option to disclose the process in a separate publication (voluntarily)	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26.
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Clarify whether LEAP approach is mandatory or voluntary	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	It should be clarified that the disclosure of significant financial resources (CAPEX/OPEX) allocated to the implementation of key actions should not be reported on an individual action level. Instead, the reporting of significant financial resources should be based on an aggregation of significant CAPEX/OPEX assigned to all key actions, if those key actions are considered part of an implementation plan which has been taken into consideration for internal planning purposes. Rationale: Reporting of OPEX is not done in financial systems based on actions. Hence, any assignment of OPEX to single actions is rather an exception, but typically not possible to do. CAPEX usually also serves more than just one purpose and hence, it is typically not possible to assign CAPEX to single actions related to an implementation plan.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 35.
Excels	Kirchhoff Consult	Consultant (including software vendor)	Germany			I disagree	The addition of 'if applicable' has been removed in the revision. As the data point is now formulated, it would be necessary to specify for each target whether it is required by law, on which scenarios it is based, etc. This is completely impractical and only leads to significantly more, but not material, text. In addition, it is illogical to specify a selected scenario for some targets, e.g. in the social sector. We therefore propose reinstating the addition 'if applicable'. Otherwise reporting on targets under the amended ESRS will be much more complicated than under the original ESRS.	ESRS2	ESRS 2 - General for targets - GDR-T	43. (f)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	A reference to materiality should be added.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	A reference to materiality should be added.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 23.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	Current financial effects are not necessarily presented "individually" in the financial statements. Direct reference is therefore not feasible.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (a)
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	We support Option 2 but regarding Option 1 - if it is adopted -, the drafting of point c) should be clarified as regards the "combined financial effects" : are undertakings required to publish aggregated information on anticipated financial effects unless not useful ?	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	Para 41 introduces new requirements. Current drafting of para 77 should be maintained.	ESRS2	ESRS 2 - General for metrics - GDR-M	41.
Excels	ETUC	Trade union	Belgium			I agree	Very important to keep reporting of workers' representatives, as in many Member States this is not a requirement to report in corporate governance statements	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (a)
Excels	ETUC	Trade union	Belgium			I agree	It is crucial to keep this datapoint in on reporting on stakeholder engagement, particularly for workers' representatives, as this is a requirement in CSRD	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (c)
Excels	ETUC	Trade union	Belgium			I agree	It is crucial to report how workers' representatives views have been taken into account by the undertakings' decision making bodies	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 21.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	General comment: EFRAG should develop comprehensive non-mandatory implementation guidance for each topical standard. The guidance should comprise instructions and examples how to conduct the materiality assessment for the topic, how to apply the disclosure requirements, and to calculate the metrics. Sectoral examples could be added, where appropriate.	ESRS2	ESRS 2 - Objective	1.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I disagree	From our reading of the standard, there are overalps between SBM-1, SBM-3 and IRO-2. All three disclosure requirements include a description of the business model, strategy and decision-making with regards to material sustainability impacts, risks and opportunities: SBM-1: "The undertaking shall disclose the following information about the key elements of its general strategy that relate to or affect material impacts, risks and opportunities" SBM-3: "The undertaking shall provide a high-level description of the interaction of the material impacts, risks and opportunities, with its business model, value chain, strategy and decision-making" IRO-2: "concise description of ... imaterial impacts...as well as its material risks and opportunities...and how and where impacts, risks and opportunities are connected to its business model, its own operations and its upstream and downstream value chain." We recommend to integrate these provisions in SBM-1 and remove the duplications from SBM-3 and IRO-2. SBM-3 should be focused on current and anticipated financial effects.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Provisions on how to conduct the double materiality assessment (DMA) for environmental topics (especially E2, E3, E4 and E5) are proposed to be deleted completely from the standards. Also the NMIG does not contain related guidance. Generic requirements in ESRS 1, chapter 3 and ESRS 2 IRO-1 do not include topical specifications. Topical instructions for the DMA are of high importance to ensure that undertakings conduct the process in a comparable manner to consistently apply the ESRS. For users it is imporant to gain a get a good understanding of the undertaking's process and how it was applied to specific sustainability topics in order to assess reported information meaningfully.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	(continued): We recommend for the finalization of ESRS 1 (chapter 3) and ESRS 2 IRO-1 to clarify for environmental topics: 1.that screening of sites is an expected step in identifying impacts and assessing their materiality, 2.that local quality of air and soil, water risk factors, incl. water quality, water availability in highly or moderately water-stressed areas, threatened species and ecosystems in biodiversity-sensitive areas need to be part of the screening process, and 3.that material impacts at a specific site or location can trigger the need for providing disaggregated information when reporting policies, actions, targets and metrics The LEAP approach should also be mentioned in ESRS 1 as a possible approach to conduct the impact materiality assessment for environmental topics. Lastly, NMIG on ESRS 1 and 2 regarding the double materiality assessment process should include the essence of the former application requirements from the topical environmental standards.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	As regards the disclosure requirements about anticipated financial effects from sustainability-related risks and opportunities (ESRS 2 SBM-3), we recommend that EFRAG chooses Option 1 (para. 23 (b) and (c)), which would require reporting of quantitative information and, if not possible, qualitative information. Only this option is in line with EFRAG's mandate to improve interoperability with the IFRS standards. In addition, we recommend to clarify that quantitative information on anticipated financial may not need be overly complex and that future financial values are not necessarily expected. Rather, information on the anticipated financial effects of risks should be presented in terms of the value of today's assets and business activities that may be impaired if a material sustainability risk materializes. This approach is used in amended ESRS E1-11 and can provide valuable insights based on information that is generally available.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	AR 33 explains that actions to address environmental impacts can be classified by lever of the mitigation hierarchy (avoidance, minimization, restoration, compensation). We recommend to establish a link to the mitigation hierarchy also in GDR-P on policies.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	AR 33.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Add an application requirement to link CapEx for key actions to the CapEx plans under the EU Taxonomy (Art. 8, DA) which increases interoperability between ESRS and the Taxonomy: "If applicable, the undertaking shall relate its CapEx amounts to the , the CapEx plan required by Commission Delegated Regulation (EU) 2021/2178."	ESRS2	ESRS 2 - General for actions and resources - GDR-A	AR 35.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	The requirement to report all data types and sources used to calculate the metric could be reduced to key data sources. Otherwise, this requirement would require very detailed information which is likely not provide decision-useful.	ESRS2	ESRS 2 - General for metrics - GDR-M	41. (a)
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I disagree	We appreciate the intention of ESRS 2 para. 41 (b) to provide contextual information for environmental metrics, but find that the requirement to report "specific environmental conditions and characteristics of the area where the impact is occurring" for each metric is practically not feasible. This is because many ESRS environmental metrics, for example GHG emissions, pollutant emissions or resource use, do not measure impacts on the environment but pressures. The impacts resulting from these pressures are often not known or complex to determine for an undertaking. For biodiversity metrics (ESRS E4-5), however, such requirement is better suited. Considering, that ESRS 2 para. 41 (d) does already require to report relevant contextual information for all types of metrics, we recommend to remove para. 41 (b) and include the requirement in ESRS E4-5.	ESRS2	ESRS 2 - General for metrics - GDR-M	41. (b)
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	We recommend to include topic-specific application requirements to SBM-3 para. 23 (anticipated financial effects) related for pollution and biodiversity. For pollution, the AR should refer to revenues from products that contain substances of very high concern, OpEx and CapEx related to major incidents and costs from environmental protection and remediation of pollution as aspects that can be reported as actual or anticipated financial effects. There should also be a link to biodiversity and ecosystem-("nature-)related financial effects that the undertaking can report here, if material. If it proofs difficult to reinstate these requirements in the AR for ESRS 2, they should at least be included in the non-mandatory guidance.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (b)
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Add an application requirement to link CapEx for key actions to the CapEx plans under the EU Taxonomy (Art. 8, DA) which increases interoperability between ESRS and the Taxonomy: "If applicable, the undertaking shall relate its CapEx amounts to the , the CapEx plan required by Commission Delegated Regulation (EU) 2021/2178."	ESRS2	ESRS 2 - General for actions and resources - GDR-A	AR 35.
Excels	TIC Council	Auditor	Belgium			I partially agree and partially disagree	BP1. New 4 c): Proposal: "the extent to which the preparation of the sustainability statement has taken into account existing ISO management system(s) already certified, EMAS and/or sustainability information and data or sustainability topics already verified under a national accreditation (regulation (EC) No. 765/2008)"	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	4.
Excels	TIC Council	Auditor	Belgium			I partially agree and partially disagree	Relevant management system(s) to apply are high level structure ISO management systems, especially ISO 14001, ISO 50001, ISO 45001 and EMAS, (please note the ISO coming standard 53001 on the SDGs). Various types of verified sustainability information, based on internationally recognized schemes, covering relevant topics within the ESRSs, are for instance ISO 14064-1 (climate change), ISO 14064-3 (Verification and validation of GHG emissions), ISO 14040 and 14044 (lifecycle assessments).	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	AR 1.
Excels	TIC Council	Auditor	Belgium			I partially agree and partially disagree	New 9f): "the extent to which the administrative, management and supervisory bodies have dealt with the issues under points d and e under an accredited, certified ISO management system"	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9.
Excels	TIC Council	Auditor	Belgium			I partially agree and partially disagree	New AR 4 for para. 9f) If the enterprise runs a certified ISO management system or is registered under EMAS the top level management is engaged and responsible for PAT's as well as performing supervision of the effectiveness of the system and efforts, including improvements.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	AR 4.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	TIC Council	Auditor	Belgium			I partially agree and partially disagree	Include text in sentence "… due diligence process, and is based on criteria laid down and evaluated on a regular basis in a ISO MS run by the enterprise	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (c)
Excels	TIC Council	Auditor	Belgium			I partially agree and partially disagree	Include for context in sentence "….specific to its process, (new text:) including processes defined within a ISO MS with a scope for the material sustainability topics. ….	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 20.
Excels	TIC Council	Auditor	Belgium			I partially agree and partially disagree	Include text in sentence "….corresponding material impacts, risks and opportunities. It shall be disclosed whether the undertaking's policies, actions, metrics, and targets are operated under an accredited and certified ISO Management System, with specific reference to the scope and certification of such management system."	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	29.
Excels	TIC Council	Auditor	Belgium			I partially agree and partially disagree	Include text: Where policies, actions, metrics, and targets are implemented through an accredited ISO Management System, the undertaking should include this in the disclosures to consolidate the basis of information given. Information shall be given relating which material sustainability topics are certified.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 26.
Excels	TIC Council	Auditor	Belgium			I partially agree and partially disagree	New 36 c: (c) information about whether these key actions has been certified under a ISO Management System, specifying the scope and standard of certification"	ESRS2	ESRS 2 - General for actions and resources - GDR-A	36.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I agree	Beyond the reference in the objective of DR BP-1, we recommend including a specific DP on the disclosure of the phase-in options applied by the undertaking. In relation to this DP, we suggest also to add an option to present such information at DR level within the list required by DR IRO-2, § 28 (d).	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	3.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I agree	We recommend clarifying the "differences" in the reporting boundary from the consolidated financial statements to which the undertaking is required to report upon, that would then correspond to the only acceptable "deviations" from an auditor's perspective.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	4.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	We recommend maintaining the information required by § 4 on the reporting boundary and the value chain consideration within the General information section in order to preserve the integrity of DR BP-1.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	AR 1.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	We suggest extending this DP to risks (and not only to adverse impacts) as this is consistent with business practices and relevant information for users.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	7. (d)
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	We invite EFRAG to review this "shall disclose" DP in order to ensure consistency with the non-binding illustrative nature of Appendix A of ESRS 1.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	7. (a)
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I agree	As the ESRS do not mandate any specific behavioural requirement with regard to due diligence actions, we invite EFRAG to rephrase this DP as it is to be reported only if the undertaking has put in place a due diligence process.	ESRS2	ESRS 2 - GOV-3 - Statement on due diligence	13.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I agree	We invite EFRAG to clarify in the ARs what "active in" refers to by leveraging on ID 644. According to this ID, the undertaking should indeed be considered "active in" the sectors covered by this DP provided that it derives any revenues from the activities described in the definitions of the applicable EU regulations. This means also that a financial institution will not be considered "active in" the sectors it finances or allocates funding.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (c)
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I disagree	We consider the requirement under AR 23 contradicts the data point under § 28(a) of ESRS 2 as this AR seems to indicate that an undertaking is not required to disclose the list of the identified material IROs and can aggregate such IROs (at the level of a group of IROs or related topics) without giving the detail of the outcome of the DMA. If EFRAG's intent is to require that each material IRO be related to a material topic in the DR IRO-2, this should be redrafted to avoid wrong interpretations of which information is to be presented. We believe it is of the utmost importance that undertakings be required to give the list of their material IROs, even if such IROs can then be aggregated for reporting purposes when providing information on policies, actions and targets put in place to manage them.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 23.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I agree	We invite EFRAG to clarify that the information can be presented in a centralized way, in consistency with the indication made in question 10 of the FAQ accompanying the ED ("…indicate with a single datapoint for the list of material topics for which there are no PATs").	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	30.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	We suggest rephrasing the last part of this AR as follows, as the description of the PATs implemented to comply with certain EU laws or regulations that are specifically covered by the ESRS (e.g. REACH) could provide relevant information for users and contribute to comply with the related DPs: "When reporting on policies, actions and targets, the undertaking shall report relevant information, avoiding information that is boilerplate, for example when describing policies, actions and targets that have been implemented to comply with law and regulation, and avoiding redundancies when the necessary information is already provided in accordance with [Draft] Amended ESRS 2 SBM-1."	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 28.

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Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	The term "environmental conditions and characteristics of the area where the impact is occurring" is undefined. As drafted, it could range from very high-level geography (e.g., "Mediterranean region") to overly granular scientific descriptors, leading to inconsistent reporting. Without a clear definition and minimum data fields, disclosures will vary widely in scope and precision, undermining comparability across undertakings and topics (E2–E5). This also weakens the linkage to risk/resilience analyses that depend on location-specific context (e.g., water scarcity, protected status, ecological sensitivity). We recommend providing a definition and examples that could include spatial scale/ecological unit to be used, status and sensitivity (e.g., legal protection status), relevant pressure indices (e.g., water stress index for water topics), socio-environmental dependencies (e.g., reliance on local ecosystem services, community sensitivity if relevant) and make clear that the spatial scale selected must match the impact pathway (e.g., catchment for water, critical habitat for biodiversity).	ESRS2	ESRS 2 - General for metrics - GDR-M	41. (b)
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	Targets "based on conclusive scientific evidence" require clarity on which thresholds, at what spatial scale, and what evidence hierarchy applies. Otherwise, targets may look "science-based" but be non-comparable, non-auditable, or ecologically irrelevant for the impact area. We recommend further describing "conclusive scientific evidence" in the Application Requirements, drawing from established hierarchies (e.g., peer-reviewed literature, recognised scientific bodies such as IPCC, authoritative datasets, legal designations with a science basis, and recognised methodologies such as SBTN) thus requiring undertakings to disclose: • the type of evidence used (peer-reviewed, governmental, industry framework, etc.); • the source and publication date; • any material uncertainties or known scientific debates; • how the evidence has been downscaled or adapted to the specific location/context; • whether the evidence is externally validated or aligned with recognised scientific frameworks. In addition, we recommend clarifying in NMIG that where multiple thresholds or evidence sources exist, undertakings should prioritise most local, legally binding, and science-backed thresholds, while reconciling with global frameworks when relevant.	ESRS2	ESRS 2 - General for targets - GDR-T	43. (g)
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	It has been added "for each metric the undertaking shall disclose, for environmental metrics, the specific environmental conditions and characteristics of the area where the impact is occurring" but it is not clead and could lead to very granular reporting. Furthermore, this provision cannot be applicable for Climate Change E1, since emissions are a transboundary phenomenon and their impact is not location-based, unlike biodiversity E4. Overall, the expressions "environmental conditions" and "characteristics of the area" lack clarity and should be reconsidered.	ESRS2	ESRS 2 - General for metrics - GDR-M	41. (b)
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	We recommend making disclosures on anticipated financial effects voluntary. Forward-looking financial estimates lack established methodologies, risk misleading users, and conflict with the financial statements' recognition and measurement bases. The commercial, strategic, and operational challenges of incorporating such data into statutory reports argue strongly against maintaining it as a compulsory requirement. Financial reporting of this nature should remain within the scope of the financial statements.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I agree	Para. 25 Equinor welcomes the simplifications in expected DMA process description.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	25.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I agree	Equinor supports simplification in removing IRO-1 sections from the topical standards.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	25.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	Equinor does not consider this a very value adding requirement. If important for some stakeholders this information need should be possible to solve through other means, for example future electronic tagging.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (f)
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	Requesting financial and other resources allocated to the key actions, including amount of financial resources is not very value adding since it does not say anything about the potential outcome or effectiveness. Stakeholders likely care more about the results (e.g., emissions reduced, potential positive effacts for biodiversity, livelihoods supported) than about how much was spent. It also does not offer much value in terms of comparison between compnaies. The term "significant" is not clearly defined. Different companies operate in different contexts (size, industry, geography), so X million in one sector may be negligible but in another sector transformative. There may also be challenges related to scoping of what to include (and not) in a financial figure given complex organizational contexts, indirect contributions, etc. Suggest focusing sustainability reporting on material impacts and descriptions of main actions. Detailed allocation of financial resources should be more an internal management detail rather than an external indicator of sustainability performance.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	Suggest deleting paragraph 41 b. Requiring the specific environmental conditions and characteristics of the area where the impact is occurring for environmental metrics may be labour-intensive, challenging and provides little additional insight. It imposes a disproportional burden on companies without significantly improving the value of the reporting and should therefore be removed.	ESRS2	ESRS 2 - General for metrics - GDR-M	41. (b)

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Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	We support increased flexibility in the materiality assessment of the broader value chain. To further enhance legal clarity and operational feasibility, we recommend that the standard explicitly state that the materiality assessment of value chain impacts should be risk-based. This would ensure a proportionate approach, focusing efforts on areas where impacts, risks, and opportunities are most likely to arise, and is consistent with international due diligence frameworks.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (b)
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	Ref. to para.27-28 We are concerned that IRO-2 combines multiple, distinct elements—materiality -outcomes, human-rights exposures, DR compliance, and EU legislative datapoints—into a single disclosure. This reduces readability, disrupts the narrative flow, and may create unnecessary duplication. We recommend separating narrative on material impacts and risks, dedicated human-rights disclosures, and administrative or tabular content into clearly signposted sections or appendices to improve coherence and usability.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	27.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I agree	Equinor supports Disclosure 34(d) as it appropriately limits the requirement to describe consideration of stakeholder interests in policy-setting, where applicable, solely to social topics, ensuring clarity and practical relevance	ESRS2	ESRS 2 - General for policies - GDR-P	34. (d)
Excels	UGT-ESPAÑA	Trade union	Spain			I agree	Very important to keep reporting of workers' representatives, as in many Member States this is not a requirement to report in corporate governance statements	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (a)
Excels	UGT-ESPAÑA	Trade union	Spain			I agree	It is crucial to keep this datapoint in on reporting on stakeholder engagement, particularly for workers' representatives, as this is a requirement in CSRD	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (c)
Excels	UGT-ESPAÑA	Trade union	Spain			I agree	It is crucial to report how workers' representatives views have been taken into account by the undertakings' decision making bodies	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 21.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially agree The relief in ESRS 1, paragraph 45(b) is for some reason not listed in ESRS2-5. Users should be informed about any topics that offhand could be assumed (by the user) to be significant to the business model, but due to reasonable and supportable EVIDENCE not being available to assess the materiality level (i.e. data are not reliable to assess materiality), the impact or risk is not reported (if this is the case). Furthermore, and while we support the reasoning behind the reporting requirements, we have noted that wording indicate a checklist format as well as it imposes significant burdens, e.g. in relation to updated estimates and information gathered af the end of the reporting period as this might be part of the normal operating procedures with sustainability and therefore not separable. Likewise, adding additional information or applying general relief form metrics might require details vs. materiality of information that would expand the reporting beyond what is useful. We suggest reconsidering the wording.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially agree The reporting requirement assumes a "full process", while it does not cater for the "update" envisaged in ESRS 1, paragraph 29. We are missing a reflection of the disclosure in its second year and onwards. We recommend it is added that an entity which already have reported on it's DMA process is only required to update on the process conducted in the FY covered by the annual report. (Similar to how you would normally provide strategy updates in the midst of a strategy cycle). This is to ensure that the entity is not repeating information already disclosure in the previous year and which might not have been repeated in the current year, if the underlying assumptions for the DMA have not changed and therefore an updated DMA and associated processes have not been conducted. In these circumstances there should be text which specifies, what the current FY processes have been.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (a)
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially agree We believe there are some overlaps between GDR-T and the requirements related to GDR-M and BP / description of accounting principles.	ESRS2	ESRS 2 - General for targets - GDR-T	43.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	This disclosure requirement is changed from "may" to "shall" and therefore adds to the reporting obligations. We do not find an appropriate reasoning for this and believe this adds unnecessary complexity and diverts from the overall purpose of the amendments. We believe that the original "May" MUST either be kept as a "May" or substituted with a "Can", but definitely not changed to a "Shall" (as this also adds documentation and disclosure requirements). Proposed change (marked with capital letters): 44. "If the undertaking has not set any measurable outcome-oriented targets, it CAN/MAY disclose whether and, if so, how it nevertheless tracks the effectiveness of its policies and actions in relation to its material related impacts, risks and opportunities either individually or at a higher level..."	ESRS2	ESRS 2 - General for targets - GDR-T	44.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	We don't agree with moving relevant "may" disclousures entirely to NMIG without specyfying their role in assurace. Our suggestion: 1) keep a list of key "may" discousures in the main text, mandatory when material or; 2) add guidance for assurers on when to require additional information.	ESRS2	ESRS 2 - Objective	1.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I disagree	BP-1 (par.5) should be strengthened: each comply/ explain declaration must be supported with a short description of the decision (e.g., why different time horizons were adopted) or a reference to documentation (e.g. materiality assessment).	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I disagree	We request reintroducing a mandatory disclouse of key elements of the ESG reporting control and risk managment system (roles, verification procedures, data owners). Refer to GOV-1 par. 8 and provide a minimum disclousure template.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	8.

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Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	Information on board/comittee ESG competence and oversight mechanism should remain mandatory (not just NMIG). Suggest a minimum disclousure of roles, meeting frequency and material issue escalation process.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	While we support the simplification and the option to disclouse PATs once if they relate to multiple IROs (par.29), we strongly recommend reintroducing the obligation to explain the absence of PATs (par. 30). Simply stating that no policy/action/target exists does not allow users to understand whether this is due to immaturity of management systems, strategic choice, or lack of materiality.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	29.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	While we support the simplification and the option to disclouse PATs once if they relate to multiple IROs (p.29), we strongly recommend reintroducing the obligation to explain the absence of PATs (p.30). Simply stating that no policy/action/target exists does not allow users to understand whether this is due to immaturity of management systems, strategic choice, or lack of materiality.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	30.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I disagree	In accordance with the previous point 65c, which has been deleted. If we don't designate a person responsible for implementing the policy, no one feels responsible for its fulfillment. Furthermore, the deletion of this point is contrary to OECD guidelines.	ESRS2	ESRS 2 - General for policies - GDR-P	34.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I disagree	In accordance with the previous point 65f, which has been deleted. We believe that this point should be reinstated, as reports are a source of knowledge and interested parties can find out where these documents are available on the basis of the report. This is the only source of information about where the company informs them about this.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	34.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I disagree	Please note that the stress test analysis is still located in two places: ESRS 2 point 24 and ESRS E1 (DR E1-3). Many entities find it extremely difficult to separate these two resilience analyses. We recommend combining the resilience analyses into a single disclosure point, taking into account the different specifics of climate change resilience. We recommend preparing ARs to support entities in reporting their resilience analysis.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	24.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	In connection with the removal of Appendix C to ESRS 2 and the removal of point 2 to ESRS 2, it is necessary to clarify and specify whether the description of IRO-1 should apply to all subject areas (even those that emerged as non-material in the DMA process) or only those that emerged as material in the DMA process. We recommend supplementing this, for example, by adding AR information for clarification.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	25.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	(ii) which of the provisions listed... shall the undertaking only specify which provisions have been used or, in case they have been used, a brief description should be provided as well?	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	In relation to the mentioned "paragraphs of ESRS 1", what about the use of others phase in provisions listed on the ESRS 1, ANNEX D (ESRS 1, par 127), beside the ones included in pag 6 and 7 below?	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	"When available" should be added at the end of the sentence	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	7.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	what about positive impacts? It should be included "or to foster positive ones"	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	7. (d)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	What' s the meaning of the "results of"?	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	7. (d)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	To be added an additional bullet containing "Should the undertaking have no policies, actions, metrics, or targets in place relating to these areas, it shall be explicitly stated."	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	7. (e)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	this disclosure requirement should be better focused on: 1) the expertise and competences the AMS body already have in sustainability topics. (GRI 2.9.VII) 2) measures taken to advance the collective knowledge, skills, and experience of the highest governance body on sustainable development. (GRI 2-17)	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (b)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	To be added :22(d)) how the administrative, management and supervisory bodies "or/and other bodies with sustainability-related responsibilities" oversee the setting of...	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (d)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	We would suggest to delete : "including whether the body(ies) or individual(s) have considered trade-offs associated with those impacts, risks and opportunities."... due to its difficulty	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (e)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	PIs, bear in mind that the term sustainability-related expertise is not directly mentioned on par 9 (b)	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	AR 3.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	To be added: This information may be presented either in a general manner or through a detailed breakdown specifying the impacts, risks, and opportunities associated with each individual element.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	4.

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Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	To be addeded "its committees, or other bodies within the organization with sustainability-related responsibilities". Updated version... incentive schemes and remuneration policies linked to sustainability topics for members of the administrative, management and supervisory bodies, its committees, or other bodies within the organization with sustainability-related responsibilities	ESRS2	ESRS 2 - GOV-2 - Integration of sustainability-related performance in incentive schemes	11.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	New proposal : The undertaking shall disclose whether it has identified any risks associated with sustainability reporting. Where such risks have been identified, the principal risks, as well as the risk management and internal control processes or systems implemented to address them, shall be disclosed.	ESRS2	ESRS 2 - GOV-4 - Risk management and internal controls over sustainability reporting	15.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	`The order could be modified to facilitate a better description: 1. a description of its business model and value chain (currently par 18) 2. the list of its significant sectors (currently par 17.b) 3. the significant groups of products and/or services offered, significant markets and/or customer groups served, and the sustainability-related goals that it has associated to them (currently par 17.a) 4. where applicable, a statement indicating, along with the respective revenues, whether the undertaking is active in: i. the fossil fuel, chemical production, controversail weapons, cultivation of tobacco (par 17.c) ...	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I agree	Please clarify which products should be considered dangerous	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (a)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	to be added: aligned with the financial statements. the list of its significant sectors aligned to financial statements including activities that are internal to the group,	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (b)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	In order to facilitate comparability, an AR clarifying par 18 related requirements could be added, including, for instance key features of the upstream and downstream value chain, inputs, outputs.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 7.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Positives impacts, risks and opportunities should be mentioned as well.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 10.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	We would suggest to modify a) by:) An overview of the principal stakeholders and the primary communication channels that have been established within the organization.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (a)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	We would suggest to modify b) by: b) The main results derived from engaging with these stakeholders, specifically in relation to identifying and evaluating impacts, risks, and opportunities.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (b)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Please ensure that the mention to "workers representative" is adapted and clarified for multinational organizations with a large number of legal entities. Specifically, it is important to specify which legal entity is responsible for involving workers' representatives to fulfill reporting obligations.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (c)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	We would suggest to update the order ot SBM-3, IRO-1 and IRO-2 to facilitate traceability and clarity of the information: - Begin with IRO-1: Clearly explain the process and methodology used for the DMA. - Proceed to IRO-2: Present the main results of the DMA, including the list of IROs and other significant findings. - Conclude with SBM-3: Describe how the resulting list of IROs is linked to the business model. This revised order facilitate better comprehension by first establishing the methodology, then reviewing the results, and finally illustrating how these outcomes connect with the overarching business model.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	21.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	We would prefer option 1	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (b)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Determined anticipated financial effects is costly and difficult. We would suggest to clarify the meaning of "without undue cost or effort"	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 15.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	When referred to "the key methodologies applied", we would suggest to add "specifying whether they are integrated into the undertaking's general procedures (for instance, risk management process, due diligence process)"	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (a)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I agree	This par should be connected with the one included in SBM-1	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (b)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	This DP is focused on negative impact. We would suggest to include a mention to negative ones.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (c)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	We would suggest to exchange "consultations" for "engagement": whether and how the process includes engagement with.... This is streghed in AR 21 for para 26(d), since a mention to "engagement" processes is included.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (d)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	We would suggest to include a mention to risks and opportunities as well: (d) whether and how the process includes engagement with affected stakeholders and external experts to understand the impacts, risks and opportunities;	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (d)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	We would suggest to add an additional DP: i) whether and how the undertaking prioritizes risks and opportunities based on their relative financial effects and likelihood, and whether this is informed and aligned by the undertaking's corporate risk methodology (or similar)	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	We would suggest to reincorporate a mention to "internal control measures": a description of the decision-making procedures and internal control measures; an	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (g)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Please consider previous comment in relation to "workers representative" (line 23)) and how multinational companies with legal entities around the world should interpretate and consider this requirement.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 21.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Prevention, mitigation and remediation are terms linked to negative impacts. PIs include some terms to also covered positive ones.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	32. (a)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Prevention, mitigation and remediation are terms linked to negative impacts. PIs include some terms to also covered positive ones.	ESRS2	ESRS 2 - General for policies - GDR-P	33.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Since information regarding the channels used to communicate policies is requested in the social standards, I recommend including the link as a requirementd: whether the policy is publicly available, the link shall be provided	ESRS2	ESRS 2 - General for policies - GDR-P	34.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	We would suggest to include clarifications in relation to "where significant"	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	to be deleted to avoid overexplanation	ESRS2	ESRS 2 - General for targets - GDR-T	43. (a)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	To be added "when applicable":the methodologies, significant assumptions used to define targets, whether the target is required by law, and, when applicable, the selected scenarios on which it is based, the key data sources and the level compatibility with national, EU or international policy goals; an	ESRS2	ESRS 2 - General for targets - GDR-T	43. (f)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Header does not correspond to what is then described respectively it would make sense to split up the IRO-2 into two sub-components. Suggestion: Change wording to reflect the split proposed: DR IRO-2: Description of mMaterial impacts, risks and opportunities and disclosure requirements included in the sustainability statement Under DR IRO-2 the objective in Paragraph 27 would have to be amended: The objective of this DR is to provide an understanding of the outcome of the materiality assessment, in terms of material impacts, risks and opportunities and material information reported in accordance with ESRS DRs. Paragraphs 28 (a), (b), (c) and (e) would then have to be allocated to IRO-2; see separate comment for Paragraph 28 (e) DR IRO-3: Disclosure requirements included in the Sustainability Statement Paragraphs (28) (d) and (f) would then have to be allocated to IRO-3 and would have to be renumbered	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	All paragraphs in this section need to be reworked to be consistent within ESRS 2 and with any other ESRS. Similar to GRD-A the focus should be on key policies.	ESRS2	ESRS 2 - General for policies - GDR-P	
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: If GDR-P is changed to focus on key policies, GDR-A would have to follow suit The use of the term resources is inconsistent within this section. On the one hand there is mentioning of CapEx and OpEx, on the other hand there is mentioning of financial and other resources. Suggestion: Wording should be made consistent. Consider using the term resources in this section and add the definition of resources to the Appendix with acronyms and defined terms.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Paragraphs 41 (b) and (c) are dispensable because (b) is already implicitly covered in ESRS 2 Paragraph 41 (a) and (c) is already covered in ESRS 1. Suggestion: Delete Paragraphs 41 (b) and (c)	ESRS2	ESRS 2 - General for metrics - GDR-M	41.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: There seems to be a typo. Suggestion: Change wording: when performance is assessed against specific sustainability-related targets and/or impacts metrics, the targets or metrics used; and	ESRS2	ESRS 2 - GOV-2 - Integration of sustainability-related performance in incentive schemes	11.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I agree	The possibility of disclosing information at group level for IROs or at topic level is supported.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	Not all income positions of credit institutions can be included in the sector-based assessment. The data point should therefore not, or at most only qualitatively, be reported by credit institutions. Quantification is only relevant in the context of the manufacturing sector.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (c)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Why is it necessary to call out workers' representatives; would suggest deleting; this would then also align with AR 11 for para. 20 (a). Suggestion: Change wording: whether and how the administrative, management and supervisory bodies are informed about the views and interests of key affected stakeholders (including workers' representatives) with regard to its material impacts, risks and opportunities, either individually or at a higher level (i.e. groups of impacts, risks and opportunities or related topics)	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (c)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I agree	We welcome that the qualitative analysis of resilience appears to be sufficient as a mandatory disclosure.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	24
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	We consider a mandatory requirement to describe the DMA process to be unnecessary. As these are audited processes, an appropriate DMA is assumed. Experience with the 2024 reports shows that process descriptions are largely uniform, provide little meaningful information, and are of limited decision-usefulness. The focus should instead be placed on metrics.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Inconsistent wording: use the term negative impacts instead of adverse impacts; in addition, be careful with the use of the term "risk" which has a very specific meaning in ESRS; it is also questionable why in this context the adverse/negative impacts are emphasized. Suggestion: Change wording: the scope of operations and value chain covered, with an indication of whether it focuses on specific activities, business relationships, geographies or other factors that give rise to heightened risk of adverse impacts;	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (b)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Is it necessary to specify all of these? If yes, are they not all aspects of (a), i.e., should they be sub-components to (a)? Suggestion: Consider streamlining	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (b) to (h)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Why is this separately called out? If this is a result of Draft Amended ESRS S1 and ESRS S2 should it not be exclusively addressed in these topic-specific standards?	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (e)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: The table of all the datapoints that derive from other EU legislation should be restricted to those that the undertaking has assessed as material. From a user perspective it is well understood that things not being disclosed are not material. Suggestion: Change wording: a table of all the datapoints that derive from other EU legislation as listed in Appendix A of this Standard, if material and indicating where they can be found in the sustainability statement or, for those that the undertaking has assessed as not material, that they are 'Not material'.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (f)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: The term metrics is missing Suggestion: Change wording: Information about policies, actions, metrics and targets shall enable an understanding of the level at which the undertaking is addressing its material impacts, risks and opportunities, i.e. at topic or sub-topic level. In instances where the undertaking has adopted policies or put in place actions or set metrics or targets for certain aspects only, this shall be reflected in the way the disclosure is prepared and presented, enabling an understanding of how the covered aspects relate to the corresponding material impacts, risks and opportunities	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	29.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	It continues to be expected under the GDRs that a "nil statement" be explicitly included in the text: "If the undertaking has not adopted policies, actions and targets with reference to a topic related to material IRO, it shall disclose this fact." In the Basis for Conclusions, however, No. 65(c) states: "Clarifying that PATs are only to be reported 'if you have' them (i.e., no behaviour mandated)." This principle of avoiding unnecessary nil statements is therefore not applied consistently. We consider nil statements to be redundant, as they unnecessarily extend the report without contributing to clarity or relevance. Proposal: All requirements mandating disclosure of the absence of elements should be removed. A general clarification could be introduced instead: what is not reported is to be understood as not existing or not material.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	30.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: The order of metrics and targets does not follow the way how it is described later in ESRS 2. Suggestion: Change wording: The undertaking shall apply the requirements provided in this section, when it discloses either in accordance with a topical standard or on an entity-specific basis, on policies, actions, targets and metrics and targets related to material impacts, risks and opportunities, either individually or at a higher level (i.e. groups of impacts, risks and opportunities or related topics), covering:	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	32.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Inconsistency within ESRS, Bolding of words should be re-assessed, does not seem useful to bold remediation and potential Furthermore, the terms prevention, mitigation and remediation are related to negative impacts, i.e., a word corresponding to positive impacts is missing. Suggestion: Change wording: (a)its policies, and actions and targets which address the prevention, mitigation and remediation of actual and potential material negative impacts to address and material risks and/or to pursue actual and potential material positive impacts and material opportunities; or (b)the targets and metrics to assess progress over time in relation to its material impacts, risks and opportunities	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	32. (a) and (b)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Resources allocated to actions are often competitive information that cannot be disclosed, even if they do not fully meet the criteria of a business secret. For example, an IT project that is inexpensive due to the chosen solution may: a) falsely give the impression of fewer resources allocated, b) reveal information to competitors, or c) overlap with taxonomy requirements for E standards to some extent. In general, the topic of resources is not indicative of commitment or results. Therefore, this disclosure is confusing and unhelpful both for target users and for the company providing it. This entire requirement remains a wrong "shall".	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: The term "material" is missing. Suggestion: Change wording: The undertaking shall disclose the measurable, time-bound, outcome-oriented qualitative or quantitative targets it has set related to its material impacts, risks and opportunities, either individually or at a higher level (i.e. groups of impacts, risks and opportunities or related topics). For each target, the undertaking shall disclose:	ESRS2	ESRS 2 - General for targets - GDR-T	43.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: This should not be covered in a separate bullet. It is already sufficiently covered in bullet (f) and does not warrant a separate paragraph. Suggestion: Delete bullet (g). If considered necessary, embed in an appropriate manner in bullet (f).	ESRS2	ESRS 2 - General for targets - GDR-T	43. (g)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: The start with "In addition" is confusing. Since this paragraph is related to paragraph 6 it would make sense to make this more transparent. Suggestion: Change wording: In addition the instances mentioned in paragraph 6, for each topic …	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	7.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: The wording suggests that time-bound targets must be set. Suggestion: Change wording: briefly describe, if applicable, any time-bound targets it has set related to the topics in question, the progress it has made towards achieving those targets, and whether its targets related to biodiversity and ecosystems are based on conclusive scientific evidence;	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	7. (b)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Why is the disclosure restricted to adverse impacts, should this not read actual or potential positive or negative impacts related to the topic in question?	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	7. (d)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: This sentence reads a bit strange in the context of providing information about sustainability governance. The other challenge is that the paragraph refers to several governance bodies and then uses the word “oversee”. While “oversee” would be appropriate in relation to supervisory bodies, it would not be appropriate in relation to management bodies because they determine strategies and other measures. Suggestion: Change wording: how the administrative, management and supervisory bodies determine whether ensure that appropriate skills and expertise are available or will be developed to determine respectively oversee strategies and other measures designed to respond to material sustainability-related impacts, risks and opportunities (or groups of them / related topics)	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	9. (b)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: As indicated for paragraph 9 (b) the term oversight only seems appropriate in conjunction with supervisory bodies, not management bodies. Suggestion: Change wording: the identity and responsibilities of the individuals, board committee or similar body within the administrative, management and supervisory bodies which are responsible for the management respectively oversight of material impacts, risks and opportunities (or groups of them / related topics), with an indication, if relevant, of those for which the administrative, management and supervisory bodies have not delegated the key decisions to another body	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	9. (c)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: As indicated for paragraph 9 (b) the term oversight only seems appropriate in conjunction with supervisory bodies, not management bodies. Suggestion: Change wording: how the administrative, management and supervisory bodies determine respectively oversee the setting of targets related to material impacts, risks and opportunities (or groups of them / related topics), and how they monitor progress towards them; and	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	9. (d)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Insertion after Paragraph 7, i.e., within the section for Disclosure Requirement BP-2. Suggestion: Move after Paragraph5, i.e., to the section for Disclosure Requirement BP-1.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	AR 1
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Die relevanten Stakeholder sollen im Einklang mit dem ESRS 1 AR 10 angegeben werden. Hiernach werden folgende Kategorien vorgegeben: “Common categories of affected stakeholders are: employees and/or workers' representatives, suppliers, consumers or end-users, affected communities and persons in vulnerable situations. Nature may be considered a silent affected stakeholder.”. Hieraus ergeben sich zwei Herausforderungen: 1. Die bisher als relevant ermittelten Stakeholder passen nicht zwingend in die vorgebenden Kategorien. Dadurch wird Flexibilität genommen. 2. Der Begriff von „persons in vulnerable situations“ wird nicht näher definiert, ist jedoch erklärungsbedürftig. Die genannten Kategorien sollten lediglich als Beispiele verwendet werden.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	AR 11.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Why is the term “other measures” used instead of the term “metrics”. Wording should be consistent with other paragraphs. Suggestion: Change wording: Information on how the undertaking addresses or plans to address its material impacts, risks and opportunities, which interact with its business model or strategy, includes a clear reference to the specific policies, actions, targets and other measures metrics it implemented during the reporting period to manage them, as disclosed in line with the GDRs and the relevant topical standards.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 14
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	Problem: Since this is an overarching principle in ESRS 1 that applies to all disclosures, why is it repeated here? Suggestion: Delete AR 15 for para. 23 Relief of undue cost and effort is welcome. However, the definition of undue cost or effort will likely lead to discussions during the audit phase without resolving discrepancies between published disclosures. A better solution would have been to allow disclosure on a “may” basis, without adding the layer of undue effort. This approach would be more consistent with option 2.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 15.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	If Option 1 is to be adopted, it shall be included in the main body rather than in an Application Requirement. In substance, Option 1 effectively evolves into a more complex version of Option 2, without providing any additional value when combined with the proposed reliefs.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 17.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Even if the presence of "diverse" in the administrative bodies is likely very small, removing the line from a table legally defined does not signal inclusion.We strongly advise to re-include the original table and leave these kind of simplifications to the single companies impacted by the ESRS	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	AR 2.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Unclear and imprecise in terminology (boilerplate).	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 20.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	Reference to workers´representive is not of value, no point is singling out the representative of a stakeholder. Additionally the workers´representative are not a stakeholder but a proxies of it, only workers are a stakeholder, consulting representative can be a process decision but will not change that DMA shall collect the workers´view, not that of their representative.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 21.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Why are sentences 2 and 3 necessary? Seems to be very detailed and only focused on certain aspects and therefore not reflective of the general nature of ESRS 2 related disclosures. Suggestion: Delete sentences 2 and 3	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Example provides is dispensable Suggestion: Change wording: The metrics include those defined in the ESRS, as well as metrics identified on an entity-specific basis, whether taken from other sources or developed by the undertaking itself, such as for [Draft] Amended ESRS S2-S4 topical standards that do not contain metrics at sector agnostic level.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	AR 38
Excels	IMA-Europe	Business association (other than association of financial institution)	Belgium			I agree	Agree with option 2	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (b)
Excels	IMA-Europe	Business association (other than association of financial institution)	Belgium			I disagree	Qualitative disclosures or ranges/estimates should be allowed for this as well, especially in the case of a private company that does not publish financial figures. We would be against publishing these figures.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38.
Excels	IMA-Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It's unclear to me whether SBM-3 is a cross cutting disclosure, because it has been removed from the topical standards (because of lack of mature methodology to prepare and report on such granular information) or if it's a general disclosure requirement that could be for all material topics. It's a little confusing the way it is currently written in ESRS 2 since it talks about aggregating or disaggregating the financial effect for risks and opportunities. (only to be reported for financially material topics). But removed from the topical standards.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23.
Excels	Allianz SE	Insurance	Germany			I partially agree and partially disagree	We do not agree with the new provisions introduced by paragraph 5, as it creates duplicated information throughout the Sustainability Statement. For example, if the reporting undertaking makes use of the relief for metrics with a partial scope (ESRS 1 paragraph 91),or changes sustainability information due to a restatement need or error correction (ESRS 1 paragraph 95-97), sufficient transparency will provided for the metrics concerned, i.e. by providing contextual information, disclosing the partial scope, and correcting/restating the previous reporting period figures. Following the new paragraph 5 and stating that the reporting undertaking has applied these "provisions" just creates duplicates and redundant information not helpful for readers and users. We therefore suggest limiting the disclosures required by paragraph 5 to those that do not create duplicated/redundant information.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5.
Excels	Allianz SE	Insurance	Germany			I disagree	The disclosure of "significant sectors" is a new disclosure requirement that goes beyond the requirements of set 1 ESRS. Reporting undertakings anyway disclose information regarding relevant business segments in financial reporting - the sustainability statement should not prescribe additional sector information that goes beyond requirements in financial reporting. As such, this new disclosure requirement adds a new requirement which is not in line with the simplification mandate given by the European Commission and should therefore be deledet.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (b)
Excels	Allianz SE	Insurance	Germany			I disagree	The objective of "understanding of significant changes to the policies adopted during the reporting period" is not reflected in the DR as currently worded. Note: In other standards, the objectives as well are sometimes worded in a way that is not aligned or cannot be sufficiently covered by the DRs. When objective and disclosure requirements are not aligned it opens room for discussion on whether the companies are expected to provide additional information in order to meet the objective of the requirement or if compliance with the ESRS is as well given if the company just sticks to the datapoints in the disclosure requirements. As a general rule, the objectives of the requirements have to be revised and aligned with the datapoints contained in the ESRS or deleted completely.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	33.
Excels	Allianz SE	Insurance	Germany			I disagree	Paragraph 41 (a) now requires, for each metric, information on data types and sources used as input to the calculation. While these disclosures are still subject to the concept of information materiality, providing information on data types and sources is not relevant for most metrics and certainly does not add additional value to users of sustainability statements. We therefore suggest deleting 'data types and sources used as input to the calculation' from the prescriptive requirements of the provision or specify 'where relevant'.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	41. (a)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Allianz SE	Insurance	Germany			I disagree	Paragraph 41 (b) introduces new requirements for all environmental metrics regarding information on the specific environmental conditions and characteristics of the area where the impact is occurring. Such information is often not available, also is it near impossible to determine the area where the impact is occurring with precision – as such the required information would by highly judgmental, subject to significant uncertainties and therefore likely to not meet the criterion of faithful presentation. 41 (b) also creates additional requirements that were not present in set 1 by advocating such information for all environmental metrics, which also includes value chain metrics. We therefore suggest deleting subparagraph 41 (b) entirely.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	41. (b)
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	"reportable sector" ⍰ same wording as in IFRS 8 "segments" would be helpful to avoid misinterpretation	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17.
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	We do not think this kind of granularity is useful, we recommend an overall description	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (c)
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Anticipated financial effects remain a non-meaningful data point as they will lack comparability and should be deleted, if it can't be deleted option 2 with only mandatory qualitative information should be chosen	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23.
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	this datapoint should be deleted, it is questionable why such risks should be higher prioritized than others	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (f)
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Such a list is not necessary from our point of view as it is more or less a table of contents of the sustainability statement	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (d)
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	this datapoint should be deleted as it leads to excessive listing of areas or conditions, additional value or necessity not clear	ESRS2	ESRS 2 - General for metrics - GDR-M	41. (b)
Excels	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland			I partially agree and partially disagree	Its not clear from the revision that it is only those risks that may have implications for strategy and business model that should be disclosed. As it stands now, it looks like it is all risks identified through the DMA; but from the 'basis of conclusions' document, it sounds like it should only be those risks with implications.	ESRS2	ESRS 2 - General for policies - GDR-P	34.
Excels	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland			I partially agree and partially disagree	It says that we should avoid boilerplate descriptions, for example when policies and actions have been implemented to comply with law and regulation. But compliance with regulation may also contribute to the ongoing management of a potential impact. For example, in the pharmaceutical industry, strict rules apply for management and monitoring of side effects and adverse events of the use of medical products already on the market. This is an ongoing risk that we have in the pharmaceutical industry and therefore an ongoing potential negative impact. We manage it - also because there is regulation. But the safety programs that we have should also be mentioned to show users of sustainability statements that we have the house in order.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 28.
Excels	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland			I partially agree and partially disagree	ESRS 2 para 26. a and AR 19 mention input parameters. Para 26a distinguishes between input parameters and data sources, but in the AR19, it is mentioned that input parameters may include specific data sources. So there is a bit of overlap between the term input parameter (which includes data sources) and key data sources.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (a)
Excels	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland			I partially agree and partially disagree	RELATED TO APPENDIX - COULD NOT CHOOSE APPENDIX IN EXCEL TEMPLATE: ESRS 2, appendix A refers to the statement on due diligence as GOV-4, but it is GOV-3 in the revised ESRS.	ESRS2	ESRS 2 - Objective	1.
Excels	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland			I partially agree and partially disagree	NOT RELATED TO OBJECTIVE OR PARAGRAPH 1 - JUST HAD TO PUT SOMETHING TO BE ABLE TO PROVIDE THIS FEEDBACK: SBM-2 and topical s-standards have disclosure requirements around stakeholder engagement. It feels a bit overlapping when trying to respond to both.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	1.
Excels	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland			I partially agree and partially disagree	Unclear what is required here. An application requirement could be useful.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (e)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	In our opinion, the new formula of the disclosure creates an unnecessary summary of the report, which, in accordance with the intention of simplification, will already be substantially shorter.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	7.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	The current structure of the disclosure is overly complicated, with unclear sentence constructions that make it difficult to understand. It should be discarded or simplified.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	9.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	This section, transferred from GOV-4, is simplified but fails to explain what due diligence entails. It also lacks a reference to ESRS 1 and presents unclear expectations compared to the current ESRS standards. Paragraph 13 should include a cross-reference to ESRS 1 for clarity and alignment	ESRS2	ESRS 2 - GOV-3 - Statement on due diligence	13.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	It would be preferable to remove the phrase '...if the undertaking refers to this hierarchy in defining its actions' and instead require mandatory reporting according to the mitigation hierarchy for all actions related to the natural environment.	ESRS2	ESRS 2 - General for policies - GDR-P	37. (b)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	Reference should be to ESRS 1 93	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5. (e)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	Reference should be to ESRS 1 94	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5. (f)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	Reference should be to ESRS 1 95 and 96	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5. (g)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	Reference should be to ESRS 1 100	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5. (h)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	Reference should be to ESRS 1 107 and 108	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5. (i)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	Reference should be to ESRS 1 73	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5. (k)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	The AR should be moved under BP-1	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	AR 1.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	This should be rephrased not to refer to strategies (in plural) which are not defined. Instead the sentence should refer to policies and actions: "how the administrative, management and supervisory bodies determine whether appropriate skills and expertise are available or will be developed to oversee policies and actions to respond to material impacts, risks and opportunities (or groups of them / related topics)"	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (b)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	This disclosure will result in lack of information who key stakeholders are. It should be rephrased as follows: "a summarised description of its stakeholder engagement, including information about the key stakeholders and with which key stakeholders it engaged"	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (a)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	Deleted datapoint 53 (e) was the only place where the undertaking could explain whether ESG risks are included in its risk management system. This is crucial information for users to understand the level of professionalization of risks management at the undertaking. It should be reinstated.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	It is difficult to understand what expectations regarding disclosures stem from this AR. Should it result in detailed disclosure on location of IRO?	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	The following sentence should be added: "The undertakings shall consider ESRS 1 point 81 second sentence.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	36.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	It should be rephrased as follows to prvde better underdstanding on resources needed: "provide an indicative range of future financial resources the undertaking expects that need to be allocated for the implementation of the key actions"	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38. (c)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	The wording should be clarified, ex. "The undertaking shall disclose a description of the main features of its business model and value chain, as well as its position in the value chain."	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	18.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	"counterparts" should be replaced with "business partners"	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 8.
Excels	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom			I partially agree and partially disagree	the TNFD notes the following aspects in the new text of AR 22 for para. 26: -The reference to LEAP is placed after the screening of site locations, while LEAP is about the whole materiality assessment -There is no reference anymore to the fact that the first three phases of the LEAP approach correspond to the actual materiality assessment process for the topical standards -This new AR also removes any guidance on what each of the phases of LEAP entails. The AR should begin with an explicit reference to the LEAP approach, framing it as corresponding to the materiality assessment for the nature-related topical standards. This introductory paragraph on LEAP can then be followed by the current text on the screening of site locations, which can serve as an example of additional guidance linked to the first phase of LEAP.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom			I partially agree and partially disagree	on para 26(e) on whether and how the process includes consultations with affected stakeholders, key information may be lost with the deletion of the provision to 'understand how they may be impacted' (Set 1 para. 53, ESRS 2), and keeping a sole focus instead on whether stakeholders have been consulted.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (e)
Excels	ESMA	European supervisory authority	France			I partially agree and partially disagree	87.SBM-1 par. 17 a ii) : Considering that all datapoints of ESRS 2 have been made subject to materiality, the mention of "where applicable and material" does not seem necessary.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 17.

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Excels	ESMA	European supervisory authority	France			I partially agree and partially disagree	88.SBM-3 par. 23 a) : Regarding current financial effects, it is unclear in the amended draft whether disclosure of aggregated financial effects (potentially for all material IROs) is allowed. This should be clarified, also in relation to AR 17 a) which mentions overlapping situations. In addition, ESMA recommends including guidance on how to calculate current financial effects in the standard. It should be clarified in the Application Requirements that the current financial effects are to be determined with consideration of the mitigation measures implemented ("net" basis).	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (a)
Excels	ESMA	European supervisory authority	France			I partially agree and partially disagree	89.IRO-1 par. 26 and AR 20: ESMA agrees that the IRO-1 topical disclosures in ESRS Set 1 were overly detailed and caused implementation challenges. Further simplification could be achieved by turning some datapoints into Application Requirements for par. 26 a). This approach could be relevant for par. 26 c) and par. 26 e). In addition, while AR 20 establishes that the disclosures under par. 26 b) to g) specify rather than expand the disclosures outlined in par. 26 a), it does not describe the links between the different datapoints, which would be helpful for undertakings to better understand the disclosure requirements. ESMA welcomes the focus on information that reflects the specificities of the individual undertakings for reporting on the materiality assessment process as included in AR 20.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26.
Excels	ESMA	European supervisory authority	France			I partially agree and partially disagree	90.IRO-1 AR 19: Reference to "key inputs" at the end of the paragraph does not provide meaningful guidance and should be supplemented with more concrete examples of what these inputs may consist of, which differ from the categories already mentioned in the paragraph. The term "parameter" also lacks clarity in this context. In addition, as the amended ESRS 1 par. 27 refers to scientific data, scientific information should be explicitly mentioned in AR 19 of ESRS 2 as well.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 19.
Excels	ESMA	European supervisory authority	France			I partially agree and partially disagree	91.IRO-1 AR 21: AR 21 merely describes the disclosure requirements on stakeholders' consultation in the different standards. For simplification and increased readability of the sustainability statement, ESMA's view is that AR 21 could further explain how the disclosures under IRO-1 can complement the ones under SBM-2 to avoid duplication or lack of specificity.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 21.
Excels	ESMA	European supervisory authority	France			I partially agree and partially disagree	92.IRO-1 AR 22: ESMA thinks that the drafting of AR 22 "the approach to such screening is a relevant aspect of disclosures addressed in (a) to (e)" is unclear about whether this information is required to be included in the referenced datapoints (where applicable), and on the type of information that is expected. ESMA considers this information important, and that, while simplification should be achieved through covering it in one datapoint only, the current approach creates too much ambiguity.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	ESMA	European supervisory authority	France			I partially agree and partially disagree	93.IRO-2 par. 28 and AR 23: ESMA concurs with moving the description of the IROs to IRO-2 (par. 28), so that this Disclosure Requirement now includes all resulting elements from the materiality assessment process. ESMA however cautions against the flexibility in the proposed AR 23 to describe the IROs at the appropriate level of aggregation. While the intention is to avoid the disclosure of long lists of very granular IROs as has been the case for some wave 1 undertakings, it may create situations where both the IROs, their interaction with the business model and strategy (SBM-3 AR 12) and the related disclosures regarding policies, actions, targets and metrics (for which similar flexibilities have been introduced in ESRS 2 par 29.) are disclosed at an aggregated level, making it impossible for the user to have access to the actual IROs and how they are specifically managed.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28.
Excels	ESMA	European supervisory authority	France			I partially agree and partially disagree	94.There is inherent flexibility in the materiality assessment process on the granularity and the setting of thresholds and ESMA sees the resulting granularity of IROs as a matter of practice which will most likely converge in the medium term. Having an additional flexibility on the description of the IROs risks undermining the transparency of the materiality assessment process and could lead to inconsistencies with the objective of sustainability reporting as expressed in ESRS 1 par. 6 "to present fairly the undertaking's material impacts on people and environment, as well as the material sustainability risks and opportunities". As a consequence, ESMA recommends having clear limitations to the level of aggregation allowed in par. 28 related disclosures.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28.
Excels	ESMA	European supervisory authority	France			I partially agree and partially disagree	95.In addition, considering the increased flexibilities in grouping of IROs and presentation, ESMA thinks that the IROs should be clearly disclosed as related to one or several ESRS sub-topics, where relevant, or topics or signposted as related to entity-specific disclosures as part of their description. This could be part of the table proposed in AR 25. ESMA would be in favour of this table being a mandatory requirement rather than a voluntary one. See also the responses to questions 13 and 15 on this issue.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28.
Excels	ESMA	European supervisory authority	France			I partially agree and partially disagree	96.IRO-2 par. 28 e: Regarding the table of EU datapoints, an option to refer to the datapoint as "non applicable" in addition to "non material" could be introduced, as it would fit better with some of the disclosures (e.g., SBM-1 par 17 c) and was used by some Wave 1 undertakings in their 2025 disclosures. The circumstances in which these different notions should be used could be clarified in an Application Requirement.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (e)
Excels	ESMA	European supervisory authority	France			I partially agree and partially disagree	97.GDR par. 29: The formerly called "Minimum Disclosure Requirements - MDR" in ESRS 2 have been streamlined and renamed as "General Disclosure Requirements – GDR". The change in name seems to reflect the fact that the filter of information materiality also applies to information required by these provisions, however EFRAG rightly proposes to stress in the new par. AR 20 of ESRS 1 that GDR provisions "are fundamental in nature and therefore likely to result in material information for all undertakings". 98.ESMA however notes that the text proposed in par. 29 of ESRS 2 is unclear where it states: "In instances where the undertaking has adopted policies or put in place actions or set targets for certain aspects only, this shall be reflected in the way the disclosure is prepared and presented, enabling an understanding of how the covered aspects relate to the corresponding material impacts, risks and opportunities". ESMA supports a requirement to explain how a given policy, action or target (or combination thereof) address one or more IROs. However, the proposed wording is not explicit in this regard and may be open to interpretation.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	29.

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Excels	ESMA	European supervisory authority	France			I partially agree and partially disagree	99.GDR par. 31: Similarly, the objective of the proposed requirements set out in the proposed par. 31 of ESRS 2 is unclear, which foresees that: "If the undertaking categorises its material impacts, risks and opportunities in accordance with a set of management priorities, reflecting their relevance to the undertaking's strategy and business model, the way disclosures are structured and presented may reflect this approach". This proposed requirement seems to address the presentation of policies actions and targets in a way that provides more prominence to certain disclosures of material IROs than to others. ESMA notes that the driving principle to prepare and present information in the sustainability statement is the double materiality approach. The general clause preventing the fact that material information shall not be obscured would, in fact, also apply if more prominence is arbitrarily given to some material IROs than others.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	31.
Excels	ESMA	European supervisory authority	France			I partially agree and partially disagree	100.GDR par. 32: Furthermore, the proposed par. 32 of ESRS 2 is also rather cryptic when it specifies that the policies, actions, targets and metrics are related to IROs "either individually or at a higher level (i.e. groups of impacts, risks, opportunities or related topics)". This specification, which appears multiple times across ESRS 2, seems to justify an approach whereby, for example, a policy would broadly address a topic without necessarily specifying how it addresses material IROs identified in a given topical area. The proposed wording risks leading to more boilerplate disclosures thus requiring a reporting effort from undertakings, for limited or no benefit to users of the information.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	32.
Excels	ESMA	European supervisory authority	France			I partially agree and partially disagree	101.Finally, ESMA stresses the fact that the disclosures on policies, actions, targets and metrics should enable users of the sustainability statements to understand whether and, if so, how IROs were managed and any associated targets/metrics and which actions have been taken, planned (or not taken) and their effectiveness to address the pre-defined policy objectives. Whenever an undertaking has only partially addressed one or more of these information elements, the user of the sustainability statement should be able to understand this fact and be able to determine how well the material IROs are being managed by the undertaking. ESMA therefore recommends that the general requirements proposed in paragraphs 29-32 are clarified in this spirit to specify that the objective of policies, actions, targets and metrics remains to shed light on the material IROs and their management and that this objective can be fulfilled based on the aggregation and disaggregation requirements in ESRS 1.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	32.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	There is no clear methodology to calculate anticipated financial effects, which makes the shared information being not aligned with the Qualitative characteristics of information in ESRS 1 - Appendix B) and it won't be comparable to other companies. Thus discolosing anticipated financial effects should be deleted.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	23. (b)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Disclosing a qualitative analysis of its resilience to the material risks should be part of the materiality analysis and should not be disclosed in ESRS 2 as a duplicate. Recommendation to delete this DR in ESRS 2 SBM 1.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	24.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	This DR might imply a lot of text without any valuable information by just disclosing that there aren't adopted policies, actions or targets to a certain material topic.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	30.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Some countries have comprehensive laws and regulations, especiallly for social topics such as workers' council which force the implementation of actions and measures, which significantly reduce a gross risks by explaining and implementing these measures.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 28.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	This needs to be clarified further.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	4. (a)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	This needs to be specified that the reporting level is on topic level.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Sectorspecific information needs to be handled individually.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 7.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Sectorspecific information needs to be handled individually.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 8.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Clarfy weater LEAP Approach is mandatory or voluntary	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Clarify definition of undue cost or effort.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 15.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Inconcise. Needs to be includes in the topic-specific Standards and not in ESRS 2 in order to align to the new ambition to reduce the complexion of the ESRS.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It is stated that also group internal activities should be listed under significant sectors. But definition of "significant" based on revenue in AR10 is not feasible for internal activities. Internal activities should be deleted 17.(b).	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (b)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	- DELETE. Anticipated financial effect are - due to the lack of acknolewdged methodologies - not a meaningful metric. The external assurance of highly uncertain and fully assumption-based metrics is most likely not feasible. The main users of reports expect robust and comparable data. - Qualitative information should be mandatory instead of quantitative information as collection of quantitative information is subject to a high degree of uncertainty. Data for a precise calculation is not available.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (b)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	DELETE. The required apporach to disaggregate targets along "markets and/or customer groups, products and/or services" would trigger nonsense disclosures! This is not an appropriate level of target setting, does noch reflect the level of corporate steering. This adjustment in the revised ESRS drafts reflects, that the practitioner and user perspective is no longer considered at all. - There is no definition of "banned product". This does not lead to a comparable reporting.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (a)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	DELETE. There is currently no definition of "significant sectors". If companies would be required to develop an own/individual sector classification, this would contradict the overall target of comparability. Since a sector-classification is already provided in the financial reporting, there is no need to duplicate information.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (b)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	CHANGE. The current concept of reporting relief based on undue costs and efforts does not lead to any reduction of reporting burden for larger companies. Instead, it should be referred to the financial reporting where significant financial effects are displayed.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 15.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	CLARIFY. Step in the right direction but the disclore requirements are still mostly applicable to quantitative/semi-quantitative targets. Qualitative targets could be discriminated by this definition of "SMART".	ESRS2	ESRS 2 - General for targets - GDR-T	43.
Excels	SZEF	Trade union	Hungary			I agree	Very important to keep reporting of workers' representatives, as in many Member States this is not a requirement to report in corporate governance statements	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (a)
Excels	SZEF	Trade union	Hungary			I agree	It is crucial to keep this datapoint in on reporting on stakeholder engagement, particularly for workers' representatives, as this is a requirement in CSRD	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (c)
Excels	SZEF	Trade union	Hungary			I agree	It is crucial to report how workers' representatives views have been taken into account by the undertakings' decision making bodies	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 21.
Excels	Little Blue Research	Consultant (including software vendor)	United Kingdom			I partially agree and partially disagree	Missing dependencies - this is out of alignment with the TNFD and ISO 14054 Natural Capital Accounting for Organizations (forthcoming). Should be "in terms of material impacts,dependencies, risks and opportunities"	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	27.
Excels	Little Blue Research	Consultant (including software vendor)	United Kingdom			I partially agree and partially disagree	Missing dependencies - this is out of alignment with the TNFD and ISO 14054 Natural Capital Accounting for Organizations (forthcoming). Should be "a concise description of its actual and potential, positive and negative material impacts and dependencies"	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28.
Excels	Little Blue Research	Consultant (including software vendor)	United Kingdom			I partially agree and partially disagree	Missing dependencies - this is out of alignment with the TNFD and ISO 14054 Natural Capital Accounting for Organizations (forthcoming). Should be "(48(g) amended) changes related to its material impacts, dependencies, risks and opportunities compared to the previous reporting period;"	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (c)
Excels	Little Blue Research	Consultant (including software vendor)	United Kingdom			I partially agree and partially disagree	Missing dependencies - this is out of alignment with the TNFD and ISO 14054 Natural Capital Accounting for Organizations (forthcoming). Should be "The description of its material impacts, dependencies, risks and opportunities shall be provided at the appropriate level of aggregation, either individually or for group(s) of impacts, dependencies, risks and opportunities, or for the related topic(s),"	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 23.
Excels	Little Blue Research	Consultant (including software vendor)	United Kingdom			I partially agree and partially disagree	Missing dependencies - this is out of alignment with the TNFD and ISO 14054 Natural Capital Accounting for Organizations (forthcoming).Should be "The undertaking may present the description of its material impact, dependencies, risk or opportunity in the same location as its disclosures on the related policies, actions, targets and metrics through which it addresses them, in order to avoid duplication and support a coherent narrative."	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 24.
Excels	Little Blue Research	Consultant (including software vendor)	United Kingdom			I partially agree and partially disagree	Missing dependencies - this is out of alignment with the TNFD and ISO 14054 Natural Capital Accounting for Organizations (forthcoming).Should be "(new) Information about policies, actions and targets shall enable an understanding of the level at which the undertaking is addressing its material impacts, dependencies, risks and opportunities, i.e. at topic or sub-topic level."	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	29.
Excels	Little Blue Research	Consultant (including software vendor)	United Kingdom			I partially agree and partially disagree	Missing dependencies - this is out of alignment with the TNFD and ISO 14054 Natural Capital Accounting for Organizations (forthcoming).Should be "(62 amended) If the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, dependencies, risks and opportunities, it shall disclose this fact."	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	30.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Little Blue Research	Consultant (including software vendor)	United Kingdom			I partially agree and partially disagree	Missing dependencies - this is out of alignment with the TNFD and ISO 14054 Natural Capital Accounting for Organizations (forthcoming).Should be "If the undertaking categorises its material impacts, dependencies, risks and opportunities in accordance with a set of management priorities, reflecting their relevance to the undertaking's strategy and business model, the way disclosures are structured and presented may reflect this approach ."	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	31.
Excels	Little Blue Research	Consultant (including software vendor)	United Kingdom			I partially agree and partially disagree	Missing dependencies - this is out of alignment with the TNFD and ISO 14054 Natural Capital Accounting for Organizations (forthcoming).Should be "(56) The undertaking shall apply the requirements provided in this section, when it discloses either in accordance with a topical standard or on an entity-specific basis, on policies, actions, targets and metrics related to material impacts, dependencies, risks and opportunities,"	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	32.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	Companies should be required to provide geographic information about where their value chains are located. Currently, descriptions of value chains are often vague and general, with companies stating the obvious i.e. that in the upstream there are subcontractors and then in the downstream there are customers. This does not provide any relevant information to users of the sustainability statements nor does it increase transparency. It also fails to communicate whether companies have actually mapped their supply chains.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 7.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	Strongly agree with guidance to "focus on information that is specific to its own process". Experience shows that boilerplate reporting here is commonplace which is why guidance specifically addressing that is welcome. Companies should however, also be instructed to avoid excessive and detailed descriptions of their internal processes and to prioritize disclosing what external information has been taken into account in the process, and explaining its outcomes.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 20.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	In 20 (a) and (b) "key stakeholders" is used and it is defined as "key categories of affected stakeholders" in AR 11. Therefore it is confusing to use "key affected stakeholders" in 20 (c).	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (c)
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	Note that ESRS 1 AR 10 does not define "key categories of affected stakeholders" as suggested here but rather provides a questionable (see comments to ESRS 1) list of "common categories of affected stakeholders". As such, the AR 11 is confusing and does not add value.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	AR 11.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	A key to appropriate impact materiality assessment is adequate identification of impacts as a first step. Companies should be required to disclose more comprehensive information about this stage than merely an overview.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (a)
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	Experience shows that information many companies disclose about their materiality thresholds is largely meaningless for an external reader. As such, suggest adding the word "explain" → "and explain qualitative and quantitative thresholds used and how it determines them".	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (a)
Excels	Finnwatch ry	NGO	Finland			I agree	Agree with emphasis on disclosures needing to go beyond generic information. Experience shows boilerplate reporting and merely name-checking due diligence here is common but of no value to users.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 19.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	In addition to points a & b already included here, companies should also be required to disclose the basis for the materiality conclusion of each material topic/impact. Experience shows that despite how central the double materiality assessment is for reporting, companies' disclosures on their assessment process tend to be overly descriptive of the process itself which is of little value for users. As such, companies should be required to clearly explain why certain topics/impacts are material to them and why other topics are not.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	Companies should also be required to disclose whether they have assessed their own involvement (i.e. whether they cause, contribute, or are linked to) to their material impacts and if so, what the conclusion of that assessment has been.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (a)
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	Companies should be required to disclose the basis for the "non material" conclusions for each and every topic that they consider not material for themselves, not only E1.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (b)
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	The DR could be further clarified by requiring companies to disclose the key contents of their policies only as far as they relate to their identified material impacts.	ESRS2	ESRS 2 - General for policies - GDR-P	34. (a)
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	"When applicable" should be removed as it creates confusion over whether to include the information or not. If the company has not given consideration to interests of "affected stakeholders" when setting the policy, it should be required to state so clearly.	ESRS2	ESRS 2 - General for policies - GDR-P	34. (d)
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	The disclosure should include information also about actions' contribution towards targets: ...how they contribute to the achievement of a policy objective or a target (i.e. add 'target').	ESRS2	ESRS 2 - General for actions and resources - GDR-A	37. (b)
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	Generally a positive clarification but when reporting on collaborative efforts, companies should be required to specifically indicate their role in and/or contribution to those efforts.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	32.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	Add 'metrics' –> a description of the relationship of the target to its policy objectives, action and metrics. Currently, the relationship between metrics and targets is sometimes very unclear in companies' reporting.	ESRS2	ESRS 2 - General for targets - GDR-T	43. (a)
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	General comment: EFRAG should develop comprehensive non-mandatory implementation guidance for each topical standard. The guidance should comprise instructions and examples how to conduct the materiality assessment for the topic, how to apply the disclosure requirements, and to calculate the metrics. Sectoral examples could be added, where appropriate.	ESRS2	ESRS 2 - Objective	1.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I disagree	From our reading of the standard, there are overalps between SBM-1, SBM-3 and IRO-2. All three disclosure requirements include a description of the business model, strategy and decision-making with regards to material sustainability impacts, risks and opportunities: SBM-1: "The undertaking shall disclose the following information about the key elements of its general strategy that relate to or affect material impacts, risks and opportunities" SBM-3: "The undertaking shall provide a high-level description of the interaction of the material impacts, risks and opportunities, with its business model, value chain, strategy and decision-making" IRO-2: "concise description of … imaterial impacts…as well as its material risks and opportunities…and how and where impacts, risks and opportunities are connected to its business model, its own operations and its upstream and downstream value chain." We recommend to integrate these provisions in SBM-1 and remove the duplications from SBM-3 and IRO-2. SBM-3 should be focused on current and anticipated financial effects.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Provisions on how to conduct the double materiality assessment (DMA) for environmental topics (especially E2, E3, E4 and E5) are proposed to be deleted completely from the standards. Also the NMIG does not contain related guidance. Generic requirements in ESRS 1, chapter 3 and ESRS 2 IRO-1 do not include topical specifications. Topical instructions for the DMA are of high importance to ensure that undertakings conduct the process in a comparable manner to consistently apply the ESRS. For users it is imporant to gain a get a good understanding of the undertaking's process and how it was applied to specific sustainability topics in order to assess reported information meaningfully.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	(continued): We recommend for the finalization of ESRS 1 (chapter 3) and ESRS 2 IRO-1 to clarify for environmental topics: 1.that screening of sites is an expected step in identifying impacts and assessing their materiality, 2.that local quality of air and soil, water risk factors, incl. water quality, water availability in highly or moderately water-stressed areas, threatened species and ecosystems in biodiversity-sensitive areas need to be part of the screening process, and 3.that material impacts at a specific site or location can trigger the need for providing disaggregated information when reporting policies, actions, targets and metrics The LEAP approach should also be mentioned in ESRS 1 as a possible approach to conduct the impact materiality assessment for environmental topics. Lastly, NMIG on ESRS 1 and 2 regarding the double materiality assessment process should include the essence of the former application requirements from the topical environmental standards.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	As regards the disclosure requirements about anticipated financial effects from sustainability-related risks and opportunities (ESRS 2 SBM-3), we recommend that EFRAG chooses Option 1 (para. 23 (b) and (c)), which would require reporting of quantitative information and, if not possible, qualitative information. Only this option is in line with EFRAG's mandate to improve interoperability with the IFRS standards. In addition, we recommend to clarify that quantitative information on anticipated financial may not need be overly complex and that future financial values are not necessarily expected. Rather, information on the anticipated financial effects of risks should be presented in terms of the value of today's assets and business activities that may be impaired if a material sustainability risk materializes. This approach is used in amended ESRS E1-11 and can provide valuable insights based on information that is generally available.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	AR 33 explains that actions to address environmental impacts can be classified by lever of the mitigation hierarchy (avoidance, minimization, restoration, compensation). We recommend to establish a link to the mitigation hierarchy also in GDR-P on policies.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	AR 33.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Add an application requirement to link CapEx for key actions to the CapEx plans under the EU Taxonomy (Art. 8, DA) which increases interoperability between ESRS and the Taxonomy: "If applicable, the undertaking shall relate its CapEx amounts to the , the CapEx plan required by Commission Delegated Regulation (EU) 2021/2178."	ESRS2	ESRS 2 - General for actions and resources - GDR-A	AR 35.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	The requirement to report all data types and sources used to calculate the metric could be reduced to key data sources. Otherwise, this requirement would require very detailed information which is likely not provide decision-useful.	ESRS2	ESRS 2 - General for metrics - GDR-M	41. (a)
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I disagree	We appreciate the intention of ESRS 2 para. 41 (b) to provide contextual information for environmental metrics, but find that the requirement to report "specific environmental conditions and characteristics of the area where the impact is occurring" for each metric is practically not feasible. This is because many ESRS environmental metrics, for example GHG emissions, pollutant emissions or resource use, do not measure impacts on the environment but pressures. The impacts resulting from these pressures are often not known or complex to determine for an undertaking. For biodiversity metrics (ESRS E4-5), however, such requirement is better suited. Considering, that ESRS 2 para. 41 (d) does already require to report relevant contextual information for all types of metrics, we recommend to remove para. 41 (b) and include the requirement in ESRS E4-5.	ESRS2	ESRS 2 - General for metrics - GDR-M	41. (b)

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Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	We recommend to include topic-specific application requirements to SBM-3 para. 23 (anticipated financial effects) related for pollution and biodiversity. For pollution, the AR should refer to revenues from products that contain substances of very high concern, OpEx and CapEx related to major incidents and costs from environmental protection and remediation of pollution as aspects that can be reported as actual or anticipated financial effects. There should also be a link to biodiversity and ecosystem-("nature-)related financial effects that the undertaking can report here, if material. If it proofs difficult to reinstate these requirements in the AR for ESRS 2, they should at least be included in the non-mandatory guidance.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (b)
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Add an application requirement to link CapEx for key actions to the CapEx plans under the EU Taxonomy (Art. 8, DA) which increases interoperability between ESRS and the Taxonomy: "If applicable, the undertaking shall relate its CapEx amounts to the , the CapEx plan required by Commission Delegated Regulation (EU) 2021/2178."	ESRS2	ESRS 2 - General for actions and resources - GDR-A	AR 35.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	Disclosures on anticipated financial effects should be voluntary, at least for the first 5 years after the adoption of amended ESRS. This conviction is supported by evidence provided in the first round of ESRS simplification consultation. Firstly, lack of common methodologies by design hinders comparability and makes this disclosure mundane for the end user, while imposing significant burden on issuers, who have to produce such methodologies, validate them etc. – which is especially valid for wave 1 issuers and groups that need to consolidate data from various markets. There are no sectoral pathways at the EU level that issuers could refer to, and available toolkits relate almost exclusively to the operational aspect of transition planning and climate-related transformation, and not financial valuations. Not all industries are equally exposed to and equally dependent on this transformation. Furthermore, significant anticipated financial events are already included in financial statements.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	The obligation to list information disclosed by reference should be limited to voluntary disclosure. Listing referenced disclosures already included in the statement in one place is not needed by the user, since, as we understand it, the purpose of references is to avoid duplications and support smoother navigation through the statement.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (d)
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	List of disclosures that derive from other than ESRS legislation should not be required to be disclosed: this disclosure does not bring any value to the key stakeholders of reporting company and, quite opposite, adds complexity to the sustainability statement ("statement"). We believe it would be beneficial that this disclosure is voluntary, allowing issuers that see the value in such information to include it, but not inflate statements that do not require such disclosure.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (f)
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	Similarly to the option to present IROs together with policies, information on how actions contribute to meeting the goals set out by policies should be allowed to be presented jointly.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	37. (b)
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	Similarly to the option to present IROs together with policies, information on the relation between targetsm actions and policies should be allowed to be presented jointly, as most often targets are set by the policies and pursued through actions.	ESRS2	ESRS 2 - General for targets - GDR-T	43. (a)
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	What is the value added of disclosing a list of the significant sectors that are related to a material IRO? It is difficult to imagine that a material IRO would not be connected to a material sector.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (b)
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I agree	Wording is unclear	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	18.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	Please define "counterparts in the value chain"	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 8.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	How do we have to interpret "an undertaking shall use reasonable and supportable information available to it at the reporting date without undue cost or effort"?	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 15.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	Please clarify what is specifically expected for this data point: "for environmental metrics; [the undertaking shall disclose] the specific environmental conditions and characteristics of the area where the impact is occurring"	ESRS2	ESRS 2 - General for metrics - GDR-M	41. (b)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is still not very clear if you can use the wording "Transition plan" while not having all the elements as described in the standards (specifically targets that respond to all the ESRS requirements)	E1	E1-1 - Transition plan for climate change mitigation	11.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	We do not agree to add 1.5°C reference in the requirement (better approach can be keeping a reference to the 2050 objective), as it relies on large-scale deployment of negative emissions technologies (NETs) like carbon capture and storage (CCS) or availability of the biofuels, which are not yet proven/commercially viable at scale.	E1	E1-1 - Transition plan for climate change mitigation	13.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	We do not agree to add 1.5°C reference in the requirement (better approach can be keeping a reference to the 2050 objective), as it relies on large-scale deployment of negative emissions technologies (NETs) like carbon capture and storage (CCS) or availability of the biofuels, which are not yet proven/commercially viable at scale.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The definition of "dependencies" in Annex II refers to the situation of an undertaking relies on natural, human and/or social resources for its business processes. However, the connection between this concept and "locked-in emissions" does not make sense. Is the term "dependencies" intended as "assumptions"?	E1	E1-1 - Transition plan for climate change mitigation	14. (c)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	(a) We do not agree to add 1.5°C reference in the requirement, also not all industries have sectorial pathways developed therefore requirement for the 3rd party to independently validate is not achievable for those (see §AR2a last sentence) (c) the information requested is sensiitive for an organization as it clearly shows the potential vulnerabilities/possible competitve angles on the market.	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	This is a new requirement which is not seen in the previous Directive requirement §16 and attributed to it ARs.	E1	E1-1 - Transition plan for climate change mitigation	AR 4

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	This requirement further complicates the IRO and adds an additional layer to it, making the overall understanding of the IRO very complex.	E1	E1-2 - Climate-related risks and scenario analysis	17.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The information requested is sensitive for an organization as it clearly shows the potential vulnerabilities/possible competitive angles on the market.	E1	E1-2 - Climate-related risks and scenario analysis	18.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	This is a new requirement which is not seen in the previous Directive requirements.	E1	E1-2 - Climate-related risks and scenario analysis	19.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	This is a new requirement which is not seen in the previous Directive requirements.	E1	E1-2 - Climate-related risks and scenario analysis	AR 5
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	This is a new requirement which is not seen in the previous Directive requirements.	E1	E1-2 - Climate-related risks and scenario analysis	AR 6
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The information requested is sensitive for an organization as it clearly shows the potential vulnerabilities/possible competitive angles on the market.	E1	E1-2 - Climate-related risks and scenario analysis	AR 7
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Not clear what "reporting date" at the end of AR means.	E1	E1-3 - Resilience in relation to climate change	AR 9
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The information requested is sensiitive for an organization as it clearly shows the potential vulnerabilities / possible competitve angle on the market.	E1	E1-3 - Resilience in relation to climate change	AR 10
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	We believe the requirement to include achieved/expected GHG reduction is bringing a confusion with the reporting on Metrics/Targets. The user might not be clear on the numbers that shall be taken into consideration.	E1	E1-5 - Actions and resources in relation to climate change	24. (b)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	(a) Information on "anticipated long-term CapEx and/or OpEx ranges" are very difficult to gather and not always relevant for all the topic. As such, this information should be voluntary. (b) The information requested is sensitive for an organization as it clearly shows the potential vulnerabilities/possible competitive angles on the market.	E1	E1-5 - Actions and resources in relation to climate change	24. (c)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The information requested is sensitive for an organization as it clearly shows the potential vulnerabilities/possible competitive angles on the market.	E1	E1-6 - Targets related to climate change	26. (c)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	This contradicts to GHG protocol where the re-baselining is not time-based. In a sense, it contradicts point (a) of the same AR which only talks about target/reporting boundary (consistent to GHG protocol). It is also not clear how the main target set against an initial base-line will be changed when the base-line is to move every 3 years.	E1	E1-6 - Targets related to climate change	AR 13
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	In case we will be comparing to a different industry (or blended industry) reduction targets, it contradicts the point of explaining the levers, scenarios and taregts for our own business model. Different industries and companies have different business model and as such comparison to their reduction targets is not accurate.	E1	E1-6 - Targets related to climate change	AR 16
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Remove/reduce mix disaggregation and keep total energy consumption as key metric. The required level of energy mix disaggregation adds little or no value in consolidated reporting for groups that report on EU and non-EU assets. Data collection is challenging and reporting has little/no value for the report user.	E1	E1-7 - Energy consumption and mix	29.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Not clear how the following can be evaluated "fails to convery a fair presentation of the emissions...". This is very subjective and open for wide interpretation therefore not aiding in clarity of application.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	19.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The application of this requirement is not clear.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 22
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	(a) Letter (c) is incoherent regarding the boundary of the numerator and denominator: the numerator as per (a) refers to "operational sites" while the denominator seems to be required on the financial boundary. This data is irrelevant. (b) This is a new requirement which is not seen in the previous Directive requirements. The application of this requirement is not clear.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 23
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The application of the term "significant" is not clear (1st line)	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The new wording seems to mandate a disaggregation of GHG emission while the previous requirement was "as appropriate", leaving more flexibility to the reporting company. We recommend to reintroduce the previous wording.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 26
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The drafting should be expanded to include avoided emissions in addition to GHG removals and storage. We recommend amending the text to read: "If it has implemented avoided GHG emissions, GHG removal or storage projects, the undertaking shall disclose information about avoided GHG emissions or GHG removal projects it has developed in its own operations or contributed to in its upstream and downstream value chain..."	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	35
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	"any other factors necessary to understand credibility..." is not very clear and open for interpretation.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	37. (b)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The information requested is sensitive for an organization as it clearly shows the potential vulnerabilities/possible competitive angles on the market.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	(a) The information requested is sensitive for an organization as it clearly shows the potential vulnerabilities/possible competitive angles on the market. (b) Please refer to question 19 of the General Section	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	This is the same information that is disclosed under EU Taxonomy, not clear why it is duplicated.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	42.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We support the simplification proposals for DR IRO-1 in ESRS 2 However, as regards audit, several companies point out that the higher level of granularity of the disclosure requirement, the more information auditors will request, which hampers the audit process and risks leading to excessive audit-related costs. An example can be found in DR IRO-1 and the need to disclose the consideration of stakeholder views in the process to identify and assess material impacts, risks, and opportunities. Auditors have requested evidence on each stakeholder engagement (i.e. "who said what and when"), while companies usually do not keep such specific information since stakeholder engagement should be assessed qualitatively (i.e. meaningful stakeholder engagement) and not quantitatively (i.e. specific information about each stakeholder interaction). Therefore, [DRAFT] DR IRO-1 paragraph 25 point (iii) could instead refer to meaningful or relevant stakholder engagement.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	25.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	Disclosing financial and other resources allocated to action plans for managing IROs as required under [DRAFT] ESRS 2 GDR-A paragraph 38 is extremely difficult for large multinational companies. Many of the actions taken to manage IROs, engage stakeholders, or improve workforce outcomes, are embedded in the core of day-to-day operations rather than being isolated initiatives with dedicated budgets, and driven by cross-functional teams and local management systems. Disaggregating and quantifying these efforts into current and future financial figures, as required in sections (a), (b), and (c), is operationally unfeasible. We recommend simplifying this requirement, perhaps by allowing narrative explanations or high-level estimates that do not require direct reconciliation with financial statements, particularly when such actions are not linked to standalone project financing. Additionally, several members have pointed out challenges with the vagueness of datapoints relating to CapEx and OpEx (i.e. difficulty to report on "future financial resources" and unclear meaning of "significant").	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	The notions of "environmental conditions" and "characteristics of the area" lack clarity and risk leading to excessively granular reporting. Also, this is not possible for all impacts (e.g. GHG emissions are transboundary and not location-based).	ESRS2	ESRS 2 - General for metrics - GDR-M	41. (b)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Data points for which phase-ins are planned should be omitted entirely or become voluntary.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	6.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	More flexibility should be granted depending on the legal form and the associated company structure	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	Instead of an overarching disclosure obligation, topic-related due diligence disclosures should be anchored	ESRS2	ESRS 2 - GOV-3 - Statement on due diligence	13.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	The reporting requirement makes the stakeholder engagement indirectly binding. This should be avoided, as the CSRD does not usually define implementation obligations but reporting obligations. The option of reporting that no dtructured engagement takes place should be introduced.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	The information should be summarized with ESRS 2 -SBM-1 to avoid duplication. Deleting the second part of the requirement "and the material risks and opportunities for which there is a significant risk of a material adjustment within the next annual reporting period to the carrying amounts of assets and liabilities reported in the related financial statements" is a step into the right direction. However, reporting on current and anticipated financial effects related to risks and opportunities should be overall removed as this goes also beyond requirements in the financial reporting.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	22.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	The reporting requirement makes the implementation of a resilience analysis indirectly binding. This should be avoided, as the CSRD does not usually define implementation obligations but reporting obligations. The option of reporting that no resilience analysis has been carried out should be introduced - A reference to ESRS E1-3should be introduced	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	24.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	The application requirement should be deleted as this could lead to unnecessary discussions with auditors on the level of detail to be included. If the ESRS requirements are clearly described, this AR should be redundant.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 20.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Deletion of "concise" as this is subject to interpretation.	ESRS2		28. (a)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	It is unclear what needs to be reported related to "disclose its exposure to the heightened risk of incidents related to child labour and forced or compulsory labour by type of operations (such as manufacturing plant), or by countries or geographies with operations. [...]". Further clarification on "exposure" needed by referring to existing frameworks such aus UN Guiding Principles or rephrasing	ESRS2		28. (e)

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Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Deletion of paragraph "When reporting on policies, actions and targets, the undertaking shall report relevant information, avoiding information that is boilerplate, and therefore not relevant for users for example when policies and actions have been implemented to comply with law and regulation, or when the necessary information is already provided in accordance with [Draft] Amended ESRS 2 SBM-1. " as this might lead to unnecessary discussions with auditors on what constitutes "boilerplate information" and whether a policy should be reported or not. Certain policies and actions relate to compliance risks (e.g. related to anti-corruption) which makes it difficult to distinguish at the end whether the policy is in scope of this limitation or not.	ESRS2		AR 28.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	Changing the significant financial resources allocated for implementing action plans to "key actions" broadens the scope of the requirements and therefore goes against the simplification and reduction aim of EFRAG. It should be changes back to the original wording or completely taken out.	ESRS2		38.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	To be deleted as this is a "may" datapoint and might broaden the scope of resources to be disclosed and might lead to discussions with auditors.	ESRS2		AR 36.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	The requirement is unclear, should be clarified. Assuming paragraph 7 always applies, even when a company adopts phasing-in options.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	7.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	SBM-3 is still difficult to understand, and getting the information is so complex. Therefore, consider removing the full SBM-3.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	21.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	SBM-3 is still difficult to understand, and getting the information is so complex. Therefore, consider removing the full SBM-3.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	22.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	SBM-3 is still difficult to understand, and getting the information is so complex. Therefore, consider removing the full SBM-3.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	SBM-3 is still difficult to understand, and getting the information is so complex. Therefore, consider removing the full SBM-3.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	24.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	It is a complex process to calculate current and future resources, so consider removing this requirement. Getting this information does not provide too much value to stakeholders.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	It is a complex process to calculate current and future resources, so consider removing this requirement. Getting this information does not provide too much value to stakeholders.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38. (a)
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	It is a complex process to calculate current and future resources, so consider removing this requirement. Getting this information does not provide too much value to stakeholders.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38. (b)
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	It is a complex process to calculate current and future resources, so consider removing this requirement. Getting this information does not provide too much value to stakeholders.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38. (c)
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	The word 'prioritises' can be misread to be about the actual prioritising of actions.Or if it rather refers to disclosing how the undertaking 'assess' negative impacts when conducting the DMA process	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (c)
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	The word 'prioritises' can be misread to be about the actual prioritising of actions.Or if it rather refers to disclosing how the undertaking 'assess' negative impacts when conducting the DMA process	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (f)
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	Is it needed to add the term 'boilerplate'? It is not helping with a good clarification to the AR or DR	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 20.

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Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	The AR seem to add more strong/binding need to use TNFD / LEAP approach	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I agree	agree to leave out topics omitted	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	27.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I agree	A positive addition, as it might be easier to simplify and merge text and avoid duplications, etc	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 23.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I agree	Assumed to lead to some changes in the reporting, assumed it can help clean up the structure of the text.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 24.
Excels	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland			I agree	Very important to keep reporting of workers' representatives, as in many Member States this is not a requirement to report in corporate governance statements	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (a)
Excels	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland			I agree	It is crucial to keep this datapoint in on reporting on stakeholder engagement, particularly for workers' representatives, as this is a requirement in CSRD	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (c)
Excels	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland			I agree	It is crucial to report how workers' representatives views have been taken into account by the undertakings' decision making bodies	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 21.
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	A reference to materiality should be added.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	A reference to materiality should be added.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 23.
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	Current financial effects are not necessarily presented "individually" in the financial statements. Direct reference is therefore not feasible.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (a)
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	We support Option 2 but regarding Option 1 - if it is adopted -, the drafting of point c) should be clarified as regards the "combined financial effects" : are undertakings required to publish aggregated information on anticipated financial effects unless not useful ?	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23.
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	Para 41 introduces new requirements. Current drafting of para 77 should be maintained.	ESRS2	ESRS 2 - General for metrics - GDR-M	41.
Excels	BDO Poland	Auditor	Poland			I disagree	The introduction of the materiality approach to ESRS 2 will disrupt our reporting process. ESRS 2 was intended to be a minimum requirement for all companies to report the information. Currently, if a company doesn't have something, it simply indicates that it doesn't have it/is not relevant to them. I don't know how a company can assess materiality in ESRS 2.	ESRS1	ESRS 1 - 3.2 Interaction between topics to be reported and material impacts, risks and opportunities	29.
Excels	BDO Poland	Auditor	Poland			I partially agree and partially disagree	Although this is a new and necessary point, it is still vague enough that it may lead to subjective interpretation.	ESRS1	ESRS 1 - 3.3.1 Impact materiality assessment	35.
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	It was already unclear and it remains like this. When asking for the % by gender and other aspects of diversity that we take into accout : what is requested exactly the % by gender on the board only ?	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (a)
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	We need to have more guidances to understand what is needed exactly.	ESRS2	ESRS 2 - GOV-3 - Statement on due diligence	AR 5.

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Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I disagree	We don't understand this AR and its objective	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 8.
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	Same as AR24. Is it necessary to repeat ?	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 29.
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	We don't understand why the old 80j was deleted considering this was requested in the objective. If something requested, it is better to have a clear DP to ask for it. Moreover, not consistent with the adding of the 41d in the GDR-M so as to provide explanations comparing to the previous year.	ESRS2	ESRS 2 - General for targets - GDR-T	43.
Excels	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium			I agree	We welcome the clarification that sustainability reporting is based on the consolidated financial statements (financial control approach). Consequently, in ESRS 2 para. 4(a), only the first part of the sentence should be retained.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	4. (a)
Excels	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium			I partially agree and partially disagree	For some metrics the information required by topical ESRS is not specifically defined or relevant for financial institutions (e.g., banks). In those situations, we already considered those metrics that are used to evaluate our performance. Please clarify how the disclosure of these metrics on an entity-specific basis should be dealt with in combination with those metrics on a topical ESRS basis, in the situation that you cannot disclose upon the topical ESRS metrics. In other words, shouldn't you also assess (via your information materiality) if the topical ESRS metrics are relevant considering the evaluation of its performance. If not relevant, you should disclose those entity-specific metrics that are used to evaluate your performance but you shouldn't or cannot disclose the topical ESRS metrics. Based on the amended paragraph it is not clear if solely disclosing entity-specific metrics, in case the topical ESRS metrics are not relevant, is possible. ESRS 1 Chapter 7.4 Relief of metrics, more specifically Paragraph 90, and ESRS 1 Appendix B: Qualitative characteristics of information, more specifically the Section on relevance, does provide some guidance. Please clarify.	ESRS2	ESRS 2 - General for metrics - GDR-M	40.
Excels	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden			I disagree	Interest and handling of affected stakeholders are important for governance and environmental aspects as well, not just social. We would urge that it remain for E, S and G topics, since it is an essential part of risk management. Pollution, ecosystem and resource usage are as important for a local community and other stakeholders - as well as corruption, bribery and whistleblowers - in a global production chain and economy.	ESRS2	ESRS 2 - General for policies - GDR-P	34. (d)
Excels	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden			I agree	Great clarifications.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38.
Excels	ASSIREVI	Auditor	Italy			I disagree	We propose the following rewording: " This standard refers to disclosing on impacts, risks and opportunities and disclosing on the topics related to them. […]". The application of DMA to all datapoints of ESRS 2 would be hard to apply considering ESRS 2 sets out general disclosure requirements that apply across sustainability topics and defines the undertakings' reporting process for the ultimate identification of material information to be disclosed.	ESRS2	ESRS 2 - Objective	2.
Excels	ASSIREVI	Auditor	Italy			I disagree	We propose re-integrating from NMIG for ESRS 2 the "NMIG 5 for para. 17(b)" in the main standard as a new Application Requirement to ESRS 2 para 17.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (b)
Excels	ASSIREVI	Auditor	Italy			I disagree	We propose re-integrating from NMIG for ESRS 2 the "NMIG 6 for para. 18" in the main standard as a new Application Requirement to ESRS 2 para 18.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	18.
Excels	ASSIREVI	Auditor	Italy			I disagree	We suggest reconsidering the removal of the ESRS 2 SBM-3 within the social topical (S1: existing para. 14; S2: existing para. 11; S3: existing para. 9; S4: existing para. 10) and including them within ESRS 2 SBM-3. Some provisions helps clarifying the scope of topical standards and IROs, in particular the letter a of each paragraph, that we propose to re-integrate in order to provide a more comprehensive description of the affected stakeholders covered by the requirements of the social standards.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	22.
Excels	ASSIREVI	Auditor	Italy			I disagree	We propose re-integrating the requirement to disclose information about how senior executive management oversee the setting of target related to material IROs. We believe such information is useful for the users of the sustainability reporting.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (d)
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We suggest deleting "where applicable" as as we believe it is essential to disclose such information if exists. We therefore suggest to restore previous paragraph as currently exists in ESRS Set 1 as per Delegated Act 2023	ESRS2	ESRS 2 - General for targets - GDR-T	43. (d)
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We propose adding some of the information contained in the existing para. 13 of ESRS E1 (in old Chapter GOV-3 "Integration of sustainability-related performance in incentive schemes") in the current para. 10 ESRS 2.	ESRS2	ESRS 2 - GOV-3 - Statement on due diligence	10.
Excels	ASSIREVI	Auditor	Italy			I disagree	We believe that the incremental guidance on aggregation requirements in ESRS 2 AR 23 may create confusion about the level of disclosure required. We recommend deletion of ESRS 2 AR 23 because guidance on aggregation and disaggregation is already addressed in ESRS 1 chapter 3.7	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 23.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We welcome the removal of the requirement referring to the next annual reporting period with respect to current financial effects, as this requirement was previously methodologically unclear and difficult to distinguish from anticipated financial effects. However, we continue to see conceptual challenges in the definition of "current financial effects" of material risks by combining financial effects and risks within a single disclosure requirement. By year-end, risks have either materialized and led to financial effects or have not. If they have materialized we are of the opinion that disclosures of material financial effects are covered by respective IFRS standards. Also, we recommend aligning the sustainability reporting requirements with existing risk reporting standards, which should serve as the basis for such disclosures for all risks and not only ESG-risks. In our opinion, sustainability reporting should not override or extend these principles through financial disclosure requirements in the sustainability statement. We therefore recommend that this disclosure requirement should be removed entirely or made explicitly optional.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (a)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The change in wording from “action plan” to “key action” creates additional effort for companies, as they must interpret this terminology and align it with their auditors. Furthermore, in our view, this change implies an expansion of the disclosure requirements regarding the associated financial impacts. We reject such an expansion, as it is not aligned with the objective of reducing administrative burden.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38.
Excels	PwC International Limited	Auditor	United Kingdom			I agree	We believe that the requirement to disclose performance against targets (included in ESRS 2 v1 paragraph 80(j)) should be reinstated as part of the general disclosure requirements related to targets. Because this is a key datapoint, we believe inclusion of a general requirement related to performance against targets in the objective is insufficient. We note that there are similar requirements in IFRS S1 paragraph 51(a) and 51(f); reinstating this disclosure requirement would also support interoperability.	ESRS2	General disclosures	43.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	This notion about disaggregation gives the impression that meaningful aggregations of IROs do not apply. Looking at 2024 Sustainability Statements the important thing is that IROs should be meaningfully aggregated so that the reader is not lost in translation. Delete the second sentence.	ESRS2	ESRS 2 - Objective	2.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The changes have merged, clarified, and simplified. The editorial changes are not substantive.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	3.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The term reporting boundary is associated with the value chain, not with the consolidation scope. Change the wording to: "... and in case the consolidated scope is different from the one adopted in the consolidated financial statements, a description of and the reasons for these circumstances"	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	4.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The relief for acquisitions in ESRS 2, paragraph 5(k) should be extended to a period of 2 years with an explanation to describe the reasons for the delay. Acquisitions are inherently complex and require significant time for systems integration. A one-year delay is not sufficient for sustainability reporting due to data limitations. For example, in a typical business combination, there is a one-year period to adjust the balances allocated to the assets and liabilities of the acquired company. If there is an IRO related to an asset (or a portfolio) due to financial materiality, when recalculating the value of the asset at the end of the one-year period, such IRO may change in terms of materiality for sustainability reporting purposes.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	5. (k)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The changes have clarified.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	6.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The start with “In addition” is confusing. Since this paragraph is related to paragraph 6 it would make sense to make this more transparent. Change the wording to: "In the instances mentioned in paragraph 6, for each topic..."	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	7.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The wording suggests that time-bound targets must be set. Change wording: "...briefly describe, if applicable, any time-bound targets it has set related to the topics in question, the progress it has made towards achieving those targets, and whether its targets related to biodiversity and ecosystems are based on conclusive scientific evidence;"	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	7. (b)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	Why is the disclosure restricted to adverse impacts, should this not read as actual or potential positive or negative impacts related to the topic in question?	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	7. (d)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	This has been inserted after pargraph 7 within the section for Disclosure Requirement BP-2. It is an AR for BP-1. So, move this to the section for BP-1, i.e., after paragraph 5.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	AR 1.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	This still assumes firms are managed by reference to IROs. The language should be changed so that it does not assume this. We also suggest to emphasise the concept of overseeing sustainability strategy rather than material IROs.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	Former paragraph 21(e) should be kept as an AR to provide guidance in the disclosure of the percentage of independent board members.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	9. (a)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	Only material datapoints are retained.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	10.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	There seems to be a typo. Change the wording to "when performance is assessed against specific sustainability-related targets and/or metrics, the targets or metrics used; and"	ESRS2	ESRS 2 - GOV-2 - Integration of sustainability-related performance in incentive schemes	11. (b)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	The statement on due diligence requirements appears still to be very generic and does not allow for a clear understanding of the required information. We consider the current ESRS version to be clearer in light of the table presented in the Application Requirement 10.	ESRS2	ESRS 2 - GOV-3 - Statement on due diligence	13.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	In our view this paragraph should be moved ahead of other paragraphs in ESRS SBM-1 to streamline the logic flow of the DR.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	18.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	We propose the deletion of this AR because it does not serve the simplification purposes of the ESRS revision; undertakings can describe groups of products and/or services offered, significant markets and/or customer groups served, and the sustainability-related goals related to them with a more strategic perspective, complying with qualitative characteristics of information.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 10.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Why is it necessary to call out workers' representatives. We would suggest deleting this. This would then also align with AR 11 for para. 20 (a). Change the wording to: "whether and how the administrative, management and supervisory bodies are informed about the views and interests of key affected stakeholders with regard to its material impacts, risks and opportunities, either individually or at a higher level (i.e. groups of impacts, risks and opportunities or related topics)"	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (c)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Clarify that credit institutions may refer to existing methodologies in describing its DMA process. Please also see our response to Part 2 Q13.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The use of the term negative impacts instead of adverse impacts is inconsistent with the rest of the ESRS.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (b)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Be careful with the use of the term risk, which has a very specific meaning in ESRS. It is also questionable why in this context the adverse/negative impacts are emphasised. Change wording to: "the scope of operations and value chain covered, with an indication of whether it focuses on specific activities, business relationships, geographies or other factors ;"	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (b)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	Is it necessary to specify all of these (26 c to h)? If yes, are they not all aspects of (a), i.e., should they be sub-components to (a)?	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Why are sentences 2 and 3 necessary? It seems to be very detailed and only focused on certain aspects and therefore not reflective of the general nature of ESRS 2 related disclosures. Delete sentences 2 and 3.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	IRO-2 should be split into two. The header does not correspond to what is described in the objective statement in paragraph 27, which refers only to the outcome of the materiality assessment as opposed to that and the disclosure requirements included in the sustainability statement. IRO-2 should therefore only include DPs related to the outcome of the materiality assessment, i.e., Paragraphs 28 (a), (b), (c), and (e). A new IRO-3 should be created to cover the disclosure requirements included in the sustainability statement. This section should include Paragraphs 28 (d) and (f). Paragraphs should then be renumbered accordingly.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	27.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	Why is this separately called out? If this is a result of Draft Amended ESRS S1 and ESRS S2 should it not be exclusively addressed in these topic-specific standards?	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (e)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	The table of all the datapoints that derive from other EU legislation should be restricted to those that the undertaking assesses as material. From a user perspective it is well understood that things not being disclosed are not material. Change the wording to: "a table of all the datapoints that derive from other EU legislation as listed in Appendix A of this Standard, if material and indicating where they can be found in the sustainability statement"	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (f)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The term metrics is missing. Change the wording to: "Information about policies, actions, metrics and targets shall enable an understanding of the level at which the undertaking is addressing its material impacts, risks and opportunities, i.e. at topic or sub-topic level. In instances where the undertaking has adopted policies or put in place actions or set metrics or targets for certain aspects only, this shall be reflected in the way the disclosure is prepared and presented, enabling an understanding of how the covered aspects relate to the corresponding material impacts, risks and opportunities."	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	29.

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Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The term metrics is missing. Change the wording to: "If the undertaking has not adopted policies, actions, metrics and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact. "	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	30.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Paragraph 31 should be changed from a Disclosure Requirement to an Application Requirement.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	31.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The order of metrics and targets does not follow the way it is described later in ESRS 2. Change the wording the: "The undertaking shall apply the requirements provided in this section, when it discloses either in accordance with a topical standard or on an entity-specific basis, on policies, actions, targets and metrics and targets related to material impacts, risks and opportunities, either individually or at a higher level (i.e. groups of impacts, risks and opportunities or related topics), covering:"	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	32.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The boldening of words within the ESRS is inconsistent. It does not seem useful to bold remediation and potential. Furthermore, the terms prevention, mitigation and remediation are related to negative impacts, i.e., a word corresponding to positive impacts is missing. Change the wording to: "its policies, and actions which address the prevention, mitigation and remediation of actual and potential material negative impacts and material risks and/or to pursue actual and potential material positive impacts and material opportunities; or"	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	32. (a)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The boldening of words within the ESRS is inconsistent. It does not seem useful to bold remediation and potential. Furthermore, the terms prevention, mitigation and remediation are related to negative impacts, i.e., a word corresponding to positive impacts is missing. Change the wording to: "the targets and metrics to assess progress over time in relation to its material impacts, risks and opportunities"	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	32. (b)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	All paragraphs in the GDR-P section need to be reworked to be consistent with other parts of ESRS 2 and any other ESRS. If GDR-P is changed to focus on key policies, GDR-A would have to follow suit.	ESRS2	ESRS 2 - General for policies - GDR-P	33.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The boldening of words within the ESRS is inconsistent. It does not seem useful to bold remediation and potential. Furthermore, the terms prevention, mitigation and remediation are related to negative impacts, i.e., a word corresponding to positive impacts is missing. Change the wording to: "the targets and metrics to assess progress over time in relation to its material impacts, risks and opportunities"	ESRS2	ESRS 2 - General for actions and resources - GDR-A	37.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	Principles-based guidance with respect to "significant" based on familiar concepts of materiality from financial reporting should be provided. Additionally, the use of the term "resources" is inconsistent. On the one hand there is mentioning of CapEx and OpEx, on the other hand there is mentioning of financial and other resources. The wording should be made consistent. Consider using the term resources in this section and add the definition of resources to the Appendix with acronyms and defined terms.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	The disclosure requirements concerning the quantification, even as an indicative range, of the financial resources supporting action plans defined by the undertaking are difficult to apply to financial institutions, and potentially complex to interpret for users of the Sustainability Statement, especially in the context of environmental standards where actions do not consist of significant investments but are connected to relationships with clients in the undertakings' portfolio. We therefore disagree with the mandatory nature of these requirements and suggest to maintain only a qualitative description of the resources allocated for implementation of action plans or other key actions	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38. (b)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	Paragraphs 41 (b) and (c) are not necessary because (b) is already implicitly covered in ESRS 2. Paragraph 41 (a) and (c) is already covered in ESRS 1.	ESRS2	ESRS 2 - General for metrics - GDR-M	41.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The examples are not necessary. Change the wording to: "The metrics include those defined in the ESRS, as well as metrics identified on an entity-specific basis, whether taken from other sources or developed by the undertaking itself"	ESRS2	ESRS 2 - General for metrics - GDR-M	AR 37.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	We believe these disclosures are burdensome and it is not practicable to meet all GDR-T and E1-6 disclosures for long-term (usually 2050) Net Zero Commitments or Targets. These are typically managed through a focus on the relevant interim targets along the pathway to Net Zero. Items expected by GDR-T and E1-6 will not be available for target setting 25 years out, resulting in non-decision useful information that is unlikely to meet the Quality of information requirements of ESRS 1. Undertakings that have made long-term Net Zero commitments should be able to limit disclosure to their interim targets which corresponds to how this is managed. Can EFRAG clarify this either in the standards or the NMIG since the Glossary definition of "target" will still pick up firms' 2050 net zero commitments.	ESRS2	ESRS 2 - General for targets - GDR-T	42.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The term "material" is missing. Change the wording to: "The undertaking shall disclose the measurable, time-bound, outcome-oriented qualitative or quantitative targets it has set related to its material impacts, risks and opportunities, either individually or at a higher level (i.e. groups of impacts, risks and opportunities or related topics). For each target, the undertaking shall disclose:"	ESRS2	ESRS 2 - General for targets - GDR-T	43.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	This should not be covered in a separate bullet. It is already sufficiently covered in bullet (f) and does not warrant a separate paragraph. Delete bullet (g). If it is considered necessary, embed it in an appropriate manner in bullet (f). In addition, guidance should be provided as to what constitutes "conclusive scientific evidence" for the basis of targets.	ESRS2	ESRS 2 - General for targets - GDR-T	43. (g)
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Deleting the second part of the requirement "and the material risks and opportunities for which there is a significant risk of a material adjustment within the next annual reporting period to the carrying amounts of assets and liabilities reported in the related financial statements" is a step into the right direction. However, reporting on current and anticipated financial effects related to risks and opportunities should be overall removed as this goes also beyond requirements in the financial reporting.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	22.
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Deletion of requirement to disclose anticipated financial effects. While also a requirement of the IFRS Sustainability Disclosure Standards, (potential future) financial effects from risks and opportunities are already indirectly taken into account when preparing financial statements or are covered as part of the risk and opportunity report in the management report. Calculating sustainability-related anticipated financial effects related to individual sustainability-related risks and opportunities lack reliable and harmonized guidance and therefore provide little information value. Additionally, reporting on financial opportunities is not a requirement in preparing finanical reports and can reveal sensitive strategic information, leading to competitive disadvantages for European companies. It is recommended this is addressed in both ESRS and to collaborate further with the ISSB with the same objective.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (b)
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The application requirement should be deleted as this could lead to unnecessary discussions with auditors on the level of detail to be included. If the ESRS requirements are clearly described, this AR should be redundant.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 20.
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	It is unclear how the AR is supposed to be considered when preparing the information for IRO-1, based on the current formulation, and thus leaving room for interpretation (i.e. is it mandatory to screen every individual site for the DMA?). A reformulation is needed or deletion of AR.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	It remains unclear what a company is supposed to disclose in relation to this datapoint. What is meant by "relative to other types of business risks"? Most sustainability risks are highly interconnected to "other business risks" making a differentiation difficult. The integration of risks in the company should be covered as part of GOV-4 (former GOV-5).	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (f)
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Deletion of "concise" as this is subject to interpretation.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (a)
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	It is unclear what needs to be reported related to "disclose its exposure to the heightened risk of incidents related to child labour and forced or compulsory labour by type of operations (such as manufacturing plant), or by countries or geographies with operations. [...]". Further clarification on "exposure" needed by referring to existing frameworks such aus UN Guiding Principles or rephrasing	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (e)
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	AR24 allows the IRO description to be presented with policies, actions, and targets in topic-specific chapters, but still mandates an IRO description in ESRS 2 leading to duplications in reporting. It should be sufficient to report the material sustainability topcics in ESRS 2 and disclose IRO-specific information in the respective topical standards.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 24.
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Deletion of paragraph "When reporting on policies, actions and targets, the undertaking shall report relevant information, avoiding information that is boilerplate, and therefore not relevant for users for example when policies and actions have been implemented to comply with law and regulation, or when the necessary information is already provided in accordance with [Draft] Amended ESRS 2 SBM-1. " as this might lead to unnecessary discussions with auditors on what constitutes "boilerplate information" and whether a policy should be reported or not. Certain policies and actions relate to compliance risks (e.g. related to anti-corruption) which makes it difficult to distinguish at the end whether the policy is in scope of this limitation or not.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 28.
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Changing the significant financial resources allocated for implementing action plans to "key actions" broadens the scope of the requirements and therefore goes against the simplification and reduction aim of EFRAG. It should be changes back to the original wording or completely taken out.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38.
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	To be deleted as this is a "may" datapoint and might broaden the scope of resources to be disclosed and might lead to discussions with auditors.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	AR 36.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	More clarity is needed on the reporting level, which should be on the topic level	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	Information that is sector-specific should be managed on an individual basis	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 7.

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Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	Same as above	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 8.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I agree	This has been streamlined	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I agree	More structured	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	21.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The wording "Undue cost effort" needs more clarification	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 15.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	Explaining how a company prioritises risks can be burdensome since prioritisation is a case-by-case process	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	While this is important to understand if something is material or not, it should be clear whether the LEAP approach is mandatory or voluntary	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I agree	The possibility of disclosing information in aggregate and the cross-reference reduces the burden	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	26.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	Disclosing environmental conditions, reliance on data from indirect sources, and contextual information about metrics can be burdensome	ESRS2	ESRS 2 - General for metrics - GDR-M	41.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	Qualitative targets may not be the best option here. They can be used on some exceptions, such as for biodiversity	ESRS2	ESRS 2 - General for targets - GDR-T	43. (b)
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	A reference to materiality should be added.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	A reference to materiality should be added.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 23.
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	Current financial effects are not necessarily presented "individually" in the financial statements. Direct reference is therefore not feasible.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (a)
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	We support Option 2 but regarding Option 1 - if it is adopted -, the drafting of point c) should be clarified as regards the "combined financial effects" : are undertakings required to publish aggregated information on anticipated financial effects unless not useful ?	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23.
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	Para 41 introduces new requirements. Current drafting of para 77 should be maintained.	ESRS2	ESRS 2 - General for metrics - GDR-M	41.
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	With sector-specific ESRS being abandoned, requiring sector-specific information would not provide any additional value for users. This requirement should be deleted.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (b)
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	Nokia welcomes the introduction of the relief “undue cost or effort” and focus on IFRS interoperability (ESRS 1, paragraph 60). However, it is not really clear what “undue cost or effort” means, how it should be computed and how deep in the supply chain the assessment should run. We call for the introduction of practical boundaries for this concept and how to calculate and demonstrate that required efforts and costs have been met to exercise this relief. See also Nokia’s comments regarding “reasonable and supportable” information / evidence in ESRS 1 - 81.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 15.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	The meaning of the concept of "key affected stakeholders" should be included in the glossary, instead of in ESRS 1 AR 10 and ESRS 2 AR11.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (c)
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	When quantitative information is required or voluntary disclosed, ESRS 2 AR 17 should be maintained and referred to whenever referring to anticipated financial effects, notably on climate matters.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (b)
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	Nokia welcomes these very important reliefs and restrictions and calls for their applicability throughout the ESRS whenever discussing current or anticipated financial effects or metrics. However, additional reliefs should be introduced to reflect that public companies have restrictions on what kind of forward-looking information they are allowed to disclose and how such information should be published (e.g., in case future investment and plans that have not been announced yet in line with applicable financial regulations).	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 17.
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	It is not clear what this disclosure requirement means in practice and why it should be included. Nokia suggests deleting it.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	26. (f)
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	This disclosure required is very detailed and specific to S1 and S2. It should be moved back to ESRS S1 and S2, and removed from ESRS 2.	ESRS2	ESRS 2 - General for targets - GDR-T	28. (e)
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	Public companies have restrictions on what kind of forward-looking information they are allowed to disclose and how such information should be published (e.g., in case future investment and plans that have not been announced yet in line with applicable financial regulations). Nokia suggests to limit the mandatory requirement to publicly announced plans.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38. (c)
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	This requirement should be disclosed only where applicable, i.e., when a target is required by a law, and not be required otherwise, i.e., not required by law. This would greatly simplify the report and disclosures.	ESRS2	ESRS 2 - General for targets - GDR-T	43. (f)
Excels	Group Caisse des Dépôts	Asset manager/Investor	France			I partially agree and partially disagree	the initial datapoints requiring the perimeter and scope of consolidation, the subsidiairies, and the use of the option to omit specific information, have been replaced by a general compliance statement with ESRS 1, which is less useful to an external reader	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	4. (a)
Excels	Group Caisse des Dépôts	Asset manager/Investor	France			I disagree	The requirement to disclose breakdown of revenues has been deleted, and the he ESRS sector classification system. This reduces comparability, and this sectoral iformation is crucial for stakeholders to undestrande business model, and IROs	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (b)
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree While we support the reasoning behind the reporting requirements, we have noted that wording indicate a checklist format as well as it imposes significant burdens. We suggest nuancing the requirements, focusing on material information rahter than a broad set of requirements. This would e.g. be relevant in relation to updated estimates and information gathered af the end of the reporting period as this might be part of the normal operating procedures with sustainability and therefore not separable. Likewise, adding additional information or applying general relief form metrics might require details vs. materiality of information that would expand the reporting beyond what is useful. We suggest reconsidering the wording. The relief in ESRS 1, paragraph 45(b) is for some reason not listed in ESRS2-5. Users should be informed about any topics that offhand could be assumed (by the user) to be significant to the business model, but due to reasonable and supportable EVIDENCE not being available to assess the materiality level (i.e. data are not reliable to assess materiality), the impact or risk is not reported (if this is the case).	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially agree The reporting requirement assumes a "full process", while it does not cater for the "update" envisaged in ESRS 1, paragraph 29. We are missing a reflection of the disclosure in its second year and onwards. We recommend it is added that an entity which already have reported on it's DMA process is only required to update on the process conducted in the FY covered by the annual report. (Similar to how you would normally provide strategy updates in the midst of a strategy cycle). This is to ensure that the entity is not repeating information already disclosure in the previous year and which might not have been repeated in the current year, if the underlying assumptions for the DMA have not changed and therefore an updated DMA and associated processes have not been conducted. In these circumstances there should be text which specifies, what the current FY processes have been.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (a)
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	We partially disagree We suggest amending ESRS 2, paragraph 28 (d) to exclude requirements on identification of information "incorporated by reference" (ESRS1-9.3) or amend it to be less, allowing for DR-references to the relevant (sub)section in the management review, e.g., "ESRS2-GOV1 is incorporated in section xxx of the management report". The practical solution on identifying sections with different levels of assurance should be left to the preparers and auditors. This would support better integration of, e.g. strategy, business model and the governance-information with the counterparts in the management report.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	We partially disagree, The standards still require somewhat "generic"/boilerplate information regarding policies. In our opinion, the extensive descriptions of policies are not generally considered to support the need for relevant and comparable information. To facilitate better and more focused reporting, we suggest separating reporting on Policies from the more specific actions, metrics and targets, thereby providing a more overarching approach to policies and focusing on the changes to policies adopted in the year rather than extensive repetition of information year-on-year. In addition, we suggest that it's clearly stated that materiality on information apply to all DR, including the description of policies.	ESRS2	ESRS 2 - General for policies - GDR-P	33.

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Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially agree We believe there are some overlaps between GDR-T and the requirements related to GDR-M and BP / description of accounting principles.	ESRS2	ESRS 2 - General for targets - GDR-T	43.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	This disclosure requirement is changed from "may" to "shall" and therefore adds to the reporting obligations. We do not find an appropriate reasoning for this and believe this adds unnecessary complexity and diverts from the overall purpose of the amendments. We believe that the original "May" MUST either be kept as a "May" or substituted with a "Can", but definitely not changed to a "Shall" (as this also adds documentation and disclosure requirements). Proposed change (marked with capital letters): 44. "If the undertaking has not set any measurable outcome-oriented targets, it CAN/MAY disclose whether and, if so, how it nevertheless tracks the effectiveness of its policies and actions in relation to its material related impacts, risks and opportunities either individually or at a higher level..."	ESRS2	ESRS 2 - General for targets - GDR-T	44.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Generally the Objective section fails to describe the actual general objective of ESRS 2, but rather address specific concepts. It is important for first time readers of the standards to understand the relationship between ESRS 1 and ESRS 2, which should be captured in the Objective sections. For example, this paragraph makes it sound as if the only purpose of ESRS 2 is to describe the GDRs, which is not the case. Instead it should be made clearer how there is a link between the principles set out in ESRS 1 and the disclosures in ESRS 2, making it clear ESRS 2 sets out the actual disclosure requirements following from the general principles and requirements.	ESRS2	ESRS 2 - Objective	1.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Text has been deleted relating to 'scope of consolidation, upstream and downstream value chain', which makes it less clear what should be included in disclosures about basis of preparation. Disclosure about 'specific circumstances' is not clear unless it means the DRs at ESRS 2:5 - if so, para 3 should clearly explain that it is referencing disclosures arising from ESRS1 on specified reliefs and other matters of application.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	3.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	It is confusing to have a paragraph refer to itself, instead amend the text to read: "...either (i) that none of the provisions listed in ESRS 2, paragraph 5 (a)-(k) apply, or (ii) which of the provisions listed in ESRS 2, paragraph 5 (a)-(k) have been applied,..."	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Reference to Appendix C should be Appendix D	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	6.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	This paragraph is an example of complications for distinguishing datapoints by combining several actual points of data into one explicit DP (a-level) (as indicated by paragraphs 9's 'shall disclose'. Based on the drafting convention, this is one DP, but it is asking for both the % of independent board members, employee representatives, gender percentage, and other aspects of diversity. Separating the requirements out clearly in 9(a)-9(d) will help undertakings undertand the requirements more readily.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	9. (a)
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	To enhance alignment with ISSB we recommend explicitly to include IFRS S1: 27(a)(v): how the body(s) or individual(s) oversees the setting of targets related to sustainability-related risks and opportunities, and monitors progress towards those targets (see paragraph 51), including whether and how related performance metrics are included in remuneration policies).	ESRS2	ESRS 2 - GOV-2 - Integration of sustainability-related performance in incentive schemes	11.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	See also ESRS 2:15. Simplification is leading to misalignment with IFRS S1, which requires much more disclosure (refer below). IFRS S1: 43-44 Risk management The objective of sustainability-related financial disclosures on risk management is to enable users of general purpose financial reports: (a) to understand an entity's processes to identify, assess, prioritise and monitor sustainability-related risks and opportunities, (...); and (b) to assess the entity's overall risk profile and its overall risk management process. To achieve this objective, an entity shall disclose information about: (a) the processes and related policies the entity uses to identify, assess, (...): (i) the inputs and parameters the entity uses (...); (ii) whether and how the entity uses scenario analysis(...) (iii) how the entity assesses the nature, likelihood and magnitude of the effects of those risks (...); (iv) whether and how the entity prioritises sustainability-related risks relative to other types of risk; v) how the entity monitors sustainability-related risks; and (vi) whether and how the entity has changed the processes it uses (...); (b) the processes the entity uses to (...); and (c) the extent to which, and how, the processes for identifying, (...).	ESRS2	ESRS 2 - GOV-4 - Risk management and internal controls over sustainability reporting	14.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Removal of ESRS 2: 53 par (e) and (f) removes the clear linkages with ERM, reducing alignment with ISSB and an important link to understand the business. (e) the extent to which and how the process to identify, assess and manage impacts and risks is integrated into the undertaking's overall risk management process and used to evaluate the undertaking's overall risk profile and risk management processes; (f) the extent to which and how the process to identify, assess and manage opportunities is integrated into the undertaking's overall management process where applicable;	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	We suggest to bring clarity about how to consider the term 'active' and its application to the financial sector. For example is 'active' defined by treference to significantly financing or allocating funding to that sector ? If yes, how to consider 'significantly finance'?	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 8.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	We suggest to clarify AR 23 as it would seem to allow an undertaking to report only at the topic (or sub-topic) level without actually describing its IROs? The architecture of the standards should be clear in requiring disclosure of material IROs rather than topics	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 23.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	While agreeing with the spirit of this, if it needs spelling out then the concept of 'material information' is not sufficiently embedded in ESRS 2 as the intent would be that the undertaking would only include material information as defined in ESRS1 - which should screen out information that is not relevant to the users's decisions/understanding. If retaining this AR, it should be clearly referenced back to the principle of material information	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 28.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	We suggest to clarify and/or give additional guidance on how PATs related to laws and regulations should be disclosed as it could be read that material information about application of those laws and regulations is not required. For example : if an undertaking is compliant with the REACH regulation, doest it mean it can only indicate it and does not have to make disclosures related to identification, tracking and management of substances of concern and does it meansit would be exempted from disclosing the quantitative information regarding SOVHC (DR 2-5)? Also, especially in the financial sector, several IROs are linked with regulations and IROs follow from those regulations (example, financial crime, prudential ESG risk management, or also employment policies). In these cases, whatdisclosures are expected from undertakings in the sustainability statement?	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 28.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	NMIG 12 is an important clarification of the DR and could be moved as an AR In ESRS 2 alongside AR 23.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (a)
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL The principles are laid out in ESRS 1, including the principle of disaggregation. It does not seem necessary to pick up this particular principle in the objective of ESRS 2 (what would be the reason to emphasize "disaggregation" but not any other principles, incl. "aggregation" etc.?). In addition: the wording seems a bit off, e.g. this standard refers to disclosing IRO… ?	ESRS2	ESRS 2 - Objective	2.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL Necessary to align "objective of this DR" with content of DR: par 3 states that the objective of BP-1 is to provide information about the use of phasing-in options. However, phasing-in disclosure do not seem to require disclosure on phase-in. Instead, this is the subject of BP-2 (which, however, does not have an "objective of this DR").	ESRS2	ESRS 2 - Objective	3.
Excels	DRSC	(National) standard setter	Germany			I disagree	"reporting boundary" seems to address only scope of consolidation (but not VC) - this should be in line with ESRS 1 / clarification needed that "reporting boundary" includes own operations and VC (as understood in ESRS 1)	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	4.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL Agree with new data point to disclose statement on the application of ESRS 1 requirements incl. an indication of the use of reliefs provided in ESRS 1; However, while we appreciate the streamlined 'comply or explain' approach to only state deviations from the ESRS 1 General requirements provisions, we would find it useful to provide that information in the relevant context and to not list all the details in the first section. We recommend reconsidering the detailed requirements, e.g. requirement in par 5(d), as partial scoping (e.g. extrapolation for own operations or selective inclusion of entities for upstream KPIs) has already been common practice and did not require explicit disclosure. Mandating such disclosure may introduce unnecessary complexity and reporting burden without significantly improving transparency. We suggest clarifying whether these detailed requirement are intended to change current practice or simply formalise existing flexibility.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5.
Excels	DRSC	(National) standard setter	Germany			I agree	new relief for acquisitions and disposals (as laid out in ESRS 1.72-73, see also ESRS 1)	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5. (k)
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL "additional non-material information" (include reference to non-material for clarification)	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5. (i)
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL reference check is needed in par 5; some of the references to the paragraphs in ESRS 1 are not correct (e.g., (a) should refer to par 79, (d) should refert to par 90, (k) should refer to par 72) Suggest to list the excemptions / reliefs in the order of appearance in ESRS 1	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL It needs to be clarified in this disclosure requirment that these disclosures are to be provided for those topics for which the undertaking chose to use the phase-in option (this is apparent from the heading of BP-2, but not from the the disclosure requirement itself).	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	7.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL Align wording. "Adverse impacts" results from SFDR, however is not defined in ESRS (i.e. not in the glossary). In order to align the wording, "adverse" should be replaced with "negative" impacts.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	7. (d)
Excels	DRSC	(National) standard setter	Germany			I disagree	"how the administrative, management and supervisory bodies determine whether appropriate skills and expertise are available or will be developed to oversee strategies and other measures… " DRSC considers the requirement to disclose "how" an undertaking determines… too vage and of questionable information value. The disclosure requirement should instead include a wording that asks the undertaking to "provide information on skills and expertise". In addition, the new wording ("determine") is likely to be understood differently than "ensure" (current wording) with the earlier asking for information on the process and not only on the knowledge being available; this could be misunderstood as an extension of this disclosure requirement.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	9. (b)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	DRSC	(National) standard setter	Germany			I disagree	This requirement now ask to disclose those IROs (groups of IROs / topics) for which "key decisions have not been delegated to another body". While this is not marked as a "new" requirement the current ESRS do not seem to contain this information. For every topic there are typically other bodies in the undertaking (besides the administrative, management and supervisory bodies) that takes "key decisions" (while the final decision arguably always resided with the management / supervisory board). It should be clarified what is expected from this disclosure requirement.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	9. (c)
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	[relates to the heading] heading, par 10 and 11(a) refer to "incentive schemes" only. The objective, according to par. 10, is to inforam about incentive schemes. However, par 11 refers to incentive schemes "and remuneration policies" without explaining the difference or which specific disclosures are expected for remuneration policies (a, b, and c seem to relate to "incentive schemes"). Generally, it is necessary to align the objective of a DR (here: understanding incentive schemes) with the specifics in the DR (here: incentive schemes and remuneration policies).	ESRS2	ESRS 2 - GOV-2 - Integration of sustainability-related performance in incentive schemes	10.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	Changes in the wording to "impacts' performance" (instead of current "impact") does not seem necessary and raises the question if "impact performance" is not part of the sustainability-related targets. There is no need to refer separately (in addition to sus. targets) to "impact performance". Delete reference to "impact performance".	ESRS2	ESRS 2 - GOV-2 - Integration of sustainability-related performance in incentive schemes	11. (c)
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG "The undertaking may present the description required by paragraph 13 in the form of a table, cross-referencing the core elements of due diligence for impacts on people and the environment- to the relevant disclosures in its sustainability statement." General question about the Due Diligence mapping (now "due diligence description in form of a table"): DRSC supports the approach to ask for a "description" rather than a "mapping". However, if AR 5 suggests a description that is in the form of a table with references etc. that basically is the same format requirement as the mapping. It is necessary to allow for more flexibility for how the undertakings describes the role / integration of due diligence. Therefore, include "description required by par 13 - for example - in the form of a table.	ESRS2	ESRS 2 - GOV-3 - Statement on due diligence	AR 5.
Excels	DRSC	(National) standard setter	Germany			I disagree	wording of this DR is still questionable as it refers to "risk managment for sustainability REPORTING"; when in fact "risk management" does not usually include the reporting process. While the main features and components of the risk management etc. are expected to provide valuable insights, it is questionable, whether there is a need for disclosures on the risk management regarding the reporting process itself. Therefore, a different wording should be considered.	ESRS2	ESRS 2 - GOV-4 - Risk management and internal controls over sustainability reporting	14.
Excels	DRSC	(National) standard setter	Germany			I agree	agree to the possiblity to group the disclosures for "groups of IRO" or at topic level	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17.
Excels	DRSC	(National) standard setter	Germany			I disagree	par 17 seems to require "sustainability-related goals" associated with significant groups of products and/or services, significant markets and / or customer groups. Sustainability related goals are typically not defined on the level of products and/ or services. In addition, this is a new level of disaggregation compared to ESRS DA.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (a)
Excels	DRSC	(National) standard setter	Germany			I disagree	[relates to 17(a)(ii)] There is currently no definition of "banned products" (i.e. products and services banned in certain markets). There is a need for clarification on which products are to be considered "banned". Are banned products and services those that were introduced into a certain market and afterwards banned? Does this require a specific decision by e.g. a national legislator or regulator? What is to be reported if the undertaking has withdrawn the products / services before a decision was made? Also, some products / services of undertakings are not intended to be sold in a certain market, e.g. b/c there is not demand for them in those markets. [continues in box below]	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (a)
Excels	DRSC	(National) standard setter	Germany			I disagree	[continued from box above] If these products at a later point in time become prohibited in that market would that be considered a case for a "banned product or service"? Which disclosure is required if product has always been prohibited in a certain market? The disclosure would need a definition / explanation regarding its intention; e.g. seems more sensible to define "banned" for those products that have been on a certain market before and are not allowed on the market anymore. The question that needs to be answered is: what is the intention of this requirement? What do we want to know about these products?	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (a)
Excels	DRSC	(National) standard setter	Germany			I disagree	Untertakings in the scope of the CSRD typically present some a segment report in its financial statements (according to IFRS 8 or local GAAP). There is not need for an additional disclosure in the sutstainability report to present "a list of significant sectors". An additional list could even lead to less connectivity if an undertaking chose to apply a different "sector classification system" compared to the financial statements. In addition: there is a need to explain the meaning of activities being significant "and/or are connected or may be connected" with material IRO. What is to be understood by "being connected" to or (even less clear) "may being connected" to IROs?	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (b)
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL list AR on 17(a) first (instead of last in the AR)	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 10.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	DRSC	(National) standard setter	Germany			I disagree	"the views and interests of key affected stakeholders (including workers' representatives)..." The additional terms in the brackets put an emphasis on "workers' representatives" which is not called for. It is not sufficiently clear or justified why there is the need for an emphasis on workers' representatives over other affected stakeholders. There should not be an unnecessary emphasis on one group of stakeholders. As every wording has an impact on how the standards are read, here: how "affected stakeholders" are understood. It could be read as affected stakeholders being mainly "workers' representatives". Even though the CSRD addresses (e.g. in recital (52)) workers' representatives explicitly this is not an emphasis for the understanding of affected stakeholders or related disclosure requirements. In addition: agree with clarification to "Key stakeholders" and level of granularity (topic instead of IRO)	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (c)
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL This is merely a reference to the glossary - this AR can be deleted.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	AR 11.
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG The DRSC disagrees with Option 1 but supports Option 2. Furthermore, the DRSC observes the need to refine the concept, including the question what the term "anticipated financial effects" is meant to capture. Additional note: to be consistent, extention of Option 2 to ESRS E1 needed as well. General Note: Clarification for "anticipated financial effects" (in ESRS 2) and "financial effects" (addressed in topical standards) needed. Please refer to our cover letter on this consultation.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23.
Excels	DRSC	(National) standard setter	Germany			I agree	reference to at which level IROs are managed	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 12.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL is this reference to the general principles in ESRS 1 a valuable AR? ("shall use reasonable and supportable information available to it at the reporting date without undue cost or effort") - these principles are relevant for all disclosures and do not seem to add information for the preparer (undue cost or effort relief is explained in ESRS 1)	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 15.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL If option 1 is decided on in the end, this relief should be placed in the main body, not in the ARs.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 17.
Excels	DRSC	(National) standard setter	Germany			I agree	"When providing quantitative information, the undertaking may present single amounts or ranges."	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 18.
Excels	DRSC	(National) standard setter	Germany			I disagree	Consider this comment in connection to ESRS E1 (the only other remaining reference to "resilience analysis". The requirements regarding the "resilience analysis" should be contained only in one standard and in one place as the results of the resilience analysis in topical standards directly inform the results of the overall resilience in ESRS 2. No need for separate requirements on resilience in ESRS E1.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	24.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL use "negative impacts" consistently (see above; there is currently no definition for "adverse" impacts)	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL Questionable whether this requirement can useful be addressed in a disclosure. It seems to rather result in boilerplate language only. "the approach used to consider impacts and dependencies in identifying and assessing its risks and opportunities" (but this is not a new requirement) Generally, the separate aspects of the list of par 26 seem to relate to each other; difficult to separatly identify each item? It could therefore be helpful to introduce these aspects by: "this disclosure shall include..." (rather than list as if separate disclosures on each are needed); this impression is also supported by the need to further explain any differences in AR 20).	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (e)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL The text of AR 20 indicates that the author of para 26 is aware of the ambiguity para 26 creates. Para 26 should be worded in a way that makes this clarification (AR 20) redundant.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 20.
Excels	DRSC	(National) standard setter	Germany			I disagree	It is currently not sufficiently clear that the site-level / location-level considerations are not required for the DMA process (which would be a stricter requirement than in the Delegated Act). While AR 22 does not explicitly address the DMA process (which is explained in ESRS 1 instead and therefore ESRS 2 would generally not include requirements regarding the DMA process) there can be a possible misunderstanding which should be avoided. Therefore, it should be clarified in the wording of AR 22 that site-level / location-level are to be considered if there is a need to disaggregate information on the DMA process, but not needed to be considered for the DMA process itself. See also related comment in ESRS 1 on the need to avoid a more granular approach than ESRS DA.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL AR 21 seems to intent to clarify the differences between the various disclosure requirements re/ stakeholder engagement. So far, AR 21 mostly repeats the requirements in IRO-1, SBM-2 etc. The differences could be explained more carefully.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 21.
Excels	DRSC	(National) standard setter	Germany			I disagree	The DRSC does not support the requirement to include a list of non-material items.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL aggregation (in ESRS 1 now complemented by "disaggregation") - suggestion to align.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 23.
Excels	DRSC	(National) standard setter	Germany			I agree	Generally, the DRSC agrees to the restructured architecture of ESRS regarding the interaction of ESRS 2 and the topical standards. This has significantly improved the readability of the standards and contributed to the streamlining of the disclosure requirements in order to avoid duplication in the sustainability report.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	29.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL par 29 is currently missing the reference to "metrics" (the heading, AR 26 for para 29 and other par in that section correctly include reference to PAT and metrics).	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	29.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL It seems questionable whether this AR is needed. AR 28 merely repeats general underlying principles from ESRS 1, e.g. reporting for the reporting period / no boilerplate. It does not seem necessary to repeat these requirements that are generally applicable to all disclosures. It will raise the question how these requirements are different for General PATM compared to other disclosures. Suggestion to delete.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 28.
Excels	DRSC	(National) standard setter	Germany			I disagree	The objective of "understanding of significant changes to the policies adopted during the reporting period" is not reflected in the DR as currently worded. The objective and the content of the DR need to be aligned. General Note for all cases in which objective and content of DR are not aligned: When objective and disclosure requirements are not aligned it opens room for discussion on whether the companies are expected to provide additional information in order to meet the objective of the requirement or if compliance with the ESRS is as well given if the company just sticks to the datapoints in the disclosure requirements. [continues in box below]	ESRS2	ESRS 2 - General for policies - GDR-P	33.
Excels	DRSC	(National) standard setter	Germany			I disagree	[continued from box above] As a general rule, the objectives of the requirements have to be revised and aligned with the datapoints contained in the ESRS or deleted completely. Furthermore, par. 33 reads: "The objective of this GDR is to provide an understanding of the policies that the undertaking has in place to address the prevention, mitigation and remediation of material actual and potential material impacts, manage material risks and pursue material opportunities ...". Material actual and potential impacts can be negative or positive. However, it should be noted that the terms "prevention, mitigation, and remediation" refer exclusively to the mitigation of negative impacts. This should be clarified in this paragraph. If the intention is to include positive impacts, the paragraph will need to be amended accordingly.	ESRS2	ESRS 2 - General for policies - GDR-P	33.
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG Policy is defined in the glossary as: A set or framework of general objectives and management principles that the undertaking uses for decision-making. A policy implements the undertaking's strategy or management decisions related to a material sustainability topic. Each policy is under the responsibility of defined person(s), specifies its perimeter of application, and includes one or more objectives (linked when applicable to measurable targets). A policy is validated and reviewed following the undertakings' applicable governance rules. A policy is implemented through actions or action plans. [continues in box below]	ESRS2	ESRS 2 - General for policies - GDR-P	34.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG [continued from box above] This definition seems to include in the understanding the related "processes" (management principles) that the undertakings uses for decision-making and implementing the strategy re/ material sustainability topics. However, in the specific DR it remains unclear where to report on processes related to the policies (previously, processes for managing and monitoring), especially if these processes cannot be seen as "key actions". The former MDR-P explicitly referred to "processes for monitoring" and was explicit. Now, there could be the understanding that processes are not part of policies, but since they are part of implementing policies are now part of "actions". It is necessary for EFRAG to clarify how to understand reporting about policies and actions in regard to general managment processes.	ESRS2	ESRS 2 - General for policies - GDR-P	34.
Excels	DRSC	(National) standard setter	Germany			I agree	agree with integration of information on S-Policy; however, it would be helpful to clarify the precondition of materiality in the context of this requirement	ESRS2	ESRS 2 - General for policies - GDR-P	35.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL The wording does not currently sufficiently clarify that this can contain actions that were initiated in earlier periods.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	37.
Excels	DRSC	(National) standard setter	Germany			I disagree	The level of reference for information on current and future financial resources allocated or expected has changed from "action plans" (in the DA) to "key actions" in the ESRSamend. The log of amendment states that par 38 has been "adjusted to link financial resources to key actions". This seems to entail a different, likely more detailed link between financial resources and key actions than before (key actions likely being part of "actions plans"). It should be clarified that there is no change intended with this amendment to the disclosure requirement.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38.
Excels	DRSC	(National) standard setter	Germany			I disagree	The AR contains "Examples of other non-monetary resources". However, this is not mentioned in the para 38 (a) and (c) to which the AR refers to. Therefore: suggestion to delete.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	AR 36.
Excels	DRSC	(National) standard setter	Germany			I disagree	In the view of the DRSC the current wording is prone to misunderstanding. Par 41 states that it is necessary to include this information for "each metric". It is necessary to clarify that the materiality of information concept also underlies this DR, i.e. disclosure on "each" metric not necessarily useful. E.g. while it is very useful for entity-specific metrics which are not explained in the ESRS it would, however, not provide particularly useful/informative for metrics that are determined following the descriptions in the ESRS. Therefore, the DRSC suggests to include "where relevant" (or something similar) as the general criteria for this DR.	ESRS2	ESRS 2 - General for metrics - GDR-M	41.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL "undertaking shall use the presentation currency of the financial statements" - should this not be a general requirement (to use the presentation currency)?	ESRS2	ESRS 2 - General for metrics - GDR-M	AR 38.
Excels	DRSC	(National) standard setter	Germany			I disagree	new requirement included for explanations regarding the metrics: "(b) for environmental metrics, the specific environmental conditions and characteristics of the area where the impact is occurring" ; generally agree with the intention (see log of amendments: to provide context for environmental metrics); However, DRSC questions this requirement due to: (a) unclear what exactly undertakings have to disclose here, (b) it would be overly burdensome if the impact cannot be located for one site but appears across operations; and (c) not each metric is directly connected to an impact.	ESRS2	ESRS 2 - General for metrics - GDR-M	41. (b)
Excels	DRSC	(National) standard setter	Germany			I disagree	"whether the undertaking's targets related to environmental topics are based on conclusive scientific evidence and, if this is the case, how the target considers ecological thresholds." Requirement on disclosing how the target considers ecological threshold is (according to log amendments) taken from E-standards; however appears as a new requirement. To avoid misunderstanding DRSC suggests a clarification that this is not an additional requirement compared to current ESRS.	ESRS2	ESRS 2 - General for targets - GDR-T	43. (g)
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL It is important to clarify that targets can comprise "to maintain the currently high standard". The current wording could be (mis-)understood to always refer to improvements (e.g. "progress", par. 43(d)) when in fact there might be topics for which the target is to maintain the results achieved in the past. It could be clarified that a target can also refer to maintaining a result, keep a stable performance.	ESRS2	ESRS 2 - General for targets - GDR-T	43.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I disagree	We do not agree with the requirement to combine a mandatory statement that the general requirements of ESRS 1 have been applied with an indication of whether and which of the provisions listed in ESRS 2, paragraph 5 have been applied. This results in meaningless boilerplate text and redundant disclosures. Compliance with ESRS 1 is self-evident, and any use of its provisions is already accompanied by mandatory disclosures under ESRS 1 itself. For example, where an undertaking applies the relief for metrics with a partial scope (ESRS 1, paragraph 91) or restates information due to error correction (ESRS 1, paragraphs 95-97), sufficient transparency is ensured by contextual explanation, disclosure of the limited scope, and correction of prior figures. Requiring additional statements under ESRS 2, paragraph 5 only duplicates this information without providing added value for readers. We therefore recommend deleting the requirement or at least limiting it to cases where paragraph 5 could genuinely add clarity and avoid duplication.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	Paragraph 9 on the representation of employees and other workers in the composition of the administrative, management and supervisory bodies does not specify what is to be considered as representation of employees. We suggest that it clarifies if it means that the board member is being employed by the reporting undertaking or if the board member is a union board member.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I disagree	It has been amended but not deleted. We suggest deleting this datapoint to reduce complexity and unnecessary reporting burden.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I disagree	It has been amended but not deleted. We suggest deleting this datapoint to reduce complexity and unnecessary reporting burden.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	AR16 should explicitly apply only to material risks and opportunities	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 16.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I disagree	Since IROs are already disclosed in IRO-2 §28 (a), it is redundant to also disclose them in GDR-P.	ESRS2	ESRS 2 - General for policies - GDR-P	34.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	A new mandatory disclosure is introduced: whether it has an overarching human rights policy committing to implement the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. If this is the case, additional disclosures are required. This is a welcomed addition in line with SFDR.	ESRS2	ESRS 2 - General for policies - GDR-P	35.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I disagree	A new mandatory disclosure is introduced: whether it has an overarching human rights policy committing to implement the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises. If this is the case, additional disclosures are required. Hence, we suggest to delete this datapoint	ESRS2	ESRS 2 - General for actions and resources - GDR-A	37.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	ESRS S2, S3 and S4 are not classified as metric-containing standards (ESRS 2 AR 37). However, the phrase "disclose these" implies quantitative disclosure, creating confusion about whether these should be treated as metrics and how they fit into the overall metrics and targets framework.	ESRS2	ESRS 2 - General for metrics - GDR-M	AR 37.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	We recommend a rewording from IROs to topics: The undertaking shall disclose the measurable, time-bound, outcome-oriented and qualitative or quantitative targets it has set related to its material impacts, risks and opportunities (change to topics).	ESRS2	ESRS 2 - General for targets - GDR-T	43.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I disagree	We suggest deleting this datapoint to reduce complexity and unnecessary reporting burden.	ESRS2	ESRS 2 - General for targets - GDR-T	44.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The term "reporting boundary" seems to address under Par. 4 only the scope of consolidation but not the value chain. A definition of "reporting boundary" is both missing in ESRS 1 and the glossary. It would be helpful if a definition is provided to clarify what is meant by "reporting boundary".	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	4.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	We would propose to list the different deviations (ESRS 2 - 5.(a)-(k)) in the order of appearance in the ESRS 1. This would further align the strcuture of ESRS 1 and the disclosures under ESRS 2. It would increase readability for the preparer as the exemption could be easier traced.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	5.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	The AR should be moved to BP-1 to follow the structure that each AR sits next to the respective DR is covers.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	AR 1.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Unclear what is meant with "how the administrative, management and supervisory bodies determine whether appropriate skills and expertise are available". Is it sufficient to have a "competency profile" for the respective body/committee or is a descrpition of all sources for skills/expertise necessary (how can bodies leverage on existing expertise in- and outside of the company)? DR seems vague and not decision-relevant for users. Therefore, delete the DR.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	9. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	What is meant with "impacts' performance"? In the current Delegated Act, the DR focuses solely on "impact". Suggestion to delete "performance" to make the DR clearer.	ESRS2	ESRS 2 - GOV-2 - Integration of sustainability-related performance in incentive schemes	11. (c)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Datapoint should be deleted as a list of sectors does not provide any added value for external users (no decision-useful information). As there will be no sector-specific ESRS, details on significant sectors will not be provided by preparers (or only based on other frameworks such as SASB). If no clear provision on the use of a specific sector classification is given, the disclosures will be incomparable even within one industry (no added value for users). If NACE code as classification is used (as suggested by NMIG 5 for SBM-1) a reference to the financial reporting makes no sense as financial reporting is not based on NACE codes.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Datapoint should be deleted as a list of sectors does not provide any added value for external users (no decision-useful information). As there will be no sector-specific ESRS, details on significant sectors will not be provided by preparers (or only based on other frameworks such as SASB). If no clear provision on the use of a specific sector classification is given, the disclosures will be incomparable even within one industry (no added value for users). If NACE code as classification is used (as suggested by NMIG 5 for SBM-1) a reference to the financial reporting makes no sense as financial reporting is not based on NACE codes. Also EU Taxonomy might not fit properly in that classification.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 7.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	1. Deletion of the reference to sectors ("and on a sector") as there will be no sector-specific ESRS and the disclosure of a list of significant provides no added value for users (see comments on ESRS 2 Par. 17b and AR 7). 2. The order of the AR should follow the order of the DR. That means the AR 10 should be the first in the list.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 10.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Not necessary to highlight "workers' representatives" as key stakeholders, as combination of datapoint and AR 11 clarifies the reporting on key affected stakeholders. "workers' representatives" should be deleted. Alternative: mention all categories of affected stakeholders as outlined in ESRS 1 AR 10.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Deletion. It is completely unclear how the reporting on current financial effects of risks and opportunities should be done. As in the current Delegated Act no guidance is given in the Exposure Drafts or NMIG on how to calcute the financial effects. The effect of risks and opportunities could best be shown as comparison to plan data (for the reporting period: PLAN vs ACTUAL). However, the planning for the respective FY is not published as it is business sensitive information (and there should never be an obligation to publish it). The DR in its current form should be deleted.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (a)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	We are strongly against the inlcusion of any disclosure on anticipated financial affects. By year-end, risks have either materialized and led to financial effects or have not. If they have materialized we are of the opinion that disclosures of material financial effects are covered by respective IFRS standards. Therefore, both options should be deleted. we recommend aligning the sustainability reporting requirements with existing risk reporting standards, which should serve as the basis for such disclosures for all risks and not only ESG-risks. In our opinion, sustainability reporting should not override or extend these principles through financial disclosure requirements in the sustainability statement. We therefore recommend that this disclosure requirement should be removed entirely or made explicitly optional.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	We are strongly against the inlcudion of any disclosure on anticipated financial affects. Both options should be deleted.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 17.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	Very useful to allow the reporting on quantitative information- to be either in single amounts or ranges. For reporting on planning figures ranges are preferred as single amounts do not reflect the uncertainty attached to planning figures.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 18.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	The term "negative impacts" should be used instead of "adverse impacts".	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	It seems as if EFRAG is aware of the fact that the reporting on Par. 26a-e will most likely lead in many cases to boilerplate reporting of mostly useless information for users of sustainability statements. A technical description of the DMA process seems not to really relevant for users. Par. 26a-e should be reduced to a short description of the DMA only focussing only key aspects. If boilerplate information is likely, the respective datapoints should be deleted.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 20.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The DMA process does not require the inclusion of site-level / location-based analysis according to ESRS 1. Why is this AR required? Should it clarify that this is additional information on the DMA in case site-level / location has been considered? We suggest to clarify the role of this AR and the link to the disclosures on the DMA and the DMA prcess requirements themselves.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Useful option to limit the reporting volume and to clarify PAT disclosures. Editorial remark: This AR should be put last as it refers to Par. 30 whereas all other ARs refer to Par. 29.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 27.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	It seems as if EFRAG is aware of the fact that the reporting on the General Disclosure Requirements might lead to the disclosure of boilerplate and not relevant information for users. This indicates that the General Disclosure Requirements are too broad, inconsise and not decision-useful. Information provided to users should always be decision-useful and relevent. Disclosure Requirement that lead to irrelevant reporting should be either deleted completely (as they provide no value for the user) or re-drafted to make them useful for users. We suggest to indicate clearer which information should be provided or to reduce the scope of the Par. 29.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 28.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Unclear if action undertaken in previous years that still have an effect on material IROs in the reporting period can be reported. It should be made clear that action from previous years can be reported as well if still relevant.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	37. (a)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	"significant resources" should be changed into "significant financial resources" as the reminder of the whole par. 38 is about financial resources. However, we do not want EFRAG or reporting bodies to define what "significant" is. This should remain a company competence.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	"financial resources" should be changed into "significant financial resources" to align the wording within par. 38.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38. (a)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	"financial resources" should be changed into "significant financial resources" to align the wording within par. 38.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	"financial resources" should be changed into "significant financial resources" to align the wording within par. 38.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38. (c)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	The wording should be aligned throughout the whole par. 38 including the connected AR. The wording "significant financial resources" should be used to align the wording within par. 38. "Resource allocation" and "resources" should be replaced accordingly. It should also be clarified that a disclosing a monetary range for the planned allocation of significant financial resources over the whole time period is sufficient.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	AR 35.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Deletion. This AR is not fully related to Par. 38. Par. 38 only refers to disclosures regarding current or future monetary resources. "Non-monetary resources" are not part of the disclosure requirements - there is only a mention of "other resources" under Par. 38a but not Par. 38c. It is therefore not understandable why "examples of other non-monetary resources" may be included if the requirement (Par. 38 in general) does not ask for it. The AR should be deleted.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	AR 36.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Deletion as it does not provide any added value for external users (no decision-useful information).	ESRS2	ESRS 2 - General for metrics - GDR-M	41. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Moving the disclosure to ESRS 2 is ok. However, the wording in brackets ("for example, own workforce and workers in the value chain being distinct from consumers and endusers") is unclear. Is it meant as a clarification to indicate the coverage of the human rights policy (which stakeholder groups are covered by the policy taking into account that the human rights policy usually only covers the own workforce and workers in the value chain and not consumers)? The disclosure is closely related to Par. 28e which is only focussing on ESRS S1 and S2.	ESRS2	ESRS 2 - General for policies - GDR-P	35.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	Overall, we welcome the flexibility introduced by paragraph 2 allowing datapoints to be presented at level of disaggregation that provides the most relevant information.	ESRS2		
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	The centralisation of the basis for preparation related provisions in one paragraph is more comprehensive.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	AR 1 for BP-1 is included in section BP-2 instead	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	AR 1.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The section BP-2 now only contains provisions (par 6 and 7) specific to entities <750 employees, as the other paragraphs moved or were deleted. The full section BP-2 is therefore not applicable to all other entities while it reads 'Specific information if the undertaking uses phasing-in options'. Suggest to merge BP-2 elsewhere or change the title.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	6.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	It should be made clear that paragraph 7 is not a standalone datapoint but relates to, and follows from, paragraph 6.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	7.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Should this read 'not delegated' (and not: 'delegated')?	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (c)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Unclear and long requirement, consider rewording. For example, what does 'of those' exactly refer to?	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (c)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	Moving former datapoint 21(d) to AR reflects the nature of this paragraph.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	AR 2.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Not clear why Biodiversity and ecosystems is specifically called out here.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	7. (b)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	This paragraph could benefit from a rephrase to make more clear what is required. The 2nd part of the DR seems to say that it should be disclosed which IROs are managed by the administrative, management and supervisory bodies themselves and not by a committee/Sr management level. However, if interpreted correctly, this is not clearly phrased.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (c)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	For the reader, it might be helpful if a specific sector classification system should be used by all preparers. That drives uniform reporting and less research for readers when they need to look up a sector classification system to understand the DR.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (b)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Should it state "or", or should it state "and" at the end of the sentence? Similar to other metrics, we'd assume that for entity-specific metrics the policies, actions and targets, as well as metrics should be disclosed.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	32. (a)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The reference to segment reporting under IFRS 8 Operating segments was removed from paragraph 17(b), while the AR applicable to this paragraph does refer to it to assess materiality. This does not seem consistent.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 10.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	ESRS 2 requires companies to disclose current and future financial resources related to key actions. ESRS 2 should provide clear and detailed guidance on the following: •What classifies as sustainability-related CapEx and OpEx? •What are the criteria for an investment to be considered significant? •What is the time horizon to be applied when calculating & disclosing these effects	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	38.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	This AR seems to be a duplicate of ESRS 2 - AR 25	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 29.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Without clear definitions, methodologies, presentation format these disclosures can not be reliably made. It's then also not possible to meet the qualitative characteristic of comparability.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38. (b)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Paragraph uses the term 'its counterparts' - which doesn't seem a defined term in ESRS 2 or Annex II	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 8.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	This disclosure requirement is not clear. The standard should provide additional detail on what is meant by environmental conditons, environmental characteristics, and area.	ESRS2	ESRS 2 - General for metrics - GDR-M	41. (b)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	The AR is supposed to clarify the concept 'key stakeholders' however does not really address what is considered key ('Key stakeholders refer to key categories of affected stakeholders'). If the deliberate intention is to keep this generic, then agreed.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	AR 11.

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Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	Overall, we welcome the flexibility introduced allowing datapoints to be presented at level of disaggregation that provides the most relevant information (ESRS 2 - par 2). Of which this AR is an example.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 12.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	Examples of input parameters are helpful.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 19.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Guidance to explain how to navigate between different DRs that touch on stakeholder engagement is generally helpful. The fact that this is needed however, may indicate that for the reader of the sustainability statements (not having such guidance at hand) the structure is complex.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 21.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	AR mentions that information on Policies, Actions and Targets needs to be 'specific to the reporting period'. Especially for Policies, the information will not likely be specific for the reporting period (Policies apply period-overarching). What is meant here in this context?	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 28.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	AR mentions that information on Policies and Actions, when they are implemented to comply with law and regulations, would not be relevant for users (and regarded boilerplate). Can it be illustrated with examples what type of Policies and Actions are meant here? As for example some Policies may (partially) be compliance driven - while still relevant in the context of the IROs they relate to. Splitting this information accordingly will also be practically challenging.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 28.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	This disclosure should be changed as follows: the methodologies, significant assumptions used to define targets, whether the target is required by law (only if applicable), the selected scenarios on which it is based, level of compatability with national, EU, or international policy goals (only if applicable).	ESRS2	ESRS 2 - General for targets - GDR-T	43. (f)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	More clarity is needed on selected scenarios. This may not be applicable to all targets and should only be required if applicable.	ESRS2	ESRS 2 - General for targets - GDR-T	43. (f)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	More appropriate to keep as it was: "a description of a decision-making process and the related internal control procedures", the entire document is mentioning high level processes and does not make sense to change the wording here.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (g)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	AR7. Issue with NEW requirement to disclose list of significant sectors as undertakings already disclose sector(s) leading to duplication and potential for conflicting information – Remove AR7. AR10. Issue with NEW requirement to assess significance of products/services, markets/customers and/or sectors based on % revenue, IFRS or local GAAP, or connection to material impacts, potentially conflicting with existing financial reporting standards – Remove AR10.	ESRS2	SBM-1 - Strategy, business model and value chain	AR7, AR10
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Duplication with existing requirements in ESRS 1 – Remove AR14.	ESRS2	SBM-3 - Interaction of material impacts risks and opportunities with strategy and business model, and financial effects	23(b), AR14
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Issue with labeling impacts as negative or positive when this distinction may not be clear and/or an accurate representation of complex topics for all impacts. In addition, the NEW requirement to specify how these impacts affect or are likely to affect people or the environment may lead to inaccurate, incomplete or misleading information about potential impacts – Revise the requirement to specify that undertakings are not required to label impacts as positive or negative and remove the phrase "including how they affect or are likely to affect people or the environment" from the requirement.	ESRS2	IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28(a)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Issue with instructions to "avoid information that is boilerplate… when policies and actions have been implemented to comply with law and regulation", which is not clear or defined (i.e., "boilerplate), may restrict preparers from proving decision useful context to their policies and actions, and may deprive users of this information – Remove the sentence starting with "When reporting on…" from AR28.	ESRS2	General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR28
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Issue with new and potentially substantive requirements that a company's human rights policies "shall specify which groups of affected stakeholders are covered", which follows a new and potentially (implied) substantive requirement that the policy commits to implementing certain external voluntary frameworks. These requirements appear directed at behaviour rather than disclosure, are overly prescriptive, and disregard that undertakings may have due diligence processes where respect for human rights is embedded in multiple policies rather than a single, overarching policy. We recommend to remove these requirements as principles-based requirements are already covered under paragraph 34. To further simplify these disclosures, the GDRs on policies should be aligned with IFRS S1 paragraph 44(a).	ESRS2	General Disclosure Requirement for policies - GDR-P	35, AR30
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Action-related financial information DRs under ESRS 2 GDR-A paragraph 38 should be removed, per our recommendation to remove all financial reporting requirements already subject to IFRS.To further simplify these disclosures, the GDR-A should be aligned with IFRS S1 paragraph 33(a)-(b).	ESRS2	General Disclosure Requirement for actions and resources - GDR-A	38

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Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	42-43. Challenges with the removal of "whether and" before "how…" (2x, from para 42), and the removal of "material" before "impacts…" (from para 43), as these terms were useful to provide sufficient context where they have not established a target. We recommend reinstating this language in the standard. In addition, the new requirement under 43(g) to disclose how environmental targets which are based on conclusive scientific evidence consider ecological thresholds is not sufficiently precise. We recommend to remove the new requirement to disclose how environmental targets consider ecological thresholds. To further simplify these disclosures, the GDR-Ts should be fully aligned with IFRS S1 para. 51(a)-(g) and IFRS S2 paras. 33-37.	ESRS2	General Disclosure Requirement for targets - GDR-T	42-43
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Agree with disaggregation concept application but definitions of disaggregation seem to differ across ESRS1 and this para therefore alignment needed	ESRS2	ESRS 2 - Objective	2.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Propose to remove datapoint (ii) as not relevant to users of the Sustainability Statement	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (a)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Propose to remove data point as the whole purpose of the DMA is to identify material impacts and overview of the process is already covered by part (a)	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (c)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Propose to remove data point as the whole purpose of the DMA is to identify material risks and ESRS1 already clarifies sources to be used including enterprise risk management processes so this data point does not add value to the reader	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (f)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Move references to LEAP to NMIG as these models are not mature yet	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Reference to systemic or widespread impacts / risks have been removed from topical disclosures but are not covered in ESRS2 (only reference is too systemic or widespread actions but should apply to the DMA itself)	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	We do not support the revised requirement to disclose a breakdown of activities per sector and their connection to IROs. This level of detail is already sufficiently covered through disclosures on the business model and strategy, where material impacts, risks, and opportunities (IROs) are explained in context. Additionally, ESRS 2 already requires companies to indicate where in the value chain IROs occur. Further granularity is also available through EU Taxonomy disclosures, financial statement segment reporting, and the broader annual report, which together provide a comprehensive view of the undertaking's activities. Including this breakdown in the ESRS adds reporting burden without clear added value and risks duplicating existing disclosures.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (b)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	We note that the disclosure requirement has been extended to include reportable segments under IFRS 8, in addition to product/service groups accounting for more than 10% of revenue. This change increases the reporting burden, as IFRS 8 segments may include activities below the 10% threshold. It may also inadvertently discourage voluntary transparency under IFRS 8. We propose giving companies the option to disclose either product/service groups exceeding 10% of revenue or reportable segments under IFRS 8, depending on which provides the most relevant and meaningful insight into their sustainability performance.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 10.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The new requirement mandating undertakings to disclose a list of significant sectors they operate in raises concerns about consistency and comparability. If this becomes mandatory, companies must be able to select from a clearly defined, publicly accessible, and officially approved list of sectors to ensure uniform application. Currently, the non-mandatory implementation guidance leaves several options open, which risks inconsistent interpretations and reduces comparability across undertakings.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 7.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The revision of ESRS 2 - 38 increases the level of granularity of resource disclosures. Companies are now required to " indicate the corresponding line items and/or notes where they are included in the financial statements" previously more flexible requirement " explain how they relate to the most relevant amounts presented in the financial statements". We do not believe this is of additional value to users, whereas it adds narrative disclosures, making the report harder to read.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38. (b)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Adapt ESRS 2 wording to reflect a top-down approach by referring to "sustainability topics and their material IROs (or groups of them)," rather than framing it primarily through the lens of "material IROs (or groups of them / related topics)"	ESRS2	ESRS 2 - Objective	1.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Clarify that ESRS 2 starts from the topic level (strategic entry point), with disclosures on associated material IROs where relevant – not the other way around "this standard refers to disclosing on both the topics to be reported and the material impacts, risks and opportunities"	ESRS2	ESRS 2 - Objective	2.

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Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	- Delete the data point on value chain coverage, as Section 5.2 of ESRS 1 already clarifies its treatment in sustainability reporting (addressed in the DMA, limited to the undertaking's scope of responsibility for PAT, and in principle excluded for metrics), and it is redundant with other ESRS provisions (e.g., SBM-3, IRO-1, PAT GDR) - Alternatively, require companies to disclose the "reporting coverage in the sustainability statement, including any limitations"	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	4. (b)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	ANC partially supports the new BP-1 datapoint. In principle, any sustainability statement prepared under the ESRS should already comply with ESRS 1, making a blanket affirmation of full application of limited value and potentially boilerplate. The real usefulness lies in requiring undertakings to disclose any deviations from ESRS 1 principles. If retained, all ESRS 1 requirements should be grouped under a single datapoint (basis for preparation), to facilitate tagging and avoid fragmented disclosures. The Excel count file shows that "Basis for Preparation-1 §5" is currently split into six datapoints (a–e, with two for §5b), whereas ANC proposes one datapoint with a single tag (see response to Q22). - Group all deviations from ESRS 1 principles under a single datapoint (basis for preparation), to facilitate tagging and avoid fragmented disclosures - Avoid listing the provisions using letters (a,b,c,d,etc.), to prevent them from being misinterpreted as separate datapoints or tagged disclosures - Replace the reference to §86 with §85 in §5c	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Move phasing-in on related material topics from Basis for Preparation to IRO-2 by adding in §28a: "if applicable, specification of the use of the phase-in provisions in Appendix F of ESRS 1 allowing to omit information on certain material impacts, risks and opportunities" to centralise information on IROs at the same place	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	6.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Remove PAT minimum disclosure content on phased in material topics from Basis for Preparation to GDR by adding a summarised paragraphe such as: "for each topic that relates to material impacts, risks and opportunities, when phasing in have been applied, the undertaking shall however briefly describe its policies, actions, targets and metrics"; this location would be more logical and will allow for a shorter requirement than current §7.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	7.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Align GOV-1 with GOV-2 by reflecting the strategic role of governance bodies in managing "sustainability topics and their material IROs (or groups of them)," rather than framing it through the lens of IROs ("material impacts, risks and opportunities (or groups of them / related topics)"	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Reintroduce the datapoint on the number of executive and non-executive members in governance bodies	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Extend the disclosure of the overseeing/approval by governance bodies to DMA results and transition plan on top of target setting (information expected by investors)	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (d)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Delete the disclosure requirement GOV-3 "Statement on due diligence"; instead include a placeholder in ESRS 1 addressing the articulation between the ESRS and due diligence	ESRS2	ESRS 2 - GOV-3 - Statement on due diligence	13.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Soften sector significance criteria (10% turnover or connected with material impacts) to become indicative as the objective is only to understand the business	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 10.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Require disclosure of employee headcount by geographical area in ESRS 2 as part of the overall company presentation, in addition to the country-level headcount required under ESRS S1	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Remove reference to internal activities in the list of significant sectors (limited to specific cases) and relocate it to the AR	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (b)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	- Delete the information on "how the undertaking has addressed or plans to address them (IROs)" when requiring a "high-level description of the interaction of material impacts, risks, and opportunities with the business model, value chain, strategy, and decision-making," as it is redundant with PAT disclosures. Such information should be addressed through concrete sustainability actions rather than at a high-level strategic description; the high-level description should focus solely on their interaction with the business model, value chain, strategy, and decision-making - Reintroduce a reference to positive impacts: "This includes how material negative and positive impacts originate from the strategy and business model." - Align SBM-3 with top-down approach by highlighting that business model, strategy and decision making interact with "sustainability topics and their material IROs (or groups of them)," rather than focusing on granular IROs	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	22.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Explicitly state that current effects should be reported "after past prevention and/or mitigation measures" to avoid creating ambiguity	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (a)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Mention climate and biodiversity risks in the AR to support their consideration in the biodiversity assessment, especially following the deletion of the related topical requirement in E4: "The undertaking shall disclose a qualitative analysis of its resilience to the material risks disclosed in accordance with paragraph 22, including how the analysis was conducted and the time horizons considered, which may be particularly relevant for climate and biodiversity topics in high impact sectors."	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	24.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Move data points on impact prioritisation, consultation findings, and consideration of impacts/dependencies in the risk/opportunity assessment to AR, as they conflict with the DMA approach in ESRS 1 (which allows for a top-down methodology) Proposed wording: "The undertaking shall disclose the following: a) an overview of the methods, assumptions, inputs (including whether and how views of affected stakeholders are factored) and judgements used during the assessment, in particular regarding materiality (qualitative and/or quantitative) thresholds; b) whether and how the undertaking prioritises sustainability risks relative to other types of business risks, including its use of risk assessment tools; and c) a description of the decision-making procedures, including significant changes compared to prior reporting period."	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Delete the data point on changes related to its material IROs compared to the previous reporting period, and merge it with the existing data point (§26g) on "description of the decision-making procedures, including significant changes compared to prior reporting period"	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (c)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Clarify the term "appropriate level of aggregation" particularly between group and subsidiary levels	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 23.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Move categorisation of material IROs based on management priorities to AR	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	31.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	- Delete the reference to "avoid generic descriptions except where necessary to enable an understanding of the undertaking's current approach to manage its material IROs," as such descriptions contradict the qualitative characteristics, and may raise audit, supervision, and enforcement issues - Instead, specify in this AR: "Information on inputs for the materiality assessment, especially data and tools used, is often more relevant when provided at the level of topics"	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 28.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Delete the information on "how and where impacts, risks, and opportunities are connected to the business model, own operations, and upstream and downstream value chain" when requiring "a concise description of actual and potential, positive and negative material impacts, as well as material risks and opportunities," as this is redundant with SBM-3, which already asks for an explanation of their interaction with the business model	ESRS2	ESRS 2 - General for policies - GDR-P	28. (a)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Introduce a reference to positive impacts in the policies, allowing undertakings to disclose policies addressing positive impacts, notably on social matters: "The objective of this GDR is to provide an understanding of the policies the undertaking has in place to prevent, mitigate and remediate material negative impacts, advance material positive impacts, and manage material risks and pursue material opportunities"	ESRS2	ESRS 2 - General for policies - GDR-P	33.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Gap with ANC proposal : deletion of when the policy refers to third party-standards or initiatives the undertaking commits to respect through the implementation of the policy, a reference to such third-party standard or initiative should remain voluntary;	ESRS2	ESRS 2 - General for policies - GDR-P	34. (c)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Gap with ANC proposal : deletion of "for social topics, a description of the consideration given to the interest of affected stakeholders in setting this policy, when applicable" as it is already required in S standards	ESRS2	ESRS 2 - General for policies - GDR-P	34. (d)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Gap with ANC proposal : deletion of whether it has an overarching human rights policy committing to implement the UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises	ESRS2	ESRS 2 - General for policies - GDR-P	35.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	We urge the removal of the implied mandatory disclosure requirement of all internal performance indicators (KPI) because the datapoint requests "shall disclose the metrics that it uses to evaluate its performance". This datapoint should only focus on the mandatory datapoints of the ESRS. The company has more KPI internally that are used for monitoring but these cannot all be made public.	ESRS2	ESRS 2 - General for metrics - GDR-M	40.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Gap with ANC proposal : deletion of "for environmental metrics, the specific environmental conditions and characteristics of the area where the impact is occurring" or replacement with "any relevant contextual information"	ESRS2	ESRS 2 - General for metrics - GDR-M	41. (b)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Gap with ANC proposal : deletion of "for value chain metrics, the reliance on data from indirect sources or proxies, and where applicable, the planned actions to improve the data quality in the future" as this is already mentioned in ESRS 1 and as the standardised metrics are not covering the value chain (except scope 3)	ESRS2	ESRS 2 - General for metrics - GDR-M	41. (c)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	- Add the requirement of the performance achieved against the disclosed targets, as well as the related metric	ESRS2	ESRS 2 - General for targets - GDR-T	44.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	Similar to IFRS standards, the introduction of the Fair Presentation principle in ESRS 1 needs to be supplemented by a requirement of an "explicit and unreserved statement of compliance with ESRS" by the undertaking. It may be implicit in the reference to "the general requirements of ESRS 1 have been applied", but the explicit and unreserved statement of compliance with ESRS should be a distinct and explicit requirement in BP-1. This is also aligned with IFRS S1 and IAS 1.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We consider that ESRS 2 BP-1 §5(h) should be modified, as the exact scope of omission covered by this requirement is unclear. It could be understood as relating to: -(a)"classified and sensitive information" covered by ESRS 1.98 and -(b) information about impending developments or matters in the course of negotiation covered by ESRS 1.AR 35 –as indicated literally by the drafting of the datapoint; or relating also to -(c) information pertaining to intellectual property, know-how or the results of innovation covered by ESRS 1 §99 – as indicated by the reference into brackets in this datapoint, mentioning ESRS 1.99 and 101. We would expect a requirement to disclose whether information was omitted relating to situations (b) and (c) in line with the current requirements under ESRS Set 1. The requirement to disclose the omission of "classified and sensitive information" (situation (a)) as suggested by the ED goes beyond ESRS Set 1 which does not require companies to explicitly confirm omission of "classified and sensitive information". This is to avoid disclosing the existence of such information defined by EU laws, and inadvertently compromising confidentiality or security.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	5. (h)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We believe there is a typo and consider that Appendix C should be replaced with "Appendix D".	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	6.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We suggest to extend this datapoint to also consider risks in addition to adverse impacts.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	7. (d)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We would rather support an approach where information required by ESRS 2 § 4 on the extent of the value chain (ESRS 2 §4(b)) and reporting boundaries (ESRS 2 §4(a)) be still provided within the General information section, in the interest of transparency and readability of the sustainability statement. We therefore suggest EFRAG to specify that information pertaining to ESRS 2 § 4 still needs to be provided within the General information section of the sustainability statement.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	AR 1.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We suggest to include a reference under ESRS 2 GOV-4 to CSDDD requirements to ensure alignment between CSRD and other EU legislation.	ESRS2	ESRS 2 - GOV-3 - Statement on due diligence	13.
Excels	Ernst & Young	Auditor	United Kingdom			I agree	In accordance with our comment below, we agree with this clarification.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 8.
Excels	Ernst & Young	Auditor	United Kingdom			I agree	We agree with this clarification and alignment with the definition currently provided in the SFDR Regulation, which would exclude financial institutions from being active in fossil fuel sectors. We recommend adding an explicit reference to the SFDR Regulation (2019/2088) within AR 9. Companies active in the fossil fuel sector would be those "that derive any revenues from exploration, mining, extraction, production, processing, storage, refining or distribution (…) of fossil fuels". This is also in line with AR 8 for §17(b), which clarifies that the "undertaking is not considered to be active in the sectors of operations of its counterparts in the upstream and downstream value chain".	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 9.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	See comment for ESRS 2 – 20.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	AR 11.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	Para 20 and AR11 for Para 20 only refer to engagement with 'affected stakeholders'. Previously, in Set 1, this requirement referred to the general definition of stakeholders (including 'primary users of information'). We ask EFRAG to clarify if this reduction in scope was intended. It may be relevant in some sectors (in particular banking, fintech etc.) to engage / disclose information on views and interests of users such as investors.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	The proposed simplification to resilience-related disclosure requires only qualitative information, which is inconsistent with IFRS requirements ('quantitative information to be disclosed if applicable'). We ask EFRAG, in line with our response to Part 2 Question 21, to maintain a requirement to disclose quantitative information related to resilience.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	24.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We recommend clarifying that the description of material IROs (§28) should reflect their underlying characteristics and the undertaking's specific facts and circumstances (as implied by the requirement for a "concise description of IRO"). Considerations relating to the management of IROs are more relevant when disclosing on the related PATs which can be aggregated accordingly. A clear mapping between individual IROs from DMA and aggregated disclosures would enhance transparency. We also ask EFRAG to insert a datapoint within ESRS 2 IRO-2 to require undertakings to provide a table indicating what additional information was included within the sustainability statement along with the location of such information in the sustainability statement.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We are concerned that the meaning of reporting "at the appropriate level of aggregation (…) depending on the nature of the IROs and reflecting the level at which the undertaking manages them" could be interpreted in different ways: -one interpretation is that disclosures should reflect the level where policies and actions are defined and implemented i.e., the operational level at which IROs are actively managed. We would support this approach for the PATs disclosures related to material IROs. However, it should be clarified how to report on IROs not (yet) managed -another broader interpretation could allow reporting at a high aggregation level (e.g. environmental or social level), even if IROs differ significantly in nature, location, or business/management context. EFRAG should clarify these concepts to avoid reporting on a level that is insufficiently granular to understand the IROs and how they are managed.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 23.

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Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We are concerned that the meaning of reporting "depending (…) on differences in the undertaking's current approach to their management" could be interpreted in different ways. Please refer to our comment on AR23 which describes the different interpretations. EFRAG should clarify to avoid reporting on a level that is insufficiently granular to understand the policies, actions, metrics and targets and how they are managed.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 28.
Excels	Ernst & Young	Auditor	United Kingdom			I agree	We welcome this additional flexibility provided by EFRAG with regards to the presentation of the description of material IROs.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 29.
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	We disagree with this datapoint within GDR-M as we consider this a substantial addition compared to the previous MDR-M disclosure requirement in ESRS Set 1. Although the log of amendments mentions that this was added from environment ESRS to centralise the provision on contextual information we do not recognize this as being required for all environmental metrics in ESRS Set 1. Furthermore, providing this type of information for each metric would be a highly complex exercise for undertakings. We consider that the burden associated with this datapoint outweighs its potential benefits. As such we ask EFRAG to remove ESRS 2 §41(b). If considered necessary this disclosure could be added for certain specific metrics where this information would be considered relevant	ESRS2	ESRS 2 - General for metrics - GDR-M	41. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The term "reporting boundary" seems to address under Par. 4 only the scope of consolidation but not the value chain. A definition of "reporting boundary" is both missing in ESRS 1 and the glossary. It would be helpful if a definition is provided to clarify what is meant by "reporting boundary".	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	4.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We would propose to list the different deviations (ESRS 2 - 5.(a)-(k)) in the order of appearance in the ESRS 1. This would further align the strcuture of ESRS 1 and the disclosures under ESRS 2. It would increase readability for the preparer as the exemption could be easier traced.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	5.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	The AR should be moved to BP-1 to follow the structure that each AR sits next to the respective DR is covers.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	AR 1.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Unclear what is meant with "how the administrative, management and supervisory bodies determine whether appropriate skills and expertise are available". Is it sufficient to have a "competency profile" for the respective body/committee or is a descrpition of all sources for skills/expertise necessary (how can bodies leverage on existing expertise in- and outside of the company)? DR seems vague and not decision-relevant for users. Either delete the DR or replace it by a summary of the necessary skills and expertise necessary for the oversight of the strategies and other measures to respond to material IROs for each body.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	9. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	What is meant with "impacts' performance"? In the current Delegated Act, the DR focuses solely on "impact". Suggestion to delete "performance" to make the DR clearer.	ESRS2	ESRS 2 - GOV-2 - Integration of sustainability-related performance in incentive schemes	11. (c)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Datapoint should be deleted as a list of sectors does not provide any added value for external users (no decision-useful information). As there will be no sector-specific ESRS, details on significant sectors will not be provided by preparers (or only based on other frameworks such as SASB). If no clear provision on the use of a specific sector classification is given, the disclosures will be incomparable even within one industry (no added value for users). If NACE code as classification is used (as suggested by NMIG 5 for SBM-1) a reference to the financial reporting makes no sense as financial reporting is not based on NACE codes.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Datapoint should be deleted as a list of sectors does not provide any added value for external users (no decision-useful information). As there will be no sector-specific ESRS, details on significant sectors will not be provided by preparers (or only based on other frameworks such as SASB). If no clear provision on the use of a specific sector classification is given, the disclosures will be incomparable even within one industry (no added value for users). If NACE code as classification is used (as suggested by NMIG 5 for SBM-1) a reference to the financial reporting makes no sense as financial reporting is not based on NACE codes. Also EU Taxonomy might not fit properly in that classification.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 7.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	1. Deletion of the reference to sectors ("and on a sector") as there will be no sector-specific ESRS and the disclosure of a list of significant provides no added value for users (see comments on ESRS 2 Par. 17b and AR 7). 2. The order of the AR should follow the order of the DR. That means the AR 10 should be the first in the list.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 10.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Not necessary to highlight "workers' representatives" as key stakeholders, as combination of datapoint and AR 11 clarifies the reporting on key affected stakeholders. "workers' representatives" should be deleted. Alternative: mention all categories of affected stakeholders as outlined in ESRS 1 AR 10.	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Deletion. It is completely unclear how the reporting on current financial effects of risks and opportunities should be done. As in the current Delegated Act no guidance is given in the Exposure Drafts or NMIG on how to calcute the financial effects. The effect of risks and opportunities could best be shown as comparison to plan data (for the reporting period: PLAN vs ACTUAL). However, the planning for the respective FY is not published as it is business sensitive information (and there should never be an obligation to publish it). The DR in its current form should be deleted.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (a)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We are strongly against the inlcudion of any disclosure on anticipated financial affects. Both options should be deleted.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (b)

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Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We are strongly against the inlcudion of any disclosure on anticipated financial affects. Both options should be deleted.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 17.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Very useful to allow the reporting on quantitative information- to be either in single amounts or ranges. For reporting on planning figures ranges are preferred as single amounts do not reflect the uncertainty attached to planning figures.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 18.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The term "negative impacts" should be used instead of "adverse impacts".	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	It seems as if EFRAG is aware of the fact that the reporting on Par. 26a-e will most likely lead in many cases to boilerplate reporting of mostly useless information for users of sustainability statements. A technical description of the DMA process seems not to really relevant for users. Par. 26a-e should be reduced to a short description of the DMA only focussing only key aspects. If boilerplate information is likely, the respective datapoints should be deleted.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 20.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The DMA process does not require the inclusion of site-level / location-based analysis according to ESRS 1. Why is this AR required? Should it clarify that this is additional information on the DMA in case site-level / location has been considered? We suggest to clarify the role of this AR and the link to the disclosures on the DMA and the DMA prcess requirements themselves.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Useful option to limit the reporting volume and to clarify PAT disclosures. Editorial remark: This AR should be put last as it refers to Par. 30 whereas all other ARs refer to Par. 29.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 27.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	It seems as if EFRAG is aware of the fact that the reporting on the General Disclosure Requirements might lead to the disclosure of boilerplate and not relevant information for users. This indicates that the General Disclosure Requirements are too broad, inconsise and not decision-useful. Information provided to users should always be decision-useful and relevent. Disclosure Requirement that lead to irrelevant reporting should be either deleted completely (as they provide no value for the user) or re-drafted to make them useful for users. We suggest to indicate clearer which information should be provided or to reduce the scope of the Par. 29.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 28.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Unclear if action undertaken in previous years that still have an effect on material IROs in the reporting period can be reported. It should be made clear that action from previous years can be reported as well if still relevant.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	37. (a)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	"significant resources" should be changed into "significant financial resources" as the reminder of the whole par. 38 is about financial resources. EFRAG should think about giving an indication what is meant by "significant". The term "significant resources" is not defined.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	"financial resources" should be changed into "significant financial resources" to align the wording within par. 38.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38. (a)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	"financial resources" should be changed into "significant financial resources" to align the wording within par. 38.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	"financial resources" should be changed into "significant financial resources" to align the wording within par. 38.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38. (c)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The wording should be aligned throughout the whole par. 38 including the connected AR. The wording "significant financial resources" should be used to align the wording within par. 38. "Resource allocation" and "resources" should be replaced accordingly. It should also be clarified that a disclosing a monetary range for the planned allocation of significant financial resources over the whole time period is sufficient.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	AR 35.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Deletion. This AR is not fully related to Par. 38. Par. 38 only refers to disclosures regarding current or future monetary resources. "Non-monetary resources" are not part of the disclosure requirements - there is only a mention of "other resources" under Par. 38a but not Par. 38c. It is therefore not understandable why "examples of other non-monetary resources" may be included if the requirement (Par. 38 in general) does not ask for it. The AR should be deleted.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	AR 36.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Deletion as it does not provide any added value for external users (no decision-useful information).	ESRS2	ESRS 2 - General for metrics - GDR-M	41. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Moving the disclosure to ESRS 2 is ok. However, the wording in brackets ("for example, own workforce and workers in the value chain being distinct from consumers and endusers") is unclear. Is it meant as a clarification to indicate the coverage of the human rights policy (which stakeholder groups are covered by the policy taking into account that the human rights policy usually only covers the own workforce and workers in the value chain and not consumers)? The disclosure is closely related to Par. 28e which is only focussing on ESRS S1 and S2.	ESRS2	ESRS 2 - General for policies - GDR-P	35.

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Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	ED 2025 §3-5 vs 2023 BP-1 §4-17 & BP-2 §6-17. Narrative optionality removed and increased mandatory cross-referencing to every ESRS 1 provision and conformation of equivalence increased technical work as this is an added compliance step (undertakings must map a mandatory list of 10 specific ESRS 1 reliefs/options where companies must check a box).	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	3.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	ED 2025 §6-7 replacing 2023 BP-2 §6-17. Overall compliance effort does not materially change through the proposal to migrate obligations to BP-1 and retain multiple bullet point confirmations. Only removes optionality for narrative and limit scope exclusively for undertakings with > 750 employees.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	6.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Still assumes firms are managed by reference to IROs; DR should be changed "whether and if so" questions - Applicable to GOV-1, GOV-2, GOV-3, GOV-4: These disclosure requirements are very perspective, they don't take account of materiality and they ultimately do not yield useful comparison data. We should advocate for a framework that grants companies the discretion, based on their size, industry and specific needs, to determine the most effective and appropriate methods for establishing, overseeing and managing their respective sustainability programs. We should also remind EFRAG that the overarching intention here is to simplify process and reduce burden and cost for business - these detailed disclosure requirements undermine that goal by adding to expenses and operational complexities. It's worth noting to EFRAG too that overly prescriptive requirements may inadvertently lead to companies issuing standardised compliance (tick the box) disclosures, which, while fulfilling the letter of the law, might not necessarily translate into meaningful improvements in transparency or the advancement of sustainability programs.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	9.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Would like to see optionality for private company boards. ED §9(a) vs 2023 §21(a),(c). Cuts two quantitative datapoints (number of executive vs non-executive members and sector/geography). Retains disaggregations (gender, independency, employee representation) which is still onerous for large groups. Deletion not substantial enough to ease collection & assurance burden.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (a)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	ED §9(b) vs 2023 §23. New explicit requirement to explain how skills & expertise are determined. Shifts from data listing to narrative but still requires qualitative evidence that does not reduce burden and creates potential audit challenges.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	9. (b)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Would like more clarity on if incentive schemes need to align with material topics or can be more general for sustainability topics overall.	ESRS2	ESRS 2 - GOV-2 - Integration of sustainability-related performance in incentive schemes	10.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	ED §11 vs 2023 §29. Improved to only if applicable and limits data points. Data points reduced from five to three: removes (i) identification of specific benchmarks in remuneration policy and (ii) level at which schemes are approved. Still requires monetised % of variable pay, which is commercially sensitive information.	ESRS2	ESRS 2 - GOV-2 - Integration of sustainability-related performance in incentive schemes	11.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	ED §14-15 vs 2023 §34-36. Removes five narrative datapoints; reduction in internal-audit mapping. Retains only description of "scope, main features and components". Deletes mandatory disclosure of risk-assessment approach, main risks identified, mitigation controls, integration, and periodic reporting. Materially lighter; however high-risk sectors may still be required to report similar/duplicative information under topical ESRS, limiting net relief.	ESRS2	ESRS 2 - GOV-4 - Risk management and internal controls over sustainability reporting	15.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	ED §17(b)-18 vs 2023 §40(a)(iii)-(g), §40(b)-(d). Partial simplification. Retains fossil fuel/chemicals/controversial weapons/tobacco statement. Eliminated revenue table, headcount and reconciliation. Revenue breakdown by ESRS sector deleted; only "list of significant sectors" now required. Headcount by geography, banned products, explicit sustainability goals, and IFRS 8 reconciliation deleted.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (b)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I agree	ED §20 vs 2023 §45. Shortens narrative; fewer speculative forward-looking claims to substantiate. Collapses five sub-requirements into three: engagement overview, stakeholder views, board information. Deletes mandatory disclosure of engagement organisation/purpose and future amendments to strategy	ESRS2	ESRS 2 - SBM-2 - Interests and views of stakeholders	20.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	- In relation to the activity covered by this clause (d), the term "reasonable and supportable," particularly "supportable," needs to be clarified as it could be interpreted as requiring a level of validation or the implementation of governance and control processes that would defeat the term's intended purpose, in this context should mean that the information is relevant and satisfies the fair presentation and qualitative characteristics of information requirements specified in ESRS 1. Such an approach is consistent with the acknowledgement in Section 7.2 of ESRS 1 that disclosed information is subject to the application of judgement, as well as measurement and outcome uncertainty.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 15.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We continue to believe that disclosure on anticipated financial effects is inappropriate given that such effects are extremely difficult for companies to predict with any degree of certainty. Moreover, such disclosure would in many cases include commercially sensitive information, necessarily include financial information not already included in the undertaking's financial statements, and is unnecessary for an understanding of an undertaking's material sustainability-related risks and opportunities.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (b)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				At first introduct, consider that we mean "material risks," "material impacts," and "material opportunities", i.e that material modifies all 3 terms and that there is no expect to report all imapcts, only material ones	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	25.

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Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	ED §26 vs 2023 §53. Inmaterial simplification. Slight narrative condensation; no change to underlying analytical workload. Substantive scoping, stakeholder consulation amd LEAP-style (locate, evaluate, assess, prepare)screening retained.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	ED §28(d)-(f) vs 2023 §56-57. Change does not simplify; the new labour-risk disclosure introduces additional supply-chain mapping. While the proposal removes granular cross-referencing, it adds a mandaotry labour-risk table resulting in an overall net effect of neutral to heavier for global supply-chains.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Multiple ED §33-44 vs 2023 §63-81. Re-labels MDR-P/A/M/T as "General Disclosure Requirements"; allowing aggregation when same policy/action covers multiple topics (positive). Benefit offset by introduction of overarching Human Rights policy datapoint (previously spread across S-standards)	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 26.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Administrative optionality is welcome but the changes does not materially simplify compliance obligations and burden	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	31.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Introduces new overarching Human Rights policy datapoint (previously spread across S-standards). Disclosure misaligned with simplification objective.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	35.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				We recognize that GDR-T allows flexibility on targets and recommend adding further acknowledgement of the challenges of setting measurable targets in connection to people	ESRS2	ESRS 2 - General for targets - GDR-T	44.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Guidance should be provided as to what constitutes "conclusive scientific evidence" for the basis of targets. Add "if any" after "targets"	ESRS2	ESRS 2 - General for targets - GDR-T	43.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I agree	Like the specific clarity on format of report.	ESRS2	ESRS 2 - BP-2 - Specific information if the undertaking uses phasing-in options	AR 1.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I agree	Like the ability to report at an aggregated topic level as compared to individual IROs.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 23.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	By attempting to streamline this overarching social metric from the Topical Standards to the General Standard, it has created increased confusion with the context of human rights policies and how these policies relate to a reporting entities policies and procedures. This disclosure requirement should be broken back out into the various Topical Standards to enhance clarity and context.	ESRS2	ESRS 2 - General for policies - GDR-P	35.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Remove "and planned for the future" from "When the undertaking implements key actions to manage material impacts, risks and opportunities, it shall disclose: (a) the description of the key actions taken in the reporting year and planned for the future..."	ESRS2	ESRS 2 - General for actions and resources - GDR-A	37.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Add clarification for how to approach for entities using Artificial Consolidated reporting	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 38.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	More clarity is needed on the reporting level, which should be on the topic level	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	Information that is sector-specific should be managed on an individual basis	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 7.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	Same as above	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	AR 8.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	This needs to be clarified, it is confusing what actually is requested.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (b)
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I agree	More structured	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	21.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The wording "Undue cost effort" needs more clarification	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	AR 15.

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Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	Explaining how a company prioritises risks can be burdensome since prioritisation is a case-by-case process	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	26.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	While this is important to understand if something is material or not, it should be clear whether the LEAP approach is mandatory or voluntary	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I agree	The possibility of disclosing information in aggregate and the cross-reference reduces the burden	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	26.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	Disclosing environmental conditions, reliance on data from indirect sources, and contextual information about metrics can be burdensome	ESRS2	ESRS 2 - General for metrics - GDR-M	41.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	Qualitative targets may not be the best option here. They can be used on some exceptions, such as for biodiversity	ESRS2	ESRS 2 - General for targets - GDR-T	43. (b)
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Qualitative information should be mandatory instead of quantitative information as collection of quantitative information is subject to a high degree of uncertainty. Data for a precise calculation is not available.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (b)
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The language requires further clarification.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	4. (a)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	If a company makes use of the phase-in requirements, it shall not be required to disclose any information relating to the provisions (or ESRS) subject to the phase-in provision.Companies should be allowed to focus on the DR and information that will indeed be included in their sustainability statement.	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	6.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	The basis for the disclosures shall be the outcome of the DMA. Hence, if a company concludes a certain topic is not material, no further dislcosures apart from ESRS 2 should be required. This principle should also apply to the topic "climate change".	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (b)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	If a company has not adopted any policies, actions and targets with reference to a specific topic related to material IROs, it shall not be obliged to disclose this fact. Not making any disclosures in this regard is sufficient for the users of the sustainability report to understand that no such policies, actions or targets exist. Otherwise, companies that do not have such policies, actions or targets would be "put on the spot" which would result in a de facto comply-or-explain-mechanism.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	30.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				38. Recommend making current/future opex and Capex disclosures optional. Focus should be on outcomes of activities rather than inputs	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				Applicable to GOV-1, GOV-2, GOV-3, GOV-4: These disclosure requirements are very perspective, they don't take account of materiality and they ultimately do not yield useful comparison data. We support a framework that grants companies the discretion, based on their size, industry and specific needs, to determine the most effective and appropriate methods for establishing, overseeing and managing their respective sustainability programs. These detailed disclosure requirements undermine the simplification goal by adding to expenses and operational complexities.	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in relation to sustainability	
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				Sub-entities metrics should be optional as sub-enitities might set their own metrics without coordinating with parent org.	ESRS2	ESRS 2 - General for metrics - GDR-M	40.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				We recognize that GDR-T allows flexibility on targets and recommend adding further acknowledgement of the challenges of setting measurable targets in connection to people	ESRS2	ESRS 2 - General for targets - GDR-T	44.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				At first introduct, consider that we mean "material risks," "material impacts," and "material opportunities", i.e that material modifies all 3 terms and that there is no expect to report all imapcts, only material ones	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	25.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Deleting the second part of the requirement "and the material risks and opportunities for which there is a significant risk of a material adjustment within the next annual reporting period to the carrying amounts of assets and liabilities reported in the related financial statements" is a step into the right direction. However, reporting on current and anticipated financial effects related to risks and opportunities should be overall removed as this goes also beyond requirements in the financial reporting.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	22.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	Deletion of requirement to disclose anticipated financial effects. While also a requirement of the IFRS Sustainability Disclosure Standards, (potential future) financial effects from risks and opportunities are already indirectly taken into account when preparing financial statements or are covered as part of the risk and opportunity report in the management report. Calculating sustainability-related anticipated financial effects related to individual sustainability-related risks and opportunities lack reliable and harmonized guidance and therefore provide little information value. Additionally, reporting on financial opportunities is not a requirement in preparing finanical reports and can reveal sensitive strategic information, leading to competitive disadvantages for European companies. It is recommended this is addressed in both ESRS and to collaborate further with the ISSB with the same objective.	ESRS2	ESRS 2 - SBM -3 - Interaction of material impacts and opportunities with strategy and business model, and financial effects	23. (b)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	The application requirement should be deleted as this could lead to unnecessary discussions with auditors on the level of detail to be included. If the ESRS requirements are clearly described, this AR should be redundant.	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 20.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Deletion of "concise" as this is subject to interpretation.	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (a)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	It is unclear what needs to be reported related to "disclose its exposure to the heightened risk of incidents related to child labour and forced or compulsory labour by type of operations (such as manufacturing plant), or by countries or geographies with operations. [...]". Further clarification on "exposure" needed by referring to existing frameworks such aus UN Guiding Principles or rephrasing	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	28. (e)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Deletion of paragraph "When reporting on policies, actions and targets, the undertaking shall report relevant information, avoiding information that is boilerplate, and therefore not relevant for users for example when policies and actions have been implemented to comply with law and regulation, or when the necessary information is already provided in accordance with [Draft] Amended ESRS 2 SBM-1. " as this might lead to unnecessary discussions with auditors on what constitutes "boilerplate information" and whether a policy should be reported or not. Certain policies and actions relate to compliance risks (e.g. related to anti-corruption) which makes it difficult to distinguish at the end whether the policy is in scope of this limitation or not.	ESRS2	ESRS 2 - General Disclosure Requirements for Policies, Actions, Metrics and Targets	AR 28.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	Changing the significant financial resources allocated for implementing action plans to "key actions" broadens the scope of the requirements and therefore goes against the simplification and reduction aim of EFRAG. It should be changes back to the original wording or completely taken out.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	38.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	To be deleted as this is a "may" datapoint and might broaden the scope of resources to be disclosed and might lead to discussions with auditors.	ESRS2	ESRS 2 - General for actions and resources - GDR-A	AR 36.
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	§ 26. The AR and in particular the screening approach needs to mention the materiality principle	ESRS2	ESRS 2 - IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 22.
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	§ 28 a. The materiality should be mentionned	ESRS2	ESRS 2 - IRO-2 - Material impacts, risks and opportunities and Disclosure Requirements included in the sustainability statement	AR 23.
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	The mention "related topics" is unclear and may lead to difficulties with auditors	ESRS2	ESRS 2 - GOV-1 - The role of the administrative, management and supervisory bodies in	AR 4.
Excels	UNESPA (Spanish Association of Insurers and Reinsurers)	Association of financial institutions	Spain			I disagree	GDR-P §34 (previously MDR-P §65) requires disclosing the material impacts, risks or opportunities to which the policy relates. Since IROs are already disclosed in IRO-2 §28 (a), it is redundant to also disclose them in GDR-P.	ESRS2	ESRS 2 - General for policies - GDR-P	34.
Excels	Exponential Roadmap Initiative	Other - please specify (required)	Sweden			I partially agree and partially disagree	It is proposed to delete para 34 c) from the current version of ESRS E1. if this is done we see a risk that companies would not be required to disclose the baseline and base year for their ghg targets, which we consider essential information for stakeholders,since the relevant point in ESRS 2 (para 43 d) begins "Where applicable". See comment on this para in Excel sheet on ESRS 2. We see two options to remedy this: 1. use a general clarification in ESRS-2, that would be suitable for targets in all sustainability topic areas by clarifying in ESRS-2 para 43(d) what is meant by where applicable eg ""disclosure of baseline value and base year is applicable where a target is a % change, but may not be applicable where a target is to reach a defined level of threshold."" 2. clarify this point specifically for ghg targets in ESRS E1 by reinstatging part of para 34 (c) in the current version. Specifically reinstate the following text (c) the undertaking shall disclose its current base year and baseline value."	E1	E1-6 - Targets related to climate change	26.

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Excels	Exponential Roadmap Initiative	Other - please specify (required)	Sweden			I partially agree and partially disagree	We note the proposal to delete para 34 (d) in the current ESRS E1, on the basis of allowing more flexibility on base year. Para 34 (d) reads " GHG emission reduction targets shall at least include target values for the year 2030 and, if available, for the year 2050. From 2030, target values shall be set after every 5-year period thereafter", which is about target years rather than base years. We recognise that requiring target values for a specific year is somewhat restrictive. However, given that global and national target setting is often done to 2030, company targets to the same date would assist in the assessment of their alignment with global and national pathways. Also signfiicant reductions are urgent, so we think all companies should have target values to 2030. This requirement could be limited to scope 1 and 2 emissions, rather than scope 3.	E1	E1-6 - Targets related to climate change	26.
Excels	Exponential Roadmap Initiative	Other - please specify (required)	Sweden			I partially agree and partially disagree	We also recommend retaining the second part of the current para 34 (d) ie" From 2030, target values shall be set after every 5-year period thereafter", either in its current form, or slightly amended to allow for any 5-year periods to be used for interim targets. It can be seen from an analysis by Oxford Net Zero (https://netzeroclimate.org/oxford-net-zero-report-assesses-the-voluntary-standards-landscape/) that there is strong convergence among voluntary standards that 5 years is an appropriate interval for interim targets. An amended text, which allows a little more flexibility by not requiring target years as 2030/35/40 etc could be Target values beyond 2030 shall be set for 5-year periods." While the Oxford Net Zero report found convergence on requiring inclusion of scope 3 emissions, the requirement in ESRS E1-26 could be set for scope 1 and 2 emissions for now.	E1	E1-6 - Targets related to climate change	26.
Excels	Exponential Roadmap Initiative	Other - please specify (required)	Sweden			I partially agree and partially disagree	This comment and the next one (on AR21) address a similar point, first in relation to targets and then in relation to ghg reporting. We propose addition of "non-electricity EACs" to the list in AR 11of items to be exluded from ghg targets.. The proper use in target-setting of non-electricity EACs (eg for steel, biomethane, SAF, cement) is under discussion internationally so we consider this is an important clarification to add. We consider that "gross" targets should not, at least until theire is more consensus including on guardrails, the use of these types of market instruments to achieve targets should be explicitly ruled out. Companies can set separate targets for the scaling of the use of non-electricity EACs.	E1		AR 11
Excels	Exponential Roadmap Initiative	Other - please specify (required)	Sweden			I partially agree and partially disagree	We propose addition of "non-electricity EACs" to the list in AR 21 (d). The proper use in ghg accounting of non-electricity EACs (eg for steel, biomethane, SAF, cement) is under discussion internationally so we consider this is an important clarification to add. If "gross" emissions is to mean "gross" emissions then use of these types of market instruments to reduce reported ghg emissions when fulfilling the CSRD should be explicitly ruled out. Space can be found elsewhere in company disclosures to report use of non-electricity EACs.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	Exponential Roadmap Initiative	Other - please specify (required)	Sweden			I partially agree and partially disagree	In AR 24 (d) we find use of the word "reflect" to be unclear, and we propose it's changed to "disclose". The shortened version of this requirement looks fine but it's not clear to us what it would mean for a company to "reflect" shares and types of contractual instruments. "Disclose" seems much clearer, and would deliver information helpful to stakeholders.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 24
Excels	Exponential Roadmap Initiative	Other - please specify (required)	Sweden			I partially agree and partially disagree	We do not support the deletion of the requirement to list scope 3 ghg categories excluded from the inventory. We spend a lot of time reviewing company ghg reports and it's often unclear which categories are included/excluded and why. We recognise that the requirement in the existing version (AR 46 (i)) may be deemed unecessary but complying this this requirement would not require any extra data collection and we consider it reasonable to retain it. The reasons for doing this are: a) gives clarity and reduces uncertainty for those analysing ghg reports, both from individual companies over time (in the case that they broaden their scope 3 reporting over time) and comparing companies in a sector. b) it's implied by the principle of "completeness" in the GHGP Corporate Standard, and it's a requirement in the GHGP Scope 3 standard c) it's easy to do, following the determinatin of significance for scope 3 categories. And, since there are presumably only two possibe reasons for excluding a scope 3 emissions category - not relevant and not significant - which makes reporting very simple. [NB this assumes that "data not available" is no longer an accepted justification for an exclusion, since estimates are preferable].	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	Exponential Roadmap Initiative	Other - please specify (required)	Sweden			I partially agree and partially disagree	We propose retention of notes (e) and (f) from AR 63 in the current version. We recognise that AR 11 and AR 21 in the exposure draft for ESRS E1 state that carbon credits shall not be included in ghg targets or reports of gross emissions, but we think that notes (e) and (f) from AR 63 in the current version serve to emphasise this point, without adding any burden on companies reporting and they are also slightly different points. AR 11 and AR 21 set requirements on the targets and emissions inventory, whereas the current text AR 63 (e) and (f) set requirements on the disclosure of those targets and ghg emissions. The distinction is perhaps small, but the former use relates to methodology to reach a data point, whereas the latter use relates to making claims.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	AR 29
Excels	Exponential Roadmap Initiative	Other - please specify (required)	Sweden			I partially agree and partially disagree	We note that AR 62 (d) and (e) in the current version of ESRS E1 have been deleted in the exposure draft and we propose that both are retained, because: 1.even if not critical today, we expect both these data points to become important in the coming years, as ghg reporting matures and more links are made between national inventories and organisations' inventories. 2. reporting on both these points would signal to companies that the relationship between reductions/removals reported nationally and reductions/removals reported at company level matters. 3. we assume reporting on removals within the EU specifically will be critical as the EU roles out mechanisms to promote and trade removals. 4. this information would not be difficult for companies to obtain because the significance of the data is well-recognised in the voluntary carbon market.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	36.
Excels	ASD					I disagree	Allow exemption of the obligation to report Scope 3.11 emissions - use of end product for military products, based on principles applied in ESRS 1 - 7.8 Classified and sensitive information. It could be disclosed on a voluntary basis	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32. (c)
Excels	ASD					I agree	We welcome EFRAG proposed change for Disclosure Requirement E1-8 – Gross Scopes 1, 2, 3 and Total GHG emissions	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	8.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ASD					I agree	The current ESRS E1 requires to report Scope 1, 2, 3 GHG emissions from associates, joint ventures, unconsolidated subsidiaries (investment entities) and joint arrangements for which the undertaking does not have operational control, and when these entities are part of the undertaking's upstream and dopwnstream value chain. This request seems inconsistent with the GHG Protocol, which for Scope 3 emissions - Category 15 Investments states that a reporting undertaking's Scope 3 emissions from investments are the Scope 1 and Scope 2 emissions of investees. The misalignment/inconsistency is relevant for Scope 3 emissions of "investment entities", which are included in the ESRS but excluded from the GHG Protocol (Scope 3 emissions - Category 15 Investments). The revised ESRS E1 introduces the reference to the GHG Protocol, eliminating potential misalignment/inconsistency. Therefore, we welcome EFRAG proposed change.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	ASD					I agree	We called to simplify reporting tables, specifically in current E1-6 AR 48 to make voluntary the section "milestones and targets years". Current E1-6 AR 48 has been deleted. Therefore, we welcome EFRAG proposed change.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 20
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	A specific narrative content will complicate the structure of a generic GDR-A. Suggestion: Create an AR to specify content (without a specific DP): "In addition to [Draft] Amended ESRS 2 GDR-A, when disclosing current and planned actions, the undertaking shall: present its key climate change mitigation actions by decarbonisation lever;"	E1	E1-5 - Actions and resources in relation to climate change	24. (a)
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	A specific narrative content will complicate the structure of a generic GDR-A. Suggestion: Create an AR to specify content (without a specific DP): "In addition to [Draft] Amended ESRS 2 GDR-A, when disclosing current and planned actions, the undertaking shall: in relation to the outcome of the key climate change mitigation actions, include the achieved and expected GHG emission reduction; and"	E1	E1-5 - Actions and resources in relation to climate change	24. (b)
Excels	Chamber of Labour, Austria	Trade union	Austria			I disagree	In para 14 (16 amended), subpara (a), after the sentence ending with "[...] and how the plan is embedded in and aligned with the undertaking's overall business strategy.": The following sentence should be added: "This further includes a description of how the workforce of the undertaking and its representatives have been involved in developing the plan." Democracy at work, a key priority for the European trade union movement, has become more and more relevant in the light of the multiple crises facing EU economies. A strong involvement of the workforce in developing the transition plan ensures that firsthand knowledge from the shop floor is reflected in the plan, that there is increased commitment for the strategies developed jointly and that implementation faces fewer hurdles. It will also lead to a more focused consideration of the needs of the workforce, including the need for qualification and training. For users, this information is important to gain a more complete picture of how the transition plan relates to the undertaking's overall development strategy.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	Chamber of Labour, Austria	Trade union	Austria			I disagree	The BAK rejects the deletion of the obligation to state (previously 16i) whether the transition plan has been approved by the administrative, management and supervisory bodies. The transition plan has strategic implications for the business model and the company. From the BAK's point of view, this information is therefore necessary and relevant for stakeholders (e.g. investors, employees) in order to gain a better overview and understanding of the strategic development of the company.	E1	E1-2 - Climate-related risks and scenario analysis	16.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Lack of a common methodology; highly business sensitive information; Data not currently available.	E1	E1-1 - Transition plan for climate change mitigation	14. (c)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Highly business-sensitive information. DR seems to be an extension of the Delegated Act (DA). The description of "financial and investment planning" (Exposure Draft, ED) goes beyond "investments and funding" (DA) as the latter is a subset/part of the former (also confirmed by the wording "investment and financial planning" in AR 2(c).	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Data not currently available (Very difficult for companies at the time of elaboration of the ESRS report, to have sufficient information to commit to a concrete date for the adoption of a climate transition plan).	E1	E1-1 - Transition plan for climate change mitigation	15.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Lack of a common methodology; Disproportionate costs. The reporting requirement makes the implementation of a resilience analysis indirectly binding. This should be avoided, as the CSRD does not usually define implementation obligations but reporting obligations. The option of reporting that no resilience analysis has been carried out should be introduced (analogous to ESRS E1-1 DR 15).	E1	E1-3 - Resilience in relation to climate change	21.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Disproportionate costs.	E1	E1-2 - Climate-related risks and scenario analysis	AR 6
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Highly business sensitive information; Disproportionate costs. Related to AR 5 (c), AR 6 (c): The requirement "base ist analysis on at least one high-emission climate scenario" is not appropriate. E1 should refer to "a scenario based on scientific evidence which reflects the climate risk properly".	E1	E1-2 - Climate-related risks and scenario analysis	AR 5
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Business-sensitive information/Redundant with Taxonomy. This requirements seems an extension of the existing requirements of the Delegated Act: The DR suggests a breakdown of "quantitative short- and medium-term CapEx and/or OpEx figures, as well as anticipated long-term CapEx and/or OpEx ranges." This should be deleted. See also our comments on AR 2 (c).	E1	E1-5 - Actions and resources in relation to climate change	24. (c)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Disproportionate costs. Lack of common methodology. The reporting requirement makes the implementation of GHG emission reduction targets indirectly binding. This should be avoided, as the CSRD does not usually define implementation obligations but reporting obligations. The option of reporting that no GHG emission reduction targets has been set should be introduced (analogous to ESRS E1-1 DR 15). Information on targets under E1-6 should be more closely linked to the transition plan in E1-1. The breakdown of GHG targets in Scope 1, 2, 3 should not be required as targets are typically not set in this way. E1 should require presentation of targets as the undertaking's management has set these (management approach).	E1	E1-6 - Targets related to climate change	26. (c)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Disproportionate costs; Concerns about usefulness (While providing information on what type of energy is purchased is important, the level of granularity and the effort to collect the information related to each type of contractual instruments (e.g. RECs) does not seem to be proportionate considering the usefulness for external stakeholders).	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	24. (b)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Lack of a common methodology; Absence of science-based metrics (Information on GHG removal and storage activities should not be a separate disclosure requirement but should be part of reporting on actions if GHG removals and storage is a relevant lever in the overall climate strategy of the company.)	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	35.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Highly business sensitive information; Redundancy or contradictions with other DRs/DPs (With GHG removal and storage happening in own operations or value chain the associated GHG emissions with removing and storing the GHGs are covered in E1-6).	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	AR 28
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Disproportionate costs; Concerns about data reliability; Lack of common methodology; Highly business sensitive information. This disclosure requires a level of data granularity that most companies simply do not have. There is no standard methodology to assess or report these figures reliably, and collecting this information would involve complex climate modeling that is often inaccessible—especially for SMEs. From a strategic and financial standpoint, disclosing such data could expose sensitive business vulnerabilities and affect investor or insurer perceptions, potentially increasing the cost of capital. These disclosures may also overlap with other ESRS requirements on climate risks and adaptation, leading to duplication. Industries with large physical asset bases—like manufacturing or logistics—would face a disproportionate burden in complying with these requirements, without clear added value for users of the information. While some financial stakeholders may seek greater transparency, this can often be achieved through qualitative or high-level disclosures. A more balanced solution would be to drop mandatory reporting and allow for materiality-based reporting, possibly introduced at a later stage when methodologies are more mature.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (a)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Disproportionate costs; Concerns about data reliability; Lack of common methodology; Highly business sensitive information. This disclosure requires a level of data granularity that most companies simply do not have. There is no standard methodology. Requirement on "location of key assets at material physical risks" results in unnecessarily detailed reporting, as depending on the sector, this could involve a large number of locations in all regions of the world; e.g., logistic companies have much more sites than industrial companies.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (b)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Lack of common methodlogy; Concerns about data reliability; Business sensitive information	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (c)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Disproprotionate costs; Lack of common methodlogy; Concerns on data reliability.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (d)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Disproportionate costs; Concerns on data reliability; Data not currently available; Business sensitive information.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (c)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Disproportionate costs; Lack of a common methodology; Concerns on data reliability.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (f)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Disproportionate costs; Concerns on data reliability; Data not currently available.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (d)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Disproportionate costs; Concerns on data reliability; Data not currently available.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (e)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	The reporting requirement makes the implementation of a climate risk analysis indirectly binding, additionally to the DMA. This should be avoided, as the CSRD does not usually define implementation obligations but reporting obligations. The option of reporting that no climate risk analysis has been carried out should be introduced (analogous to ESRS E1-1 DR 15). In the document "Basis for Conclusion" there is the following note: "it should be clear under E1-2, Climate related risks and scenario analysis that there is an expectation that undertakings report on key elements of the methodology to assess climate risks, but that scenario analysis is not required for all undertakings."It is not clear from the text of ESRS 1-2 which companies do not have to perform a scenario analysis.	E1	E1-2 - Climate-related risks and scenario analysis	18.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	This information is supplementary to the climate risk analysis and should therefore be combined with ESRS E1-2 where possible. The climate risk analysis including the quantifications in this section represent a new obligation for companies. This should be avoided, as the CSRD does not usually define implementation obligations but reporting obligations. It should also be made possible to only report qualitatively on the climate risk analysis.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	39.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	AR 18/19 should be merged, allowing for both financial control (consolidation) and/or operational control (consolidation) boundary, as defined in the GHG Protocol	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	shall' to be changed to 'may' as a disaggregation of GHG emissions (by country, operating segments, economic activity, subsidiary, GHG or source type) might not be available	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 26
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	related to AR 2 (c): DR seems an extension of the DA. Disclosure of "quantitative short- and medium-terms CapEx, and/or OpEx figures, as well as anticipated long-term CapEx and/or OpEx ranges". The DP should be deleted.	E1	E1-1 - Transition plan for climate change mitigation	AR 2

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	related to AR 2 (c): EFRAG should consider the Transition Plan Taskforce (TPT) Disclosure Framework which 1) contains the elements "investment and disposal plan" and "planned sources to fund the plan" and 2) sets conditions on the disclosures: a) to the extent the financial effects of its transition plan are separately identifiable, b) information available to the entity at the reporting date without undue cost and effort, c) approach that is commensurate with the skills, capabilities, and resources that are available to the entity for preparing those disclosures; NMIG might contain as a "may" guidance in line with the TPT Disclosure framework	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	We doubt that this AR is needed; Probably a clarification in the main body might be sufficient that only a qualitative assessment of the exposure is required. Additionally the wording regarding the anticipated financial effects has to be aligned; If Option 2 in ESRS 2 is adopted, a quantification will not be required.	E1	E1-2 - Climate-related risks and scenario analysis	AR 7
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	The wording "shall provide its climate resilience at the reporting date" creates confusion: 1) it is not clear as to what it refers to, "process" or "outcome"; 2) if "process" is meant: we don't see the relevance of this information; 3) if "outcome" is meant: it seems conceptually understandable, but such purely reporting date-specific statement only makes sense for individual locations or individual products/services/markets. When considering location, product and service portfolios a date-specific assessment is not feasible. Furthermore, a historical analysis (which is what a reporting date analysis is) is questionable in the context of a strategically oriented disclosure such as E1-3. This will result in extensive discussions between preparers and auditors.	E1	E1-3 - Resilience in relation to climate change	AR 9
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	related to AR 10 (c): Regarding the wording "the effects of current and planned investments in climate mitigation, adaptation and transition opportunities on climate resilience enhancement": 1) the requirement is not clear; 2) it seems as it is an extension of the requirements in the Delegated Act and should therefore be deleted	E1	E1-3 - Resilience in relation to climate change	AR 10
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	The standard should make clear that 1) Breakdown of CapEx/OpEx per time buckets/horizons is NOT required, and 2) Breakdown of CapEx/OpEx per decarbonisation lever is NOT required.	E1	E1-5 - Actions and resources in relation to climate change	24.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	related to AR 13 (a): The term "key change" is not defined; The standard should make clear 1) that "key change" means "significant" and 2) that this assessment of significance is up to the undertaking. E.g., "the undertaking may decide on changes in the reporting boundary, e.g., becaus of M&A, or changes in the target. If the undertaking concludes that these changes are significant they should be reflected in the basline value or base year."	E1	E1-6 - Targets related to climate change	AR 13
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	1) The DR should make clear that the undertaking is NOT required to choose one of both alternatives mentiond in this paragraph to present its GHG reduction targets. In practice further ways and less granular presentation were applied for the 2024 reporting, 2) Examples should rather be addressed as "may" guidance in the NMIG.	E1	E1-6 - Targets related to climate change	AR 14
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	This DR seems to include and extension of the DA where the scope of this DR is limited to high climate impact sectors. This DP should either be deleted or limited in scope as in the DA.	E1	E1-7 - Energy consumption and mix	29.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	In practice there are extensive discussions with auditors about whether a disclosure in millions is possible here. Therefore it should be clarified (perhaps at a central location in ESRS 1) that "millions" is allowed too. Ideally the untertaking should be free to choose for each metric the units that are most meaningful.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	The exclusion of biogenic emissions should - if ever - refer to Scope 1 only (like in the DA), but not to "all scopes". Moreover, the relevance of this requirement is questionable.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	related to AR 21 (a): The undertaking shall consider the GHG Protocol (GHGP) when preparing the information on GHG emissions. However, it remains unclear how to consider optional Scope 3 sub-categories or exemptions provided in the GHGP. As an example, GHGP allows not to report scope 3.10 emissions if the company is unable to estimate the emissions as the processing of the products is unknown. The ESRS should allow such exemptions too - in accordance with the GHGP.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	"The assumptions regarding permance" seems an extension of the DA. As there is no evidence on the relevance of this information it should be deleted.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	35. (c)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	It is recommended to change this to voluntary disclosure. A new requirement introduces potential complexity by mandating that companies "shall" also report emissions using the "operational control" method if the financial control approach fails to provide a fair presentation. This adds ambiguity and should be an optional ("may") disclosure rather than a mandatory one.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 18
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	E1-1 – Transition plan for climate change mitigation §13 Issue: E1 recognizes related EU legislation but does not explicitly permit using Taxonomy references to satisfy parts of E1 through cross-reference. Proposed amendment (add AR under E1-1/E1-5/E1-6): "Where evidence prepared for EU Taxonomy alignment (e.g., TSC/DNSH/Minimum Safeguards files, EPC certificates) covers elements required by this Standard (policies, actions, targets, metrics and related evidence), the undertaking may incorporate such evidence by reference, provided it clearly identifies: (i) the Taxonomy activity(ies) concerned; (ii) the criteria applied; (iii) the location of the evidence; and (iv) any differences between Taxonomy criteria and ESRS E1 metrics or scopes." Why it helps: Enables reuse of existing verified documentation, improving efficiency and consistency.	E1	E1-1 - Transition plan for climate change mitigation	13.
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	ESRS E1 §14 Issue: No explicit permission to cross-reference Taxonomy evidence. Proposed simplification: Add permission to cross-reference. Proposed text: See clause 16(c) below. Why it helps: Aligns ESRS with existing Taxonomy documentation practices.	E1	E1-1 - Transition plan for climate change mitigation	14.

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Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	ESRS E1 §11 Issue: EU Taxonomy not explicitly mentioned in the opening section. Proposed simplification: Add explicit mention of EU Taxonomy Proposed text: "Where evidence assembled for the EU Taxonomy delegated acts (technical screening criteria and DNSH) already demonstrates elements required by this Standard, the undertaking may incorporate such evidence by reference in line with ESRS 2 content-index mechanics, clearly identifying the activity, criterion, file location, and any differences with ESRS metrics." Why it helps: Clarifies linkage and removes redundency	E1	E1-1 - Transition plan for climate change mitigation	11.
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	ESRS E1 §14(d) Issues observed: No direct linkage to Article 8 KPIs(Taxonomy Regulation), which investors and assurance providers expect. Many preparers already organise plans by Taxonomy activity, but E1 does not require this mapping. Proposition: Allow a short "Plan → Article 8 KPI and CapEx Plan" bridge table in E1-1. Each major action or lever should show: - The Articl 8 KPI line impacted (turnover, capital expenditure, operating expenditure). - Whether the CapEx Plan is used. - The EU Taxonomy activity and criterion that action supports (for example, "new buildings—primary energy demand threshold and commissioning tests"). Proposed wording (add after §14(d)) "Provide a one-page bridge mapping transition actions and related resources to (a) the Article 8 KPIs and, where applicable, the CapEx Plan, and (b) the EU Taxonomy delegated act objectives and activities for which evidence is provided by reference." Why it helps: Improves traceability and investor confidence.	E1	E1-1 - Transition plan for climate change mitigation	14. (d)
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	Issue : E1 describes method elements but does not explicitly acknowledge the risk and vulnerability assessment workflow that the Climate Delegated Act requires for physical risk. Recommendation: Recognise Taxonomy-aligned risk methods explicitly and allow cross referencing - For physical risk, allow the risk and vulnerability assessment workflow required under the Climate Delegated Act (screening, assessment, measures) as an accepted method, with an explicit reference to the underlying file. Proposed wording (add to AR 6) "The undertaking may apply the risk and vulnerability assessment steps required under the EU Taxonomy Climate Delegated Act to identify and evaluate physical risks." Why it helps: Aligns ESRS with regulator-anchored methods.	E1	E1-2 - Climate-related risks and scenario analysis	AR 6
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	Reference: E1-1 §14(a)–(d) & AR 2–5; NMIG E1-5 (NMIG 5–6 on CapEx/OpEx & CapEx Plan). Issue: The Taxonomy bridge sits in NMIG (non-mandatory). Proposed amendment (modify §14(a) + AR 2; new AR under E1-5 §24(c)): add explicit permission to cross-reference to Taxonomy evidence. "Disclose a reconciliation table linking transition actions/levers and resource allocation to Article 8 KPIs (turnover/CapEx/OpEx) and, where applicable, to a Taxonomy CapEx Plan. Where OpEx is non-material under Article 8, indicate numerator 0 with the required explanation and disclose the denominator, consistent with Article 8." Why it helps: Improves consistency and assurance.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	E1-5 Actions and resources in relation to climate change (§23–24) Issue : The non-mandatory guidance already shows how to connect actions and resources to Article 8 and EU Taxonomy activities, but because it is guidance, reporting is uneven, and assurance is harder. Proposal : allow direct linkage to structure actions and resources by EU Taxonomy activity; Cross-reference Article 8 KPIs (and any CapEx Plan); Suggested wording (add to §24(c)): "Where relevant, structure actions and resources by EU Taxonomy activity and cross-reference to Article 8 KPIs." Why it helps: Improves consistency and assurance.	E1	E1-5 - Actions and resources in relation to climate change	23.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	E1-6 Targets related to climate change (§25–26; AR 12–17) Issue : Targets can be blurred by the use of carbon credits and may duplicate performance thresholds already defined in the Climate Delegated Act. Proposal : Where a target is calibrated to a Climate Delegated Act criterion (for example, primary energy demand at handover), permit a direct reference. Why it helps: Enhances clarity and comparability.	E1	E1-6 - Targets related to climate change	26.
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	Reference: E1-5, E1-6 (AR 13); NMIG sections for actions/targets; TSC for 7.1/7.2 (real estate) Issue: E1 is method-heavy, while Taxonomy provides hard criteria and documentable evidence (e.g., Energy Performance Certificate of NZEB –10% PED, airtightness/thermal integrity tests, Appendix A risk assessment…). Proposed amendment (add cross-cutting AR under E1-5/E1-6): "For activities also covered by EU Taxonomy, the undertaking shall compile a baseline evidence set comprising: (i) SC proof , (ii) DNSH checks for the other environmental objectives (incl. Appendix A for physical risk), and (iii) Minimum Safeguards governance proof; such items may be incorporated by reference per ESRS 2." Why it helps: Enhances verifiability and comparability; leverages existing files.	E1	E1-6 - Targets related to climate change	AR 13
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	Reference: E1-2 §18–19; taxonomy AR 6–8 (scenario analysis). Issue: Appendix A's screening→assessment→measures chain is widely used but not referenced. Proposed amendment (add AR under E1-2): "The undertaking may apply the EU Taxonomy Appendix A process to screen and assess physical climate risks and to define adaptation measures." Why it helps: Normalises a robust, regulator-anchored workflow many issuers already use.	E1	E1-6 - Targets related to climate change	AR 8
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	E1-8 Scope 3: allow staged disclosure with strict update rules Reference: AR 26 (Scope 3 methodology, significance, annual updates on significant categories and full inventory at least every 3 years). Issue: Complex categories (e.g., embodied carbon in real estate) may need a phased path while keeping integrity. Proposed amendment (clarify AR 26(e)): "A staged approach is acceptable: Year 1 methods & ranges; Year 2 refined quantification; Year 3 full consolidated update—provided annual updates are applied to significant categories and the 3-year full inventory rule is met." Why it helps: Avoids spurious precision; maintains discipline.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 26
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I disagree	E1-11 Anticipated financial effects (§39–42; AR 31) Issue : Current drafting assumes a level of quantification maturity that does not exist across sectors. There is no coherent sector guidance, and methodologies for monetising emissions, estimating stranded assets, or revenue-at-risk are inconsistent. For many preparers, forcing early quantification risks producing unreliable or incomparable numbers. Proposal : - Prioritise sector-specific guidance first: EFRAG should publish robust, sector-tailored methodologies before making detailed quantification mandatory. Until such methodologies exist, allow qualitative disclosures as sufficient to meet the requirement, provided they explain: - the nature of the risk or opportunity, - the expected direction and drivers of financial effects, and - the time horizons considered. Encourage preparers to describe linkages between strategic actions (E1-1 and E1-5) and anticipated financial effects qualitatively, without requiring numeric estimates until sector guidance is in place. Why it helps: Avoids unreliable quantification and supports meaningful disclosure.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40.
Excels	BDEW	Other - please specify (required)	Germany			I agree	Seems in general consistent with proposed amendments of SBTi Corporate Net-zero Standard 2.0 and with Transition Plan Taskforce Disclosure Framework (which is aligned with ISSB positions) Deletion of reference to the EU Tax Reg is supported Red flags re some details as below	E1	E1-1 - Transition plan for climate change mitigation	in general
Excels	BDEW	Other - please specify (required)	Germany			I agree	disclosure of "quantitative short- and medium-term CapEx, and/or OpEx figures, as well as anticipated long-term CapEx and/or OpEx ranges" --> additional DR/stricter requirement as in delegated act, risk of requiring sensitive information (The relief on sensitive information will not help as even the fact that the undertaking reports that it has omitted sensitive information might be a problem.)	E1	E1-1 - Transition plan for climate change mitigation	AR 2 (c)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	BDEW	Other - please specify (required)	Germany			I agree	"shall provide its climate resilience at the reporting date" (1) is not clear as to what it refers to, "process" or "outcome" (2) if "process" is meant, we fail to see the relevance of this information, (3) if outcome: It seems conceptually understandable, but such a purely reporting date-specific statement only makes sense for individual locations or individual products/services/markets. When considering location, product, and service portfolios, however, a date-specific assessment is not feasible. Furthermore, a historical analysis (which is what a reporting date analysis is) is questionable in the context of a strategically oriented disclosure such as E1-3. Practitioners in particular fear potential conflicts with auditors in this regard.	E1	E1-3 Resilience in relation to climate change	AR 9
Excels	BDEW	Other - please specify (required)	Germany			I agree	("the effects of current and planned investments in climate mitigation, adaptation and transition opportunities on climate resilience enhancement"), (1) requirement is not clear, (2) it seems as it is an addtl requirement that does not exist in the DA	E1	E1-3 - Resilience in relation to climate change	AR 10 (c)
Excels	BDEW	Other - please specify (required)	Germany			I agree	DR should make crystal clear that (1) Breakdown of CapEx/OpEx per time buckets (time horizons) is not required, and (2) Breakdown of CapEx/OpEx per decarbonisation lever is not required, either.	E1	E1-5 - Actions and resources in relation to climate change	24
Excels	BDEW	Other - please specify (required)	Germany			I agree	DR suggests a breakdown of "quantitative short- and medium-term CapEx and/or OpEx figures, as well as anticipated long-term CapEx and/or OpEx ranges." --> This tightens the requirements compared to the DA.	E1	E1-5 - Actions and resources in relation to climate change	24 (c)
Excels	BDEW	Other - please specify (required)	Germany			I agree	The linking of changes to the baseline value and/or base year to "key changes" relating to the target or reporting boundary is too narrow. A change in calculation methods (even for actual emissions in the base year) may also require changes to targets, according the SBTi Corporate Net-zero Standard V1.2 (pg. 14) The term "key change" is not defined. --> Key change should be meant as a "key" or "significant" change from the undertaking's perspective AND/OR refer to SBTi as a source of inspiration for when a change could be considered "key".	E1	E1-6 - Targets related to climate change	AR 13(a)
Excels	BDEW	Other - please specify (required)	Germany			I agree	DR should make crystal clear that the undertaking is not required to choose one of both alternatives mentioned in this paragraph to present its GHG reduction targets. In practice further ways and less granular presentation were applied for the 2024 reporting.	E1	E1-6 - Targets related to climate change	AR 14
Excels	BDEW	Other - please specify (required)	Germany			I agree	Provision may become obsolete in the near future. Although the combination of Scope 1 and Scope 2 targets is still reflected in the current SBTi Net-Zero Standard (V1.2), the consultation draft of March 2025 now proposes a (possible) separation of the targets (for Scope 1 and Scope 2). This should be reflected accordingly in E1.	E1	E1-6 - Targets related to climate change	AR 16, 2nd sentence
Excels	BDEW	Other - please specify (required)	Germany			I agree	Extended requirement than in Delegated act where the scope of this DR is limited to high climate impact sectors. BfC (257) "the reference to climate impact sectors was also deleted, in line with feedback received." BfC (128): The notion of "high climate impact sector" is not properly defined and created practical issues. Disaggregation of fossil sources was considered essential for undertakings, but these apply the disaggregation requirements of ESRS 1 under a system of fair presentation. This should be sufficient if properly applied, to trigger disaggregation only in the circumstance where this is material. ---> Problem: Easier if the information is excluded per se due to the lack of allocation to climate impact sectors?	E1	Disclosure Requirement E1-7 - Energy consumption and mix	29
Excels	BDEW	Other - please specify (required)	Germany			I agree	Practitioners report pointless discussions with auditors about whether a disclosure in millions is possible here.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32
Excels	BDEW	Other - please specify (required)	Germany			I agree	Exclusion of biogenic emissions should - if ever - refer to Scope 1 (delegated act) but not to "all scopes". In addition, the relevance of this requirement is questionable.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33
Excels	BDEW	Other - please specify (required)	Germany			I agree	(Operational control is proposed to apply for the GHG-Emissions in case that financial control does not convey fair presentation.) (1) The concept of operational control should not play any role at all. (2) Is considered an additional requirement since some undertakings will have to report under the OpCon boundary in addition to the FinCon boundary. (3) It should be added that the undertaking is the party that assesses whether or not the financial control perimeter fails to convey fair presentation of the GHG emissions.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	BDEW	Other - please specify (required)	Germany			I agree	E1-11 does not constitute a simplification for anticipated financial effects as, for example, it still refers to "monetary amount and percentage of assets", "monetary amount and percentage of revenue".	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40
Excels	BDEW	Other - please specify (required)	Germany			I agree	Requirement on "location of key assets at material physical risks" results in unnecessarily detailed reporting, as depending on the sector, this could involve a large number of locations in all regions of the world. As an example, logistic sector undertakings have much more sites than heavy industry.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40 (b)
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	In the context of AR 19, the wording is not comprehensible. If, under paragraph (DR) 32 (on E1-8), I apply operational control IN ADDITION to the financial control approach, as AR 19 applies, it is possible to implement Scope 1 and 2 targets related to climate change ONLY according to the operational control approach. From our point of view, this argues in favor of continuing to allow both approaches, financial and operational control, to be equivalent with regard to Paragraph 32, and not have financial control as the default option.	E1	E1-6 - Targets related to climate change	AR 15
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The Basis for Conclusion 128 refers to the "fair presentation" principle, which in turn limits the granularity at which fossil source consumption should be reported here. This limitation is not reflected in paragraph (DR) 28 a) or paragraph (DR) 29. The DR therefore seems to include an extension of the Delegated Act where the scope of this DR is limited to high climate impact sectors. The reasons mentioned in the BfC (paras 257 and 128) for changing this are noted. The suggestion is that this data point should either be deleted or limited in scope as in the Delegated Act. should refer to the "fair presentation" principle.	E1	E1-7 - Energy consumption and mix	28. (a)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The Basis for Conclusion 128 refers to the "fair presentation" principle, which in turn limits the granularity at which fossil source consumption should be reported here. This limitation is not reflected in paragraph (DR) 28 a) or paragraph (DR) 29. The DR therefore seems to include an extension of the Delegated Act where the scope of this DR is limited to high climate impact sectors. The reasons mentioned in the BfC (paras 257 and 128) for changing this are noted. The suggestion is that this data point should either be deleted or limited in scope as in the Delegated Act. should refer to the "fair presentation" principleas mentioned in BfC 128.	E1	E1-7 - Energy consumption and mix	29.
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The wording presupposes that GHG emissions must first be presented according to financial control (even if this does not represent a fair presentation) and only then may they be presented ADDITIONALLY according to operational control. The wording and the default to financial control has a significant impact on our previous reporting scope for data collection on our greenhouse gas emissions and changes our "consolidation boundary" as a company. In our opinion, the default to financial control does not result in a meaningful application and explicitly contradicts the GHG Protocol. The GHG Protocol allows both the operational control and financial control approaches to be used to limit the reporting scope of the organization. In our opinion, the argument presented (see Basis for Conclusion, e.g., 143 a) and 145) that this is in line with the GHG Protocol is therefore not valid. We therefore request the option to use the operational control approach as the default option for reporting GHG emissions.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 18
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The wording presupposes that GHG emissions must first be presented according to financial control (even if this does not represent a fair presentation) and only then may they be presented ADDITIONALLY according to operational control. The wording and the default to financial control has a significant impact on our previous reporting scope for data collection on our greenhouse gas emissions and changes our "consolidation boundary" as a company. In our opinion, the default to financial control does not result in a meaningful application and explicitly contradicts the GHG Protocol. The GHG Protocol allows both the operational control and financial control approaches to be used to limit the reporting scope of the organization. In our opinion, the argument presented (see Basis for Conclusion, e.g., 143 a) and 145) that this is in line with the GHG Protocol is therefore not valid. We therefore request the option to use the operational control approach as the default option for reporting GHG emissions.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	BSR	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	•Welcome AR2 compatibility with validation through independent 3rd parties, i.e. SBT •Welcome alignment and interoperability with IFRS S2 on CTP •Welcome clarity that a company shall only disclose relevant information about a CTP instead of the whole plan under ESRS E1-1 and that this aligns with IFRS guidance on disclosing information about an entity's climate-related transition, including information about transition plans in accordance with IFRS S2 •BSR would welcome an acknowledgment of climate adaptation, nature and human rights interlinkages in climate transition planning given the current trends/calls of integration elsewhere. See NGFS Input Paper on Integrating Adaptation and Resilience into Transition plans and IFRS guidance on disclosing information about an entity's climate-related transition, including information about transition plans in accordance with IFRS S2 on integration of adaptation, GFANZ on nature in net-zero transition plans and GRI 102 Climate Change 2025 on link to just transition. •Welcome very much AR3 specifications on dependencies disclosure	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	BSR	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	•BSR suggests add/including a definition of resilience analysis •Welcome change in structure that disclosure on process to identify impacts, risks and opportunities come before disclosure on resilience analysis and hence, is now part of the strategy section •Welcome clarity of objective (why disclosure is important) and the improved structure •Welcome 21a as clearer and stronger than previous 2 SBM 3, which focused on disclosure of scope of resilience analysis, how and when it was conducted including scenario analysis. Now 21a focused on explaining implications of resilience analysis on strategy and business model, explaining needed responses to effects under scenario analysis and how current and planned mitigation and adaptation actions and transition plans support, strengthen or impact climate-related business model and strategy resilience •Welcome AR10's clarity and detail as compared to previous AR8.	E1	E1-3 - Resilience in relation to climate change	21. (a)
Excels	BSR	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	•We see a risk that adaptation planning falls behind given that headline disclosures do not specify btw mitigation and adaptation anymore for policies and actions and that AR's do not define the difference between mitigation and adaptation policies anymore	E1	E1-4 - Policies related to climate change	22.
Excels	BSR	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	•We see a risk that adaptation planning falls behind given that headline disclosures do not specify btw mitigation and adaptation anymore for policies and actions and that AR's do not define the difference between mitigation and adaptation policies anymore	E1	E1-5 - Actions and resources in relation to climate change	23.
Excels	BSR	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	•Welcome 37 (a) very good and important for robust approach and to avoid mitigation deterrence •Consider keeping a version of old net-zero paragraph (60) that is feasible for companies to disclose at this point in time (e.g. qualitative disclosure of approach) or consider inclusion for future iterations	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	37. (a)
Excels	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	Noting SBTs for oil and gas remain paused, it is not reasonable to expect the oil and gas sector to be able to disclose SBTs validated through an independent third party (i.e.SBTi). Either SBTi releases the oil and gas standard or this requirement is amended to explicitly state "where recognised Science Based Target standards exist", and allow reporters to state SBTs for their sector are not in place	E1	E1-6 - Targets related to climate change	AR 2
Excels	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States			I disagree	Disaggregation of purchased electricity from fossil sources is already accounted for in either market or location based electricity emission factors – this requires back calculating from emission factors or research into grid composition, which adds an onerous burden on reportees given the lack of data in a number of countries, and the currency of datasets such as IEA, UK DESNZ – this disaggregation should be removed	E1	E1-7 - Energy consumption and mix	38.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States			I disagree	Whilst this is possible for organisations with a clear PPA or supplier providing renewables certification, for market based scope 2 emissions calculations, this is already incorporated into grid factors. This disaggregation is unnecessary, and onerous to complete if location based emissions are the only practicable report (which is common for international companies with operations outside of the EU)	E1	E1 - Interaction with other ESRS	AR 17
Excels	Society for Corporate Governance	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	E1-2, when read in combination with ARs 5 and 6, can be read as requiring scenario analysis for the purposes of evaluating physical and transition climate-related risks. We recommend the following changes to better reflect EFRAG's intent and avoid any uncertainty: ●In paragraph 19 (changes in CAPS): "The key elements of the methodology include: the scope of the analysis, the methodologies and/or tools used for the analysis, the ranges of scenarios used, if any, the time period when it was carried out and WHETHER AND how the undertaking has used climate-related scenario analysis. In addition, for paragraph 18 (a) the undertaking shall include the spatial resolution of the analysis and for paragraph 18(b) it shall include the type of transition events analysed." ●E1-2 should incorporate the following statement, which was reflected in Exhibit E to the existing version of ESRS 1 but removed from the proposed amended version of that standard: "Disclosure requirements in relation to scenario analysis are proportionate because they are contingent on the undertaking conducting such analysis, which is not required for all undertakings and may depend on an undertaking's size, capacity, resources and skills."	E1	E1-2 - Climate-related risks and scenario analysis	AR 5
Excels	Society for Corporate Governance	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	E1-2, when read in combination with ARs 5 and 6, can be read as requiring scenario analysis for the purposes of evaluating physical and transition climate-related risks. We recommend the following changes to better reflect EFRAG's intent and avoid any uncertainty: ●In paragraph 19 (changes in CAPS): "The key elements of the methodology include: the scope of the analysis, the methodologies and/or tools used for the analysis, the ranges of scenarios used, if any, the time period when it was carried out and WHETHER AND how the undertaking has used climate-related scenario analysis. In addition, for paragraph 18 (a) the undertaking shall include the spatial resolution of the analysis and for paragraph 18(b) it shall include the type of transition events analysed." ●E1-2 should incorporate the following statement, which was reflected in Exhibit E to the existing version of ESRS 1 but removed from the proposed amended version of that standard: "Disclosure requirements in relation to scenario analysis are proportionate because they are contingent on the undertaking conducting such analysis, which is not required for all undertakings and may depend on an undertaking's size, capacity, resources and skills."	E1	E1-2 - Climate-related risks and scenario analysis	6.
Excels	Materiality	Consultant (including software vendor)	Poland			I disagree	To make reports comparable, biogenic emissions should be defined, either with a reference to an external source or in the glossary.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33.
Excels	Materiality	Consultant (including software vendor)	Poland			I disagree	In the last version of ESRS E1, AR 37 and AR 38 required the presentation of energy intensity per revenue, while in ESRS E3 in E3-4 there was a disclosure related to water intensity (total water consumption in own operations in m^3 per million EUR net revenue). These requirements provided the possibility to compare data regardless of company growth, and reports significantly benefited in terms of comparability thanks to these indicators.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	13.
Excels	TomTom NV	Preparer (non-financial preparing a sustainability report)	Netherlands			I disagree	The amendment to the DR, which now requires reporting by all sectors rather than just High Climate Impact Sectors related to energy consumption from fossil fuels, undermines the goal of simplifying the ESRS. For non-HCIS, this change imposes a significant reporting burden and demands considerable effort to collect relevant data, ultimately providing little value in return.	E1	E1-7 - Energy consumption and mix	29.
Excels	Vereniging Milieudefensie	NGO	Netherlands			I disagree	We disagree with the deletion of the requirement to disclose the actual TP (i.e., deletion of the old paragraph 14) as it goes against the level 1 requirements, which clearly requires disclosure of the actual transition plan and exceeds the Commmision's and EFRAG's mandate. Art. 19(a) of the Accounting Directive requires disclosure of "a brief description of the undertaking's business model and strategy including: [...] the plans of the undertaking [...] to ensure that its business model and strategy are compatible with the transition to a sustainable economy and with limiting of global warming to 1,5°C in line with the Paris Agreement under the United Nations Framework Convention on Climate Change." Consideration (30) of the CSRD confirms ihat the intention of the legislator was to require disclosure of the actual TP: "They should also be required to disclose any plans they may have to ensure that their business model and strategy are compatible with the transition to a sustainable economy and with the objectives of limiting global warming to 1,5 °C in line with the Paris Agreement and achieving climate neutrality by 2050, as established in Regulation (EU) 2021/1119, with no or limited overshoot."	E1	E1-1 - Transition plan for climate change mitigation	14.
Excels	Vereniging Milieudefensie	NGO	Netherlands			I disagree	The addition that the undertaking "shall also include information on how the undertaking's strategy and business model are compatible with the limiting global warming to 1.5°C in line with the Paris Agreement and wiht the EU's objective of achieving climate neutrality by 2050" goes against the purpose of streamlining and simplifying the ESRS. The CSRD requires undertaking to disclose their TP, defined as the plans of the undertaking [...] to ensure that its business model and strategy are compatible with the transition to a sustainable economy and with the limiting of global warming to 1,5°C [...]. The ESRS must clarify the conditions for meeting this disclosure requirement. The new addition merely repeats the definition of the TP (already covered in the CSRD and in AR 1). Moreover, the conten of the additiont is already covered in paragraph 13 on the aim of the DR E1-1. If stakeholders found it challenging to demonstrate target compatibility with 1.5°C citing lack of guidance and methodology, they will find it all the more challenging to demonstrate "more wholistically" strategy and business model compatibility with 1.5°C. The proposed solution to the problem exacertbates the problem.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Vereniging Milieudefensie	NGO	Netherlands			I disagree	We disagree with the removal of the requirrement to demonstrate emission reduction target compatibility with 1.5°C from the DR. Demonstrating emission reduction target compatibility with 1.5°C is a key feature of the TP as target compatibility with 1.5°C is a primary yardstick to assess compatibility of business model and strategy with 1.5°C (which is what the TP is all about). Therefore, we believe its place is in the DR. While it is logical that the explanation on how to demonstrate target compatibility is found in the AR, it is unclear why the complete requirement is now moved to the AR and replaced in the DR by a requirement to provide information "more wholistically" (see also previous comment). This obfuscates rather than simplifies or clarifies what is required.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	Vereniging Milieudefensie	NGO	Netherlands			I partially agree and partially disagree	Requirement to disclose qualitative assessment of how potential locked-in GHG emissions from key assets and products may jeopardise the achievement of the GHG emission reduction targets and drive transition risk is crucial and must be maintained as a mandatory requirement. "Achievement of the plan" must be replaced by "achievement of the GHG emission reduction targets", because that's what it is about here: locked-in GHG emissions must be concretely related to the GHG emission reduction targets.	E1	E1-1 - Transition plan for climate change mitigation	14. (c)
Excels	Vereniging Milieudefensie	NGO	Netherlands			I partially agree and partially disagree	Disclosure of significant CapEx amounts related to coal, oil and gas-related economic activities must be maintained. An adapted version of this requirement must be added for financial institutions, requiring that they: - disclose financial services to coal, oil and gas-related activities, disaggregated by type of fossil fuel and by type of service - disclose financial services to companies involved in new coal, oil and gas-related activities specifically, disaggregated by type of fossil fuel and by type of service - disclose financial services to renewable versus non-renewable energy, disdaggregated by energy source - disclose their energy supply ratio	E1	E1-1 - Transition plan for climate change mitigation	14. (b)
Excels	Vereniging Milieudefensie	NGO	Netherlands			I disagree	The reference to ESRS 2 GDR-P removes the specification of areas for which the undertaking is required to indicate how its policies addresses them (i.e., climate change mitigation, climate change adaptation, energy efficiency, renewable energy deployment and other). The list of areas required to be covered must be added, either here, or under ESRS 2 GDR-P, providing the necessary clarify to undertakings what is expected from them. Deforestation and forest degradation must be added to the list, given their significant role in climate change and climate change mitigation.	E1	E1-4 - Policies related to climate change	22.
Excels	Vereniging Milieudefensie	NGO	Netherlands			I disagree	Description of TP lacks essential component: "A transition plan for climate change mitigation sets out how the undertaking intends to transform its strategy and business model to ensure compatibility with the transition to a sustainable economy." This must be changed to (cfr. Art. 19(a) Accounting Directive): "A transition plan for climate change mitigation sets out how the undertaking intends to transform its strategy and business model to ensure compatibility with the transition to a sustainable economy and with the limiting of global warming to 1,5 °C in line with the Paris Agreement under the United Nations Framework Convention on Climate Change."	E1	E1-1 - Transition plan for climate change mitigation	AR 1
Excels	Vereniging Milieudefensie	NGO	Netherlands			I disagree	We understand that the issue of the meaning of "compatibility with 1.5°C" is not addressed by EFRAG in the current EDs, as recommended by the EC representatives. Nonetheless, it must be clear that comparing GHG emission reduction target values with reference values derived from a 1.5°C pathway and scenario does not imply "compatibility" and that further guidance is required on the minimum amount of reductions required.	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	Vereniging Milieudefensie	NGO	Netherlands			I disagree	It is positive that reference to PCAF A was maintained. However the decision not to include reference to PCAF B and C lacks solid justification. Despite their nascency, various financial institutions have started or announced their intention to start using these standards. Moreover, it is unreasonable to require endorsement by the GHG Protocol, since the GHG Protocol has officially closed, on August 13, 2024, its Built on GHG Protocol review service.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	Vereniging Milieudefensie	NGO	Netherlands			I disagree	We disagree with an exception for banks on the requirement to disclose associated absolute values corresponding to intensity reduction targets in target year and interim year(s). As users ans shareholders, we consider absolute targets highly relevant for banks and other financial insitutions. Absolute emissions provide insight in banks' contribution to climate change, including through their financial activities. Absoltue targets (or absolute values if only intensity targets are used) represent material information with regard to the climate mitigation ambitions and the management of climate-related transition risk by financial institutions.e	E1	E1-6 - Targets related to climate change	12.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I agree	The new version of DR E1-1 brings greater clarity, improved alignment with European regulation, and a reduction in reporting redundancies, particularly regarding Taxonomy-related CapEx. This update contributes to more efficient reporting and strengthens regulatory coherence without compromising the quality of the required information.	E1	E1-1 - Transition plan for climate change mitigation	13.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I agree	The new version of DR E1-2 presents a more robust integration of climate risk perception, directly connecting with ESRS 2 and the disclosure requirements related to risk management. This approach helps demonstrate whether climate-related impacts, risks, and opportunities (IROs) are effectively embedded in the company's risk management processes. It also enhances methodological transparency by requiring more detail on how climate-related IROs are identified and assessed.	E1	E1-2 - Climate-related risks and scenario analysis	16.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I agree	The thematic reorganisation of DR E1-3, focusing exclusively on climate resilience analysis and transferring risk-related elements to DR E1-2 is a welcome change. It allows for a clearer focus on resilience disclosures and aligns the requirement with IFRS S2, promoting interoperability between the two reporting standards. Additionally, it reinforces the strategic importance of resilience, especially for sectors highly exposed to climate risks. DR E1-3 thus takes on a central role as a tool to assess the robustness of the business model against adverse climate scenarios.	E1	E1-3 - Resilience in relation to climate change	20.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The new version of DR E1-4, which refers to DR GDR-P, adopts a more standardised and cross-cutting approach to climate policy reporting. This change improves consistency and comparability across companies and topics. However, it may lead to a loss of focus on specific areas such as mitigation, adaptation, or energy efficiency. While standardisation facilitates reporting, it requires careful attention to ensure that critical themes are not underrepresented, especially in sectors with high climate exposure. It could be useful to include guidance that help companies maintain visibility on key climate topics within the standardised framework. This would support both completeness and relevance of disclosures.	E1	E1-4 - Policies related to climate change	22.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I agree	The new version of DR E1-5 retains most of the previous requirements related to climate mitigation actions, while introducing a significant shift in the approach to investments. Whereas the previous version focused on current CapEx and OpEx in line with financial reporting and the Taxonomy, the new version shifts the focus to medium- and long-term planned values. Although this change may be more challenging, it enables a more strategic and forward-looking view of the company's climate actions and avoids duplication with requirements already covered under ESRS 1.	E1	E1-5 - Actions and resources in relation to climate change	23.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The new version of DR E1-6 adopts a simpler and more concise approach, which may facilitate reporting for many companies. However, some important elements have been removed, such as: • The requirement for specific targets for 2030 and 2050, which weakens the connection to long-term global and national climate goals. • External verification of targets, which may compromise transparency. While simplification brings flexibility, it may result in a loss of depth, particularly for sectors with high carbon intensity, where the clarity and ambition of targets are critical. To balance simplicity with robustness, it could be helpful to include the years 2030 and 2050 in the requirement of information, not just in the AR as example, and encourage voluntary disclosure of long-term targets and verification practices, especially for companies in high-impact sectors. This would preserve transparency and ambition without imposing excessive burden.	E1	E1-6 - Targets related to climate change	25.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The new version of DR E1-7 maintains its core focus while simplifying the general requirements to improve clarity. However, some relevant elements have been removed, such as: • The breakdown of renewable energy sources, which previously helped clarify the actual share of clean energy used. • The specific reference to companies with high climate impact, which excluded crucial information on emissions intensity relative to net revenue, reducing comparability across carbon-intensive sectors. While this simplification may ease reporting, it reduces data granularity and comparability, especially in contexts where energy consumption is a critical driver of climate impact. To preserve the usefulness of the disclosure, it could be helpful to recommend optional breakdowns or sector-specific indicators for companies with high climate exposure. This would support both transparency and comparability without compromising simplicity.	E1	E1-7 - Energy consumption and mix	28.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	DR E1-8 continues to focus on the quantification and characterisation of GHG emissions, while introducing important clarifications: • The inclusion of biogenic emissions represents progress in line with international standards. • The harmonisation of the operational threshold with ESRS 1 improves consistency and interoperability, especially with IFRS S2. However, the removal of the requirement to report emissions intensity (relative to net revenue) may reduce comparability between companies, particularly across sectors with different operational scales. To maintain comparability, it could be useful to recommend voluntary disclosure of emissions intensity, especially for high-impact sectors. This would support more meaningful benchmarking and sectoral analysis.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	31.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The DR E1-9 retains most of the previous disclosure requirements, while introducing a clearer structure and more objective language, which facilitates understanding and reporting. The main change is the removal of references to "net zero" targets, reflecting the current uncertainty and lack of standardisation around this concept. However, removing transparency requirements regarding carbon neutrality positions is a step backwards. The "net zero" concept is extremely difficult to substantiate, which makes it all the more important to maintain this requirement, so that entities adopting such positions can present their rationale. To preserve transparency and accountability, it could be useful to encourage voluntary disclosure of "net zero" commitments, along with supporting methodologies and assumptions. This would allow stakeholders to better assess the credibility and ambition of such claims.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	34.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	This Disclosure Requirement (DR) has undergone significant changes, notably by introducing the requirement to report the internal carbon price per metric tonne. However, several important elements have been removed, such as: • The explicit link to climate policies and targets. • The description of methodologies, assumptions, and scientific guidance. • The coverage in terms of carbon footprint scopes. Despite these removals, the DR maintains the core intent of reporting on internal carbon pricing schemes, now with a more streamlined structure and better alignment with IFRS S2, reinforcing interoperability between standards.	E1	E1-10 - Internal carbon pricing	38.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The new version improves transparency and understanding of the financial impacts associated with climate-related risks and opportunities, by requiring: • More precise quantification of assets and revenues at risk. • Geographic location of vulnerable operations. • Detailed methodologies for financial estimates. Although the content has been reorganised, the DR strengthens the link between IROs and financial performance, promoting a more integrated and strategic approach to climate reporting. However, the application of Options 1 and 2, as referenced in the ESRS requirement, remains problematic. To ensure the DR remains relevant and decision-useful, it may be helpful to reconsider the inclusion of Options 1 and 2, or at least provide clearer guidance on their application. Prioritising disclosures that support financial sector needs, such as risk exposure and asset vulnerability, should remain the central objective.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	39.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	There is a new datapoint included, we object the inclusion of new datapoints as it is against the explicit target of the ESRS revision	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	There is a new datapoint included, we object the inclusion of new datapoints as it is against the explicit target of the ESRS revision	E1	E1-3 - Resilience in relation to climate change	AR 10
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	- As climate scenario analysis is not mandatory under ESRS, it is not explicitly mentioned, we would suggest to clearly state that fact	E1	E1-2 - Climate-related risks and scenario analysis	16.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	- AR 9 states companies "shall provide its climate resilience at the reporting date". This might imply a yearly update of the resilience analysis, please clarify that this is not the case in the next ESRS version.	E1	E1-3 - Resilience in relation to climate change	AR 9
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	- Paragraph 26 and AR 16 require a breakdown of targets for Scope 1, 2 and 3. We, as well as many other companies, do not set targets on scope level. We suggest to delete this requirement.	E1	E1-6 - Targets related to climate change	26.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	- We do not see the relevance of a distinct disclosure of biogenic emissions as required by paragraph 33	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	- In AR 21 (a) it remains unclear how to consider optional Scope 3 sub-categories or exemptions provided in GHGP. We would appreciate a clarification.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	- Paragraph 35 (c) about permanence of GHG storage seems not relevant in our opinion. Therefore, we propose to delete it.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	35. (c)
Excels	European Biogas Association	Other - please specify (required)	Belgium			I partially agree and partially disagree	Based on our answer to the survey, AR 21, paragraph a) should be amended as follows: "consider the GHG Protocol Corporate Standard or the Commission Recommendation (EU) 2021/22795 or EN ISO 14064-1:2018. (...)"	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	European Biogas Association	Other - please specify (required)	Belgium			I partially agree and partially disagree	Based on our answer to the survey, AR 21, paragraph e) should be amended as follows: "report biogenic emissions from the combustion or biodegradation of biomass outside the scopes."	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	European Biogas Association	Other - please specify (required)	Belgium			I partially agree and partially disagree	The alternative choice between the GHG Protocol, the Commission Recommendation and the ISO standard should be phrased in clearer way. Suggested amendment: "(a) take into account the GHG Protocol Scope 2 Guidance (Version 2015, particularly the Scope 2 quality criteria in Chapter 7.1 relating to contractual instruments), or Commission Recommendation (EU) 2021/2279, or the relevant requirements for the quantification of indirect GHG emissions from imported energy in EN ISO 14064-1:2018;"	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 24
Excels	European Biogas Association	Other - please specify (required)	Belgium			I partially agree and partially disagree	The alternative choice between the GHG Protocol, the Commission Recommendation and the ISO standard should be phrased in clearer way. Suggested amendment: (a) consider the principles and provisions of the GHG Protocol Corporate Value Chain (Scope 3) Accounting and Reporting Standard (Version 2011), or Commission Recommendation (EU) 2021/2279 or the relevant requirements for the quantification of indirect GHG emissions from EN ISO 14064-1:2018"	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	European Biogas Association	Other - please specify (required)	Belgium			I disagree	Suggested amendment: (d) (AR 46(g) amended) prioritise direct measurement of Scope 3 GHG emissions and, where this is not possible, further prioritise their inputs and assumptions based on the characteristics of the data (e.g. data from specific activities within the entity's upstream and downstream value chain, timely data that faithfully represents the jurisdiction of, and the technology used for, the upstream and downstream value chain activity and its GHG emissions, and data that has been verified); to this end, regulated market instruments based on certification and third-party auditing may be used. Comment: "In the EU, Proofs of Sustainability are a market instrument legally rooted in the RED and issued within regulated mass-balance systems. The certification framework is supported by national or voluntary schemes recognised by the European Commission, requiring third-party audits, standardised GHG emission accounting, and traceability from feedstock to end-use. Production plants are certified. On this basis, producers can issue PoS that accompany biomethane consignments through the gas infrastructure, where the EU gas grid is legally treated as a single logistical facility. This robust architecture enables companies purchasing certified biomethane (with PoS) to demonstrate measurable and verifiable emissions reductions—even if the physical gas is delivered via shared infrastructure."	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	European Biogas Association	Other - please specify (required)	Belgium			I partially agree and partially disagree	While this AR fully allows the use of the EU ETS Methodology for sectors under or not under the EU ETS, a clearer recognition of regulated market-based instruments such as RED-compliant Proofs of Sustainability, should be worded, to ensure clarity for reporters whatever the way that the EU ETS MRR is implemented in Member States. Suggested amendment: "For activities reporting under the EU Emissions Trading Scheme (ETS), the undertaking shall report on Scope 1 emissions following the EU ETS methodology. The EU ETS methodology may also be applied to activities in geographies and sectors that are not covered by the EU ETS, where regulated market instruments based on certification and third-party auditing may be used."	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 22

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I agree	We welcome the improvements to the requirement to report the role of the administrative, management and supervisory bodies in the transition plan, which is more closely aligned with GRI 102: Climate Change (it used to be 'whether the transition plan is approved by...', leading to a yes/no answer).	E1	E1 - Objective	14. (a)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We recommend referring to the just transition-related metrics in GRI 102: Climate Change, to further support undertakings in reporting the impacts on their own workforce resulting from the transition plan.	E1	E1 - Interaction with other ESRS	12. (c)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I agree	Target validation information has been introduced, which is in line with GRI 102.	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	AR 6 is marked in the exposure draft as 'for para 19', but based on the content it seems it should be 'for para 18 (b)' instead.	E1	E1-2 - Climate-related risks and scenario analysis	AR 6
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	AR 16 establishes the need for separate targets for Scope 1+2 and Scope 3, consistent with the requirements of GRI 102. We therefore suggest revising paragraph 26 to ensure that this distinction is made explicit.	E1	E1-6 - Targets related to climate change	26.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	Compared to the previous version, the specification 'in absolute value (either in tonnes of CO2eq or as a percentage of the emissions of a base year)' (former E1-4 34 (a)) has been removed. We deem it important to retain this specification, to provide clarity to the data point and for alignment with GRI 102.	E1	E1-6 - Targets related to climate change	26. (a)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	The following requirement has been removed: 'The undertaking shall state the method used to calculate Scope 2 GHG emissions included in the target (i.e., either the location-based or market-based method)' (former E1-4 AR 24). We deem it important to retain this requirement, for alignment with GRI 102 and improved clarity and transparency.	E1	E1-6 - Targets related to climate change	26. (a)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	1. The difference between 'decarbonization levers' and 'actions' is not clear. We suggest this be made clear. 2. The tables' graphic resolution is not optimal. We suggest EFRAG considers moving the tables/graphics to an appendix, if this improves readability.	E1	E1-6 - Targets related to climate change	AR 14
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I disagree	GRI 102 does not require the quantitative contribution of each decarbonization lever to achieve the targets, but includes a requirement to explain the progress achieved (see GRI 102-4-j). The quantitative information by decarbonization lever may be too granular.	E1	E1-6 - Targets related to climate change	AR 14
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We suggest changing the following provision of AR 16: 'the undertaking shall calculate a 1.5°C-aligned reference target value for Scope 1 and 2 (and a separate one for Scope 3, if it has Scope 3 GHG emissions reduction targets)' to 'the undertaking shall calculate a 1.5°C-aligned reference target value for Scope 1 and 2 (and a separate one for Scope 3)' to clarify that Scope 3 targets are required, in line with E1 26.	E1	E1-6 - Targets related to climate change	AR 16
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	GRI 103 does not require reporting the total energy consumption related to own operations. Instead, reporting the total energy consumption within the organization is an optional disclosure. This is because the total amount can be misleading and for reporting to be meaningful it needs to focus on the specific types of energy consumption. We recommend that the ESRS adopt the same approach and move the total energy consumption to the NMIG.	E1	E1-7 - Energy consumption and mix	28.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	Compared to the previous version, the breakdown of energy consumption from renewable sources (fuel/purchased/self-generated) has been removed. The previous version (former E1-5 37 (c)) was better aligned with GRI 103 and provided more information on the organization's renewable energy strategy.	E1	E1-7 - Energy consumption and mix	28. (c)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I agree	The disaggregation of energy consumption by fossil sources was previously only required for organizations in high climate impact sectors. The current requirement is more aligned with GRI 103 and provides more transparency on energy consumption from fossil fuels.	E1	E1-7 - Energy consumption and mix	29.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	GRI 103 does not cover non-renewable energy production, as it is deemed sector specific. We suggest EFRAG considers removing the data point for simplification purposes and in alignment with GRI.	E1	E1-7 - Energy consumption and mix	30.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	ESRS requires reporting 'renewable energy production'. GRI 103 on the other hand requires reporting self-generated renewable energy consumption and sale. GRI does not cover all energy production, for example, self-generated renewable energy that is stored (and not consumed or sold), as it is deemed sector specific. We suggest EFRAG to consider whether further alignment with GRI 103 is possible.	E1	E1-7 - Energy consumption and mix	30.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	AR 17(j) appears to suggest that only the market-based approach is permitted for calculating purchased renewable and non-renewable energy consumption. However, as Scope 2 emissions must be reported using both the market-based and location-based methods (see E1-8 32(b)), we recommend aligning with GRI 102 and allowing the use of both methods for calculating purchased renewable and non-renewable energy consumption.	E1	E1-7 - Energy consumption and mix	AR 17
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I agree	The removal of the mandatory data point on total GHG emissions increases the alignment with GRI 102.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	Note that GRI covers all Scope 3 emissions and all 15 categories, while ESRS focuses the reporting on significant Scope 3 categories only.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32. (c)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	The new language on boundaries of GHG emissions is more aligned with the GHG Protocol, IFRS S2 and GRI. EFRAG now requires using the financial control (consolidation) boundary. GRI recommends the same in GRI 1. However, both GRI and IFRS S2 allow the use of equity share as consolidation approach for GHG emissions. We suggest EFRAG considers further aligning allowing this third consolidation approach for GHG emissions.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 18
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	With regards to AR 21 (e), it should be specified that the biogenic emissions exclude biogenic CO2 emissions.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We suggest including in the table separate reporting of biogenic CO2 emissions, in line with E1-8 33.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 27
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	Former E1-7 58 (a) required to disaggregate and separately disclose the total GHG removals that occur in the undertaking's own operations from those that occur in its upstream and downstream value chain. This was more in line with GRI 102, which requires reporting the total Scope 1 removals and recommends reporting total Scope 3 removals. We suggest reinstating the disaggregation of total Scope 1 removals and total Scope 3 removals. Furthermore, GRI recommends but does not require reporting Scope 3 removals, based on experts' feedback that this information is difficult to compile. For the purpose of simplification, we suggest that EFRAG aligns with GRI 102 and moves reporting of Scope 3 removals to the NMIG.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	35.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	GRI recommends that any reversals be reported separately from GHG removals, in line with the GHG removals quality criteria. GRI 102's guidance states the following: "The CO2 and other GHG losses should be reported as GHG emissions (if storage pools are part of the GHG inventory boundary) or as reversals (if storage pools are no longer part of the GHG inventory boundary) in the reporting period". We suggest EFRAG considers aligning with GRI for greater transparency.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	35. (d)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	The formulation financing through the purchase of carbon credits is not clear. GRI 102 requires reporting only carbon credits canceled, and recommends (but does not require) reporting the amount of carbon credits purchased and not canceled. We suggest EFRAG considers aligning with GRI, to enhance clarity and to support further simplification.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	36.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	GRI 102 recommends but does not require an explanation of whether the removal projects are from nature-based or technological sinks. We suggest moving this to the NMIG for simplification purposes and for alignment with GRI.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	36. (c)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	Former E1-7 60 on the approach to reporting net-zero targets has been removed. We suggest reinstating part of this content as an Application Requirement for paragraph 37, to clarify expectations regarding the use of carbon credits (but also removals within the value chain) when making public GHG neutrality claims. Please see the following wording suggestion, based on GRI 102: 'In the context of GHG neutrality claims, organizations are expected to prioritize implementing all feasible technical and scientific actions to avoid and reduce GHG emissions across their value chains in alignment with the global effort needed to limit global warming to 1.5°C. According to the latest scientific evidence, GHG removals within and beyond the value chain can only be used to counterbalance residual GHG emissions as the last step of the mitigation hierarchy. Residual GHG emissions refer to the unabated GHG emissions after the organization has reduced at least 90% of its GHG emissions, and further reduction is not possible'.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	37.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I agree	We agree with the inclusion of impacts in the objective of Disclosure requirement E1-11 "Anticipated financial effects from material physical and transition risks and potential climate-related opportunities".	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	39.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The alignment regarding the 1.5°C target has shifted from specific taregts to a broader focus on strategy and business models. This change introduces additional effort and complexity, as the terms "strategy" and "business model" are inherently flexible and open to interpretation. This flexibility allows for extensive discussions with auditors, but it does not provide any added value compared to the previous target-oriented approach. The targets were integral to the strategy and were already aligned with the business model. Therefore, maintaining a clear focus on the alignment of targets is essential for effective alignment and implementation.	E1	E1-1 - Transition plan for climate change mitigation	AR 1
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The timelines mentioned are "short, medium and long term", the word "and" here can increase the reporting burden. It is the same for DR 18 a and 18 b. Could you please add an overarching AR that covers all DR to state that undertakings are only requested to report on the most relevant timeline and not all 3?	E1	E1-3 - Resilience in relation to climate change	21. (c)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Regarding AR 13 b, it will not be possible to select a base year of no longer than 3 years for companies that are aligned with the SBTi Net Zero standard, as they have set their decarbonisation targets for 2050 often as early as in 2019. Please do not increase the reporting burden by requesting a re-submission of targets for validation by changing the baseline year. Companies should be able to keep their current targets if they are indeed already proven to be in line with the Paris Agreement.	E1	E1-6 - Targets related to climate change	AR 13
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	There seems to be a contradiction with AR 21 e, do biogenic CO2 emissions need to be included or separated from the emissions scopes? The required information provides limited material insights with data difficult to obtain. Suggestion to delete requirements.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Regarding AR 24 b, the use of "shall reflect" here is confusing and implies a mandatory datapoint. The datapoint on the share and types of contractual instruments should be a voluntary datapoint. Please modify to "may". Futhermore, the idea and purpose of the information regarding "share and types of contractual instruments used to purchase energy" is unclear to us and should therefore be deleted or further specified.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 24
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is still not very clear if you can use the wording "Transition plan" while not having all the elements as described in the standards (specifically targets that respond to all the ESRS requirements)	E1	E1-1 - Transition plan for climate change mitigation	11.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Some of the disclosures expected by the ESRS cover sensitive information from a strategic perspective, disclosure of which could be used to their disadvantage by non-EU competitors of EU issuers that are under no such transparency obligations. The current wording of the exemption for disclosure of sensitive information should be revisited as it is currently too stringent to be used to safeguard business secrecy, especially in an international business environment that risks becoming even tenser. Information on future investment projects is sensitive, and its disclosure may have a severe impact on the competitiveness of the preparer. All data points regarding significant CapEx and OpEx amounts should be deleted or made voluntary. Information on future investment projects is sensitive, and its disclosure may have a severe impact on the competitiveness of the preparer. Moreover, the granularity required for GDR-A quantitative disclosures is disproportionately high. Although it would be much better to exclude resource-related quantitative metrics, if their reporting is deemed necessary, it should be required at consolidated level to ensure both relevance and practicality. Additionally, the level of detail required under the climate standard is significantly higher than in other standards.	E1	E1-5 - Actions and resources in relation to climate change	24. (c)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Letter (c) it is incoherent the boundary of the numerator and the denominator: the numerator as per letter a is referred to "operational sites" while the denominator seems to be required on financial boundary. This data is irrelevant.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 23

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	AR 26 in reference to ESRS 1 3.7 may result in a high number of new datapoints depending on its interpretation by auditors. EFRAG should clearly state that the disaggregation of data is voluntary ("may…") or delete the AR completely. Furthermore, this disaggregation does not provide any added value for the users of the information; instead, it leads to information overload and unjustified burdens for the disclosing company (information may not be available or only with high effort). The new wording seems to mandate a disaggregation of GHG emission while the previous requirement was "as appropriate", leaving more flexibility to the reporting company. We recommend to reintroduce the previous wording.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 26
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Please refer to question 20 of the General Section	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Unclear whether included provision on EU Climate Law entails new requirements. Clarification also for audit process needed to avoid discussions.	E1	E1-1 - Transition plan for climate change mitigation	13.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Reduction targets, decarbonisation levers, key actions and the role of administrative, management and supervisory bodies are duplicated to paragraphs in E1-5, E1-6 and ESRS 2. This leads to additional work and complication even with clarification in new AR 2. Suggestion: Deletion of the requirements in the Transition Plan and additions in the named paragraphs.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The requirement on the qualitative assessment on locked-in GHG emissions from key assets and products is unclear and not comparable. The recording of locked-in GHG emissions is time-consuming and generates little added value. A qualitative assessment is not comparable between companies. It is unclear what counts as key assets and products. Proposal: Deletion of the paragraph, as it offers no added value and generates a lot of effort.	E1	E1-1 - Transition plan for climate change mitigation	14. (c)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The granularity required for quantitative disclosures is disproportionately high. If considered necessary, it should be required at the consolidated level to ensure relevance and practicality. AR 2.b: It is not clear why the requirement was moved to ARs. Complicates the reading of the standard, as it is a mandatory specification. AR 2.c: Some of the disclosures under the ESRS cover sensitive information from a strategic perspective. The current wording of the exemption should be revisited as it is currently too stringent to be used to safeguard business secrecy. All data points regarding significant CapEx and OpEx amounts should be deleted. New Wording " there is no expectation that the undertaking discloses all internal information used to manage the plan." does not solving this issue. The disclosure of "financial resources supporting the implementation and strategic ambition of its transition plan for climate change mitigation, including quantitative short- and medium-term CapEx, and/or OpEx figures, and anticipated long-term CapEx and/or OpEx ranges" go beyond the initial requirements. It is unclear how the short-/medium-term and long-term time horizons are defined, considering the respective GHG targets defined by the companies. Requirements related to Transition Plans should be aligned with existing international frameworks.	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The requirment "explanation of the plans to manage – e.g. by transforming, decommissioning or phasing out – its GHG-intensive and energy-intensive assets and products." went from voluntary to mandatory. Additionally mandatory reporting requirements were added regarding "dependencies of future financial resources and other resources and how these may constrain the ability to implement the transition plan actions." This results in additional work to fulfill the reporting requirements. Proposal: Change to voluntary disclosures.	E1	E1-1 - Transition plan for climate change mitigation	AR 3
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Additional shall requirement to resources and actions taken imprecise. Generates high coordination efforts. Achieved and expected GHG emissions are metrics. These should not be in ARs. The inclusion of a shall statement on sector-specific standards also generates additional work in the survey. In addition, high coordination effort with the auditor due to lack of precision	E1	E1-1 - Transition plan for climate change mitigation	AR 4
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The disclosure requirement should be able to be fulfilled in the ESRS 2 section when describing material IROs. Otherwise it would be duplicated.	E1	E1-2 - Climate-related risks and scenario analysis	17.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The short-term period is limited to 1 year with reference to ESRS 1. It does not make sense to carry out a climate scenario analysis for the reporting year (physical and transitory risks), as various climate scenarios are unrealistic in one year. The short-term period should be removed from the disclosure requirement.	E1	E1-2 - Climate-related risks and scenario analysis	18.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The short-term period is limited to 1 year with reference to ESRS 1. It does not make sense to carry out a climate scenario analysis for the reporting year (physical and transitory risks), as various climate scenarios are unrealistic in one year. The short-term period should be removed from the disclosure requirement. Moreover, the current formulation of the AR indicate behavior obligations in how to conduct the scenario analysis going against ESRS 2 (ED) para. 5. Particularly the mandatory use of geospatial data and detailed methodological requirements related to supply chain lead to unnecessary complexity in the overall requirements. Reformulation needed (previously "This description shall include its process in relation to […]").	E1	E1-2 - Climate-related risks and scenario analysis	AR 5
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The disclosure of the entire evaluation of the resilience analysis is unrealistic, as it involves far-reaching confidential documents. Companies may experience competitive disadvantages as a result of disclosure	E1	E1-3 - Resilience in relation to climate change	AR 9

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Additional requirements that mean increased effort in carrying out the resilience analysis and providing evidence. Consideration of the points listed offers no added value for external stakeholders like investors.	E1	E1-3 - Resilience in relation to climate change	AR 10
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The approach to reporting quantitative emission reductions should be based on aggregated data. Providing detailed information for each individual action/lever is particularly challenging, as the boundaries between actions can often be unclear. Additionally, individual disclosure implies revealing projected growth figures, which are both commercially sensitive and subject to a high degree of uncertainty. Therefore allowing companies the possibility to consolidate the information and report the total reductions considering all actions would be a more appropriate approach. Moreover, The information on achieved and expected GHG emissions should already be provided as part of the Transition Plan, AR 4. Duplication should be omitted.	E1	E1-5 - Actions and resources in relation to climate change	24. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Absolute targets can mislead as they limit economic growth or reward market failure even for less CO2 intensive businesses. They do therefore consitute a behavioural requirements which contradicts that the general guidance that the ESRS do not make behavioural requirements. The disclosure of intensity/relative targets and the additional disclosure of the associated absolute values for the target year and the interim target year(s) means that companies must disclose the planned volume growth. This represents highly sensitive information and results in a competitive disadvantage and cannot be published. The current flexibilization of the requirement therefore does not represent the desired simplification. It should be possible to report intensity/relative targets without absolute values and also to prioritize intensity/relative targets over absolute targets.	E1	E1-6 - Targets related to climate change	26. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	"In cases where the undertaking has only set a GHG intensity reduction target, it shall nevertheless disclose the associated absolute values for the target year and interim target year(s)." This requirement forces companies to disclose the planned volume growth. This puts them at a massive competitive disadvantage and cannot be published in this way.	E1	E1-6 - Targets related to climate change	AR 12
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Share of energy from nuclear sources in electricity mix should be deleted to avoid „duplication" with primary energy; little usefulness as metric is derived from statistical data only; share of nuclear energy in the electricity mix should not be part of reporting.	E1	E1-7 - Energy consumption and mix	28. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	E1 - 36 (d) should be kept as no additional burden for disclosing companies; Removal of disclosure on total emissions appears illogical, as both users and disclosers are likely to want to see this information published. Even though it can be calculated independently, the lack of a requirement may lead to unnecessary discussions about whether it can be provided as a voluntary additional disclosure.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The introduced separate disclosure following the operational control approach allows for significant interpretation and is hence burdensome when aligning with auditors. EFRAG should make it clearer, that this is a "may"-disclosure.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We welcome the revisions especially in AR 25 (d); but the disclosure required in AR 25 (g) should be deleted as Cloud computing is only rented through the user company (Scope 3) but already disclosed by the provider (Scope 1) which leads to double counting and high efforts for verification	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	We welcome the revisions regarding the table to report on emissions and the flexibilities it allows in presenting the information.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 27
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Failure to achieve the general objective of reducing disclosure requirements. This information has not only been moved, but has been changed from may to shall. We see no added value for external readers in this information.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	35. (d)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	We believe that disclosing the monetary and percentage exposure to physical risks without considering adaptation measures is problematic. It involves high uncertainty, may overestimate risks, and could discourage proactive resilience efforts. Disclosures should account for adaptation actions to reflect a more accurate risk picture and encourage companies to invest in climate resilience.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	In many cases, adaptation measures cannot reliably be directly linked to specific assets. Doing so would require enormous effort or result in imprecise data that offers little value. Therefore, a one-to-one attribution is neither practical nor feasible. There is also no clear use case for this metric. Also, please note, that while within Europe there are standardized energy efficiency categories for real estate, outside Europe this is not the case. Also, within Europe while the categories are standardized, the thresholds are different depending on the country.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (c)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	We believe it is nearly impossible to reliably calculate the monetary amount and percentage of net revenue at risk from physical climate impacts before considering adaptation measures. The complexity arises from the high uncertainty of climate projections, the difficulty in quantifying future physical damages, and the challenge in accurately modeling how risks will evolve over time. Additionally, the lack of standardized methodologies and reliable data further complicates such estimations.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (d)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	We believe that estimating the monetary and percentage impact on net revenue from transitional risks before considering mitigation and adaptation measures is highly challenging. Given the high uncertainty surrounding future policy changes, technological developments, and market shifts, it is more meaningful to incorporate measures into the assessment. Disclosing risks without accounting for planned actions may be misleading and fail to provide an accurate picture of the true risk exposure.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	In many cases, adaptation measures cannot reliably be directly linked to specific assets. Doing so would require enormous effort or result in imprecise data that offers little value. Therefore, a one-to-one attribution is neither practical nor feasible.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (b)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	We believe that providing a detailed breakdown of the carrying amount of real estate assets used as loan collateral by energy-efficiency classes is challenging and may not be practical. Such detailed classification requires extensive data collection and consistent assessment methods, which can be resource-intensive and may result in inconsistent or unreliable information. Also, please note, that while within Europe there are standardized energy efficiency categories for real estate, outside Europe this is not the case. Also, within Europe while the categories are standardized, the thresholds are different depending on the country.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (c)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	We believe that identifying potential liabilities from climate transition risks that do not meet current recognition criteria is challenging due to inherent uncertainties. Such liabilities depend on future developments and may not be reliably quantifiable or recognizeable in the financial statements at this stage. This point would also create a lot of confusion to readers to disclose potential liabilities, not already recognised in the financial statements.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (d)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The lack of precise data, the variability of future scenarios, and the difficulty in accurately predicting asset devaluation make such disclosures unreliable and potentially misleading. Therefore, BMW opts not to implement or publish such estimates.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (f)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Such estimates are highly challenging because opportunities related to the transition are difficult to quantify accurately. Additionally, due to competitive reasons, we would prefer not to disclose such figures, as they could reveal strategic information and be misinterpreted.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	42.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	We consider the prescribed calculation approaches under AR 30—such as disclosing effects over different time horizons, including all asset types, and presenting energy efficiency classes—challenging to implement and potentially risky from a competitive perspective. Disclosing detailed, asset-specific data and estimates could reveal strategic information to competitors. High reporting burden on companies, high implementation costs.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	AR 30
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Remove the reference to 'spatial resolution', as it is a new reporting requirement and its inclusion demands an excessive level of detail that may obstruct companies' ability to provide a meaningful and proportionate response.	E1	E1-2 - Climate-related risks and scenario analysis	19.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	While also a requirement of the IFRS Sustainability Disclosure Standards, the lack of clear and harmonized guidance on calculating anticiapted financial effects linked to individual climate-related risks and opportunities leads to inconsistent and unreliable information. The complexity and lack of integration between sustainability and financial systems make such quantification impractical. Additionally, by going beyond the requirements of the ISSB, the disclosure requirement can also reveal sensitive strategic information, that may affect the valuation of the company, leading to competitive disadvantages for European companies. We therefore advocate for removing all requirements related to anticipated financial effects while allowing voluntary provision of anticipated financial effects should a company wish to do so.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	39.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Please refer to question 20 of the General Section.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	From our perspective, removing the intensity metric makes sense because the metric involved additional effort, and the comparability of the metric with other companies was not guaranteed.	E1	E1-7 - Energy consumption and mix	27.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	From our perspective, removing the intensity metric makes sense because the metric involved additional effort, and the comparability of the metric with other companies was not guaranteed.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	31.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	It's a positive development that the application of the financial control approach has been clarified.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 18
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	We view the removal of the addition concerning high climate impact sectors as a positive step.	E1	E1-7 - Energy consumption and mix	29.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	We do not understand why the metric "Percentage of Scope 1 GHG emissions from regulated emission trading schemes" is being retained. We recommend removing the addendum to simplify reporting.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The idea and purpose of the information regarding "share and types of contractual instruments used to purchase energy" is unclear to us and should therefore be deleted or further specified.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 24
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	We support the simplification of the requirements regarding carbon credits. This leads to a simplification of reporting, while the most important information has still been retained.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	36.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	We support the simplification of the requirements regarding Internal Carbon Pricing. This leads to a simplification of reporting, while the most important information has still been retained.	E1	E1-10 - Internal carbon pricing	38.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	This requires extensive quantification, is highly subjective and may not always result in useful information	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (e)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	This requires extensive quantification, is highly subjective and may not always result in useful information.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (f)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Please refer also to question 20 of the General Section.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	See comment above for more remarks: Firstly, revenue generation is highly interconnected and rarely attributable solely to individual assets or specific physical risks. Companies operate with complex supply chains, diverse customer bases, and integrated operations. Disaggregating total revenue to quantify the portion "at material physical risk" before adaptation is extremely challenging, if not practically impossible, given current data and attribution capabilities. Existing financial systems are not designed to track revenue at such granular, risk-specific levels. Secondly, estimating revenue "before considering climate adaptation actions" requires a hypothetical calculation, introducing significant subjectivity and uncertainty. This figure cannot be readily extracted from current financial reporting or modelled accurately, making it inherently unreliable. Finally, the complexity and speculative nature of this calculation create major auditability challenges. Producing figures that are both robust and verifiable would be extremely difficult, likely resulting in inconsistent reporting and reduced credibility of disclosures	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (d)
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Challenges with understanding and calculation methodology of potential locked-in GHG emissions. This is not applicable to all companies, only for those that have emissions-intensive assets with a long lifetime. Make this DP voluntary and/or conditional, as it only applies to certain sectors, and specific assets.	E1	E1-1 - Transition plan for climate change mitigation	14. (c)
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Annual progress reporting (para. 16j) is impractical where projects run on 3- to 5-year cycles, allowing rolling three-year reporting for example with interim qualitative status for multi-year projects would be easier for companies to implement in practice. It should be allowed to disclose that the progress in implementing the transition plan from last year still applies (especially regarding individual measures) to reduce effort	E1	E1-1 - Transition plan for climate change mitigation	16.
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Insufficiently defined coverage of actions with regard to targets that go beyond the ESRS requirements (e.g. FLAG, no deforestation). Guidance needed, simplify DR	E1	E1-5 - Actions and resources in relation to climate change	23.
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Difficulty in quantifying the contribution of specific "decarbonisation levers" to overall scope 3 targets due to data gaps and influence limitations upstream	E1	E1-5 - Actions and resources in relation to climate change	24. (a)
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Clarification and relevance: The calculation and reporting of biogenic emissions that occur in the company's upstream and downstream value chain cannot be meaningfully implemented in practice due to a lack of guidance, guidelines and standards. Remove datapoint or make voluntary	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33.
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Amendment for d) "prioritise direct measurement of Scope 3 GHG emissions" is not clear enough currently, unclear if this is guidance for data collection or disclosure requirement - if disclosure - what is to be disclosed exactly? To prioritise "primary data" is common best-practice for undertakings to achieve reductions - disclosing this has no added value Note: there is an error in the nummeration of AR 25 (a, f, b, c, e, d)	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Clarification needed for the definition of a "key asset". Note: there's an error in nummeration (a, c, b)	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (b)
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Information should be allowed to be omitted if anticipated financial effects are not related. Financial risks and assets at risk are not always necessarily related, but can also be related to other factors (make DR conditional). The focus on assets reflects certain business models but this approach is irrelevant for the rest of the economy. This entails an enormous effort for information that is very important for a certain part of the economy, but for the rest the effort is not in proportion to the added value of the information to be reported. It should be made clear that financial terms (e.g. revenue) are consistent with definitions of financial accounting of the reporting companies and there should be no separate ESRS-specific definitions. Changes made are not helpful.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (d)
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Further guidance required, as it remains unclear whether mitigation matters are to be included or not - the question is, if measures at current state should be taken into account or not. This is still unclear	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (d)
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We welcome the focus made in reporting on "key features" of a transition plan for climate change mitigation which correspond to the essential components on which the undertaking shall disclose information. However, we invite EFRAG to clarify whether a plan could be qualified as a "transition plan" under ESRS E1 if any of the key features is missing, and therefore not disclosed. Besides, we invite EFRAG to clarify the reporting requirement on the 1.5°C compatibility of the undertaking's strategy and business model (third sentence of § 14(a)) as it is unclear to assess what is expected beyond the description of the "key features" that already include information on such compatibility for the GHG emission reduction targets.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We recommend including a definition and/or examples of potential locked-in emissions from «key assets». EFRAG could leverage on the definition already provided in AR 3 of the current ESRS E1.	E1	E1-1 - Transition plan for climate change mitigation	14. (c)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	With reference to point (c) on financial resources, we encourage EFRAG to further rely on ESRS 2 GDR-A (cf. § 38) to which AR 2(c) refers. ESRS 2 indeed makes a clear distinction between financial resources allocated to the key actions in the reporting period (with the disclosure of the related amounts and the corresponding line items and/or notes where these amounts are included in the financial statements) and future financial resources expected to be allocated for the implementation of the key actions (with the disclosure of an indicative range). Besides, we recommend that EFRAG insist on the need for consistency between internal available information and reported information. Further guidance on how to build estimates of future financial resources could also be provided in view of the challenges for preparers to provide reliable and comparable information. Besides, we invite EFRAG to indicate that CapEx and/or OpEx may be presented on an aggregate basis, as implicitly authorized by NMIG 4 (a).	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We understand that the references to specific climate scenarios which may, for example, be based on IPCC SSP5-8.5, relevant regional climate projections based on these emission scenarios, or NGFS (Network for Greening the Financial System) climate scenarios with high physical risk such as "Hot house world" or "Too ligle, too late" were removed because they were not applicable to certain companies, but we believe this references remain useful as guidance. We recommend keeping these references while making it clearer that they are in NMIG for guidance purposes only.	E1	E1-2 - Climate-related risks and scenario analysis	AR 5
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	In this comment we are referring to former AR 28 on emission reduction factors, which is deleted in the current proposal. We believe the precisions brought by former AR 28 are useful to support the calculation of a 1.5°C-aligned reference target value.	E1	E1-6 - Targets related to climate change	26.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We invite EFRAG to specify that the 1.5°C compatibility of the GHG emission reduction targets can be demonstrated by providing the validation of an independent third party, in consistency with what is stated in DR E1-1 (cf. AR 2 (a)).	E1	E1-6 - Targets related to climate change	AR 16
Excels	Forvis Mazars Group	Auditor	Belgium			I disagree	Requiring to also report according to the operational control approach would increase both the burden and the complexity in the reporting. Besides, this approach leaves significant room for judgement regarding the circumstances that could lead to impose a reporting in accordance with such approach. We therefore recommend removing such requirement. As indicated in Part 2 of the survey, we encourage EFRAG to align with IFRS S2 even though it means allowing a company to choose between different approaches under the GHG Protocol. Should this paragraph be maintained, EFRAG should not limit the requirement to Scope 1 and 2, excluding Scope 3 emissions, since operational control boundaries can significantly impact Scope 3 emissions.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	As indicated in Part 2 of the survey, we encourage EFRAG to clarify the "shall consider" requirement with respect to the GHG Protocol Corporate Standard. We encourage EFRAG to clarify that the GHG Protocol shall be applied, while precisely listing the elements for which ESRS take precedence over the GHG Protocol (in particular with respect to the emissions reporting boundary). Besides, EFRAG should also clarify what is allowed/required in practice if a company considers Commission Recommendation (EU) 2021/2279 or EN ISO 14064-1:2018 as permitted by § AR 21. For instance, does a company using the ISO guidance still has to report under the GHG Protocol if the calculation and reporting of GHG emissions under EN ISO 14064-1:2018 differ at some point from the GHG Protocol Corporate Standard? Same comment applies to § AR 24 and AR 25.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We suggest imposing the use of a table template to present the GHG emissions disaggregated by Scopes 1, 2 and significant Scope 3 categories, to ensure comparability in reporting, while allowing the undertaking to present additional lines and/or columns to this table to provide further granularity, if relevant.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 27
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We welcome the streamlining of former DR E1-9 since the granularity and complexity of this DR raise many questions in practice. Very few companies have chosen to provide information in the 2024 reports and it is expected that the phase-in measures will still be widely used based on the "quick fix" amendments. Nonetheless, we note that the proposed new DR is still very granular. In view of the significant difficulties in preparing this information, we encourage EFRAG to ensure that only information that is essential to users is required.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40.
Excels	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany			I partially agree and partially disagree	We do not understand the need to refer to 'finance-lease / right-of-use-assets'. It seems simpler to refer just to 'leases' (with the term being defined as we suggested for ESRS 1 - 70). Right-of-use assets includes both (former) finance lease and (former) operating leases, so it seems redundant to now refer separately to finance leases.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	AR 30
Excels	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany			I partially agree and partially disagree	Clause (a) refers to the GHG Protocol Corporat Value Chain (Scope 3) Accounting and Reporting Standard (Version 2011). Appendix A of this Standard, Accounting for Emissions from Leased Assets, was obviously developed prior to IFRS 16 being in place, and it therefore tends to contradict the approach of ESRS 1-70. We suggest it is clarified that for leases, the approach set out in ESRS 1-70 overrides the GHG Standard.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	Bundesverband Deutscher Leasing-Unternehmen e. V..	Association of financial institutions	Germany			I partially agree and partially disagree	The reporting boundary cross refers to ESRS 1 59, that deals specifically with group reporting. Taken in isolation (i.e. without reading ESRS 1 70, this might be seen as including assets leased nby a lessor to its customers. We suggest a cross-reference to ESRS 1 70	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 18
Excels	Triodos Bank N.V.	Bank	Netherlands			I disagree	We suggest to keep the requirement that targets should be updated every 5 years after 2030 in.	E1	E1-6 - Targets related to climate change	6.
Excels	Triodos Bank N.V.	Bank	Netherlands			I disagree	GHG intensity is deleted. We share the concern that this will affect user' ability to understand an undertaking's carbon risk exposure over time. We propose to maintain this indicator.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	30.
Excels	Triodos Bank N.V.	Bank	Netherlands			I agree	We agree with the financial control approach.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	8.
Excels	Triodos Bank N.V.	Bank	Netherlands			I disagree	We propose to keep the requirement, to publish a date of adoption of transition plan for undertakings not having adopted transition plan yet, in place.	E1	E1-1 - Transition plan for climate change mitigation	16.
Excels	Triodos Bank N.V.	Bank	Netherlands			I disagree	Considering the relevance of GHG Scope 3 GHG emissions in the total emissions of many companies, we propose to keep the disclosure requirement about why scope 3 GHG emissions has been excluded in.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	26.
Excels	BDO	Auditor	Belgium			I partially agree and partially disagree	Please be aware that practices may differ across EU member states. Therefore, it is advisable to consider these variations when finalising the revised ESRS requirements and to consider whether flexibility is needed as to the approach to be followed.	E1	E1-7 - Energy consumption and mix	AR 17

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	The Exposure Draft allows GHG emission reduction targets to be presented in a combined manner. However, in cases where combined targets are disclosed, it requires undertakings to indicate the share related to each respective GHG emission Scope. In practice, we think that this requirement is problematic for several reasons: 1) Decarbonization levers impact multiple Scopes simultaneously, making a reliable split by Scope unrealistic. 2) Holistic impact of reduction measures: Large multinational groups with decentralized structures implement decarbonization programs across various business units and geographies. These programs are designed to achieve overall reductions in GHG emissions, not to optimize reductions in a specific Scope. Requiring a Scope-by-Scope allocation risks introducing artificial splits that do not reflect the actual management approach. 3) Complexity and inconsistency risk: Estimating Scope-specific shares would require assumptions, undermining comparability and reliability. 4) Existing disclosures already ensure clarity, as companies must specify which Scopes are covered by the target. We therefore propose deleting the wording "and the share related to each respective GHG emission scope" in E1.26a, to keep the requirement both meaningful and feasible.	E1	E1-6 - Targets related to climate change	26. (a)
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	Presentation of targets and actions: We would suggest including this Application Requirement in the NMIG, as it is only a "may" requirement and therefore not mandatory. To avoid confusion regarding the mandatory Disclosure Requirements, we believe it is misplaced in its current location.	E1	E1-6 - Targets related to climate change	AR 14
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	We would like to raise concerns regarding the interpretation of AR 15 for E1.26 (GHG emissions reduction targets compatible with 1.5°C). AR 15 refers to companies applying the operational control boundary under E1-8. Yet the revised E1-8 requires the financial control boundary as the default, with operational control disclosure only where needed to avoid unfair presentation of Scope 1 and Scope 2 emissions. Generally, target setting only makes sense on an operational control basis. Setting a target for a leased asset (for Scopes 1 and 2) does not make sense if it is not possible to influence emissions in this area. We therefore recommend that the operational control approach also be permitted for E1-8.	E1	E1-6 - Targets related to climate change	AR 15
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	ESRS 1.70 clearly states that "impacts, risks and opportunities arising from the use of a leased asset do not depend on whether the asset is legally owned or leased. The lessee is causing and contributing to the impacts of the leased asset, therefore reports the impacts and related risks and opportunities in its own operations, during the lease period. The lessor is directly connected with the impacts of the leased asset; therefore, it reports the impacts and related risks and opportunities as part of its downstream value chain." This corresponds to the operational control approach. However, this important and sensible clarification is undermined in E1-8. This means that the operational approach is permitted for all impacts expect for GHG emissions. This is inconsistent and leads to completely unnecessary confusion among stakeholders. We therefore propose allowing the operational approach to be permitted also for GHG emissions.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32.
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	For the sake of clarity, we would recommend explicitly stating that the level of aggregation may, in accordance with [Draft] Amended ESRS 1, Chapter 3.7, be determined by the undertaking itself. Otherwise, we see a risk that this Application Requirement could be interpreted as imposing a requirement to disclose GHG emissions disaggregated by country, operating segment, economic activity, subsidiary, GHG, or source type in all cases.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 26
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	We suggest including this Application Requirement in the NMIG, as it is only a "may" requirement and therefore not mandatory. To avoid confusion regarding the mandatory Disclosure Requirements, we believe it is misplaced in its current location.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 27
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Proposition to delete. For companies where this is relevant this is probaly communicated to investors anyway (oil & gas, utilities, etc.)	E1	E1-1 - Transition plan for climate change mitigation	14. (b)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The value of this information depends on the sector	E1	E1-1 - Transition plan for climate change mitigation	14. (d)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	For OPEX, it is typically not possible to retrieve the information reliably from financial reporting; for CAPEX it can be typically done based on assumptions	E1	E1-1 - Transition plan for climate change mitigation	AR 2 (c)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Delete. Recommendation to report the outcome and not the process; it would be an option to disclose the process in a separate publication (voluntarily)	E1	E1-2 - Climate-related risks and scenario analysis	18.
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Delete. Recommendation to report the outcome and not the process; it would be an option to disclose the process in a separate publication (voluntarily)	E1	E1-2 - Climate-related risks and scenario analysis	AR 5
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Delete. Recommendation to report the outcome and not the process; it would be an option to disclose the process in a separate publication (voluntarily)	E1	E1-2 - Climate-related risks and scenario analysis	AR 6
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Delete. Actions are already described, what is an action and what is the lever? The distinction is unclear	E1	E1-5 - Actions and resources in relation to climate change	24. (a)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Keep but merge with the transition plan, "expected emission reductions" are forward looking statements, potentially sensitive information and difficult to audit. Delete "achieved reduction" by lever. Achieved reductions can be reported for key actions, however it is impossible for preparers to meaningfully calculate the achieved reduction by levers as a combination of all single actions (bottom-up) or top-down where the allocation would be based on expert judgement/assumption and have a high degree of measurement uncertainty	E1	E1-5 - Actions and resources in relation to climate change	24. (b)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Generally valuable information, however this will already be covered with the target and can be deleted here	E1	E1-6 - Targets related to climate change	26. (a)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Biogenic emissions should not count from our perspective, current reporting can lead to double counting and misinterpretations, also not aligned with reporting under EU ETS	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21 (e)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We propose to delete the entire E1-11. We do not support disclosing anticipated finanial effects due to the high uncertainty. The main concern is that such disclosures would in any case not be comparable, as methodologies for determining the anticipated financial effects would need to be based on a number of (interdependent) assumptions about the future which by definition lead to a broad range of outputs (scenarios). We do not believe that speculative information about potential future developments and broad ranges of outcomes can be considered decision-making useful information for any stakeholder.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	39.
Excels	European Renewable Gas Registry	Other - please specify (required)	Belgium			I partially agree and partially disagree	Biomethane plays a crucial role in this direction and there is uncertainty in the ESRS on how biomethane can be treated to assist companies in their sustainable reporting. Simply referring to the GHG Protocol Corporate Standard for reporting GHG emissions does not solve the issue particularly when the GHG Protocol itself does not provide clear guidance on the accounting of biomethane certificates for Scope 1 emissions and its revision is scheduled for 2028. As a consequence, we see delays in investments in biomethane production, as companies hesitate to make investments without certainty that biomethane use will be recognised in ESG reporting and decarbonisation targets. ERGaR calls on EFRAG to clarify how biomethane can be treated for Scope 1 & 3 emissions by explicitly referencing the ETS methodology (please see paragraph below). If such clarification cannot be included directly in the final standard, we recommend providing a footnote or supplementary guidance on the EFRAG website. This would be particularly valuable during the transition period, until the GHG Protocol offers more comprehensive guidance.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	European Renewable Gas Registry	Other - please specify (required)	Belgium			I partially agree and partially disagree	In the same spirit as the AR 21, we also believe that the AM does not help provide clarity for companies. AR 22 refers to the ETS methodology, under which sustainable biomethane can be zero-rated (i.e. its emissions are considered zero). While this approach should encourage the use of biomethane, current practice shows that many companies and auditors perceive the rules as unclear, which in turn hinders crucial investment decisions. As ERGaR, we call on EFRAG to explicitly refer to the ETS methodology as a way to treat biomethane in reporting for Scope 1 & 3 emissions until the new guidance from the GHG Protocol becomes available.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 22
Excels	European Renewable Gas Registry	Other - please specify (required)	Belgium			I partially agree and partially disagree	Based on our answer to the survey, AR 21, paragraph e) should be amended as follows: "report biogenic emissions from the combustion or biodegradation of biomass outside the scopes."	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	European Renewable Gas Registry	Other - please specify (required)	Belgium			I disagree	Suggested amendment: (d) (AR 46(g) amended) prioritise direct measurement of Scope 3 GHG emissions and, where this is not possible, further prioritise their inputs and assumptions based on the characteristics of the data (e.g. data from specific activities within the entity's upstream and downstream value chain, timely data that faithfully represents the jurisdiction of, and the technology used for, the upstream and downstream value chain activity and its GHG emissions, and data that has been verified); to this end, regulated market instruments based on certification and third-party auditing may be used. Comment: "In the EU, Proofs of Sustainability are a market instrument legally rooted in the RED and issued within regulated mass-balance systems. The certification framework is supported by national or voluntary schemes recognised by the European Commission, requiring third-party audits, standardised GHG emission accounting, and traceability from feedstock to end-use. Production plants are certified. On this basis, producers can issue PoS that accompany biomethane consignments through the gas infrastructure, where the EU gas grid is legally treated as a single logistical facility. This robust architecture enables companies purchasing certified biomethane (with PoS) to demonstrate measurable and verifiable emissions reductions—even if the physical gas is delivered via shared infrastructure."	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	Companies also remind that the European Commission committed to define by end of 2025 the meaning of "compatibility between companies'target and 1.5°C targets". Until such a definition is published, no obligations are legitimate on this issue. They stress that the Paris Agreement also refers to "well below 2°C objective" which should be reinserted in the amended CSRD.	E1	E1-1 - Transition plan for climate change mitigation	1.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	In §14c), a new requirement has been inserted : "dependencies on which the transition plan relies". This additional "shall" requirement goes too far; furthermore, it is inconsistent with AR21. This new reference needs to be suppressed.	E1	E1-1 - Transition plan for climate change mitigation	1.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	§19 includes a new "shall" requirement:" for paragraph 18(b) it shall include the type of transition event analysed. In conducting its climate -related physical risk analysis supported by scenario analysis, the undertaking shall". Tha table in AR12 of set was presented as an example, not as a requirement. Those new obligations should be suppressed.	E1	E1-2 - Climate-related risks and scenario analysis	2.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	AR5 for §18 includes new requirement on the way the climate-related physical risks should conducted. The same with AR6 on §19 for climate-related transition risks. This goes too far in details considering methodologies are not yet mature. Those requirements should be suppressed.	E1	E1-2 - Climate-related risks and scenario analysis	2.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	The notion of resilience used in this section is very much unclear (see glossary); if the concept refers to adaptation, then it should be replaced by climate adaptation (without any reference to transition). In addition, in §21, new requirements b) and dc) have been inserted which appear excessive. They should be suppressed.	E1	E1-3 - Resilience in relation to climate change	3.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	AR 8 to §20 added a requirement: "shall consider the implications of the combined assessments performed according to DRs E1-2". This new obligation is excessive and should be suppressed.	E1	E1-3 - Resilience in relation to climate change	3.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	AR10 to §21c) introduced a new c):" The effect of current and planned investments in climate mitigation, adaptation and transition opportunities on climate resilience enhancement". This requirement is excessive in regard to the uncertainties faced by undertakings. It should be suppressed.	E1	E1-3 - Resilience in relation to climate change	3.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	§24 a) adds a "shall" disclosure by requesting climate change mitigation actions by decarbonisation lever; this goes too far for operators. This decomposition should be suppressed.	E1	E1-5 - Actions and resources in relation to climate change	5.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	In regard to §26 c) companies remind that the European Commission committed to define by end of 2025 the meaning of "compatibility between companies'target and 1.5°C targets". Until such a definition is published, no obligations are legitimate on this issue.	E1	E1-6 - Targets related to climate change	6.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	Companies consider, in the case where disclosing an absolute emissions target would provide to competitors key sensitive information (i.e.: production forecasts) which are very sensitive, that they should be entitled to publish only a target expressed in intensity,. In this regard, a clarification that the "relief" mentioned in ESRS 1 §98 is effectively applicable for section E1-6 appears essential.	E1	E1-6 - Targets related to climate change	6.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	§24 c) adds a "shall" disclosure to indicate different CapEx and OpEx for 3 horizons: short term, medium term and long term; this is too prescriptive, gives rise to uncertainty and may be considered as misleading for the markets. Therefore, global information can be provided but only for significant amounts of CapEx/OpEx and without obligations of time horizon.	E1	E1-5 - Actions and resources in relation to climate change	5.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	AR13 to §26 introduced a new obligation in b): " The undertaking is to select a recent base year that does not precede the first reporting year of the new target by longer than three years". Companies question the need for such a new requirement.	E1	E1-6 - Targets related to climate change	6.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	In §29, a new obligation was inserted compared to "set1" to require the undertaking "to further disaggregate its total energy consumption from fossil" by categories. This goes too far in details and is not compatible with the simplification objective of ESRSs. Therefore, this new requirement should be suppressed.	E1	E1-7 - Energy consumption and mix	7.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	4 data points have turned to "shall" in §34; this goes too far and subparagraphs a) to d) should be transferred to NMIG.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	9.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	In §38, a new requirement has been inserted about: "the consistency of the prices used with the prices used in the financial statement for impairment tests". This goes too far in details and should be suppressed.	E1	E1-10 - Internal carbon pricing	10.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	General comment: EFRAG should develop comprehensive non-mandatory implementation guidance for each topical standard, including ESRS E1. The guidance should comprise instructions and examples how to conduct the materiality assessment for the topic, how to apply the disclosure requirements, and to calculate the metrics. Sectoral examples could be added, where appropriate.	E1	E1 - Interaction with other ESRS	1.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Change title to "Policies related to climate change mitigation, adaptation and energy" to put more emphasis on the sub-topics of the standard. Change "climate policies" to "policies on climate change mitigation, adaptation and energy"	E1	E1-4 - Policies related to climate change	22.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Change title to "Actions and resources related to climate change mitigation, adaptation and energy" to put more emphasis on the sub-topics of the standard. Change "key climate change actions and resources" to "key actions and resources related to climate change mitigation, adaptation and energy"	E1	E1-5 - Actions and resources in relation to climate change	23.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Change title to "Targets related to climate change mitigation, adaptation and energy" to put more emphasis on the sub-topics of the standard. Change "climate change targets" to "targets related to climate change mitigation, adaptation and energy"	E1	E1-6 - Targets related to climate change	25.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I agree	Transition plans are essential for report users in the financial sector, but also for public policy and civil society, to understand an undertaking's contribution to mitigate climate change. The requirement to report a transition plan, based on different essential and supporting elements (or "key features"), should consequently remain a central part of ESRS E1.	E1	E1-1 - Transition plan for climate change mitigation	13.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Given the political decision to discontinue EFRAG's work on ESRS sector standards, we recommend to include the possibility to disclose sector-specific transition metrics as part of the transition plan under para. 14.	E1	E1-1 - Transition plan for climate change mitigation	14.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	The Commission should rapidly clarify what is expected from an undertaking, when reporting on the compatibility of its transition plan with the goal to limit global warming to 1.5°C.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Para. 18 only relates to exposure to hazards and transition events. Risk, however, is defined as the combination of exposure and sensitivity (see AR 5/AR 6 (a) and (b)). Hence, the introductory sentence of para. 18 needs to be amended to: "...how its assets and business activities in own operations and upstream and downstream value chain may be exposed and are sensitive:"	E1	E1-2 - Climate-related risks and scenario analysis	18.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Undertaking should not only "include the spatial resolution of the analysis" but use scenarios with the highest available resolution. Amend sentence to: "For paragraph 18 (a), the undertaking shall use scenarios with the highest available spatial resolution."	E1	E1-2 - Climate-related risks and scenario analysis	19.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	the key elements of methodology "how the undertaking has used scenario analyses" should include "which scenarios were used, their sources and alignment with state-of-the-art science" (reinstating former AR 13 (a))	E1	E1-2 - Climate-related risks and scenario analysis	19.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	AR 5 should be complemented by a note that "Using climate scenarios for the analysis is most useful for time horizons of more than 10 years. For shorter time horizons climate forecasts or trend analysis can be more proportionate."	E1	E1-2 - Climate-related risks and scenario analysis	AR 5
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	The requirement is lacking a clarification on the time horizons undertakings are expected to consider. We recommend to specify as follows: "The undertaking shall explain how it has defined short-, medium- and long-term time horizons for the identification of climate-related hazards and how these definitions are linked to the expected lifetime of its assets, strategic planning horizons and capital allocation plans"	E1	E1-2 - Climate-related risks and scenario analysis	AR 5
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	The requirement is lacking a clarification on the time horizons undertakings are expected to consider. We recommend to specify as follows: "The undertaking shall explain how it has defined short-, medium- and long-term time horizons for the identification of climate-related transition events and how these definitions are linked to the expected lifetime of its assets, strategic planning horizons and capital allocation plans"	E1	E1-2 - Climate-related risks and scenario analysis	AR 6
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Confusing use of terminology. It should be clarified that here financial exposure is meant (not physical exposure to a hazard). Change to "The quantification of the financial exposure of assets and business activities..."	E1	E1-2 - Climate-related risks and scenario analysis	AR 7
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	We note that this paragraph is not fully clear. 1) E1-2 does not specifiy of which types of scenario anaylsis are possible. E1-2 is the disclosure requirement covering provisions for scenario analysis. Therefore, the distinction between qualitative and quantitative analysis should be introduced already in E1-2. 2) independently from the scenario analysis being quantiative, semi-quantitative or qualitative, the underatking should consider the interplay between E1-2, E1-3 and E1-11. We suggest to EFRAG to revisit these provisions and better align the requirements.	E1	E1-3 - Resilience in relation to climate change	AR 8

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	The link between the CapEx plans as part of the EU Taxonomy (former E1 para. 29 (c) and ESRS reporting on resources allocated to actions should be reinstated. Preferably, an AR to ESRS 2 GDR-A should specify: "If applicable, the undertaking shall relate its CapEx amounts to the , the CapEx plan required by Commission Delegated Regulation (EU) 2021/2178." Alternatively, that provision can be introduced only for E1 as AR for para. 24 (c).	E1	E1-5 - Actions and resources in relation to climate change	24. (c)
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	We recommend to reinstate the requirement to update base year and target year in five year intervals starting from 2030 (former para. 34 (d)). This requirement is particularly useful from a user perspective because it will ease the comparison of GHG emission reduction targets.	E1	E1-6 - Targets related to climate change	AR 13
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	The reporting of GHG emissions under proposed amended ESRS E1-8 is based on the GHG Protocol Corporate Standard, Scope 2 Guidance and Scope 3 Standard. These standards do not explicitly define how to account for the non-CO2-climate effects of air traffic (especially NOx emissions and long-lived contrails), which are significant. However, it is common practice to account for these effects through the "radiative forcing index" (RFI). We recommend to EFRAG to include a provision in Application Requirement (AR) 21 that these effects shall be included in the GHG inventory and that RFI used is to be disclosed.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I agree	We welcome that proposed amended E1-8 retains the requirement for dual reporting of Scope 2 GHG emissions with the location-based and market-based approach, which is in line with the GHG Protocol, will assist comparability of GHG inventory data and avoid greenwashing.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32. (a)
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I disagree	The concept of "net-zero targets" is deleted from [Draft] amended ESRS E1. Targets labelled as "net-zero" should, however, follow basic rules to ensure their credibility and avoid greenwashing. These targets must be separated and not confused from more common but less ambitious claims to achieve GHG neutrality based on carbon credits. Hence, we recommend to EFRAG to reinstate the possibility to report net-zero targets from current ESRS E1-7 (para. 60) along with the definition of the term.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	34.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I disagree	[Draft] amended E1-9 para. 35 conflates removals from projects in own operations with those in the value chain and is not clear whether the amount is to be reported by project or as a sum of all projects. We recommend reporting the sum of removed GHG from projects in own operations and the value chain separately, leaving the option to provide project specific information, if deemed material.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	35. (b)
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Practical implementation of E1-9 would be significantly eased with a publicly available list of standards and carbon crediting programs that can be considered as "recognized quality standards". Based on such a list, undertakings would have certainty which carbon credits are of high quality and can be reported according to ESRS E1. They would also not have to assess for themselves if the programs / standards, based on which their purchased carbon credits are generated and cancelled, fulfil the ESRS quality criteria. Therefore, we recommend that the European Commission issues a list of recognized quality standards for carbon credits and acts as a neutral instance to assess whether a carbon crediting program applying to be listed can be recognised based on defined quality criteria (additionality, permanence, avoidance of double counting, ..., see ESRS definition of "recognised quality standards for carbon credits"). For the purpose of ensuring credibility and environmental integrity, the quality criteria in the ESRS definition would need to be further specified by the Commission (e.g. what does permanence mean for certain reduction and removal projects?). For that, the Commission can rely on existing work, e.g. on ICAOs CORSIA.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	37. (b)
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I disagree	The proposed amendment of ESRS E1-10 on internal carbon pricing schemes suggests that an undertaking shall report "the price per metric tonne of GHG emissions" (para. 38 (b)). Often companies apply different internal carbon prices for different purposes. Hence, it is unclear which price is to be reported. EFRAG should specify that transparency is expected for the average carbon price in each pricing scheme the undertaking applies.	E1	E1-10 - Internal carbon pricing	38. (b)
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	WE note that the text of NMIG 12 for para. 41(d) need to be amended in accordance with E1-8 (delete total GHG emissions)	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (d)
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	We acknowledge and support the extension of the compatibility assessment beyond GHG targets to cover the overall strategy and business model, including explicit reference to the EU's 2050 climate neutrality goal. This is consistent with EFRAG's stated objective of enhancing the credibility of transition plans. However, performing, substantiating and evaluating such compatibility without a recognised framework or criteria will be challenging. We recommend that EFRAG provides at least high-level guidance on the principles or parameters that undertakings should consider when assessing compatibility of their strategy and business model with 1.5°C, until such time as Level 1 regulation provides a more detailed definition.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	The revised DR on climate transition plans introduces a list of key features but does not clarify what is expected at a minimum for an undertaking to legitimately claim it has a transition plan. It remains ambiguous whether all of the key features must be covered, or if a partial disclosure would still qualify as a transition plan under ESRS. We recommend that EFRAG clarifies in the DR or AR what constitutes the minimum requirements for a transition plan, i.e. whether all the identified key features must be addressed, or whether a transition plan can be considered valid with only some of them, provided material gaps are explained.	E1	E1-1 - Transition plan for climate change mitigation	AR 1

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	The revised text (E1-2) clarifies that scenario analysis is not mandatory for all undertakings, but if performed, it must conform with AR 5 and AR 6 methodological requirements. However, several helpful references and examples from Set 1 have been removed, including: • Reference to the SSP5-8.5 high-emission pathway for physical risk analysis. • Reference to established scenario analysis frameworks (e.g., TCFD, ISO 14091). • Examples of reference low-carbon scenarios (e.g., IEA, NGFS) for transition risk assessment. • Spatial resolution of physical risk analysis is not mentioned explicitly. While these were deleted to streamline the text, we recommend that EFRAG retains these references in non-mandatory implementation guidance (NMIG) to guide preparers, especially smaller entities, on which scenarios to select.	E1	E1-2 - Climate-related risks and scenario analysis	19.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	The revised E1-3 improves alignment with IFRS S2 but removes explicit mention of certain aspects that helped delimit scope and increase clarity in Set 1. We recommend that EFRAG reintroduces description of boundaries or exclusions in resilience analysis from ex-AR6.	E1	E1-3 - Resilience in relation to climate change	AR 9
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	The revised DR requires undertakings to disclose CapEx and OpEx related to climate change, but it does not define any significance threshold. As a result, companies are left without clear criteria to determine which expenditures to include, especially for forward-looking (prospective) investments. In addition, the attribution of CapEx/OpEx to climate or environmental objectives remains difficult in practice, since many investments serve multiple purposes and the boundary between climate-related and other expenditures is hard to delineate. • We recommend that EFRAG provide guidance on how to determine when CapEx/OpEx should be considered for reporting including how prospective amounts should be included. • And clarify attribution principles for CapEx/OpEx related to climate/environmental objectives, for example by allowing allocation on a proportionate or estimated basis where investments serve multiple purposes. In addition, direct and indirect reconciliations with the financial statements are necessary to ensure overall coherence and connectivity of CapEx/OpEx disclosures.	E1	E1-5 - Actions and resources in relation to climate change	24. (c)
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	While E1-1 now includes a datapoint for third-party validation of 1.5°C-aligned targets, there is no equivalent requirement for targets disclosed under E1-6. Ensure consistency by introducing a similar datapoint in E1-6 for external validation of climate targets.	E1	E1-6 - Targets related to climate change	26. (c)
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I disagree	The revised ESRS E1 now specifies that the organisational boundary for GHG emissions reporting shall follow the reporting undertaking definition in amended ESRS 1 §59, which is "equivalent to the financial control (consolidation) boundary under the GHG Protocol". However: • The ESRS definition of "own operations" for joint operations departs from the GHG Protocol's approach, creating potential interoperability issues. • The accounting of GHG emissions from joint ventures according to the GHG Protocol is based on equity share. This may differ from the way they are treated under ESRS which can be as investments depending on accounting principles applied. • ESRS 1 §70 introduces a distinct treatment for leased assets, whereas under the GHG Protocol, such assets may be reported differently (we recognise that the GHG Protocol is not up-to-date). We recommend EFRAG to allow undertakings to choose between the financial control, operational control, and equity share approaches provided by the GHG Protocol, to clarify how ESRS 1 §70's treatment of leased assets interacts with the GHG Protocol definitions for Scope 1, 2, and 3 to avoid double counting or omission, and to provide illustrative boundary application examples for joint ventures, joint operations, and leased assets under ESRS, with explicit reconciliation to GHG Protocol options.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 18
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I disagree	The amended AR 19 mandates additional disclosure of Scope 1 and 2 emissions under the operational control boundary "when, due to specific facts and circumstances, the financial control boundary fails to provide a fair presentation". As a result, the proposed approach may create complexity through double reporting and is not fully aligned or interoperable with IFRS S2 and the GHG Protocol. The notion of "fair presentation" is not well defined, creating ambiguity regarding when this supplementary reporting will be required. Besides, the requirement is restricted to Scope 1 and 2, excluding Scope 3 emissions, although operational control boundaries can significantly impact Scope 3 reporting. In addition, while the revised ESRS provisions maintain the possibility to use the operational control boundary "in line with the GHG Protocol", there is still no clear guidance on how this control criterion should be applied in practice. We recommend allowing a company to decide which approach under the GHG Protocol it wants to apply, avoiding duplicative "fair presentation" reporting, and that EFRAG provide explicit technical guidance on the application of the operational control concept, including borderline cases (e.g., operated joint ventures, leased assets, outsourced operations).	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	AR 21 states that undertakings "shall consider" the GHG Protocol Corporate Standard (2004) and "can also consider" ISO 14064-1:2018 or Commission Recommendation (EU) 2021/2279. If ISO 14064-1 is applied, undertakings must still comply with ESRS requirements. The wording "shall consider" and "can also consider" is ambiguous and causes uncertainty on whether alternative methodologies can be applied in full. We recommend that EFRAG clarify whether undertakings can fully apply other recognised methodologies (e.g., ISO 14064-1) where equivalent to the GHG Protocol and ensure the language differentiates between mandatory application and optional reference to prevent ambiguity, while considering differences with ESRS that could create reporting conflicts.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	21.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	The revised ESRS E1 retains the requirement to explain carbon removals and the use of carbon credits. However, we note with concern the deletion of datapoints related to net-zero targets and the associated guidance. This removal creates uncertainty over the meaning and use of the "net-zero" terminology in corporate disclosures, despite its wide adoption as a structuring element in climate strategies. Net-zero commitments are a cornerstone of many corporate climate strategies and a key reference point for stakeholders assessing transition plans. Without clear guidance, companies may adopt divergent interpretations, impairing comparability and transparency. We recommend that EFRAG reconsider the treatment of net-zero targets and related guidance on residual emissions, removals, and carbon credits to provide clarity and ensure consistency in corporate disclosures.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	37.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	We acknowledge the streamlining of E1-11 and its improved interoperability with IFRS S2. However, despite the reduction in datapoints, the current disclosure remains too granular and insufficiently prioritised compared to ISSB; we recommend allowing aggregation with clear guidance, while retaining quantitative reporting only for key metrics to ensure decision-usefulness and comparability.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	It is still not very clear if you can use the wording "Transition plan" while not having all the elements as described in the standards (specifically targets that respond to all the ESRS requirements).	E1	E1-1 - Transition plan for climate change mitigation	11.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	The definition of "dependencies" in Annex II refers to the situation of an undertaking relies on natural, human and/or social resources for its business processes. However, the connection between this concept and "locked-in emissions" does not make sense. Is the term "dependencies" intended as "assumptions"?.	E1	E1-1 - Transition plan for climate change mitigation	14. (c)
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	Information on "anticipated long-term CapEx and/or OpEx ranges" are very difficult to gather and not always relevant for all the topic. As such, this information should be voluntary.	E1	E1-5 - Actions and resources in relation to climate change	24. (c)
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	Letter (c) - the boundary of the numerator is incoherent with the denominator: the numerator as per letter a is referred to "operational sites" while the denominator seems to be required on financial boundary. This data is irrelevant.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 23
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	The new wording seems to mandate a disaggregation of GHG emission while the previous requirement was "as appropriate", leaving more flexibility to the reporting company. We recommend to reintroduce the previous wording.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 26
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	Please refer to question 20 of the General Section	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	Please refer to question 20 of the General Section	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	Please refer to question 20 of the General Section	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	42.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I agree	Generally welcome the simplified structure and clearer language. Appreciate that references to other ESRS sections have been reduced to enable the standard to be read and understood on its own.	E1	E1 - Objective	1.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	This AR includes a requirement to "With reference to targets, incude a statement on wheter the GHG emission reduction targets are science-based and compatible with limiting global warming to 1,5deg C". The exact same requirement is included in DR E1-6 26 (c), see line below. Consider wheter it would be sufficient to include this requirement only in one place in the document.	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	This DR includes a requirement to incude "a statement on wheter the GHG emission reduction targets are science-based and compatible with limiting global warming to 1,5 deg C". This is a duplication of the requirement in E1-1 (AR 2 for para 14 (a). Same comment as line above regarding considering not to dublicate requirements in the document.	E1	E1-6 - Targets related to climate change	26. (c)
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	Consider whether it would be useful to include the term "gross targets" in Annex II "Aggregated acronyms and glossary of terms", thereby including "gross targets" in bold&italic font in the text of this DR.	E1	E1-6 - Targets related to climate change	AR 11
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	Point (b) in the list covers the same as point (a) ie. reference to Figure 2 is done twice. Propose to remove the (a) and (b), and continue the main section with the text included in (b), ie: .....showing the decarbonisation levers and their quantitative contributions to achieve the GHG emission reduction targets (e.g. energy or material efficiency and consumption reduction, fuel switching, use of renewable energy, phase-out or substitution of product and process) as a table (see, e.g. Figure 2) or graphic over time (see, e.g. Figure 1) (underlined text is the text from (b).	E1	E1-6 - Targets related to climate change	AR 14
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	Par. 28 and AR 17 c). This DR/AR specify that energy consumption shall be disclosed in MWh. Propose to make it clearer that if more appropriate, energy consumption can also be reported in kWh, GWh, TWh, etc.	E1	E1-7 - Energy consumption and mix	28.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	Para 29 includes a requirement to disaggreget its total energy consumption from fossil sources, including (e) consumption of purchased or acquired electricity, heat, steam, or cooling from fossil sources. Propose that a requirement to disclose the "consumption of purchasaed or acquired electricity.... from renewable sources" and also "consumption of purchased or acquired electricity.... from nuclear sources" are also included in E1-7, either direcly in para 28 or specified / made clearer in AR 17.	E1	E1-7 - Energy consumption and mix	29.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	This DR/AR specify that GHG emissions shall be disclosed in tonnes of CO_2eq. Propose to make it clearer that if more appropriate, GHG emissions can also be reported in million tonnes, etc.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32.

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Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	This AR presents different alternatives for disaggregating information on its GHG emissions. Whereas several alternatives are available, the list is exhaustive and can be read to mean that other disaggregations than those presented may not be done. There may be better ways of disaggregating GHG emissions in various industrial sectors than the ones described, eg. for the O&G sector, disaggregation of GHG emissions on eg power&heat, flaring and venting to illustrate how much of the GHG emissions stem from eg flaring (with much focus) could be relevant. Therefore, the alternatives should not be presented as exhaustive, but open up for other ways of disaggregating emissions than those included in the text.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 26
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	Consider to include DR E1-5 "Actions and resources in relation to climate change" after DR E1-6 - Targets related to climate change", as this is the logical order; setting targets and then defining actions and resources to achieve the targets. In DR E1-1 "Transition plan.." this order is now used in the text, ie in para 14: "...This includes GHG emission reduction targets, the decarbonisation levers, key actions, " and in AR 2 "The key features referred to in paragraph 14(a) shall refer to disclosures on policies, actions, resources and targets made elsewhere..". This should also be considered for the other standards.	E1	E1-5 - Actions and resources in relation to climate change	23.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	#13 The disclosure draft adds a requirement that transition plans to show compatibility with the objectives of European Climate law 2021/1119 (not in the original E-1 standard). This law has quite clear objectives for e.g. 2030 interim ambitions (55% reduction). #14 also references the need ("shall") to have transition plans that are compatible with the EU's climate neutrality objective. This would seem to add quite significantly to the requirments and the evidentiary standard for transition plans.	E1	E1-1 - Transition plan for climate change mitigation	13.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	#21c The requirement for a company to explain "how it would need to respond to the effects identified in the climate-related scenario analysis" is cumbersome and could add significant amount of unncessary work and as well as raise liability issues. It is not desirable/impossible for a preparer go into great detail about how we would have to change our strategy/behaviour according to a range of scenarios. This text can be removed without affecting intent and value to investors of the information requested requirement.	E1	E1-3 - Resilience in relation to climate change	21. (c)
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	#26c and AR16: suggest that the AR includes an additional provision to say: "If the undertaking has stated that its targets are science based and compatible with limiting global warming to 1.5-degrees C.... the undertaking shall compare its target value(s) with a sector-specific (if available) or a cross-sector emission pathway etc"	E1	E1-6 - Targets related to climate change	26. (c)
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	ANSWER PROVIDED IN PART 2	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	Equinor strongly supports opening for the use of current industry reporting boundaries like the GHG protocol when reporting our emissions. However, clarification of the concept of"fair presentation"is needed. What constitutes a "fair" view from the perspective of the users of the sustainability statement and ensure interoperability with IFRS Sustainability Disclosure Standards. See also our comments to ESRS 1 and Q25 in part 2.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree Firstly, there is an inconsistency in language compared to ESRS E1, paragraph 17, using "climate-related physical risk" (17) and here "climate-related hazards" (18). Secondly, we find the disclosure requirements in ESRS-E1-18 and supplemented by the additional requirements in ESRS E1, paragraph 19, to go beyond what should be disclosed in an annual report (general purpose sustainability report). We believe the details illustrate the steps needed internally (and hence part of the internal documentation) but should not be a direct disclosure requirement. It is particularly the list in ESRS E1, paragraph 19, that triggers the unnecessary level of detail.	E1	E1-2 - Climate-related risks and scenario analysis	18.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree As stated above, this should be removed as a disclosure requirement or at the very least refocussed together with (18) to provide a condensed and focussed reporting relevant for a general-purpose sustainability reporting	E1	E1-2 - Climate-related risks and scenario analysis	19.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially agree We would like to note that the requirement in ESRS E1, paragraph 24c, may be difficult to report on in practice. If a company is renovating a factory – and as part of this ensures that it can handle future climate risks, pollution requirements and reduce the water consumption – then it is very difficult to identify the specific elements of CAPEX/OPEX relating to climate change compared to the overall CAPEX/OPEX, as the climate change elements may just be a specification in the overall design. We suggest allowing for a qualitative description of the CapEX for the user to understand the current investments etc. rather than providing an arbitrary split. It should be noted that this is an additional requirement to the information required by EU Taxonomy and based on different allocation.	E1	E1-5 - Actions and resources in relation to climate change	24. (c)
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree ESRS E1, paragraph 26a, requires "absolute" reduction targets. Many entities have SBTi approved "relative" reduction targets, and which is still in accordance with the SBTi standard. Therefore, entities should also be allowed to report their relative reduction targets. We suggest amending the paragraph to include both options as possible disclosure, i.e. requiring entities to choose one of them.	E1	E1-6 - Targets related to climate change	26. (a)
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially agree ESRS E1, AR26, state the entities "shall" compare information required in DR26(c) to sector-specific or cross-sector emission pathway. ARs should not include disclosure requirements. We suggest the AR is changed from "shall" to a possible comparison without requiring such comparable. It should furthermore be considered moved to NMIG.	E1	E1-6 - Targets related to climate change	AR 16

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Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially agree We believe it is important that this amendment is further amended with a materiality threshold, as the biogenic emissions should only be required to be reported, if they are material. Not securing this will put an unnecessary reporting burden on the entities and will not provide decision useful information. We propose to amend to ESRS E1, paragraph 33, as a minimum with the inclusion of a 10% threshold inspired by the taxonomy reporting or at least with the inclusion of "material" (changes marked with capital letters: "33... The undertaking shall disclose its MATERIAL biogenic CO2 emissions from the compulsion or biodegrading of biomass separately from the emission scopes, IF THIS CONSTITUTES MORE THAN 10 % OF THE EMISSIONS." We also note that the reporting of biogenic emissions are currently not included in the proposed table in AR27.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	We find only the exposure to physical risks at the reporting date has relevance to users. For this reason, we recommend that undertakings shall consider physical risks net of climate change adaptation actions concluded at the reporting date, i.e. only before planned and unfinished actions. This can be emphasized by adding the following text to the datapoint: '... before considering planned and unfinished climate adaptation actions at the reporting date.'	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (a)
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	We do not see the relevance of this datapoint. Assets addressed by mitigating actions are not exposed to material physical risks at the reporting date. If not removed, the datapoint should be limited to assets addressed by mitigating actions completed in the reporting period, i.e. excluding historical mitigation actions.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (c)
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	We do not see the relevance of disclosing revenue associated with assets for which the physical risks have been mitigated. Only net risk exposures are relevant to users. Hence, it should be limited to assets at material physical risks before planned and unfinished climate adaptation actions at the reporting date.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (d)
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	We support option 2 also for climate-related anticipated financial risks. Only transition risks net of climate change mitigation actions completed at the reporting date is relevant to users.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (a)
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	We do not see the relevance of this datapoint. If not removed, the datapoint should be limited to assets addressed by mitigation actions completed in the reporting period, i.e. excluding historical mitigation actions.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (b)
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	We find this datapoint onerous and resulting in overly granular disclosure of little relevance. If not removed, it should be limited to real estate assets exposed to material transitional risks, net of mitigation actions at the reporting date.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (c)
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	We find that 'potential liabilities' does not sufficiently delimit scenarios for what can be considered relevant to users. The datapoint should be limited to 'liabilities from anticipated financial effects'.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (d)
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	We find that 'potential stranded assets' does not sufficiently delimit the scenarios for what can be considered relevant to users. The datapoint should be limited to 'anticipated stranded assets'.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (f)
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	We support option 2 also for climate-related opportunities.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	42.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	The requirement states that the description of the transformation plan "shall also include information on how the undertaking's strategy and business model are compatible with the Paris Agreement limiting global warming to 1.5°C and with the EU's objective of achieving climate neutrality by 2050." However, it lacks clarification on how to recognize this compliance (which will be difficult for an auditor to verify later).	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	Failure to define what "significant CapEx amounts" means will result in different approaches to disclosing this information by entities and a lack of basis for verification of these statements by the auditor.	E1	E1-1 - Transition plan for climate change mitigation	14. (b)
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I disagree	There is no explanation of the time period covered by the description of progress in implementing the transformation plan.	E1	E1-1 - Transition plan for climate change mitigation	14. (d)
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I disagree	There is no definition of "climate-related transition events and trends".	E1	E1-2 - Climate-related risks and scenario analysis	18.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I disagree	There is no definition of "high-emission climate scenario" and no examples of scenarios.	E1	E1-2 - Climate-related risks and scenario analysis	AR 5

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I disagree	There is no definition of "climate scenario in line with limiting global warming to 1.5°C with no, or limited, overshooting" and no examples of scenarios are provided.	E1	E1-4 - Policies related to climate change	AR 6
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	There is a lack of information on how to understand "non-renewable energy production" (e.g. is owning a gas furnace considered such production?).	E1	E1-7 - Energy consumption and mix	30.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I disagree	The issue of biogenic emissions is complex and poorly understood, even among carbon footprint experts. We propose clarifying how "biogenic CO2 emissions from the combustion or biodegradation of biomass" should be defined. Does this refer only to direct biomass combustion or, for example, the use of biocomponents in fuels (in practice, this would apply to most companies). There is also a lack of guidance on how to approach the identification of biogenic emissions in Scope 3.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	as these characteristic should guide the production of the whole report, should it be particularly noted here? which end?	E1	E1 - Interaction with other ESRS	AR 1
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	As the AR introduce reporting requirement, we would suggest to include it as part of par 14	E1	E1 - Interaction with other ESRS	AR 2
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	We suggest to include something like "the undertaking may include this information (progress in implementing the transition plan) while describing the transition plan"	E1	E1 - Interaction with other ESRS	4.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	I recommend incorporating the time horizons in this para and removing them from paragraphs a) and b) below to maintain coherence.	E1	E1-2 - Climate-related risks and scenario analysis	18.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	please clarify the meaning of spacial resolution of the analysis	E1	E1-2 - Climate-related risks and scenario analysis	19.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	as this requirement ((a) identify climate-related hazards over the short, medium and long term and screen whether its assets and business activities are exposed to these hazards;) is already included in par 18, we would suggest to remove it	E1	E1-2 - Climate-related risks and scenario analysis	AR 5
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	as this requirement ((a) identify transition events over the short, medium and long term and screen whether its assets and business activities are exposed to these events;) is already included in par 18, we would suggest to remove it	E1	E1-2 - Climate-related risks and scenario analysis	AR 6
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	As the scenario analysis requirement is specifically associated with E1-2, we recommend relocating this AR to that section.	E1	E1-3 - Resilience in relation to climate change	8.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	To avoid duplication with the information already included in section E1-1, We suggest to include the following clarification: In addition to the P, A, and T elements already disclosed in DR E1-1 regarding the climate transition plan, the following information should be reported for other climate change-related IROs—including those related to climate change mitigation, adaptation, and energy.	E1	E1-4 - Policies related to climate change	22.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	This paragraph addresses climate change mitigation as outlined in page 24.a. If actions related to energy and climate change adaptation are also to be reported, this should be clearly stated. Furthermore, any duplication with information already provided in E1-1 should be avoided.	E1	E1-4 - Policies related to climate change	24.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Please be aware that applying decarbonization levers may not always be suitable in this context. For instance, when the positive impact relates to supporting climate change mitigation through solutions that enable third parties to lower their greenhouse gas emissions, these levers might not be applicable. As such, we recommend either removing this reference or offering additional clarification.	E1	E1-4 - Policies related to climate change	24. (a)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Please see comments above.	E1	E1-4 - Policies related to climate change	24. (b)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Could you clarify the key differences between this paragraph and the information requirements already addressed/requested in ESRS 2 - GDR-A? Is this redundant?	E1	E1-4 - Policies related to climate change	24. (c)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Could you please clarify how the information requested in E1-6 differs from that in E1-1 regarding targets? Understanding this distinction would help prevent any duplication.	E1	E1-6 - Targets related to climate change	26.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Total flexibility on the base year should be provided	E1	E1-6 - Targets related to climate change	AR 13
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	We would suggest to include at least the base year, the Current year -1 , and the current year	E1	E1-6 - Targets related to climate change	AR 27
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Given that the disclosure requirements primarily emphasize risks and opportunities, what is the rationale for also including impacts?	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	39.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	This creates requirements that differ from those outlined in ESRS 1, which states that "Internal risk management processes are a critical source of input for the materiality assessment of risks." If these internal risk management processes employ a net approach, it would introduce a distinct requirement.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (a)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	This creates requirements that differ from those outlined in ESRS 1, which states that "Internal risk management processes are a critical source of input for the materiality assessment of risks." If these internal risk management processes employ a net approach, it would introduce a distinct requirement.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (a)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Please specify if this is referred to material opportunities	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	42.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	In section b), please specify which asset value should be taken into account? Since this is a finance lease, it may not be feasible to obtain this information.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	AR 30
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS E1 Climate change, when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, and targets (if in place), dependencies when relevant, metrics and financial effects. Suggestion: When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS E1 Climate change, when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, metrics and targets (if in place), dependencies when relevant, metrics and financial effects.	E1	ESRS E1 - Objective	1.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	The addition of the EU's target year of achieving climate neutrality within the ESRS does not seem useful, as the year might change in the future and will be specified within other regulation. In addition, it is hard for internationally operating undertakings (especially financial institutions) to adhere to such a year, when international ambitions outside the EU might differ. Therefore, we would welcome the option to set different target years for transition plans (within reason).	E1	E1-1 - Transition plan for climate change mitigation	13 -14
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	Point b was deleted because it was too broad in scope, but its purpose was correct. Removing it enables "scenario picking," which limits comparability and the assessment of the information provided. Considering the phase-in period for valuing anticipated financial effects, it would have been better to keep the requirement to explain "why it believes the range of scenarios used covers its plausible risks and uncertainties," linked to the disclosure of anticipated financial effects.	E1	E1-1 - Transition plan for climate change mitigation	13.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	The mandatory disclosure is difficult for financial institutions, as CapEx ist not a widely used KPI (if at all). We would welcome a clarification/alternative disclosure or option to leave out the data point for the financial services sector.	E1	E1-1 - Transition plan for climate change mitigation	14 (b)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	The new wording includes items previously listed in subparagraphs that are now deleted. This compact form does not add clarity but instead creates additional uncertainty when interpreting a more broadly defined disclosure. A clear list of items to be disclosed was far more effective, and saving pages in the ESRS was never an objective of the simplification exercise. §14.e – deleting subparagraph e) is wrong. While the Taxonomy Regulation was indeed excessive, as long as it remains valid, the coordination between Capex Art. 8 activities and a transition plan is essential information for assessing the transition plan itself. Similarly, the new §14.b makes little sense without referencing the Taxonomy Regulation. Shouldn't this, in fact, be required under the SFDR regulation?	E1	E1-1 - Transition plan for climate change mitigation	14.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	The clarifications, the stronger prioritization of requirements, and the reduction of data points are welcomed. However, certain disclosure elements extend beyond planned investments and their financing, as they would require disclosure of the entire corporate planning in connection with transition plans, including financial and investment planning. While the matter is still under discussion in the Omnibus process, it should be made explicit that deviations from the 1.5°C pathway are permissible. The Paris Agreement refers to a target of "significantly below 2 degrees," and much of the scientific community no longer considers the 1.5°C target realistically achievable. In the real estate sector, other targets are commonly applied. For example, the CRREM pathway provides scientifically based decarbonization trajectories, defining specific CO_2e emission thresholds depending on the type and location of properties. These pathways are regularly updated, most recently in 2023, to reflect new developments and improved data, particularly the reduced remaining CO_2e budgets. The 2.0°C pathway is regarded as a practicable benchmark, aligned with the specific requirements and possibilities of the real estate industry.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	This requirement overlaps with the DMA and risks resulting in duplicative reporting without ensuring the intended focus of E1-2 on climate risks and scenarios. The deletion of sub-paragraphs does not contribute to clarity in implementation. More generally, this issue applies to all comparable DRs: the cross-references to SBM3 and IRO-1 do not add value. Such overlaps should therefore be removed, and it should be made clear—through explicit and, where necessary, detailed references within the connected DRs—that double reporting is not required.	E1	E1-2 - Climate-related risks and scenario analysis	16.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	The value added of indicating the "tools" used for analysis is unclear. What matters is the methodology, not the technical tool. In addition, the use of "and/or" leaves open the possibility of naming a tool without providing any information on the methodology.	E1	E1-2 - Climate-related risks and scenario analysis	19.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Die Veröffentlichung der Emissionsreduktion für Kreditinstitute in Form von THG-Intensitäten ist zu begrüßen. Allerdings wird im ESRS E1-26a weiterhin gefordert, zusätzlich zu den Intensitäten absolute Reduktionswerte offenzulegen […] "in relation to the outcome of the key climate change mitigation actions, include the achieved and expected GHG emission reduction". Wenn Finanzinsitute ihre Reduktion in THG-Intensitäten berichten gilt es diesen Paragraphen zu spezifizieren. Für Own Operations Emissionen ist die Offenlegung von absoluten Werten weiterhin sinnvoll.	E1	E1-5 - Actions and resources in relation to climate change	24. (b)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	The deletion of the Taxonomy reference due to reconciliation challenges renders the figures largely arbitrary and, in practice, of little use if not misleading. In such case, it would have been preferable to remove the CapEx/OpEx requirement entirely and instead rely, where applicable, on disclosures already required under the Taxonomy Regulation. A comparison of ESRS V1.0 and the Exposure Drafts highlights inconsistencies. ESRS E1-29c requires disclosure of only significant CapEx and OpEx amounts. By contrast, ESRS E1-24c of the Exposure Drafts demands disclosure of short-, medium-, and long-term CapEx and OpEx, including ranges, in relation to financial and other resources allocated to key actions. Such a breakdown is neither required nor evident in the current ESRS and does not ease the broader discussion on quantifying anticipated financial effects. If this data point is retained within the ESRS, further clarification is required, particularly for the financial services sector, regarding the scope and manner of CapEx and OpEx reporting.	E1	E1-5 - Actions and resources in relation to climate change	24. (c)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Reporting GHG reductions by financial institutions in terms of intensities is welcomed. However, ESRS E1-26(a) still requires disclosure of absolute reduction targets for Scopes 1, 2, and 3, either separately or combined, and, where relevant, also in intensity terms. In cases of combined targets, undertakings must specify which Scopes are covered and the share attributable to each Scope. For financial institutions that report reductions in GHG intensities, this provision requires clarification, as absolute targets are not meaningful at portfolio level. For own operations, disclosure in absolute terms remains appropriate. Problem: The current text of ESRS E1-26(a) requires disclosure of absolute GHG emission reduction targets for Scopes 1–3, either separately or combined, and, where relevant, in intensity terms, with a breakdown of coverage and share per Scope. Suggestion: The requirement should be revised to permit disclosure either in absolute or in intensity terms, depending on the undertaking's activities, with clarification that intensity-based reporting is sufficient for financial institutions, while absolute targets remain relevant for own operations.	E1	E1-6 - Targets related to climate change	26. (a)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	The simplification in energy consumption reporting is welcomed. However, the requirements set out in paragraph ESRS E1-29 remain overly granular. The relevance of this information for credit institutions is still not evident. A further simplification for credit institutions is therefore recommended.	E1	E1-7 - Energy consumption and mix	29.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	The deletion of intensity metrics removes one of the few KPIs that enable proper benchmarking of companies within industries. Moreover, these metrics can always be calculated by users with the available information, meaning they required zero additional effort from CSRD report preparers and offered no real simplification. Given that CSRD sector standards are not planned for the coming years, removing the KPI instead of integrating it and providing more flexibility in disclosure is not the correct solution.	E1	E1-7 - Energy consumption and mix	30.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	No additional value is created, and the proposed simplification does not address the potential ambiguities and complexity arising from the value chain.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	31.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	It is questionable whether the data point "biogenic CO_2 emissions from the combustion or biodegradation of biomass, reported separately from the emission scopes," is sufficiently common to justify its inclusion in a generally applicable standard. For financial institutions in particular, this data point provides no added value, as such emissions are negligible compared to financed emissions.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	The requirement, as currently drafted, is of limited relevance. Projects outside an undertaking's own operations and value chain are essentially comparable to donations, and the reference to both "financed" and "intends to finance" further reduces clarity. The additional phrase "if it has financed" is inconsistent with the earlier wording "intends to finance" and should be aligned. Financial institutions should be permitted to report on certificates deriving from projects they have financed, provided such certificates are used within their decarbonization strategy and the associated emission reductions are not double counted in other calculations. In this context, the requirement referring to projects "outside the upstream and downstream value chain" should either be removed or explicitly clarified for financial institutions.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	36.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Limited to cases where undertaking made public claims...The required disclosures regarding carbon credits are important even in the cases the usage of carbon credits is not part of claims of GHG neutrality. Especially considering the widespread need to use carbon credits for the hard-to-abate GHG by 2050.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	37.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	It is welcomed that ESRS E1-11 permits qualitative reporting. However, the requirements do not specify how such disclosure should be structured. Clarification is needed that reporting may rely on existing methodologies already in use and that the ESRS do not mandate the development or application of any new methodology for assessing financial effects.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Unnecessary duplication: The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M. In particular: (a) if the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact; (b) the undertaking may present the description of its material impacts, risks and opportunities, in accordance with [Draft] Amended ESRS 2 IRO-2, alongside information about its policies, actions, targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative Suggestion: The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M. In particular: (a)if the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact; (b)the undertaking may present the description of its material impacts, risks and opportunities, in accordance with [Draft] Amended ESRS 2 IRO-2, alongside information about its policies, actions, targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative .	E1	ESRS E1 - Objective	9.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	Wir begrüßen grundsätzlich den Fokus auf dem Konzept der finanziellen Kontrolle. Jedoch kann nicht ausgeschlossen werden, dass die Berichtsgrenzen im Sinne der finanziellen Kontrolle nach dem GHG-Protokoll von dem Konsolidierungskreis gemäß dem Finanzbericht abweichen. Wir plädieren für den Gleichlauf bei konsolidierten Unternehmen in der Finanz- und Nachhaltigkeitsberichterstattung, auch für ESRS E1 / GHG.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 18
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Im Sinne der Vergleichbarkeit würden wir einen Gleichlauf bei konsolidierten Unternehmen in der Finanz- und Nachhaltigkeitsberichterstattung bevorzugen, auch für ESRS E1 / GHG. Sollte eine weitere Kennzahl sinnvoll sein, die auf einen abweichenden Kreis der Unternehmen bezieht, könnte diese freiwillig ergänzend als "entity specific" berichtet werden.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	The final sentence is unclear: "While this information helps demonstrate the coherence and credibility of the transition plan, there is no expectation that the undertaking disclose all internal information used to manage the plan." It is uncertain whether this means disclosure requirements are not binding, or whether reporting may remain at a very high-level and generic. A clearer approach would be to permit non-disclosure, provided that a limited set of clearly defined information is made available. As noted in other comments, such vague simplifications add uncertainty, reduce comparability, and create unnecessary discussions with auditors. ESRS E1-AR2 introduces a cross-reference mechanism within the transition plan, requiring that key features under paragraph 14(a) refer to disclosures on policies, actions, resources and targets made elsewhere (e.g., ESRS E1-5, E1-6, and ESRS 2). This is intended to eliminate duplication and consolidate information into a coherent narrative demonstrating strategic alignment. However, separate disclosure requirements for policies, actions, and targets remain in place, leaving unclear how consolidation is to be achieved in practice without duplication or inconsistency. Further clarification is therefore required.	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	The wording "shall adopt" is considerably stricter than the "shall consider" used in AR21 with respect to the GHG Protocol. For consistency, AR25 and AR21 should be aligned. If the GHG Protocol is intended to be mandatory, this should be clearly stated with "shall adopt"; if not, it should be clarified as a recommendation only. In AR25(f), the requirement appears overstretched. ESRS 1 allows undertakings to define their own methodologies and explain their quality, yet the implicit "shall adopt" in AR25 goes beyond this and creates undue rigidity by referencing only Part A of December 2022, despite the fact that the ESRS will have legal force and future developments should be anticipated. In AR25(d), it remains unclear whether the reference is intended as an alternative to the GHG Protocol and the two other options, or as a complementary requirement. This ambiguity requires clarification.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	Allianz SE	Insurance	Germany			I disagree	This DR introduces a new concept of "related financial and investment plans" – This goes beyond the initial ESRS and thus, the reference to financial plans/resources and locked-in emissions should be removed. Even though the new disclsoure might make sense, it would increae burden tremendously. Including this new concept should be evaluated in a future ESRS revision, not in a simplification exercise.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	Allianz SE	Insurance	Germany			I disagree	The DR of "quantitative short- and medium-term CapEx, and/or OpEx figures, as well as anticipated long-term CapEx and/or OpEx ranges" goes beyond the old ESRS. It brings stricter requirments and the risk of requiring sensitive information. We therefore suggest to remove the new requirement as it contradicts the intended simplification. It should be reassessed in a future ESRS revision. (The relief on sensitive information will not help as even the fact that the undertaking reports that it has omitted sensitive information might be a problem.)	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	Allianz SE	Insurance	Germany			I disagree	NEW AR: the wording of this AR indicates a net-perspective of reporting for scenario analysis and resilience analysis, as well as for anticipated financial effects.	E1	E1-2 - Climate-related risks and scenario analysis	AR 8
Excels	Allianz SE	Insurance	Germany			I disagree	"shall provide its climate resilience at the reporting date" (1) is not clear as to what it refers to, "process" or "outcome" (2) if "process" is meant, we fail to see the relevance of this information, (3) if outcome: It seems conceptually understandable, but such a purely reporting date-specific statement only makes sense for individual locations or individual products/services/markets. When considering location, product, and service portfolios, however, a date-specific assessment is not feasible. Furthermore, a historical analysis (which is what a reporting date analysis is) is questionable in the context of a strategically oriented disclosure such as E1-3. Practitioners in particular fear potential conflicts with auditors in this regard.	E1	E1-3 - Resilience in relation to climate change	AR 9
Excels	Allianz SE	Insurance	Germany			I partially agree and partially disagree	The requirement "the effects of current and planned investments in climate mitigation, adaptation and transition opportunities on climate resilience enhancement"), (1) requirement is not clear, (2) it seems as it is an addtl requirement that does not exist in the current DA	E1	E1-3 - Resilience in relation to climate change	AR 10

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Allianz SE	Insurance	Germany			I disagree	NEW DR: DR suggests a breakdown of "quantitative short- and medium-term CapEx and/or OpEx figures, as well as anticipated long-term CapEx and/or OpEx ranges." --> This tightens the requirements compared to the DA.	E1	E1-5 - Actions and resources in relation to climate change	24. (c)
Excels	Allianz SE	Insurance	Germany			I disagree	Extended requirement compared to the old ESRS where the scope of this DR is limited to high climate impact sectors.	E1	E1-7 - Energy consumption and mix	29.
Excels	Allianz SE	Insurance	Germany			I disagree	To our understanding, the changes aim to align GHG emission accounting with the GHG protocol but still incorporate the layered approach from Set 1, i.e., financial and operational control, in a more complicated manner. This increases assessment complexity due to new standard interpretations, potential updates to current approaches aligned with auditors, and the requirement for more granular evidence. We rather suggest to a) Reverting to the initial disclosure requirements if EFRAG wishes to retain the layered approach or b) Adopting full optionality as proposed by many users, aligning wording closely with GHG protocol.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	Allianz SE	Insurance	Germany			I partially agree and partially disagree	Joint operations: Delete the reference to financial risk and rewards as this concept (1) has become obesolete in IFRS Accounting Standards, and (2) is not the basis for consolidation in every national GAAP. "on the basis of the share the undertaking has in these assets and liabilities in its financial statements"	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 20
Excels	Allianz SE	Insurance	Germany			I partially agree and partially disagree	Requirement on "location of key assets at material physical risks" results in unnecessarily detailed reporting, as depending on the sector, this could involve a large number of locations in all regions of the world. As an example, logistic sector undertakings have much more sites than heavy industry.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (b)
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	detailed information regarding physical (no location analysis) and transitional risks (explanation of transition event) should be simplified and focus should be on overall information	E1	E1-2 - Climate-related risks and scenario analysis	18.
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	anticipated financial effects should be deleted	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	39.
Excels	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland			I partially agree and partially disagree	It still stands in the ESRS as if scenario analysis is required, even though the basis for conclusions says something else. Should be clarified.	E1	E1-2 - Climate-related risks and scenario analysis	19.
Excels	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland			I partially agree and partially disagree	E1 para 18-19 and basis for conclusions point 247: In the basis for conclusions, it is stated that the revised E1 paragraph should make it clear that scenario analysis is not mandatory. But as it reads in paragraph 19 "the key elements of the analysis include (...) the ranges of scenarios used (...) and how the undertaking has used climate-related scenario analysis." It reads as if it is mandatory. Please clarify.	E1	E1-2 - Climate-related risks and scenario analysis	18.
Excels	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland			I partially agree and partially disagree	Paragraph 22 only mentions that anticipated financial effects must be addressed for risks and opportunitites. But the AR also refers to impacts. It is not clear whether the financial effects of impacts must also be addressed, since its part of the AR but not the datapoint 22.	E1	E1-4 - Policies related to climate change	AR 14
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	At the end of the sentence the following should be added "and indicate all identified material negative impacts and risks that remained unaddressed by actions during the reporting year"	E1	E1-5 - Actions and resources in relation to climate change	23.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	At the end of the sentence the following should be added "against each action disclosed under DR G1-2".	E1	E1-6 - Targets related to climate change	25.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	To make reports comparable, biogenic emissions should be defined, either with a reference to an external source or in the glossary.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	In the last version of ESRS E1, AR 37 and AR 38 required the presentation of energy intensity per revenue, while in ESRS E3 in E3-4 there was a disclosure related to water intensity (total water consumption in own operations in m^3 per million EUR net revenue). These requirements provided the possibility to compare data regardless of company growth, and reports significantly benefited in terms of comparability thanks to these indicators.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	13.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	The simplifications are organizational in nature and still require a range of information that may be difficult for companies to understand and interpret (point 14a concerning compliance with global warming limits and reference target issues). These issues were clarified earlier in the draft IG4, but in the draft simplifications, the provisions remain vague. There is still no reference to transformation plans resulting, for example, from IED 2.0 or EU ETS.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	Indicates the possibility of using sectoral indicators – without specifying what these indicators are or where they should be obtained from – leaves a lot of space for interpretation, and is not very precise.	E1	E1-1 - Transition plan for climate change mitigation	AR 4
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	It is not entirely clear whether a company must disclose its greenhouse gas emission reduction targets. In the current version of the ESRS, a company did not have to disclose them if it had not set any, but this is not so clearly stated in the draft simplifications.	E1	E1-6 - Targets related to climate change	26.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	When aggregating total energy consumption from fossil and atomic sources, does the company need to know its supplier's energy mix? This issue was already problematic in the current wording of the ESRS, and has not been clarified in the simplifications.	E1	E1-7 - Energy consumption and mix	28. (b)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	The transition from operational to financial boundaries is a reasonable simplification—until now, companies have had difficulty properly understanding operational boundaries. Will this change require companies to “recalculate” previously reported emissions that were calculated using operational boundaries?	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 18

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	The simplification regarding the exclusion of climate risks from separate disclosure is entirely appropriate, but the transfer of information on how risks are identified to the NMIG is inappropriate. The analysis should continue to include, among other things: identification of risks over different time horizons, assessment of the sensitivity and exposure of assets to risks, determination of the probability, scale, and duration of these risks, development of an analysis based on at least one high-emission climate scenario. It is necessary to have a list of risks, which is the starting point for further analysis. Consequence: • the lack of risk list will make it difficult to compare data between entities, • an entity may not have knowledge or awareness of the scale of these risks and thus omit significant risks in its analysis – incorrect risk assessment • lack of consistency with the taxonomy	E1	E1-2 - Climate-related risks and scenario analysis	16.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	Point (e) on including biogenic emissions is contradictory to Paragraph 33, which clearly states that biogenic emissions should be disclosed separately. Clarification needed.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	The DASB ask for clarification of the term "spatial resolution"	E1	E1-2 - Climate-related risks and scenario analysis	19.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	The DASB feels the wording could be clarer and suggest to refer to "in future periods" in the last part of the sentence	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (d)
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Reference is made to leases but to the DASB it is unclear how this requirement should be applied for lessees versus lessors.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	AR 30
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	- Objective 11 with 5 references to other EU Regulations increase complexity and uncertaintiy for preparer of sustainability statement. Please delete these references. - former 8. (a) - 12? Pg. 5. It needs to be clarified that undertakings may report in CO2e - former 10. (b) it needs to be clarified that undertakings may cross reference to other topicl standards, if neccessary . Combining all topics will highly increase workload and diverge from the material topics - ESRS E1-9: needs to be specified that reporting level needs to be on topic level	E1	E1-1 - Transition plan for climate change mitigation	13.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It needs to be clarified that this cannot be laid out in detail as technological development is highly dynamic and only projects that have been board approved, can be reported	E1	E1-1 - Transition plan for climate change mitigation	AR 4
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	E1-1- 14 and E1-5-24 should be combined in one DR instead of two DRs asking for the same actions.	E1	E1-5 - Actions and resources in relation to climate change	24.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	E1-1- 14 and E1-6-25 should be combined in one DR instead of two DRs asking for the same targets	E1	E1-6 - Targets related to climate change	26.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	For companies with huge assets such as power plants or combustion plants the baseyear for targets should not be changed and adapted in such short terms like 3 years, because changes for assets can take up to 10 years from planning, permit, construction to operations. It should be allowed to take a individual appropriate base year for the undertaking.	E1	E1-6 - Targets related to climate change	AR 13
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	AR 15 clarify if this means targets boundaries need to be set in line with the reporting boundary, which is more than impossible to achieve	E1	E1-6 - Targets related to climate change	AR 15
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	undertakings need to have the option to adjust their base value in order to keep the target ambition level but not compromise on growth	E1	E1-6 - Targets related to climate change	AR 25
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	undertakings need to be able to communicate past achievements	E1	E1-6 - Targets related to climate change	AR 25
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	- Scope 3 emissions: Due to the complexity of the information required, to the investments needed in terms of human resources, information systems, third party databases and to the considerable amount of information required to be retrieved from business partners in the value chain (upstream and downstream as well), we suggest to adopt a phase-in approach for the disclosure of Scope 3 emissions. - Furthermore, it is highly recommended to allow the computation of Scope 3 emissions using emission factors that include/account for both biogenic emissions as well as biogenic uptake. Renowed third party, independent databases like ecoinvent can provide these emission factors for a timeframe of 100 years (GWP100), which are also aligned with the ISO 14067 and EN 15804 standards.	E1	E1-6 - Targets related to climate change	26. (a)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	- For reference, SBTi's Chemical Sector Guidance Consultation Draft (https://files.sciencebasedtargets.org/production/files/SBTi-Chemicals-Sector-Guidance-Consultation-Draft.pdf) has included requirements for chemical companies to set an alternative feedstock target on shares of feedstocks from Carbon Capture and Utilization (CCU) including DAC, Bio-Based Feedstocks and Chemical Recycling. In the chemical industry, the Bio-Based Feedstock pathway makes sense only if CO2eq. biogenic emissions and uptakes are both considered and explicitly accepted/allowed for the computation of Scope 3 GHG emissions. The same reasoning applies for CO2eq. uptakes when using CCU-based feedstock.	E1	E1-6 - Targets related to climate change	26. (c)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Please see comment to ESRS E1 - 26. (c).	E1	E1-6 - Targets related to climate change	AR 16

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Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	- While we understand the utility and meaningfulness of this requirement, operators within the European Union and outside the European Union are not able to provide the necessary breakdown of information yet and/or not able to provide the information in a timely manner (sometimes energy providers communicate the breakdown/disaggregation of energy sources with 9-12 months delay). '- We suggest to adopt a phase-in approach to allow energy providers to organize themselves accordingly.	E1	E1-7 - Energy consumption and mix	29.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Please see comment to ESRS E1 - 29.	E1	E1-7 - Energy consumption and mix	29. (a)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Please see comment to ESRS E1 - 29.	E1	E1-7 - Energy consumption and mix	29. (b)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Please see comment to ESRS E1 - 29.	E1	E1-7 - Energy consumption and mix	29. (c)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Please see comment to ESRS E1 - 29.	E1	E1-7 - Energy consumption and mix	29. (d)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Please see comment to ESRS E1 - 29.	E1	E1-7 - Energy consumption and mix	29. (e)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I agree	Good clarification for energy mix: The undertaking shall only consider these energy consumptions as deriving from renewable sources if the origin of the purchased energy is clearly defined in the contractual arrangements with its suppliers (renewable power purchasing agreement, standardised green electricity tariff, market instruments like Guarantee of Origin from renewable sources in Europe	E1	E1-7 - Energy consumption and mix	AR 17
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	- What is exactly meant by this? Is it related to the so called out-of-scope-emissions? - For clarity, it is suggested to reformulate this paragraph by adding "direct" before "biogenic CO2 emissions". Please see "A Corporate Accounting and Reporting Standard", Revides Edition, page 25 published by GHG Protocol initiive Team (https://ghgprotocol.org/sites/default/files/standards/ghg-protocol-revised.pdf).	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	- It is suggested to limit the the percentage of Scope 1 GHG emissions from regulated emission trading schemes only to EU regulated schemes.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32. (a)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	- AR 21 (d): "any removals," should be deleted, please see comments to ESRS E1 26. (a) and ESRS E1 26. (c).	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	- AR 21 (e): please see comment to ESRS E1 - 33. For clarity, it is suggested to reformulate this paragraph by adding "direct" before "biogenic CO2 emissions". Please see "A Corporate Accounting and Reporting Standard", Revides Edition, page 25 published by GHG Protocol initiive Team (https://ghgprotocol.org/sites/default/files/standards/ghg-protocol-revised.pdf).	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	- It is suggested to limit the calculation to installations subject to the EU-ETS for simplicity and comparability.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 23
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Remove the whole DR E1-11 Anticipated financial effects due to lack of methods and comparability between companies. There is no clear methodology to calculate anticipated financial effects, which makes the shared information being not aligned with the Qualitative characteristics of information in ESRS 1 - Appendix B) and it won't be comparable to other companies. Thus discolosing anticipated financial effects should be deleted.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	39.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	This requirement is not feasible at all (lack of methods and comparability). Either delete it or keep former E1 -70.: A quantification of the financial effects that arise from opportunities is not required if such a disclosure does not meet the qualitative characteristics of useful information included under ESRS 1 Appendix B Qualitaive characteristics of information.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	42.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	This requirement is not feasible at all (lack of methods and comparability). It also offers extensive room for discussions with auditors related to scope and basis for this information.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (d)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Pt. 67 - anticipated financial effects are hypothetical to anticpate before measures have been taken and do not contain any valuable information	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	13.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	The objective of the DR in paragraph 13 refers to "mitigation efforts", but following requirements in paragraph 14 refers only to "GHG emission reduction targets". While emission reduction targets are crucial for the stated objective, undertakings in some sectors (e.g. forestry) may have material climate impacts that should be addressed on other targets (e.g. on biogenic carbon sinks). Another example of a climate impact that is missed by focusing solely on GHG emission targets is the case of non-CO2 effects of aviation that are not typically included in straightforward emission reduction targets. Instead of "GHG emission reduction targets" it should say "targets to reduce climate impact".	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	The compatibility of the undertaking's business model and climate measures and goals should also be examined in relation to the goals of the national climate policy objectives and not only in relation to the EU goals. In this way, transition plans should also take national special circumstances into account, such as the issue of forest carbon sinks in Finland. With such a requirement, the climate transition plan could also be better aligned with the biodiversity transition plan (where an assessment towards national policy is required).	E1	E1-1 - Transition plan for climate change mitigation	13.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	The transition plan's requirement for assessing locked-in emissions should be clarified. When assessing the CSRD reporting of biggest Finnish companies we can see that companies also report (or in some cases only report) locked-in emissions outside the definition of the standard. For the sake of clarity, the transition plans should require the assessment of all locked-in emissions that have a material climate effect on the undertaking's overall emissions, e.g. the indirect emissions from sold products or emissions related to financed activities should be included as well where they are material.	E1	E1-1 - Transition plan for climate change mitigation	14. (c)
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	The amended ESRS should retain the requirement of original ESRS E1 to set the emission reduction targets for certain predefined years, i.e. 2030 and every five years after that (as exemplified in the Figure 2 of the AR14). This is crucial to ensure that the climate targets and wider transition plans of the companies are comparable.	E1	E1-6 - Targets related to climate change	26. (a)
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	In addition to GHG emissions, the standard and its DRs should include other factors that contribute to overall climate impacts such as impact on natural carbon sinks or other removals and on impacts that have a climate impact beyond reported emissions (e.g. non-CO2 effect from aviation). Also, this paragraph should explicitly state that both fossil and biogenic emissions must be taken into account.	E1	E1 - Objective	5.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	For clarity this paragraph should refer to the objective of the DR (paragraph 13) and the requirements (paragraph 14). This is needed in order to avoid a situation where undertaking reports an inadequate transition plan without transparent disclosure on its shortcomings. Reporting inadequate transition plans has been a common practice in Finland. Our preferred wording for paragraph 15 would be: "If the undertaking does not have a transition plan for climate change mitigation [ADD: that meets the requirements set in paragraphs 13 and 14] in place, it must state this explicitly and indicate whether it will adopt one and if so, when."	E1	E1-1 - Transition plan for climate change mitigation	15.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	In this paragraph companies should be required to disclose whether they regard their transition plan complete or inadequate regarding the objective (paragraph 13) and the requirements (paragraph 14) of the DR. In our study on Finnish companies we observed common practice of reporting inadequate transition plans without addressing their limitations: https://finnwatch.org/images/pdf/Climate-reporting-in-the-first-CSRD-reports-by-the-largest-Finnish-companies.pdf	E1	E1-1 - Transition plan for climate change mitigation	AR 1
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	Companies should be instructed to disclose both the past and future progress. We recommend changing "or" to "and" in this: "When explaining its progress in implementing the transition plan, the undertaking shall describe the deployment of resources, the actions taken and the GHG emission reductions achieved or expected to be achieved."	E1	E1-1 - Transition plan for climate change mitigation	AR 4
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	The objective of this DR should be more clearly explained. Both the original E1-1 and the amended version are unclear on whether undertaking should report on any climate related transition plan it has, or only when it fulfills the objective (in paragraph 13) and the requirements (in paragraph 14). This could be further clarified with an additional AR stating that: "Undertakings should report only a transition plan that they consider to be in line with the objective and the requirements in paragraphs 13 and 14."	E1	E1-1 - Transition plan for climate change mitigation	13.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	The wording should be clarified: "...include the [ADD: absolute] achieved and expected GHG emission reduction [ADD: by the target year set in E1-6]"	E1	E1-5 - Actions and resources in relation to climate change	24. (b)
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	If an undertaking has used reference target value or values, it should be instructed to disclose these values and their justification.	E1	E1-6 - Targets related to climate change	AR 16
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	For clarity, the requirement to report the total emissions should be kept in, when the undertaking has reported its material scope 1, 2 and 3 emissions.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	The phrasing on the objective of the DR is misleading as the requirements relate only to emissions. Many companies have material climate impacts beyond their direct and indirect emissions. For example, a company in the forestry sector has an impact on natural forest carbon sinks and an aviation company can have a significant non-CO2 impact on the atmosphere beyond its GHG emissions. Recommended wording for the objective: "to provide an understanding of the undertaking's direct and indirect [REMOVE: impacts on climate change, ADD: GHG emissions]". The climate impact related to non-emissions mechanisms should be required to be discussed as part of the transition plan in E1-1.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	31.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	We do not support the proposal to remove the obligation to disclose and explain excluded scope 3 categories as such disclosure provides transparency on how comprehensive the emissions reporting is (by describing what is ignored and why). Original wording that should be kept in the standard is: "...disclose a list of Scope 3 GHG emissions categories included in and excluded from the inventory with a justification for excluded Scope 3 categories;"	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	This requirement should include more specific information about the carbon credits. At minimum the requirement to disclose "share (percentage of volume) for each recognised quality standard" should be retained. However, to ensure the credible and transparent use of credits the requirement should go further and instruct to report separately the absolute tonnes from each project from which carbon credits have been purchased.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	36. (a)
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	The requirement should include explicit wordings of the claims that have been used and clear information on what emissions (and how many tonnes) have been offsetted for each claim.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	37.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	It is unclear what is required when undertakings are asked to "consider recognised quality standards". The requirement should be more clear and straigthforward, for example to "disclose all quality standards for purchased credits and number of credits from each".	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	AR 29
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	The requirement should include the share of emissions for which the internal pricing mechanism (or mechanisms) are being applied.	E1	E1-10 - Internal carbon pricing	38.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	The requirement should acknowledge that there may be multiple prices for different purposes. This should be taken into account in the wording as all prices should be disclosed.	E1	E1-10 - Internal carbon pricing	38. (b)

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Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	General comment: EFRAG should develop comprehensive non-mandatory implementation guidance for each topical standard, including ESRS E1. The guidance should comprise instructions and examples how to conduct the materiality assessment for the topic, how to apply the disclosure requirements, and to calculate the metrics. Sectoral examples could be added, where appropriate.	E1	E1 - Interaction with other ESRS	1.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Change title to "Policies related to climate change mitigation, adaptation and energy" to put more emphasis on the sub-topics of the standard. Change "climate policies" to "policies on climate change mitigation, adaptation and energy"	E1	E1-4 - Policies related to climate change	22.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Change title to "Actions and resources related to climate change mitigation, adaptation and energy" to put more emphasis on the sub-topics of the standard. Change "key climate change actions and resources" to "key actions and resources related to climate change mitigation, adaptation and energy"	E1	E1-5 - Actions and resources in relation to climate change	23.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Change title to "Targets related to climate change mitigation, adaptation and energy" to put more emphasis on the sub-topics of the standard. Change "climate change targets" to "targets related to climate change mitigation, adaptation and energy"	E1	E1-6 - Targets related to climate change	25.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I agree	Transition plans are essential for report users in the financial sector, but also for public policy and civil society, to understand an undertaking's contribution to mitigate climate change. The requirement to report a transition plan, based on different essential and supporting elements (or "key features"), should consequently remain a central part of ESRS E1.	E1	E1-1 - Transition plan for climate change mitigation	13.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Given the political decision to discontinue EFRAG's work on ESRS sector standards, we recommend to include the possibility to disclose sector-specific transition metrics as part of the transition plan under para. 14.	E1	E1-1 - Transition plan for climate change mitigation	14.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	The Commission should rapidly clarify what is expected from an undertaking, when reporting on the compatibility of its transition plan with the goal to limit global warming to 1.5°C.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Para. 18 only relates to exposure to hazards and transition events. Risk, however, is defined as the combination of exposure and sensitivity (see AR 5/AR 6 (a) and (b)). Hence, the introductory sentence of para. 18 needs to be amended to: "...how its assets and business activities in own operations and upstream and downstream value chain may be exposed and are sensitive:"	E1	E1-2 - Climate-related risks and scenario analysis	18.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Undertaking should not only "include the spatial resolution of the analysis" but use scenarios with the highest available resolution. Amend sentence to: "For paragraph 18 (a), the undertaking shall use scenarios with the highest available spatial resolution."	E1	E1-2 - Climate-related risks and scenario analysis	19.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	the key elements of methodology "how the undertaking has used scenario analyses" should include "which scenarios were used, their sources and alignment with state-of-the-art science" (reinstating former AR 13 (a))	E1	E1-2 - Climate-related risks and scenario analysis	19.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	AR 5 should be complemented by a note that "Using climate scenarios for the analysis is most useful for time horizons of more than 10 years. For shorter time horizons climate forecasts or trend analysis can be more proportionate."	E1	E1-2 - Climate-related risks and scenario analysis	AR 5
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	The requirement is lacking a clarification on the time horizons undertakings are expected to consider. We recommend to specify as follows: "The undertaking shall explain how it has defined short-, medium- and long-term time horizons for the identification of climate-related hazards and how these definitions are linked to the expected lifetime of its assets, strategic planning horizons and capital allocation plans"	E1	E1-2 - Climate-related risks and scenario analysis	AR 5
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	The requirement is lacking a clarification on the time horizons undertakings are expected to consider. We recommend to specify as follows: "The undertaking shall explain how it has defined short-, medium- and long-term time horizons for the identification of climate-related transition events and how these definitions are linked to the expected lifetime of its assets, strategic planning horizons and capital allocation plans"	E1	E1-2 - Climate-related risks and scenario analysis	AR 6
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Confusing use of terminology. It should be clarified that here financial exposure is meant (not physical exposure to a hazard). Change to "The quantification of the financial exposure of assets and business activities..."	E1	E1-2 - Climate-related risks and scenario analysis	AR 7
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	We note that this paragraph is not fully clear. 1) E1-2 does not specifiy of which types of scenario anaylsis are possible. E1-2 is the disclosure requirement covering provisions for scenario analysis. Therefore, the distinction between qualitative and quantitative analysis should be introduced already in E1-2. 2) independently from the scenario analysis being quantiative, semi-quantitative or qualitative, the underatking should consider the interplay between E1-2, E1-3 and E1-11. We suggest to EFRAG to revisit these provisions and better align the requirements.	E1	E1-3 - Resilience in relation to climate change	AR 8
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	The link between the CapEx plans as part of the EU Taxonomy (former E1 para. 29 (c) and ESRS reporting on resources allocated to actions should be reinstated. Preferably, an AR to ESRS 2 GDR-A should specify: "If applicable, the undertaking shall relate its CapEx amounts to the , the CapEx plan required by Commission Delegated Regulation (EU) 2021/2178." Alternatively, that provision can be introduced only for E1 as AR for para. 24 (c).	E1	E1-5 - Actions and resources in relation to climate change	24. (c)
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	We recommend to reinstate the requirement to update base year and target year in five year intervals starting from 2030 (former para. 34 (d)). This requirement is particularly useful from a user perspective because it will ease the comparison of GHG emission reduction targets.	E1	E1-6 - Targets related to climate change	AR 13
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	The reporting of GHG emissions under proposed amended ESRS E1-8 is based on the GHG Protocol Corporate Standard, Scope 2 Guidance and Scope 3 Standard. These standards do not explicitly define how to account for the non-CO2-climate effects of air traffic (especially NOx emissions and long-lived contrails), which are significant. However, it is common practice to account for these effects through the "radiative forcing index" (RFI). We recommend to EFRAG to include a provision in Application Requirement (AR) 21 that these effects shall be included in the GHG inventory and that RFI used is to be disclosed.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I agree	We welcome that proposed amended E1-8 retains the requirement for dual reporting of Scope 2 GHG emissions with the location-based and market-based approach, which is in line with the GHG Protocol, will assist comparability of GHG inventory data and avoid greenwashing.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32. (a)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I disagree	The concept of "net-zero targets" is deleted from [Draft] amended ESRS E1. Targets labelled as "net-zero" should, however, follow basic rules to ensure their credibility and avoid greenwashing. These targets must be separated and not confused from more common but less ambitious claims to achieve GHG neutrality based on carbon credits. Hence, we recommend to EFRAG to reinstate the possibility to report net-zero targets from current ESRS E1-7 (para. 60) along with the definition of the term.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	34.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I disagree	[Draft] amended E1-9 para. 35 conflates removals from projects in own operations with those in the value chain and is not clear whether the amount is to be reported by project or as a sum of all projects. We recommend reporting the sum of removed GHG from projects in own operations and the value chain separately, leaving the option to provide project specific information, if deemed material.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	35. (b)
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Practical implementation of E1-9 would be significantly eased with a publicly available list of standards and carbon crediting programs that can be considered as "recognized quality standards". Based on such a list, undertakings would have certainty which carbon credits are of high quality and can be reported according to ESRS E1. They would also not have to assess for themselves if the programs / standards, based on which their purchased carbon credits are generated and cancelled, fulfil the ESRS quality criteria. Therefore, we recommend that the European Commission issues a list of recognized quality standards for carbon credits and acts as a neutral instance to assess whether a carbon crediting program applying to be listed can be recognised based on defined quality criteria (additionality, permanence, avoidance of double counting, ..., see ESRS definition of "recognised quality standards for carbon credits"). For the purpose of ensuring credibility and environmental integrity, the quality criteria in the ESRS definition would need to be further specified by the Commission (e.g. what does permanence mean for certain reduction and removal projects?). For that, the Commission can rely on existing work, e.g. on ICAOs CORSIA.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	37. (b)
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I disagree	The proposed amendment of ESRS E1-10 on internal carbon pricing schemes suggests that an undertaking shall report "the price per metric tonne of GHG emissions" (para. 38 (b)). Often companies apply different internal carbon prices for different purposes. Hence, it is unclear which price is to be reported. EFRAG should specify that transparency is expected for the average carbon price in each pricing scheme the undertaking applies.	E1	E1-10 - Internal carbon pricing	38. (b)
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	WE note that the text of NMIG 12 for para. 41(d) need to be amended in accordance with E1-8 (delete total GHG emissions)	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (d)
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	Disclosures on anticipated financial effects should be voluntary, at least for the first 5 years after the adoption of amended ESRS. This conviction is supported by evidence provided in the first round of ESRS simplification consultation. Firstly, lack of common methodologies by design hinders comparability and makes this disclosure mundane for the end user, while imposing significant burden on issuers, who have to produce such methodologies, validate them etc. – which is especially valid for wave 1 issuers and groups that need to consolidate data from various markets. There are no sectoral pathways at the EU level that issuers could refer to, and available toolkits relate almost exclusively to the operational aspect of transition planning and climate-related transformation, and not financial valuations. Not all industries are equally exposed to and equally dependent on this transformation. Anticipated financial data eg. on energy sourcing transformation and energy costs are considered sensitive information in many cases. Furthermore, significant anticipated financial events are already included in financial statements.	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	Due to complexity of supply chains and immaturity of value chain climate change related risk assesment there should be a transition period provided for AR5(b).	E1	E1-2 - Climate-related risks and scenario analysis	AR 5
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	As explained above, due to the complexity and lack of established methodology, we believe that disclosures on anticipated financial effects should be voluntary.	E1	E1-2 - Climate-related risks and scenario analysis	AR 7
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	For clarity and readability, it should be possible to include this section in ESRS 2 SBM 1.	E1	E1-3 - Resilience in relation to climate change	20.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	As explained above, due to the complexity and lack of established methodology, we believe that disclosures on anticipated financial effects should be voluntary.	E1	E1-3 - Resilience in relation to climate change	AR 8
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	For clarity and readability, it should be possible to include this section in ESRS E1 - 1.	E1	E1-5 - Actions and resources in relation to climate change	24.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	Reporting companies should not be limited in selecting their base year. The n-3 rule for base year is not compliant with well established GHG reduction target methodologies, incl. SBTi.	E1	E1-6 - Targets related to climate change	AR 13
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	For clarity and readability, it should be possible to include this section in ESRS E1 - 1.	E1	E1-6 - Targets related to climate change	AR 14
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	Financial consolidation in the context of statements is not equal to financial control in the context of emissions accounting. Operational control approach is a key concept of the GHG Protocol, and used by many companies. The Protocol clearly states that operational control is the desired criterium, as it allows for most accurate emissions accounting. The shift to financial control is a major change in the approach towards GHG accounting, and as such will require significant additional effort, while not brining any added value to the user. Hence, to ensure interoperability with the dominant GHG accounting standard - GHG Protocol - operational control should remain as the required method, with possible relief including financial control as an option for companies that are not able to use operational control criterium.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 18

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Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	Financial consolidation in the context of statements is not equal to financial control in the context of emissions accounting. Operational control approach is a key concept of the GHG Protocol, and used by many companies. The Protocol clearly states that operational control is the desired criterium, as it allows for most accurate emissions accounting. The shift to financial control is a major change in the approach towards GHG accounting, and as such will require significant additional effort, while not brining any added value to the user. Hence, to ensure interoperability with the dominant GHG accounting standard - GHG Protocol - operational control should remain as the required method, with possible relief including financial control as an option for companies that are not able to use operational control criterium.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	Financial consolidation in the context of statements is not equal to financial control in the context of emissions accounting. Operational control approach is a key concept of the GHG Protocol, and used by many companies. The Protocol clearly states that operational control is the desired criterium, as it allows for most accurate emissions accounting. The shift to financial control is a major change in the approach towards GHG accounting, and as such will require significant additional effort, while not brining any added value to the user. Hence, to ensure interoperability with the dominant GHG accounting standard - GHG Protocol - operational control should remain as the required method, with possible relief including financial control as an option for companies that are not able to use operational control criterium.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 20
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	Financial consolidation in the context of statements is not equal to financial control in the context of emissions accounting. Operational control approach is a key concept of the GHG Protocol, and used by many companies. The Protocol clearly states that operational control is the desired criterium, as it allows for most accurate emissions accounting. The shift to financial control is a major change in the approach towards GHG accounting, and as such will require significant additional effort, while not brining any added value to the user. Hence, to ensure interoperability with the dominant GHG accounting standard - GHG Protocol - operational control should remain as the required method, with possible relief including financial control as an option for companies that are not able to use operational control criterium.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	Point (e) on including biogenic emissions is contradictory to Paragraph 33, which clearly states that biogenic emissions should be disclosed separately. Clarification needed.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	Unclear how to reflect the share and types of instruments in Scope 2 market based figure.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 24
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	Unclear how to include GHG emissions related to carbon removal and storage in ESRS E1-8. Clarification/illustrative example needed.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	AR 28
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	Disclosures on anticipated financial effects should be voluntary, at least for the first 5 years after the adoption of amended ESRS. This conviction is supported by evidence provided in the first round of ESRS simplification consultation. Firstly, lack of common methodologies by design hinders comparability and makes this disclosure mundane for the end user, while imposing significant burden on issuers, who have to produce such methodologies, validate them etc. – which is especially valid for wave 1 issuers and groups that need to consolidate data from various markets. There are no sectoral pathways at the EU level that issuers could refer to, and available toolkits relate almost exclusively to the operational aspect of transition planning and climate-related transformation, and not financial valuations. Not all industries are equally exposed to and equally dependent on this transformation. Anticipated financial data eg. on energy sourcing transformation and energy costs are considered sensitive information in many cases. Furthermore, significant anticipated financial events are already included in financial statements.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	39.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	Location of key assets (40b) in many cases is an extremely sensitive information, often times additionally regulated by national laws. Disclosing such information, combined with shares of revenue dependent on those assets, does not bring any added value to the end user of the statement, while putting at risk the commercial position and continuity of operations of issuers.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (b)
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	Paragraphs 40 and 41 maintain very granular DRs related i.a. to building energy efficiency, not taking into account that in some industries this information may be not material due to their business model.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	Paragraphs 40 and 41 maintain very granular DRs related i.a. to building energy efficiency, not taking into account that in some industries this information may be not material due to their business model.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	Requiring de facto information on financial valuation of climate-related opportunities, does not bring added value due to lack of common methodology and as a result, lack of comparability.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	42.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	Our understanding is that this data point is mandatory for all undertakings and not only for those belonging to high-climate impact sectors. If our understanding is correct, we disagree on that point (this data point should be limited to high-climate impact sectors). We are publshing scope 2 emissions in market based and location based mode and shouldn't have to identify the part of fossil originated emissions in the national grid.	E1	E1-7 - Energy consumption and mix	29.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	New paragraph 16(a) requires disclosure of material pollutants to air, water and soil. As drafted, AR2 could be interpreted during assurance as obliging companies to collect and report data for every pollutant in Annex II of Regulation (EU) 2024/1244 as well as all pollutants monitored under permits, simply to demonstrate materiality. This would represent a disproportionate new requirement and create a significant additional burden. We recommend clarifying in AR3 that Annex II and permit pollutants are reference points for consideration in a company's materiality assessment, but that a comprehensive materiality assessment, based on the specificity of business processes and operations, is sufficient to identify relevant pollutants without collecting data for all listed items.	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	AR3 allows for the use of thresholds that apply exclusively to the E-PRTR pollutant list. However, there is a potential risk that auditors may request reporting of pollutants from permitting without applying any thresholds as it is not mentioned. It should be clarified that thresholds may also be applicable to pollutants from permitting. Our suggestion is to clarify in AR3 that a comprehensive materiality assessment—based on the specificity of business processes and operations—can determine which pollutants are relevant for disclosure.	E2	E2-4 - Pollution of air, water and soil	AR 3
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Manufacturing and use of microplastics should not be included in this DR in their current form, as this disclosure duplicates obligations already established in Set 1 of ESRS and under Regulation (EU) 2023/2055 (REACH), as well as industry frameworks such as Operation Clean Sweep (OCS). Production is not a pollutant per se and should instead be addressed, if relevant, as a key product in E5-5 Resource outflows. Primary microplastic production and use may also be sensitive and confidential. For example, in the proposal for the Regulation on preventing plastic pellet losses it was explicitly noted that "confidential business information is safeguarded." Regulation (EU) 2023/2055 already requires mandatory reporting on the quantity of synthetic polymer microparticles released into the environment and introduces a ban on intentionally added microplastics in final products, recognising that manufacturing data is not the relevant focus.	E2	E2-4 - Pollution of air, water and soil	15.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Manufacturing and use of microplastic should not be included in this DR as the production of microplastics is not a pollutant per se and, as such, it should be treated (in case) as a key product in E5-5 Resource outflows. Primary microplastic production and use could be sensitive and confidential. "release" Should be added also in the text of AR 1 Para. 16	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	This comment refers to ESRS E2-16 (c). Disclosure of quantities of manufactured or used microplastics could be considered sensitive for some companies (e.g. those operating in the chemical sector), as such data may represent core production activities. Furthermore, it is unclear whether this refers to an intentional release or an accidental one. Additionally, it should be specified whether, in the case of an accidental release, the actual quantity released or only the quantity remaining after remediation activities should be considered. These concerns mirror those already raised in ESRS E2-15, and are compounded by the overlap with existing legislation (Regulation 2023/2055 under REACH and OCS), which risks duplication and inconsistent reporting obligations.	E2	E2-4 - Pollution of air, water and soil	16.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Removed.	E2	E2-4 - Pollution of air, water and soil	16.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I agree	Support the revision of pollutant emissions reporting to focus on material pollutants, and amend the reference to Annex II of Regulation (EU) 2024/1244 (Industrial Emissions Portal Regulation) from a mandatory list to a reference for consideration in determining material pollutants (AR 2 and 3). This adjustment simplifies the reporting process, enhances flexibility, and improves applicability for entities operating outside the EU.	E2	E2-4 - Pollution of air, water and soil	16. (a)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Disclosure Requirement E2-4 on primary microplastic can include the quantity of plastic pellet and/or additional microplastic released that it considers material. The calculation methodology on plastic pellet release should be consistent with the one used for regulation 2023/2055. Data on primary microplastic release could be provided as percentage respect produced or used microplastics	E2	E2-4 - Pollution of air, water and soil	AR 1
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Support the removal of point (iii) from the definition of "Substances of Concern" in Annex II. However, it introduces a new definition of Substances of Concern that is not aligned with existing frameworks, creates confusion and contradicts the ESRS review's objective of simplification. EFRAG's proposal does not consider sustainability-related aspects and focuses on hazard properties only, an area where REACH should remain the primary legislative framework The broad scope of point (ii) would make information gathering highly challenging, creating additional administrative burden – especially for non-European operated sites SVHCs ((i)) are well-defined hazard categories, with existing processes for substances that pose significant, scientifically recognized risks to human health or the environment. Referencing SVHCs ensures clarity, consistency, regulatory alignment, and practical usability for businesses operating within or exporting to the EU. This approach promotes risk awareness, encourages substitution, maintains regulatory control, and protects environmental health. The SVHC Candidate List is regularly updated by ECHA, ensuring the definition remains relevant and reflects the latest scientific and regulatory developments. It is therefore recommended to remove the definition of SoC from the list of definitions and to limit the disclosure obligations under E2-5 (items 17, 18, 19, and 20) to SVHCs as defined under REACH.	E2	E2-5 - Substances of concern and substances of very high concern	17.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	It is recommended that the disclosure requirement E2-5 (18, 19) is streamlined to focus on SVHCs only. The list of SoC is too fluid for reporting purposes. Next to that the concept of SoC is EU focused and complex to apply outside EU. The broad scope of SoC would make information gathering highly challenging, creating additional administrative burden – especially for non-European operated sites SVHCs are already well-defined hazard categories, with existing processes for substances that pose significant, scientifically recognized risks to human health or the environment. Referencing SVHCs ensures clarity, consistency, regulatory alignment, and practical usability for businesses operating within or exporting to the EU. This approach promotes risk awareness, encourages substitution, maintains regulatory control, and protects environmental health. The SVHC Candidate List is regularly updated by ECHA, ensuring the definition remains relevant and reflects the latest scientific and regulatory developments	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	We still believe that SOC (in particular) and SVHC are very difficult to disclose and, as such, to verify the request. The DR should focus on which SOC/SVHC is manufactured rather than the quantity. The widespread inability of Wave 1 companies to report on Substances of Concern provides clear evidence that this disclosure requirement is practically unworkable in its current form. This challenge stems directly from the lack of a harmonised definition and the immense scope, which requires companies to assess thousands of substances whose "concern" status is highly dependent on specific product use and context. Without clear and consistent criteria, any reported data would be based on individual company interpretations, making it inherently non-comparable across the market. Mandating this disclosure would therefore force the generation of low-quality, potentially misleading information, which undermines the CSRD's core objective of providing reliable data. Furthermore, these data would be collected only for the European market, as outside Europe there are different definitions of SOC/SVHC. A full consolidation of these data worldwide would not be possible. To reduce administrative burden and ensure comparability, the disclosure requirement should be streamlined to focus on SVHCs only, where established processes already exist.	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I agree	We support the changes proposed.	E1	E1-5 - Actions and resources in relation to climate change	5.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We flagged this DR as excessively burdensome. In line with our input, we would recommend OPTION 2, since it better addresses our concerns on the sensitivity of the information disclosed and on the excessive burden in calculating quantitative disclosures.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	11.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I agree	We support the changes proposed.	E1	E1-10 - Internal carbon pricing	10.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	This paragraph excludes the possibility to use carbon credits as possible offsets during the trajectory of a company, even if a net-zero target has been adopted. This risks limiting EU companies' investments in projects generating carbon credits at lower costs before 2050, while putting them at competitive disadvantage compared to companies from competing regions of the world. The restriction to use credits only for residual emissions in the case of companies having adopted a net zero target should be reassessed.	E1	E1-6 - Targets related to climate change	AR 11
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I agree	We agree with the changes proposed.	E1	E1-7 - Energy consumption and mix	7.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The Commission has not yet clarified the meaning of "compatibility of the strategy and business model with the goal of limiting global warming to 1.5°C in line with the Paris Agreement", therefore reporting on this can be challenging.	E1	E1-1 - Transition plan for climate change mitigation	13.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	Companies consider, in the case where disclosing an absolute emissions target would provide to competitors key sensitive information (i.e.: production forecasts) which are very sensitive, that they should be entitled to publish only a target expressed in intensity. In this regard, a clarification that the "relief" mentioned in ESRS 1 §98 is effectively applicable for section E1-6 appears essential.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Need clarification on some points: If a company has no transition plan (paragraph 15) is the "shall" removed from the DRs stated in 14a, b, c (i.e. does a company not have to disclose paragraph 14a, b, c)?	E1	E1-1 - Transition plan for climate change mitigation	15.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The text under AR 2 in ESRS E1 is not clear on what still should be disclosed: While this information helps demonstrate the coherence and credibility of the transition plan, there is no expectation that the undertaking disclose all internal information used to manage the plan.	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	The reporting requirement makes the implementation of a climate risk analysis indirectly binding, additionally to the DMA. This should be avoided, as the CSRD does not usually define implementation obligations but reporting obligations. The option of reporting that no climate risk analysis has been carried out should be introduced (analogous to ESRS E1-1 DR 15). In the document "Basis for Conclusion" there is the following note: "it should be clear under E1-2, Climate related risks and scenario analysis that there is an expectation that undertakings report on key elements of the methodology to assess climate risks, but that scenario analysis is not required for all undertakings."It is not clear from the text of ESRS 1-2 which companies do not have to perform a scenario analysis.	E1	E1-2 - Climate-related risks and scenario analysis	18.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	The reporting requirement makes the implementation of a resilience analysis indirectly binding. This should be avoided, as the CSRD does not usually define implementation obligations but reporting obligations. The option of reporting that no resilience analysis has been carried out should be introduced (analogous to ESRS E1-1 DR 15)	E1	E1-3 - Resilience in relation to climate change	21.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	The reporting requirement makes the implementation of GHG emission reduction targets indirectly binding. This should be avoided, as the CSRD does not usually define implementation obligations but reporting obligations. The option of reporting that no GHG emission reduction targets has been set should be introduced (analogous to ESRS E1-1 DR 15). Information on targets under E1-6 should be more closely linked to the transition plan in E1-1	E1	E1-6 - Targets related to climate change	26.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	This information is supplementary to the climate risk analysis and should therefore be combined with ESRS E1-2 where possible. The climate risk analysis including the quantifications in this section represent a new obligation for companies. This should be avoided, as the CSRD does not usually define implementation obligations but reporting obligations. It should also be made possible to only report qualitatively on the climate risk analysis. While also a requirement of the IFRS Sustainability Disclosure Standards, the lack of clear and harmonized guidance on calculating anticiapted financial effects linked to individual climate-related risks and opportunities leads to inconsistent and unreliable information. The complexity and lack of integration between sustainability and financial systems make such quantification impractical. Additionally, by going beyond the requirements of the ISSB, the disclosure requirement can also reveal sensitive strategic information, leading to competitive disadvantages for European companies. We therefore advocate for removing all requirements related to anticipated financial effects.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	39.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	AR 18/19 should be merged, allowing for both financial control (consolidation) and/or operational control (consolidation) boundary, as defined in the GHG Protocol	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	'shall' to be changed to 'may' as a disaggregation of GHG emissions (by country, operating segments, economic activity, subsidiary, GHG or source type) might not be available	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 26
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	DR seems to be an extension of the Delegated Act (DA). The description of "financial and investment planning" (Exposure Draft, ED) goes beyond "Investments and funding" (DA) as the latter is a subset/part of the former (also confirmed by the wording "investment and financial planning" in AR 2(c).	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	related to AR 2 (c): DR seems an extension of the DA. Disclosure of "quantitative short- and medium-terms CapEx, and/or OpEx figures, as well as anticipated long-term CapEx and/or OpEx ranges". The DP should be deleted. The disclosure of "financial and investment planing (including the short- and medium- term financial and investment plan)" and "financial resources supporting the implementation and strategic ambition of its transition plan for climate change mitigation, including quantitative short- and medium-term CapEx, and/or OpEx figures, as well as anticipated long-term CapEx and/or OpEx ranges" go beyond the initial requirements and the changes therefore go against the aim of simplifying the ESRS. Additionally, it is unclear how the short-/medium-term and long-term time horizons are defined considering also the respective GHG targets defined by the companies. Does long-term refer to 2050? Disclosing any investment figures until 2050 is not feasible and the information would not be reliable. Requirements related to Transition Plans should be closely aligned with existing international frameworks.	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	related to AR 2 (c): EFRAG should consider the Transition Plan Taskforce (TPT) Disclosure Framework which 1) contains the elements "investment and disposal plan" and "planned sources to fund the plan" and 2) sets conditions on the disclosures: a) to the extent the financial effects of its transition plan are separately identifiable, b) information available to the entity at the reporting date without undue cost and effort, c) approach that is commensurate with the skills, capabilities, and resources that are available to the entity for preparing those disclosures; NMIG might contain as a "may" guidance in line with the TPT Disclosure framework	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	related to AR 5 (c), AR 6 (c): The requirement "base ist analysis on at least one high-emission climate scenario" is not appropriate. E1 should refer to "a scenario based on scientific evidence which reflects the climate risk properly". The current formulation of the AR indicate behavior obligations in how to conduct the scenario analysis going against ESRS 2 (ED) para. 5. Particularly the mandatory use of geospatial data and detailed methodological requirements related to supply chain lead to unnecessary complexity in the overall requirements. Reformulation needed (previously "This description shall include its process in relation to [...]").	E1	E1-2 - Climate-related risks and scenario analysis	AR 5
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	We doubt that this AR is needed; Probably a clarification in the main body might be sufficient that only a qualitative assessment of the exposure is required. Additionally the wording regarding the anticipated financial effects has to be aligned; If Option 2 in ESRS 2 is adopted, a quantification will not be required.	E1	E1-2 - Climate-related risks and scenario analysis	AR 7
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	The wording "shall provide its climate resilience at the reporting date" creates confusion: 1) it is not clear as to what it refers to, "process" or "outcome"; 2) if "process" is meant: we don't see the relevance of this information; 3) if "outcome" is meant: it seems conceptually understandable, but such purely reporting date-specific statement only makes sense for individual locations or individual products/services/markets. When considering location, product and service portfolios a date-specific assessment is not feasible. Furthermore, a historical analysis (which is what a reporting date analysis is) is questionable in the context of a strategically oriented disclosure such as E1-3. This will result in extensive discussions between preparers and auditors.	E1	E1-3 - Resilience in relation to climate change	AR 9
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	related to AR 10 (c): Regarding the wording "the effects of current and planned investments in climate mitigation, adaptation and transition opportunities on climate resilience enhancement": 1) the requirement is not clear; 2) it seems as it is an extension of the requirements in the Delegated Act and should therefore be deleted	E1	E1-3 - Resilience in relation to climate change	AR 10
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	The standard should make clear that 1) Breakdown of CapEx/OpEx per time buckets/horizons is NOT required, and 2) Breakdown of CapEx/OpEx per decarbonisation lever is NOT required.	E1	E1-5 - Actions and resources in relation to climate change	24.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	This requirements seems an extension of the existing requirements of the Delegated Act: The DR suggests a breakdown of "quantitative short- and medium-term CapEx and/or OpEx figures, as well as anticipated long-term CapEx and/or OpEx ranges." This should be deleted. See also our comments on AR 2 (c).	E1	E1-5 - Actions and resources in relation to climate change	24. (c)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	related to AR 13 (a): The term "key change" is not defined; The standard should make clear 1) that "key change" means "significant" and 2) that this assessment of significance is up to the undertaking. E.g., "the undertaking may decide on changes in the reporting boundary, e.g., becaus of M&A, or changes in the target. If the undertaking concludes that these changes are significant they should be reflected in the basline value or base year."	E1	E1-6 - Targets related to climate change	AR 13

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	1) The DR should make clear that the undertaking is NOT required to choose one of both alternatives mentiond in this paragraph to present its GHG reduction targets. In practice further ways and less granular presentation were applied for the 2024 reporting, 2) Examples should rather be addressed as "may" guidance in the NMIG.	E1	E1-6 - Targets related to climate change	AR 14
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	The breakdown of GHG targets in Scope 1, 2, 3 should not be required as targets are typically not set in this way. E1 should require presentation of targets as the undertaking's management has set these (management approach).	E1	E1-6 - Targets related to climate change	26.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	This DR seems to include and extension of the DA where the scope of this DR is limited to high climate impact sectors. This DP should either be deleted or limited in scope as in the DA.	E1	E1-7 - Energy consumption and mix	29.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	In practice there are extensive discussions with auditors about whether a disclosure in millions is possible here. Therefore it should be clarified (perhaps at a central location in ESRS 1) that "millions" is allowed too. Ideally the untertaking should be free to choose for each metric the units that are most meaningful.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	The exclusion of biogenic emissions should - if ever - refer to Scope 1 only (like in the DA), but not to "all scopes". Moreover, the relevance of this requirement is questionable.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	related to AR 21 (a): The undertaking shall consider the GHG Protocol (GHGP) when preparing the information on GHG emissions. However, it remains unclear how to consider optional Scope 3 sub-categories or exemptions provided in the GHGP. As an example, GHGP allows not to report scope 3.10 emissions if the company is unable to estimate the emissions as the processing of the products is unknown. The ESRS should allow such exemptions too - in accordance with the GHGP.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	"The assumptions regarding permance" seems an extension of the DA. As there is no evidence on the relevance of this information it should be deleted.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	35. (c)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Requirement on "location of key assets at material physical risks" results in unnecessarily detailed reporting, as depending on the sector, this could involve a large number of locations in all regions of the world; e.g., logistic companies have much more sites than industrial companies.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (b)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	Is unclear, if you need scope 1, 2 and 3 ghg reduction targets that are aligned with Paris 2015 Agreement (science based CO2 reduction path). Please provide clarification!	E1	E1-4 - Policies related to climate change	34.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	Information on the potential locked-in emsission provides limited material insights on a company's decarbonization pathway with information difficult to obtain. We suggest to remove this requirement.	E1	E1-1 - Transition plan for climate change mitigation	14. (c)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	The current formulation of the AR indicate behavior obligations in how to conduct the scenario analysis going against ESRS 2 (ED) para. 5. Reformulation needed (previously "This description shall include its process in relation to [...]").	E1	E1-2 - Climate-related risks and scenario analysis	AR 6
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	We believe that companies that can demonstrate net positive impacts for the society (e.g., contribute to the green transition), should be allowed to set short- and medium-term intensity targets. Another solution would be to allow for Scope 4 reporting, which will be deducted from the total GHG emissions inventory.	E1	E1-6 - Targets related to climate change	26. (a)
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	There is no definition of "science-based target" in E1, nor in the glossary. If undertakings are not using the SBTi framework, it would be useful to know what constitutes a science-based target.	E1	E1-6 - Targets related to climate change	26. (c)
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	Consider allowing undertakings to report transition risk on an aggregated level (e.g., group level).	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	Consider deleting this disclosure requirement.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	42.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	c) It would be useful with a clarification that undertakings can present the financial information on an aggregated level.	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	It is unclear whether an undertaking can set an intensity target only, or if it must set an absolute target and may, in addition, set an intensity target. Undertakings should be allowed to only set intensity targets.	E1	E1-6 - Targets related to climate change	AR 12
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	j) Delete or amend. The conservative market-based approach does not provide a realistic picture of renewable vs. fossil sources.	E1	E1-7 - Energy consumption and mix	AR 17
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	It is unclear whether the EU ETS methodology requires companies to report CO2 or CO2 equivalents. Companies are required to report CO2 equivalents under the CSRD, thus it is important that the methodology of the EU ETS is consitent with this.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 22
Excels	SAIM GmbH	Consultant (including software vendor)	Germany			I disagree	The removal of the definition for net zero seriously reduces transparency and comparability among these targets and negatively affects the financial players using these reports, since their targets to reduce portfolio emissions intensity is skewed by unclear target reduction paths (some net zero targets rely heavily on neutralisation or even compensation)	E1	E1-6 - Targets related to climate change	26. (c)
Excels	SAIM GmbH	Consultant (including software vendor)	Germany			I partially agree and partially disagree	It should be assessed, whether an alignment with 1.5°C is the only way of benchmarking/reporting a climate target or if e.g. Well-below 2°C can also be a viable option, given that 1.5°C increasingly gets out of reach, and WB2° is the minimum target of the Paris agreement.	E1	E1-6 - Targets related to climate change	4.
Excels	SAIM GmbH	Consultant (including software vendor)	Germany			I partially agree and partially disagree	Generally, leaving less room for uncertainty by defining the control appraoch is sensible. However, obliging companies to use financial control over operational control can lead to a change in boundary as well as questions particularly around leased assets. Moreover, this could mean that companies have to adjust their baselines to guarantee comparabaility in the future. Reporting numbers under both financial and operational control at the same time, might lead to confusion among external stakeholders and increases the need fo explanation, in case of significant deviations.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	40.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	SBTi	Standard setting initiative	United Kingdom			I disagree	The revised provision appears to allow combined Scope 1, 2, and 3 targets without specifying minimum Scope 3 coverage. SBTi recommends requiring separate Scope 1, 2, and 3 targets, with Scope 3 targets mandatory for Category A companies as defined in CNZS V2. In its 2025 Financial Institutions Net Zero Standard, SBTi introduced portfolio alignment as an alternative leading metric for target-setting. Emissions inventories are required on an ex post basis. It may be useful for ESRS to introduce a 3rd category to accommodate alignment and other non-emissions target setting metrics.	E1	E1-6 - Targets related to climate change	26.
Excels	SBTi	Standard setting initiative	United Kingdom			I partially agree and partially disagree	The revised provision allows intensity-only targets, provided absolute values for target years are disclosed (even if absolute emissions grow). SBTi, as part of its ongoing development of the corporate net-zero standard v2, requires companies to establish S1+2 emissions emissions targets in absolute or physical emissions intensity terms. Economic emissions intensity are not permitted due to the volatility of the underlying economic denominator. For scope 3 value chain targets, SBTi proposes to establish non-emissions based "alignment" targets which are used to demonstrate an increasing share of procurement spend and revenue generation from net-zero aligned value chain activities. Companies may additionally set absolute emissions targets on upstream and downstream scope 3 emissions. Setting physical or economic intensity targets for scope 3 is not favoured due to lack of a common physical metric to represent all scope 3 activities, and due to the volatility of economic metrics.	E1	E1-6 - Targets related to climate change	26. (a)
Excels	SBTi	Standard setting initiative	United Kingdom			I partially agree and partially disagree	We suggest that the disclosure of a statement on whether the GHG emission reduction targets are science-based and compatible with limiting global warming to 1.5°C.should also include validation date, status (near-term, net-zero) and when requesting for the specific methodology (e.g., SDA, absolute contraction) the provision should reference to the SBTi sectoral decarbonisation approaches in the following way: "The undertaking shall state which framework and methodology underpin the targets, including whether they are based on a sectoral decarbonisation pathway such as those developed by the Science based targets Initiative and regularly updated on the SBTi website, and the underlying climate and policy scenarios." We encourage to include SBTI reference because without reference to a recognised framework, companies may report targets that are framed differently and not comparable. Referencing SBTi approaches ensures users (investors, policymakers, regulators) can benchmark across companies.	E1	E1-6 - Targets related to climate change	26. (b)
Excels	SBTi	Standard setting initiative	United Kingdom			I partially agree and partially disagree	The following requirement has been removed: 'The undertaking shall state the method used to calculate Scope 2 GHG emissions included in the target (i.e., either the location-based or market-based method)' (former E1-4 AR 24).The revised provision should require companies to state the method used to calculate Scope 2 GHG emissions included in the target (i.e., either the location-based or market-based method) for improved clarity and transparency and interoperability with SBTi	E1	E1-6 - Targets related to climate change	24. (a)
Excels	SBTi	Standard setting initiative	United Kingdom			I disagree	This revised provision doesn't provide any detail on sequencing of removals and doesn't address residual emissions. The AR should reinforce that removals should only be used only after achieving reductions in line with 1.5°C pathway.	E1	E1-6 - Targets related to climate change	AR 11
Excels	SBTi	Standard setting initiative	United Kingdom			I disagree	The revised provision seems to indicate that Scope 3 targets are optional. Under CNZS V2, however, this depends on whether a company is categorized as Category A or Category B. We suggest requiring that, if an undertaking has Scope 3 GHG emission reduction targets, it shall calculate a 1.5°C-aligned reference target value for Scope 3.	E1	E1-6 - Targets related to climate change	AR 16
Excels	SBTi	Standard setting initiative	United Kingdom			I disagree	On amendment of paragraph 61 (GHG neutrality claims using carbon credits): SBTi supports the clarification and streamlining of the text.However, we recommend including clear definitions of "GHG neutrality claims" and "carbon credits," aligned with recognised frameworks (e.g., ISO, ICVCM, SBTi). This helps avoid greenwashing and misinterpretation.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	34.
Excels	SBTi	Standard setting initiative	United Kingdom			I disagree	On deletion of sub-point (a) (linking neutrality claims to reduction targets):we acknowledge the intention to reduce redundancy with E1-4 but we are concerned that removal risks allowing neutrality claims must be additional to, not a substitute for real reductions.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	34.
Excels	SBTi	Standard setting initiative	United Kingdom			I disagree	SBTi suggests to clarify that this requirement applies only to direct or indirect removals, i.e. those generated from sinks owned or controlled by the undertaking or occurring within its value chain. For avoidance of doubt, SBTi further suggests to specify that removals reported through recognised carbon removal registries already represent net removals (life-cycle emissions accounted for) and therefore this requirement should not apply to removals represented by carbon removal credits purchased from such registries.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	AR 28
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	Companies also remind that the European Commission committed to define by end of 2025 the meaning of "compatibility between companies'target and 1.5°C targets". Until such a definition is published, no obligations are legitimate on this issue. They stress that the Paris Agreement also refers to "well below 2°C objective" which should be reinserted in the amended CSRD.	E1	E1-1 - Transition plan for climate change mitigation	1.
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	In §14c), a new requirement has been inserted : "dependencies on which the transition plan relies". This additional "shall" requirement goes too far; furthermore, it is inconsistent with AR21. This new reference needs to be suppressed.	E1	E1-1 - Transition plan for climate change mitigation	1.
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	§19 includes a new "shall" requirement:" for paragraph 18(b) it shall include the type of transition event analysed. In conducting its climate -related physical risk analysis supported by scenario analysis, the undertaking shall". Tha table in AR12 of set was presented as an example, not as a requirement. Those new obligations should be suppressed.	E1	E1-2 - Climate-related risks and scenario analysis	2.
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	AR5 for §18 includes new requirement on the way the climate-related physical risks should conducted. The same with AR6 on §19 for climate-related transition risks. This goes too far in details considering methodologies are not yet mature. Those requirements should be suppressed.	E1	E1-2 - Climate-related risks and scenario analysis	2.
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	The notion of resilience used in this section is very much unclear (see glossary); if the concept refers to adaptation, then it should be replaced by climate adaptation (without any reference to transition). In addition, in §21, new requirements b) and dc) have been inserted which appear excessive. They should be suppressed.	E1	E1-3 - Resilience in relation to climate change	3.
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	AR 8 to §20 added a requirement: "shall consider the implications of the combined assessments performed according to DRs E1-2". This new obligation is excessive and should be suppressed.	E1	E1-3 - Resilience in relation to climate change	3.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	AR10 to §21c) introduced a new c):" The effect of current and planned investments in climate mitigation, adaptation and transition opportunities on climate resilience enhancement". This requirement is excessive in regard to the uncertainties faced by undertakings. It should be suppressed.	E1	E1-3 - Resilience in relation to climate change	3.
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	§24 a) adds a "shall" disclosure by requesting climate change mitigation actions by decarbonisation lever; this goes too far for operators. This decomposition should be suppressed.	E1	E1-5 - Actions and resources in relation to climate change	5.
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	In regard to §26 c) companies remind that the European Commission committed to define by end of 2025 the meaning of "compatibility between companies'target and 1.5°C targets". Until such a definition is published, no obligations are legitimate on this issue.	E1	E1-6 - Targets related to climate change	6.
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	Companies consider, in the case where disclosing an absolute emissions target would provide to competitors key sensitive information (i.e.: production forecasts) which are very sensitive, that they should be entitled to publish only a target expressed in intensity,. In this regard, a clarification that the "relief" mentioned in ESRS 1 §98 is effectively applicable for section E1-6 appears essential.	E1	E1-6 - Targets related to climate change	6.
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	§24 c) adds a "shall" disclosure to indicate different CapEx and OpEx for 3 horizons: short term, medium term and long term; this is too prescriptive, gives rise to uncertainty and may be considered as misleading for the markets. Therefore, global information can be provided but only for significant amounts of CapEx/OpEx and without obligations of time horizon.	E1	E1-5 - Actions and resources in relation to climate change	5.
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	AR13 to §26 introduced a new obligation in b): " The undertaking is to select a recent base year that does not precede the first reporting year of the new target by longer than three years". Companies question the need for such a new requirement.	E1	E1-6 - Targets related to climate change	6.
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	In §29, a new obligation was inserted compared to "set1" to require the undertaking "to further disaggregate its total energy consumption from fossil" by categories. This goes too far in details and is not compatible with the simplification objective of ESRSs. Therefore, this new requirement should be suppressed.	E1	E1-7 - Energy consumption and mix	7.
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	4 data points have turned to "shall" in §34; this goes too far and subparagraphs a) to d) should be transferred to NMIG.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	9.
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	In §38, a new requirement has been inserted about: "the consistency of the prices used with the prices used in the financial statement for impairment tests". This goes too far in details and should be suppressed.	E1	E1-10 - Internal carbon pricing	10.
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	Option 2 must apply to §40, §41 and §42.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	39.
Excels	BDO Poland	Auditor	Poland			I disagree	The Exposure Draft requires companies to explain how their transition plan is "compatible with limiting global warming to 1.5°C." However, the absence of a clear methodology for assessing compatibility may result in inconsistent interpretation across companies. While a qualitative assessment of locked-in emissions is valuable, it will be challenging for many companies to conduct without sector-specific guidance. To enhance comparability and auditability, the Standard should require reference to a recognised set of pathways (e.g., sectoral 1.5°C pathways or a defined methodology) or, at a minimum, mandate disclosure of the exact pathway(s), model(s), and key parameter choices used to support the compatibility claim.	E1	E1-1 - Transition plan for climate change mitigation	14.
Excels	BDO Poland	Auditor	Poland			I partially agree and partially disagree	The revised drafting convention counts "shall disclose" datapoints in main body and places methodology in ARs (which are still mandatory methodological guidance but not counted as datapoints). This distinction is subtle and could cause inconsistent recording of required datapoints and confusion for assurance scope (what counts as a disclosure datapoint vs methodology).	E1	E1-1 - Transition plan for climate change mitigation	AR 1
Excels	BDO Poland	Auditor	Poland			I disagree	AR2 asks for consolidated narrative linking targets, actions, CapEx/OpEx and governance, but allows that internal management information need not all be disclosed. The threshold of what constitutes "key features" vs. confidential internal modelling is ambiguous. Companies will struggle to balance transparency with commercially sensitive detail; auditors will struggle to know whether withheld details are material.	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	BDO Poland	Auditor	Poland			I disagree	The requirement to disclose geospatial coordinates for company assets and, where relevant, supply-chain nodes (AR5(b), presents a significant implementation challenge. Many suppliers are unlikely to have such data readily available, which may necessitate extensive procurement and IT projects to collect, validate, and maintain geospatial information. Without phased guidance or minimum data standards, this requirement risks imposing disproportionate costs and may limit comparability across undertakings.	E1	E1-2 - Climate-related risks and scenario analysis	AR 5
Excels	BDO Poland	Auditor	Poland			I disagree	The primary boundary is the financial consolidation (reporting undertaking) but AR19 requires operational-control reporting if the financial boundary fails to fairly present operated assets. No clear tests or quantitative thresholds for when the "fails to convey a fair presentation" trigger applies. That creates inconsistent choices and reconciliation issues (Scope 1/2 reported on two boundaries) that auditors will need to assess.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	BDO Poland	Auditor	Poland			I disagree	AR25(e) requires updating Scope 3 categories every year for significant categories and full inventory at least every three years, but the screening rules for "significant" categories are wide (magnitude + other criteria). The lack of clearer thresholds (e.g., % of total emissions, spend thresholds) will create year-to-year comparability problems and put heavy supplier data collection burdens on companies. Auditors will have to rely heavily on estimates and sampling with limited guidance on acceptable estimation techniques.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	Share of each GHG Emission by scope if combined. Why is it necessary to separate Scope 1 & 2? (it is not requiered in GHG protocal)	E1	E1-6 - Targets related to climate change	26. (a)
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	Intensity in value "where relevant". What does mean "where relevant" ? Why is it asked in the target part and not anymore in the 1.8 emission real ? We recommend to put the intensity value both for target and real data in NMIG	E1	E1-6 - Targets related to climate change	26. (a)
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	We recommend to specify if Scope 2 can be calculed on market or location basis. There is no information about it.	E1	E1-6 - Targets related to climate change	26. (a)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	The mention of the objectif of limiting warming to 1.5° is only for scope 1 and 2 according to SBTI. Not clear in this paragraph even if AR 16 clarify a little bit.	E1	E1-6 - Targets related to climate change	26. (c)
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	Why is the KPI target only in absolute value ? Indeed, the objective is set up in % and this % doesn't change. Whereas the absolute value might change depending on different cases partly described in AR13a.	E1	E1-6 - Targets related to climate change	26. (a)
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	The situations with a change in base year value should also include changes in methodologies and updates in the referentials (As example : ADEME)	E1	E1-6 - Targets related to climate change	AR 13
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	The total is not requested anymore . It is not consistent between the target (combined target possible) and the real data (split only). Moreover, the total is still requested in E1-5 par 24b.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32.
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	AR25e says that significant categories are to update every year and the full scope every three years. But in AR25c it is said that we have to identify and disclose the significant categories. So it is unclear. Do we have to disclose not significant categories ?	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I agree	Do you confirm we do not have to disclose the information of the share of bundled and unbundled instrument. The total share only ?	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 24
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	Percentage of GHG Scope 3 calculated using primary data is not requested anymore ? Do you think narrative date is enough to compare compagnies ?	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	It would be useful to add a definition of storage and removal projects	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	35.
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	What is the time horizon for the amounts of GHG ? We think it is unclear and need to be specify. End of the project ?	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	35. (b)
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	Examples to clarify reversals would help in an AR to clarify if we are on exceptional events.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	35. (d)
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	Is it possible to clarify the GHG emissions are only for technological removals and storage activities (nature based solutions not concerned)	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	28. (c)
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	We would like to have the formula of this calculation . We think it is unclear. Are we talking about the % of removal GHG on the total GHG corresponding to the 35b ? What is the denominator ?	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	36. (c)
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	We think we should add a brief description of the project as in the part 35 in order to present the project in a narrative way (same presentation as for the paragraph 35).	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	36.
Excels	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden			I agree	From a strategic perspective, I did not understand the need of (the former) disaggregation of renewable sources, so great clarifications.	E1	E1-7 - Energy consumption and mix	28.
Excels	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden			I disagree	I strongly disagree. It is necessary to use intensity-figures to enable sectoral comparability and benchmarking, both financial and physical denominators (Former para 40). I believe that it is necessary that all companies operating in high climate impact sectors have to disclose energy intensity and climate intensity. I also think that the addition of physical intensity based figures (production volumes or sold products) should be disclosed. Even though it may not enable comparability between sectors, it can enable comparability within sectors and most importantly, be really useful for internal analysis and business strategy as well as meet the objective of ESRS of fair presentation.	E1	E1-7 - Energy consumption and mix	30.
Excels	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden			I disagree	I strongly disagree. It is necessary to use intensity-figures to enable sectoral comparability and benchmarking, both financial and physical denominators (Former para E1-6 para 53, not really new AR 19). I believe that it is necessary that all companies operating in high climate impact sectors have to disclose energy intensity and climate intensity. I also think that the addition of physical intensity based figures (production volumes or sold products) should be disclosed. Even though it may not enable comparability between sectors, it can enable comparability within sectors and most importantly, be really useful for internal analysis and business strategy,as well as meet the objective of ESRS of fair presentation.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden			I partially agree and partially disagree	I would appreciate AR regarding carbon credits and which quality standards that are recognised? Both for new para 36.a and 37 b.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	36. (a)
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We propose re-integrating disaggregation into (c)(i)(ii)(iii). These information are useful for the users of the sustainability reporting to better understand the disaggregation of renewable energy consumption. The requested data are not complex to collect and they are in line with GRI-based KPI on energy consumption.	E1	E1-7 - Energy consumption and mix	28. (c)
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We propose re-integrating the existing AR 34 containing the table on energy consumptions and mix as a new Application Requirement to ESRS E1-7 para 28. The standardized table can ensure greater comparability in the presentation of such information.	E1	E1-7 - Energy consumption and mix	AR 17
Excels	ASSIREVI	Auditor	Italy			I disagree	We propose to re-integrate the "NMIG 9 for para. 32 (GHG Intensity) " in the main standard as new AR to para. 32.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32.
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We propose re-integrating the existing para. 44(d), representing the total of GHG emissions .	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32.
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We suggest to clarify the meaning of "reflect" (AR 24(b)), in order to understand whether it is necessary to provide separate quantitative disclosure of the share of contractual instruments used to purchase energy or not.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 24

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We propose re-integrating the requirement to justify scope 3 emission category exclusions (part of existing para. 46(i)). We suggest to maintain the requirement in order to distinguish between categories not applicable to the organisation and categories that the organisation does not disclose or does not fully report due to lack of information or because the analysis is still immature/incomplete.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	ASSIREVI	Auditor	Italy			I disagree	We recommend re-integrating the existing para. 60 of ESRS Set 1 about in the case of Net Zero targets in addition to the gross GHG emission reduction targets. We believe that if an organisation has a Net Zero target, it has this type of information available.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	36.
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We propose re-integrating the existing para. 63(d) regarding the current year approximate gross GHG emission volumes by Scopes 1, 2 and, where applicable, Scope 3 covered by internal carbon pricing schemes. We believe that if an organisation uses these schemes, it has this type of information available.	E1	E1-10 - Internal carbon pricing	38.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	From our perspective, removing the intensity metric makes sense because the metric involved additional effort, and the comparability of the metric with other companies was not guaranteed.	E1	E1-7 - Energy consumption and mix	27.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	From our perspective, removing the intensity metric makes sense because the metric involved additional effort, and the comparability of the metric with other companies was not guaranteed.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	31.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	It's a positive development that the application of the financial control approach has been clarified.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 18
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We view the removal of the addition concerning high climate impact sectors as a positive step.	E1	E1-7 - Energy consumption and mix	29.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We do not understand why the metric "Percentage of Scope 1 GHG emissions from regulated emission trading schemes" is being retained. We recommend removing the addendum to simplify reporting.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32. (a)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The idea and purpose of the information regarding "share and types of contractual instruments used to purchase energy" is unclear to us and should therefore be deleted or further specified.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 24
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We support the simplification of the requirements regarding carbon credits. This leads to a simplification of reporting, while the most important information has still been retained.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	36.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We support the simplification of the requirements regarding Internal Carbon Pricing. This leads to a simplification of reporting, while the most important information has still been retained.	E1	E1-10 - Internal carbon pricing	38.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We welcome the fact that the table is now optional, as the strict specification of the table columns was associated with various uncertainties. This change simplifies the reporting process.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 27
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The framework references 'transition events.' There needs to be some further guidance on this, particularly if this means transition risk events, or whether this also encapsulates transition opportunities. There are statements made which could be open to interpretation. Clear definitions are required to ensure we report the desired information.	E1	E1 - Objective	1.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The objective described in para. 1 of each draft topical ESRS is inconsistent to Draft ESRS 1. The statement about "dependencies when relevant" and "financial effects" should be deleted to make it consistent with ESRS 1. Change the wording to: "When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS E1 Climate change, when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, metrics and targets (if in place)."	E1	E1 - Objective	1.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Remove parts (a) and (b) and keep the introductory paragraph to avoid unnecessary duplication. Paragraph 9 should read as follows: "The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M."	E1	E1 - Objective	9.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	ESRS E1's ARs expect undertakings to break down GHG disclosures by country, segment, activity, subsidiary, GHG type or source type. For credit institutions, a more meaningful lens is by exposure (e.g., asset class, sector, counterparty type), which is how banks manage and monitor climate-related risks. The ARs should explicitly permit disaggregation by asset class, sector and client type for financial institutions.	E1	E1 - Objective	1.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	AFME supports the clarification and simplification of the DR outlining transition planning requirements, including the clarification that a transition plan shoud provide information about about how the strategy and business model are compatible with the limiting of global warming rather than targets only. The requirement for an explanation of the "decarbonization levers identified and key actions planned" (by reference to E1-3) is not feasible for financial institutions for whom Scope 3 Category 15 is most relevant, given the lack of direct control and inability to quantify the amount of client decarbonization directly resulting from bank decarbonization "actions". The ARs should recognize the inability of financial institutions to quantify expected GHG reductions as part of transition plans and permit disclosure of transition plans without this detail.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	AFME supports the removal of references to taxonomy-aligned KPIs. From the preparer perspective, AFME has raised comprehensive concerns with the usefulness and relevance of Taxonomy KPIs for credit institutions. The actions defined within the transition plans pertain to the bank's portfolio, and in this context, the financial resources allocated cannot be interpreted in conjunction with the disclosure published under the Taxonomy Regulation.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	AFME supports the clarification that undertakings should only disclose significant CapEx amounts related to coal, oil and gas economic activities if the undertaking has them.	E1	E1-1 - Transition plan for climate change mitigation	14. (b)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	We welcome the clarification that information on the transition plan is required and not the disclosure of the TP itself. However, it is still quite unclear how this disclosure in E1-1 should interact with the more granular disclosures in subsequent sections (e.g. on targets, actions, etc.). Additional guidance is welcomed with respect to how this overlapping disclosure should be managed.	E1	E1-1 - Transition plan for climate change mitigation	14.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	We would appreciate clarity with respect to how we can demonstrate that strategy and business model are compatible with 1.5C, if retained. For targets (as previously required), it is clear how temperature alignment can be provided . This is less clear for strategy and business model. We propose to change back to target alignment.	E1	E1-1 - Transition plan for climate change mitigation	14.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	Companies face uncertainty regarding the requirements for transition plans to explain how an entity's strategy and business model are compatible with the transition to a sustainable economy, and with the limiting of global warming to 1.5 °C in line with the Paris Agreement and with the objective of achieving climate neutrality by 2050" (E1-1 15) and to explain how GHG emissions targets are "compatible with 1.5C" (E1-1 16). Rather than prescribing that the plan must be compatible with a particular temperature increase, transition plans should explain how the entity will contribute to decarbonisation objectives. Given the dependencies for companies' transition including actions outside their control, and uncertainties as to what "compatible with 1.5C" entails, we recommend instead allowing reporters to disclose a climate mitigation plan which responds and contributes to the transition towards a low-greenhouse gas emissions, climate-resilient economy (the latter being aligned with ISSB S2). This should also be addressed in the review of the level 1 Directive.	E1	E1-1 - Transition plan for climate change mitigation	14.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	The requirements in ESRS E1-1, para. 14, ESRS 1-5, para. 24c, and GDR-A, para. 38, all include different but similar requirements. This is confusing. We would appreciate closer alignment. Further, the disclosure of financial and investment planning/capex and opex information is often commercially sensitive for companies. We would welcome additional flexibility with regards to disclosure of such information (also in subsequent sections where additional requirements on this topic are provided). We propose to change the wording to make clear that only the most significant financial and investment/capex and opex plans need to be disclosed in in relation to transition plans. The breakdown of short-/medium-term and longer-term provides and additional requirment vs. the original ESRS requirements. This is difficult information to provide and often commercially sensitive.	E1	E1-1 - Transition plan for climate change mitigation	14.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Guidance on how financial institutions should measure "locked-in" emissions and show how they impact a transition plan should be provided.	E1	E1-1 - Transition plan for climate change mitigation	14. (c)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	Undertakings which do not have a transition plan need to indicate whether, and, if so, when, it will adopt a transition plan. Transition plans meeting ESRS requirements may be a new concept and also something guided by applicable law; therefore it is hard for firms to give a precise date for when an ESRS-compliant transition plan will be adopted. So as to not lead to imprecise answers given the shifting nature of mandatory transition plans, it would be more appropriate for this DR to not ask when firms will adopt transition plans, particularly when legislative regimes requiring transition plans, such as the CSDDD, have had their application dates delayed.	E1	E1-1 - Transition plan for climate change mitigation	15.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	Companies face uncertainty regarding the requirements for transition plans to explain how an entity's strategy and business model are compatible with the transition to a sustainable economy, and with the limiting of global warming to 1.5 °C in line with the Paris Agreement and with the objective of achieving climate neutrality by 2050" (E1-1 15) and to explain how GHG emissions targets are "compatible with 1.5C" (E1-1 16). Rather than prescribing that the plan must be compatible with a particular temperature increase, transition plans should explain how the entity will contribute to decarbonisation objectives. Given the dependencies for companies' transition including actions outside their control, and uncertainties as to what "compatible with 1.5C" entails, we recommend instead allowing reporters to disclose a climate mitigation plan which responds and contributes to the transition towards a low-greenhouse gas emissions, climate-resilient economy (the latter being aligned with ISSB S2). This should also be addressed in the review of the level 1 Directive.	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	The disclosure requirements concerning the quantification, even as an indicative range, of the financial resources supporting transition plans defined by the undertaking are difficult to apply to financial institutions, and potentially complex to interpret for users of the Sustainability Statement, because actions typically do not consist in significant investments but are connected to relationships with clients in the undertakings' portfolio. We therefore disagree with the mandatory nature of these requirements and suggest to maintain only a qualitative description of the resources allocated for implementation of action plans or other key actions	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	We welcome the introduction of 'dependencies' around transition plans aligned to IFRS S2.	E1	E1-1 - Transition plan for climate change mitigation	AR 3
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	We welcome the simplified disclosure requirements and the clear focus on exposure to climate-related hazards and transition events and trends. We recommend to use more general language in 18b) since transition risk scenarios may not be event based (e.g. NGFS scenarios) Change this to "(b) to transition risk factors (over the short,- medium- and long-term)". It must allow flexiblity for different types of transition risk scenarios used by banks. We would also ask to reconsider financial institution specific definitions for upstream and downstream value chains.	E1	E1-2 - Climate-related risks and scenario analysis	18.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	We recommend to use more general language in 19 since transition risk scenarios may not be event based (e.g. NGFS scenarios). Change the language to "transition factors".	E1	E1-2 - Climate-related risks and scenario analysis	19.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	For additional simplification, we suggest the combination of paragraphs 18 and 19 under E1-2; they both inquire about methodology and the latter refers to 18(a) and 18(b). In addition, we believe there should be better guidance on what constitutes the "upstream and downstream value chain" in paragraph 18 as this is a very broad statement and, for a global bank, can include an enormous number of components in our value chain.	E1	E1-2 - Climate-related risks and scenario analysis	18.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	The amended text expects undertakings to "assess the extent" of exposure and sensitivity to climate-related hazards, "taking into consideration the likelihood, magnitude and duration of the hazards as well as the geospatial coordinates … specific to its locations and supply chains." For a global bank with highly diversified geographies, industries and products, a comprehensive, granular geospatial assessment at the level suggested is aspirational; it is especially challenging for our own supply chains. This creates unrealistic and overly burdensome requirements. Clarify that use of location-specific (including geospatial) information is on a best-efforts basis, subject to data availability and proportionality. We suggest adding at the end of AR5(c): "on a best-efforts basis, where reasonably obtainable, and using appropriate proxies where necessary."	E1	E1-2 - Climate-related risks and scenario analysis	AR 5
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	The amended wording requires undertakings to "assess the extent" of exposure and sensitivity to identified transition events, "taking into account the likelihood, magnitude and duration of the transition events." For policy, market and behavioural shifts, forward-looking likelihood/duration judgements are highly uncertain. There is a meaningful risk of misleading precision or comparability issues across reporters. Subject to our comments on paragraph 19, delete the clause "taking into account the likelihood, magnitude and duration of the transition events," or qualify it as "high-level, qualitative judgements on a best-efforts basis." This keeps the focus on identifying relevant transition events and describing potential exposure pathways without requiring point estimates that would not be decision-useful.	E1	E1-2 - Climate-related risks and scenario analysis	AR 6
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	It should also be clarified, in line with EFRAG's intentions (as set out in question 17 of part 2 of this consultation), that these resilience disclosures are only meant to be qualitative. It is still possible to interpret these provisions as requiring quantitative disclosures.	E1	E1-3 - Resilience in relation to climate change	21.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The proposed text asks undertakings to explain how "current and planned mitigation and adaptation actions (as per DR E1-5) and transition plans (as per DR E1-1) support, strengthen or impact resilience," which reads as if a transition plan is mandatory. Elsewhere, ESRS E1 acknowledges that transition plans are not mandatory (if none exists, the undertaking indicates whether and when it will adopt one). The drafting should not imply a de facto requirement. Clarify that this disclosure is conditional on the undertaking having adopted a transition plan. Suggested wording: "and, where a transition plan has been adopted in accordance with DR E1-1, how that plan supports…" This would also align with the non-mandatory guidance that frames transition-plan disclosures as "if and when adopted." It should also be clarified, in line with EFRAG's intentions (as set out in question 17 of part 2 of this consultation), that these resilience disclosures are only meant to be qualitative. It is still possible to interpret these provisions as requiring quantitative disclosures.	E1	E1-3 - Resilience in relation to climate change	21. (a)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	We suggest modifying AR 10 for 21(c), which requires the disclosure of the availbility and flexibility of existing resources to manage the financial impact of climate-related risk, to a more qualitiative approach by not specifying financial resources and financial impacts. These are very difficult to ascertain at this juncture. Similarly, AR 10(b) as it relates to the redeployment, repurpose, upgrade or decommissioning of assets is very difficult to calculate with precision at this time and should be modified to reduce burden. We also believe the disclosure of financial resources to manage financial impacts, risks and opportunities - similarly to disclosures on investments, opex, capex - is often commercially sensitive information. We would propose this as an optional disclosure requirement.	E1	E1-3 - Resilience in relation to climate change	AR 10
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	We agree with amendments to policy disclosures including with respect to GDR-P.	E1	E1-4 - Policies related to climate change	22.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	We see many duplications of information with transition plan's requirements, as well as with GDR-A para 38. It should be clarified that undertakings have to report on this information only if not already done so in the context of E1-1.	E1	E1-5 - Actions and resources in relation to climate change	24.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	It is unclear how the logic of actions structured by decarbonisation levers should be applied for financial institutions, especially downstream activities. Financial institutions disclosures show challenges around this as the logic simply does not apply the same way as to e.g. an operations company.	E1	E1-5 - Actions and resources in relation to climate change	24. (a)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The original ESRS, E1 §29(b) required disclosure of "achieved and expected GHG reductions" resulting from actions for climate change mitigation. AR 19(c) required the disclosure of key mitigation actions alongside GHG targets, disaggregated by decarbonization lever. These disclosures are not possible and not useful in the context of Scope 3 Category 15 Financed Emissions for banks. Bank actions for CCM will not result in direct and calculable GHG reductions. While it is possible to show achieved reductions, it is not possible to attribute those to specific bank actions since reductions stem from client activity. §29(b) should recognize this and the disclosure of achieved/expected GHG reductions should be required only "where reasonably calculable". The revised drafts retain largely the same language as before, without any qualification language. As an alternative, banks could disclose a decarbonisation target (as an expected emissions reduction) including annual progress reporting (as achieved emissions reductions), with each target having multiple associated actions. It is not always possible to accurately quantify, for each individual action, the level of decarbonization. We recommend allowing qualitative descriptions where quantitative attribution is not feasible.	E1	E1-5 - Actions and resources in relation to climate change	24. (b)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	The disclosure requirements concerning the quantification, even as an indicative range, of the financial resources supporting climate change mitigation actions defined by the undertaking are difficult to apply to financial institutions, and potentially complex to interpret for users of the Sustainability Statement, because actions typically do not consist in significant investments but are connected to relationships with clients in the undertakings' portfolio. The disclosure of financial and investment planning/capex and opex information is often commercially sensitive for companies. We would welcome additional flexbility with regards to disclosure of such information (also in subsequent sections where additional requirements on this topic are provided). Alternatively, we would propose to change the wording to make clear only the most significant financial and investment/capex and opex plans need to be disclosed related to TPs. The breakdown of short-/medium-term and longer-term provides an additional requirment vs. the original ESRS requirements .This is difficult information to provide and often commercially sensitive. We therefore disagree with the mandatory nature of these requirements and suggest to maintain only a qualitative or simplified description of the resources allocated for implementation of action plans or other key actions	E1	E1-5 - Actions and resources in relation to climate change	24. (c)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	We believe these disclosures are burdensome and it is not practicable to meet all GDR-T and E1-6 disclosures for long-term (usually 2050) Net Zero Commitments or Targets. These are typically managed through a focus on the relevant interim targets along the pathway to Net Zero. Items expected by GDR-T and E1-6 will not be available for target setting 25 years out resulting in non-decision useful information that is unlikely to meet the quality of information requirements of ESRS 1. Undertakings that have made long-term Net Zero commitments should be able to limit disclosures to their interim targets which corresponds to how this is managed. Can EFRAG clarify this either in the standards or the NMIG since the Glossary definition of "target" will still pick up firms' 2050 net zero commitments.	E1	E1-6 - Targets related to climate change	25.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Duplications of information with transition plan's requirements (e.g. targets compatible with 1,5° scenario) are still present. It should be clarified that undertakings have to report on this information only if not already done in the context of E1-1.	E1	E1-6 - Targets related to climate change	26.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	For the previous ESRS 1 §34(e), we sought guidance on what's needed to show targets are "science-based and compatible with limiting global warming to 1.5C."; guidance on this does not seem to have been provided in the exposure drafts.	E1	E1-6 - Targets related to climate change	26. (c)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	We believe a net-zero target, as implied by the 'net' wording, should also be possible to be 'net' instead of 'gross', aligned to the definition of 'net zero target' by ESRS. The maximum amount of offsets used should be transparently stated though. The previous ESRS E1 §34(b) required that disclosed GHG reduction targets be gross targets not including removal, credits or avoided emissions. But Net Zero targets assume a certain amount of residual emissions will be neutralized by these means, as was recognized in E1-7 §60. It should be clarified that Net Zero targets are NOT subject to E1-4 and only MDR-Ts.	E1	E1-6 - Targets related to climate change	AR 11
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	We welcome the the requirement to quantifiy decarbonization levers has been made voluntary.	E1	E1-6 - Targets related to climate change	AR 14
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	We welcome the removal of requirement to disaggregate total energy consumption from renewable sources.	E1	E1-7 - Energy consumption and mix	28.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	AFME does not agree with this new breakdown, i.e. the removal of reference to HCIS for the disaggregation of energy consumption from fossil sources. This information is not relevant for all sectors. The revised draft extends this reporting requirement to all companies, regardless of sector. For entities outside those sectors, this clearly constitutes a new requirement rather than a simplification. We support the deletion of this metric in line with EFRAG benchmarking analysis. We do agree with the deletion of the disclosure requirements of energy intensity for activities in HCIS (as per para. 40 in original ESRS).	E1	E1-7 - Energy consumption and mix	29.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The application requirements do not provide additional guidance to undertakings on how to report energy production metrics; practical examples would be useful, in particular with regard to the inclusion of thermal energy produced by cogeneration. Please provide supplementary guidance through the inclusion of specific application requirements.	E1	E1-7 - Energy consumption and mix	30.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	AFME urges stronger alignment between the scope and methodology for the calculation of financed emissions between the SFDR, Pillar 3 and ESRS. Banks disclose financed GHG emissions (Scope 1, 2, and 3 emissions of the counterpart) for positions that most significantly contribute to climate change within Pillar 3 disclosure. The scope of this disclosure differs from the provisions of the ESRS. Financial market participants subject to SFDR (e.g. asset managers, insurance companies) disclose financed GHG emissions (Scope 1, 2, and 3 emissions of the counterpart) for the exposures in their portfolios. The scope and methodology of this disclosure differ from the requirements of the ESRS. We do however welcome the deletion of the requirement to disclose total emissions as well as GHG Intensity based on net revenue (as per previous para. 53. of the original ESRS). We also suggest reformulating the wording of G1-8 32(a) to clarify that the disclosure of Scope 1 GHG emissions from regulated emission trading schemes is intended to be mandatory only for undertakings having such emissions.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	Biogenic emissions are generally of limited relevance for the financial sector and their calculation methodologies may still not be robust enough for a solid disclosure. We suggest to limit the disclosure requirement to undertakings with a significant exposure to biogenic emissions or to make it voluntary.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	Concerning new application requirements 18-19 on the reporting boundary for GHG emissions, we propose the insertion of a specific guidance to explain the approach to be used and to outline the most critical cases through concrete examples, in line with the purpose of Appendix C in ESRS 1. In particular, given ESRS requirements on GHG emissions reporting according to the financial control approach and the added provisions on leased assets, we would expect ESRS to clarify how to consider the following real estate categories: - own assets used by the undertaking for its business activities (i.e. Scope 1 and 2 in our view) - own assets leased to third parties (i.e. Scope 3 cat. 13 in our view) - leased assets used by the undertaking for its business activities (i.e. Scope 1 and 2 in our view) - leased assets used by the undertaking for reasons different than typical business activities (i.e. Scope 3 cat. 8 in our view)	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 18
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	We suggest rewording the application requirement 21(b) to clarify that the mentioned gases should be included in the calculation of GHG "where relevant".	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	In relation to the new AR 24(b) on share and types of contractual instruments, we see inconsistency with EFRAG's stated approach that application requirements should serve as guidance rather than as content requirements. If EFRAG expects companies to disclose information on contractual instruments, it should move such a paragraph to disclosure requirements. Also on this AR, the wording remains unclear with a reference to "share" that is not accompanied by any indications on calculation formula.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 24
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	We welcome that the disclosure of the GHG emissions reporting table has become voluntary.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 27
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	We welcome the deletion of the previous disclosure requirement para. 60 around net-zero target and residual emissions due to the significant uncertainties that were involved. We reiterate that the definition of a net-zero target should not include a defined temperature alignment (it currently references 1.5C). It just means emissions in the atmosphere are in a state of 'net zero'. We propose to change this definition and exclude any temperature alignment.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	37.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	The additional requirement regarding the consistency of the carbon prices used with the prices used in the financial statement for impairment tests is not aligned with the simplification purposes. We propose the deletion of this part.	E1	E1-10 - Internal carbon pricing	38. (a)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	Paragraphs 40-41: Subject to our response to question 20 in part 2 of this consultation, which states that disclosures related to paragraphs 41-42 should be optional, assets at material physical and transition risk should exclude a bank's own assets. This would result in greater alignment with Pillar 3 reporting templates 4 and 5, which exclude a bank's own assets.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	We recommend adding "where applicable" and allowing qualitative disclosure to meet this requirement. Disagree with disclosing potential liabilities that are material, given that they are already disclosed in the financial statements and do not need to be duplicated in sustainability reporting;	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	We support the deletion of the split between chronic and acute physical and support the removal to report over the "short, medium and long term" as these time horizons do not align with the time horizons required in Pillar 3 reporting.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (a)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The amendment requires the disclosure of "the location of key assets at material physical risk." For banks, if "assets" is read to include client exposures (e.g., loans), pinpointing locations could reveal client-confidential information or be impracticable at granular levels. If EFRAG intends banks to report on financial exposures, specify that disclosures should be provided on an appropriately aggregated basis (e.g., by geography/region) that avoids revealing client-confidential information.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (b)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	Climate change mitigation actions are not primarily aimed at transition risk mitigation. Therefore, it is difficult/not always possible to link climate change mitigation actions to limiting the degree of assets at transition risk. Climate change mitigation actions are strongly aimed at limiting negative impacts related to climate change, not necessarily risk mitigation. Subject to our response to question 20 in part 2 of this consultation, which states that disclosures related to paragraphs 41-42 should be optional, we recommend adding "where applicable" and explicitly allowing qualitative disclosure.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	We welcome the deletion of mandatory requirements around the reconciliation of line items to financial statements as per previous DR 68.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	We disagree with the retention of this paragraph – any "potential liabilities" which are material will be disclosed within companies' financial statements and don't need to be disclosed here.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (d)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	Disagree with the revised formula, considering that scenario selection (" a scenario aligned with limiting climate change to 1.5°C") should not be imposed on banks.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (f)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	We disagree with the formulation of revised paragraph 42 - percentage of assets or revenue derived from business activities aligned with climate-related opportunities and time horizons. If an opportunity is only material in the long-term, this will be impossible to quantify as the revenue may not have actually been earned yet and this may lead to the wrong outcome. Preparers would arbitrarily make up numbers that are not decision-useful information for the end-users of the sustainability statement. We support EFRAG's effort to align the language in this paragraph with IFRS S2, but this will be challenging to implement in practice given there is no definition of "climate-related opportunities" within the ESRS. The quantitative specificity provided in this paragraph goes beyond the requirements of ISSB. Disclsoure against this paragraph should be made voluntary.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	42.
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I disagree	Quantitative disclosure of CapEx/OpEx for the short and medium term, as well as disclosure of investment plans, is being required; however, investment plans pertain to information related to corporate/undertaking strategies and provide advantageous insights to competitors, so whether to disclose this information should be left to the company's discretion.	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I disagree	Emissions related to liabilities are classified as part of the company's own operation. Since the GHG Protocol does not cover emissions related to liabilities, we request to delete this requirement.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 20
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is required that the data has been verified should be given priority.We request to clarify that the definition of "the data has been verified" will be determined at the discretion of the company.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I disagree	Since the company cannot verify the amount of energy supplied from nuclear power, we request to delete this requirement.	E1	E1-7 - Energy consumption and mix	28. (b)
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is required to conduct calculation for all type of assets including right-of-use assets. Some right-of-use assets such as intellectual property rights and copyrights do not involve GHG emissions. We request to exclude right-of-use assets that do not emit any GHG from AR30(b).	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	AR 30
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Information on the potential locked-in emsission provides limited material insights on a company's decarbonization pathway with information difficult to obtain. We suggest to remove this requirement.	E1	E1-1 - Transition plan for climate change mitigation	14. (c)
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The disclosure of "financial and investment planing (including the short- and medium-term financial and investment plan)" and "financial resources supporting the implementation and strategic ambition of its transition plan for climate change mitigation, including quantitative short- and medium-term CapEx, and/or OpEx figures, as well as anticipated long-term CapEx and/or OpEx ranges" go beyond the initial requirements and the changes therefore go against the aim of simplifying the ESRS. Additionally, it is unclear how the short-/medium-term and long-term time horizons are defined considering also the respective GHG targets defined by the companies. Does long-term refer to 2050? Disclosing any investment figures until 2050 is not feasible and the information would not be reliable. Requirements related to Transition Plans should be closely aligned with existing international frameworks.	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The current formulation of the AR indicate behavior obligations in how to conduct the scenario analysis going against ESRS 2 (ED) para. 5. Particularly the mandatory use of geospatial data and detailed methodological requirements related to supply chain lead to unnecessary complexity in the overall requirements. Reformulation needed (previously "This description shall include its process in relation to [...]").	E1	E1-2 - Climate-related risks and scenario analysis	AR 5
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The current formulation of the AR indicate behavior obligations in how to conduct the scenario analysis going against ESRS 2 (ED) para. 5. Reformulation needed (previously "This description shall include its process in relation to [...]").	E1	E1-2 - Climate-related risks and scenario analysis	AR 6
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The required information provides limited material insights with data difficult to obtain. Suggestion to delete requiremetns	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33.
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	While also a requirement of the IFRS Sustainability Disclosure Standards, the lack of clear and harmonized guidance on calculating anticiapted financial effects linked to individual climate-related risks and opportunities leads to inconsistent and unreliable information. The complexity and lack of integration between sustainability and financial systems make such quantification impractical. Additionally, by going beyond the requirements of the ISSB, the disclosure requirement can also reveal sensitive strategic information, leading to competitive disadvantages for European companies. We therefore advocate for removing all requirements related to anticipated financial effects.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	39.
Excels	Leaseurope	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We do not understand the need to refer to 'finance-lease / right-of-use-assets'. It seems simpler to refer just to 'leases' (with the term being defined as we suggested for ESRS 1 -70). Right-of-use assets includes both (former) finance lease and (former) operating leases, so it seems redundant to now refer separately to finance leases.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	AR 30
Excels	Leaseurope	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Clause (a) refers to the GHG Protocol Corporat Value Chain (Scope 3) Accounting and Reporting Standard (Version 2011). Appendix A of this Standard, Accounting for Emissions from Leased Assets, was obviously developed prior to IFRS 16 being in place, and it therefore tends to contradict the approach of ESRS 1-70. We suggest it is clarified that for leases, the approach set out in ESRS 1-70 overrides the GHG Standard.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	Leaseurope	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The reporting boundary cross refers to ESRS 1 59, that deals specifically with group reporting. Taken in isolation (i.e. without reading ESRS 1 70, this might be seen as including assets leased nby a lessor to its customers. We suggest a cross-reference to ESRS 1 70	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 18

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Leaseurope	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Transition plans will need preparers to find a difficult balance between the costs of preparation and providing reliable and meaingful data. Within the mobility field, we cannot achieve net-zero by 2050 unless (1) the grid in all the countries where we operate is 100% fossil fuel free, and (2) all vehicles are powered by carbon free fuel (or electricity). Any assumptions we make in a transition plan will be based on predicting the global grid in 2050 and the adoption of EVs and other technologies by the public. This is out of the control of fiannce companies and and would be highly speculative. Moreover, imposing an obligation on companies to align their business model with the 1.5C aspirational goal is highly problematic, given that the Nationally Determined Contributions (NDCs) of states under the Paris Agreement do not to respect the 2C target (the UN Environment Programme estimates the current trajectory to be at 2.6-3.1C). Strengthened collective efforts are needed, but the proposed transition plans expect companies to fulfil an obligation they do not have full control over.	E1	E1-1 - Transition plan for climate change mitigation	13.
Excels	Leaseurope	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Disclosure of resources associated with any transition plan necessarily requires a clear picture of the underlying plan itself. As noted in response to E1-1, multiple external variables make it challenging for mobility companies to publish transition plans that meet a strict rubric for included disclosures. Given the flexibility required to be associated with any transition plan, it is difficult to implement a transition plan with clear financial resources attached to any specific category. Accordingly, it would be beneficial for these data points to be streamlined with a set of financial reporting requirements that is tied only to the information (if any) disclosed as part of any company's designed transition plan.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	Leaseurope	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The multiple dimensions of information required in order to meet Scope 3 targets makes it difficult for private companies to disclose without showing business growth projections/ information on how the business may evolve, which can be highly sensitive for private businesses. Given this additional effort should be taken to limit Scope 3 reporting obligations to only require total amounts not to require breakdowns from each separate Scope 3 category.	E1	E1-6 - Targets related to climate change	26. (a)
Excels	ETSA	Business association (other than association of financial institution)	Belgium			I agree	ETSA members appreciate the closer link between the double materiality analysis and the resilience analysis related to climate change, as they can now be reported as closely connected exercises – rather than individual analyses. •ETSA members believe EFRAG should align its application requirements and NMIG on climate resilience analysis to what is possible with open source climate risk tools, to avoid unnecessary costs for (smaller) preparers. •EFRAG holds on to the requirement to provide current financial effects related to material risks and opportunities. ETSA members ask EFRAG to provide (or co-develop) supportive (preferably open-source, sector-specific) analytical tools that can help preparers quantify climate and other environmental risks. This can be part of the NMIG, as EFRAG does with proposing tools like Natura2000 or the WWF Risk filter	E1	E1-3 - Resilience in relation to climate change	AR 8
Excels	ETSA	Business association (other than association of financial institution)	Belgium			I disagree	•ETSA members do underwrite the fact that preparers should disclose whether their transition plan is aligned with a 1.5°C pathway or not – without imposing a certain performance level that would be out of the scope of a reporting/transparency directive. •In this context, ETSA suggests considering a reference to the Paris Agreement in both the sections E1-1 Transition plan (already included) as the E1-6 Targets related to climate change. The Paris Agreement offers a stable legal anchor also referring to well-below 2°C, while the interpretation of the 1.5°C goal may evolve over time through scientific updates (e.g., IPCC reports). Referencing the Agreement ensures alignment with the latest policy and scientific benchmarks without requiring frequent amendments to the standards. •ETSA members understand and welcome the fact that EFRAG provides the possibility for companies to prove compatibility of the target with the 1.5°C pathway by benchmarking against a reference target – without having to provide assurance or target validation by a third party. ETSA does raise the question on how detailed a preparer should disclose its benchmarking methodology and (if applicable) gap with a 1.5°C aligned target.	E1	E1-6 - Targets related to climate change	26. (c)
Excels	ETSA	Business association (other than association of financial institution)	Belgium			I disagree	•ETSA members do underwrite the fact that preparers should disclose whether their transition plan is aligned with a 1.5°C pathway or not – without imposing a certain performance level that would be out of the scope of a reporting/transparency directive. •In this context, ETSA suggests considering a reference to the Paris Agreement in both the sections E1-1 Transition plan (already included) as the E1-6 Targets related to climate change. The Paris Agreement offers a stable legal anchor also referring to well-below 2°C, while the interpretation of the 1.5°C goal may evolve over time through scientific updates (e.g., IPCC reports). Referencing the Agreement ensures alignment with the latest policy and scientific benchmarks without requiring frequent amendments to the standards. •ETSA members understand and welcome the fact that EFRAG provides the possibility for companies to prove compatibility of the target with the 1.5°C pathway by benchmarking against a reference target – without having to provide assurance or target validation by a third party. ETSA does raise the question on how detailed a preparer should disclose its benchmarking methodology and (if applicable) gap with a 1.5°C aligned target.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	The consideration of energy as a disclosure requirement increases complexity	E1	E1 - Objective	4.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	More clarification is needed on the reporting of CO2	E1	E1 - Interaction with other ESRS	12.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I agree	This requirement looks streamlined	E1	E1-1 - Transition plan for climate change mitigation	AR 1
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The focus should rather be on medium term (2030). Longer term (2050) can increase complexity, given the level of uncertainty	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I agree	The disclosure information on the transition plan seems streamlined and reference to EU taxonomy moved to NMIG	E1	E1-1 - Transition plan for climate change mitigation	14.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	Disclosing further information on resilience of strategy and business model increases burden	E1	E1-3 - Resilience in relation to climate change	21.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I agree	The disclosure requirement on climate change actions seems streamlined	E1	E1-5 - Actions and resources in relation to climate change	23.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	Providing absolute value related to intensity targets can imply disclosing confidential information	E1	E1-6 - Targets related to climate change	26. (a)
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Alignment between operational control boundaries and organisational boundaries might be difficult to achieve	E1	E1-6 - Targets related to climate change	AR 15
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	Disclosing separately Scope 1,2 and 3 increases granularity	E1	E1-6 - Targets related to climate change	32.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	While it is important to describe a material risk in financial terms, companies should be able to use their enterprise risk management approaches for the reporting	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Same as above	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	An estimation of monetary amount and percentage of assets can make the process more complex	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (f)
Excels	EFPIA	Business association (other than association of financial institution)	Belgium			I disagree	The requirement to present GHG emission reduction targets as gross targets is not aligned with existing GHG emissions target and accounting standards like SBTi and GHG Protocol and renders them not science-based. Existing standards allow targets to include validated bundled and unbundled energy attribute credits (EACs) like those obtained through voluntary power purchase agreements or through the use of renewable fuels. Gross targets that do not include EACs are not science-based. Requiring reporting entities to maintain two sets of climate action targets, one of which cannot be validated, creates unnecessary risk for the reporting entity.	E1	E1-6 - Targets related to climate change	AR 11
Excels	EFPIA	Business association (other than association of financial institution)	Belgium			I disagree	Disaggregation of Scope 2 energy consumption would be inconsistent with the GHG Protocol and the information is not currently available from all energy providers. We recommend aligning with GHG Protocol and disaggregating only for Scope 1.	E1	E1-7 - Energy consumption and mix	28.
Excels	EFPIA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We appreciate the elimination of the references to "high climate impact sectors," but disaggregation of Scope 2 energy consumption would be inconsistent with the GHG Protocol and the information is not currently available from all energy providers. We recommend aligning with GHG Protocol and disaggregating only for Scope 1.	E1	E1-7 - Energy consumption and mix	29.
Excels	EFPIA	Business association (other than association of financial institution)	Belgium			I disagree	It is not feasible to report constituent gases for Scopes 2 & 3 because emission factors are not readily available and the amended guidance in ESRS E1-8 AR 26 and ESRS 1 §3.7 no longer provides enough flexibility to allow for reasonable judgment. AR 21(b) and AR 26 should clarify that disaggregation by constituent is only necessary for Scope 1.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	EFPIA	Business association (other than association of financial institution)	Belgium			I disagree	It is not feasible to report constituent gases for Scopes 2 & 3 because emission factors are not readily available and the amended guidance in ESRS E1-8 AR 26 and ESRS 1 §3.7 no longer provides enough flexibility to allow for reasonable judgment. AR 21(b) and AR 26 should clarify that disaggregation by constituent is only necessary for Scope 1.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 26
Excels	EFPIA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	As revised, this requirement now applies to Scope 1, 2, and 3 emissions. It is inconsistent with the GHG Protocol and is not feasible for Scope 2 and Scope 3. This requirement should align with the GHG Protocol and clarify that it only applies to Scope 1. The three-year grace period provided in Amended ESRS E1 122-125 for value chain data is unlikely to provide enough time for this type of data and/or valid emission factors to become available.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33.
Excels	EFPIA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	As revised, this requirement now applies to Scope 1, 2, and 3 emissions. It is inconsistent with the GHG Protocol and is not feasible for Scope 2 and Scope 3. This requirement should align with the GHG Protocol and clarify that it only applies to Scope 1. The three-year grace period provided in Amended ESRS E1 122-125 for value chain data is unlikely to provide enough time for this type of data and/or valid emission factors to become available.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I disagree	While intensity targets are useful for tracking efficiency improvements, they can obscure the absolute environmental impact of financial institutions, particularly in growing portfolios. The proposed exemption risks undermining transparency and comparability across sectors. Absolute emissions are critical for understanding real-world climate impact, especially for stakeholders assessing alignment with the EU Green Deal and Paris Agreement goals. Intensity-only disclosures may mask rising emissions in expanding lending or investment portfolios, and sector-specific exemptions could create an unlevel playing field while reducing pressure on high-emitting sectors to transition.	E1	E1 - Objective	AR 12
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	Agree with the simplification of introduction.	E1	E1-7 - Energy consumption and mix	27.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	Agree with the deletion of breakdown of renewable sources.	E1	E1-7 - Energy consumption and mix	28.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	Agree with deletion of specification for "high climate impact sectors (HCIS)" - and all further requirements related to HCIS.	E1	E1-7 - Energy consumption and mix	29.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	Agree with the simplification for clarity.	E1	E1-7 - Energy consumption and mix	30.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	Companies also remind that the European Commission committed to define by end of 2025 the meaning of "compatibility between companies'target and 1.5°C targets". Until such a definition is published, no obligations are legitimate on this issue. They stress that the Paris Agreement also refers to "well below 2°C objective" which should be reinserted in the amended CSRD.	E1	E1-1 - Transition plan for climate change mitigation	1.
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	In §14c), a new requirement has been inserted : "dependencies on which the transition plan relies". This additional "shall" requirement goes too far; furthermore, it is inconsistent with AR21. This new reference needs to be suppressed.	E1	E1-1 - Transition plan for climate change mitigation	1.
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	§19 includes a new "shall" requirement:" for paragraph 18(b) it shall include the type of transition event analysed. In conducting its climate -related physical risk analysis supported by scenario analysis, the undertaking shall". Tha table in AR12 of set was presented as an example, not as a requirement. Those new obligations should be suppressed.	E1	E1-2 - Climate-related risks and scenario analysis	2.
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	AR5 for §18 includes new requirement on the way the climate-related physical risks should conducted. The same with AR6 on §19 for climate-related transition risks. This goes too far in details considering methodologies are not yet mature. Those requirements should be suppressed.	E1	E1-2 - Climate-related risks and scenario analysis	2.
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	The notion of resilience used in this section is very much unclear (see glossary); if the concept refers to adaptation, then it should be replaced by climate adaptation (without any reference to transition). In addition, in §21, new requirements b) and dc) have been inserted which appear excessive. They should be suppressed.	E1	E1-3 - Resilience in relation to climate change	3.
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	AR 8 to §20 added a requirement: "shall consider the implications of the combined assessments performed according to DRs E1-2". This new obligation is excessive and should be suppressed.	E1	E1-3 - Resilience in relation to climate change	3.
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	AR10 to §21c) introduced a new c):" The effect of current and planned investments in climate mitigation, adaptation and transition opportunities on climate resilience enhancement". This requirement is excessive in regard to the uncertainties faced by undertakings. It should be suppressed.	E1	E1-3 - Resilience in relation to climate change	3.
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	§24 a) adds a "shall" disclosure by requesting climate change mitigation actions by decarbonisation lever; this goes too far for operators. This decomposition should be suppressed.	E1	E1-5 - Actions and resources in relation to climate change	5.
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	In regard to §26 c) companies remind that the European Commission committed to define by end of 2025 the meaning of "compatibility between companies'target and 1.5°C targets". Until such a definition is published, no obligations are legitimate on this issue.	E1	E1-6 - Targets related to climate change	6.
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	Companies consider, in the case where disclosing an absolute emissions target would provide to competitors key sensitive information (i.e.: production forecasts) which are very sensitive, that they should be entitled to publish only a target expressed in intensity,. In this regard, a clarification that the "relief" mentioned in ESRS 1 §98 is effectively applicable for section E1-6 appears essential.	E1	E1-6 - Targets related to climate change	6.
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	§24 c) adds a "shall" disclosure to indicate different CapEx and OpEx for 3 horizons: short term, medium term and long term; this is too prescriptive, gives rise to uncertainty and may be considered as misleading for the markets. Therefore, global information can be provided but only for significant amounts of CapEx/OpEx and without obligations of time horizon.	E1	E1-5 - Actions and resources in relation to climate change	5.
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	AR13 to §26 introduced a new obligation in b): " The undertaking is to select a recent base year that does not precede the first reporting year of the new target by longer than three years". Companies question the need for such a new requirement.	E1	E1-6 - Targets related to climate change	6.
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	In §29, a new obligation was inserted compared to "set1" to require the undertaking "to further disaggregate its total energy consumption from fossil" by categories. This goes too far in details and is not compatible with the simplification objective of ESRSs. Therefore, this new requirement should be suppressed.	E1	E1-7 - Energy consumption and mix	7.
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	4 data points have turned to "shall" in §34; this goes too far and subparagraphs a) to d) should be transferred to NMIG.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	9.
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	In §38, a new requirement has been inserted about: "the consistency of the prices used with the prices used in the financial statement for impairment tests". This goes too far in details and should be suppressed.	E1	E1-10 - Internal carbon pricing	10.
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	Option 2 must apply to §40, §41 and §42.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	39.
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I agree	Nokia welcomes the simplification and clarity provided on locked-in GHG emissions is explained, as well as the specification that only qualitative assessment is needed.	E1	E1-1 - Transition plan for climate change mitigation	14. (c)
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I agree	Nokia welcomes summarizing and streamlining the former (a)-(j) under new DR 14(a).	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I agree	Nokia welcomes the simplification and move from former AR to DR.	E1	E1-2 - Climate-related risks and scenario analysis	19.
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I agree	Nokia welcomes the simplification, notably renaming the chapter from IRO-1 to E1-2 as it caused confusion on where the information should be disclosed in the report, especially if it should go under General Information or ESRS E1 section. The new wording also clarifies the purpose of the required information.	E1	E1-2 - Climate-related risks and scenario analysis	16.
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I agree	Nokia welcomes the simplification, notably renaming the chapter from SBM-3 to E1-3 as it caused confusion on where the information should be disclosed in the report. The new wording also clarifies the purpose of the required information.	E1	E1-3 - Resilience in relation to climate change	20.
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I agree	Nokia welcomes the simplification and better distinction with previous chapter.	E1	E1-3 - Resilience in relation to climate change	21.
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I agree	Nokia welcomes the simplification that GDRs applicable to all material topics are in ESRS 2 and that GDRs are not repeated under the topical standard. GDR-P requirements are also simpler and more straightforward.	E1	E1-4 - Policies related to climate change	22.

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Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I agree	Nokia welcomes the simplification for the target chapter overall and GDR-T, having applicability included and 5-year steps deleted.	E1	E1-6 - Targets related to climate change	26.
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	Nokia welcomes the clarity on expectations, namely a summary with details in respective other chapters. However, duplicative information is now required and should be removed, e.g. (a) statement of GHG emission reduction targets being science-based which is also expected to be disclosed under E1-6 26(c). Additionally, the reliefs introduced in ESRS 2 - AR 17 should apply throughout the ESRS whenever discussing current or anticipated financial effects or metrics, notably on ESRS E1 - AR 2. A relief should also be introduced to reflect that public companies have restrictions on what kind of forward-looking information they are allowed to disclose and how such information should be published (e.g., in case future investment and plans that have not been announced yet in line with applicable financial regulations).	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	The term "resources" should be explained in the glossary and clarify what type of resources it relates to (e.g., people, financial, everything, etc.). With sector-specific ESRS being abandoned, sector-specific information should not be required. This requirement should be deleted. Overall, no additional disclosure requirements should be derived from the ARs.	E1	E1-1 - Transition plan for climate change mitigation	AR 4
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	This disclosure requirement should be further clarified, notably what "as of the reporting date" means in practice (e.g., is it expected that the company does the resilience analysis every year or considers major triggering events to update).	E1	E1-3 - Resilience in relation to climate change	AR 9
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I disagree	A new disclosure requirement on GHG emission specifications has been introduced in AR 26. This would require significant effort and resources to assess and evidence variations or lack of variations for all these categories. This disclosure requirement should be removed or made voluntary. Nokia calls for no additional disclosure requirements to be derived from the ARs.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 26
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I agree	Nokia welcomes the simplification.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32. (c)
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	The proposed text is easier to read but additional clarity is needed: are the companies required to disclose if internal carbon pricing schemes are not in place? Disclosure requirements should be formulated such that companies can focus on relevant and material information, and only in very specific cases required to disclose if certain requirement is not applicable.	E1	E1-10 - Internal carbon pricing	38. (a)
Excels	Group Caisse des Dépôts	Asset manager/Investor	France			I partially agree and partially disagree	the initial datapoints requiring the perimeter and scope of consolidation, the subsidiairies, and the use of the option to omit specific information, have been replaced by a general compliance statement with ESRS 1, which is less useful to an external reader	ESRS2	ESRS 2 - BP-1 - Basis for the preparation of the sustainability statement	4. (a)
Excels	Group Caisse des Dépôts	Asset manager/Investor	France			I disagree	The requirement to disclose breakdown of revenues has been deleted, and the he ESRS sector classification system. This reduces comparability, and this sectoral iformation is crucial for stakedholders to undestrande business model, and IROs	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (b)
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree Firstly, there is an inconsistency in language compared to ESRS E1, paragraph 17, using "climate-related physical risk" (17) and here "climate-related hazards" (18). Secondly, we find the disclosure requirements in ESRS-E1-18 and supplemented by the additional requirements in ESRS E1, paragraph 19, to go beyond what should be disclosed in an annual report (general purpose sustainability report). We believe the details illustrate the steps needed internally (and hence part of the internal documentation) but should not be a direct disclosure requirement. It is particularly the list in ESRS E1, paragraph 19, that triggers the unnecessary level of detail.	E1	E1-2 - Climate-related risks and scenario analysis	18.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree As stated above, this should be removed as a disclosure requirement or at the very least refocussed together with (18) to provide a condensed and focussed reporting relevant for a general-purpose sustainability reporting	E1	E1-2 - Climate-related risks and scenario analysis	19.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially agree We would like to note that the requirement in ESRS E1, paragraph 24c, may be difficult to report on in practice. If a company is renovating a factory – and as part of this ensures that it can handle future climate risks, pollution requirements and reduce the water consumption – then it is very difficult to identify the specific elements of CAPEX/OPEX relating to climate change compared to the overall CAPEX/OPEX, as the climate change elements may just be a specification in the overall design. We suggest allowing for a qualitative description of the CapEX for the user to understand the current investments etc. rather than providing an arbitrary split. It should be noted that this is an additional requirement to the information required by EU Taxonomy and based on different allocation.	E1	E1-5 - Actions and resources in relation to climate change	24. (c)
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree ESRS E1, paragraph 26a, requires “absolute” reduction targets. Many entities have SBTi approved “relative” reduction targets, and which is still in accordance with the SBTi standard. Therefore, entities should also be allowed to report their relative reduction targets. We suggest amending the paragraph to include both options as possible disclosure, i.e. requiring entities to choose one of them.	E1	E1-6 - Targets related to climate change	26. (a)
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially agree ESRS E1, AR26, state the entities “shall” compare information required in DR26(c) to sector-specific or cross-sector emission pathway. ARs should not include disclosure requirements. We suggest the AR is changed from “shall” to a possible comparison without requiring such comparable. It should furthermore be considered moved to NMIG.	E1	E1-6 - Targets related to climate change	AR 16

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Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially agree We believe it is important that this amendment is further amended with a materiality threshold, as the biogenic emissions should only be required to be reported, if they are material. Not securing this will put an unnecessary reporting burden on the entities and will not provide decision useful information. We propose to amend to ESRS E1, paragraph 33, as a minimum with the inclusion of a 10% threshold inspired by the taxonomy reporting or at least with the inclusion of "material" (changes marked with capital letters: "33... The undertaking shall disclose its MATERIAL biogenic CO2 emissions from the compulsion or biodegrading of biomass separately from the emission scopes, IF THIS CONSTITUTES MORE THAN 10 % OF THE EMISSIONS." We also note that the reporting of biogenic emissions are currently not included in the proposed table in AR27.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	We find only the exposure to physical risks at the reporting date has relevance to users. For this reason, we recommend that undertakings shall consider physical risks net of climate change adaptation actions concluded at the reporting date, i.e. only before planned and unfinished actions. This can be emphasized by adding the following text to the datapoint: '... before considering planned and unfinished climate adaptation actions at the reporting date.'	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (a)
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	We do not see the relevance of this datapoint. Assets addressed by mitigating actions are not exposed to material physical risks at the reporting date. If not removed, the datapoint should be limited to assets addressed by mitigating actions completed in the reporting period, i.e. excluding historical mitigation actions.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (c)
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	We do not see the relevance of disclosing revenue associated with assets for which the physical risks have been mitigated. Only net risk exposures are relevant to users. Hence, it should be limited to assets at material physical risks before planned and unfinished climate adaptation actions at the reporting date.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (d)
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	We support option 2 also for climate-related anticipated financial risks. Only transition risks net of climate change mitigation actions completed at the reporting date is relevant to users.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (a)
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	We do not see the relevance of this datapoint. If not removed, the datapoint should be limited to assets addressed by mitigation actions completed in the reporting period, i.e. excluding historical mitigation actions.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (b)
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	We find this datapoint onerous and resulting in overly granular disclosure of little relevance. If not removed, it should be limited to real estate assets exposed to material transitional risks, net of mitigation actions at the reporting date.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (c)
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	We find that 'potential liabilities' does not sufficiently delimit scenarios for what can be considered relevant to users. The datapoint should be limited to 'liabilities from anticipated financial effects'.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (d)
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	We find that 'potential stranded assets' does not sufficiently delimit the scenarios for what can be considered relevant to users. The datapoint should be limited to 'anticipated stranded assets'.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (f)
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	We support option 2 also for climate-related opportunities.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	42.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Proposed ESRS E1 refers toEU Climate Law specifically in relation to the undertaking's endeavours but only referenced it in the context of the standard as a whole in existing E1:2. If a non-EU undertaking was applying the standard on a voluntary basis how would it meet this requirement? Further consideration is needed (this would also apply to supplier payment, Gender pay gap as well).	E1	E1 - Objective	5.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Reference to Glossary: 'Transition plan' and 'Transition plan for climate change' are included with different wording and there is no cross-reference or relationship between the two (one is described as a specific type of action plan and the other an aspect of an undertaking's overall strategy), Recommend that there is one term aligned to ISSB definition.	E1	E1-1 - Transition plan for climate change mitigation	14.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Transition plan publication - the drafting in paragraph 14 doesn't seem that clear that disclosure is only required when a plan has been put in place (we think it is clearer existing ESRS E1:14).	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	The wording is inconsistent with the annex definition of transition plan for climate change. An aspect of an undertaking's overall strategy that lays out the undertaking's targets, actions and resources for its transition towards a lower--carbon economy, including actions such as reducing its GHG emissions with regard to the objective of limiting global warming to 1.5°C and climate neutrality.	E1	E1-1 - Transition plan for climate change mitigation	AR 1

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Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Transition plan sector specific metrics to track progress - it is unclear which sector specific metrics are referenced and how an undertaking would determine the appropriate metrics. For example, IFRS S1:48 uses principles-based language and provides guidance to determine industry-specific information. If reference to 'sector-specific' requirements is retained, the standards should explain what sector-specific means in this context and how it would determine what sources of guidance to apply.	E1	E1-1 - Transition plan for climate change mitigation	AR 4
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	The new paragraph is very unclear what the actual disclosure of the methodology should be (it includes a list of 'key elements' but does not specify what should be disclosed. It is also not clear what is expected by way of use of scenario analysis - in this para it states 'how the undertaking has used scenario analysis' but AR5 appears to require physical risk assessment to be supported by scenario analysis and transition risk requires use of at least one scenario in line with 1.5 degrees. Paragraph 21a appears to presume that scenario analysis has been performed as it refers to (21a) the effects identified in the climate-related scenario analysis).	E1	E1-1 - Transition plan for climate change mitigation	19.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	See entry for paragraph 19 above.	E1	E1-1 - Transition plan for climate change mitigation	21. (a)
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Clarify what 'significant categories' (Scope 3) means ensuring aligment with ISSB. Still remains unclear in the original ESRS and revised ESRS.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32. (c)
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	"When, due to specific facts and circumstances, the information reported in paragraph 32(a)(b) for the reporting undertaking (equivalent to the financial control organisational boundary) fails to convey a fair presentation of the emissions" This is not specific enough and may lead to judgemental debates with "operational control" which is not clearly defined. See our response in the survey to Q33 where we recommend alignment with GHGP and IFRS S2 as far as possible	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	This seems to be introducing a new option for companies not to have to use the most recent GWP values, which could create issues for alignment with ISSB and comparability between companies.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Reference to NMIG 7: Incorporates 'shall' requirements that should be either removed or moved to the main body of E1.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Reference to NMIG 9: It is not clear why guidance is included on GHG emissions intensity as this is not required in E1. It is an example where NMIG includes references to additional disclosures that 'may be' provided but which are not in fact required in the standard itself - in other words, this is not illustration to support required disclosures but additional information that is not asked for.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Existing ESRS - 34c It is unclear that there is a requirement to disclose a base year for targets - it is a didden requirement in AR13a: 'baseline value and base year are not to be changed unless changes in either the target or reporting boundary occur'. This arises from the deletion of text in ESRS E1: 26c, c. The requirement needs to be reinstated.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	34.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Reference to Glossary: The definition provided seems to only be defining what an 'asset' is, but does not define when it shall be considered as 'stranded'.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (f)
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL The section "objective" contains not only the objective but also clarification of the scope of the standard and the factors to be considered incl. drafting conventions (the latter does not fit to the headline "objective").	E1	E1 - Objective	1.
Excels	DRSC	(National) standard setter	Germany			I disagree	The "objectives" contents for both standards and disclosure requirements create problems on preparer's end: (1) References to many EU requirements increase complexity and uncertainty for preparers. Many require deletion of these references. (2) The objectives create a significant general uncertainty: Do preparers have to justify towards the auditors and, probably, the public audience in addition) that the disclosures made based on the single DRs and DPs result in the report to satisfy the objectives? Do preparers have to ensure this is the case? Or may a preparer assume that compliance with the DRs always result in the objective being satisified? (3) Each ESRSs objective contains the requirement "When only one of the sub-topics covered by this Standard is material ...". Since the subtopics in AR 16 (Delegated act) will not be mandatory anymore according to the ED ESRS, the references in para 3 are not consistent.	E1	E1 - Objective	1.
Excels	DRSC	(National) standard setter	Germany			I agree	The DR seems in general consistent with proposed amendments of SBTi Corporate Net-zero Standard 2.0 and with Transition Plan Taskforce Disclosure Framework (which is aligned with ISSB positions) The deletion of reference to the EU Taxonomy Regulation is supported. However, there are red flags and reservations regarding the details as set out below.	E1	E1-1 - Transition plan for climate change mitigation	13.
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG: The requirement seems an extension of Delegated Act: The description of “financial and investment planning” (ED) goes beyond “investments and funding” (DA) as the latter is a subset or part of the former. This is further confirmed by the wording “investment and financial planning (including the short- and medium-term financial and investment plan)” in AR 2(c).	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG: The requirement seems an extension of Delegated Act: Disclosure of "quantitative short- and medium-term CapEx, and/or OpEx figures, as well as anticipated long-term CapEx and/or OpEx ranges" The DP should be deleted. Furthermore, it is unclear why "long-term CapEx..." comes with the attribute "anticipated" because short- and mid-term CapEx" are "anticipated" as well as these are not reflected in current financial statements. This is true for most OpEx as well.	E1	E1-1 - Transition plan for climate change mitigation	AR 2

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	DRSC	(National) standard setter	Germany			I disagree	We believe, EFRAG should consider the Transition Plan Taskforce Disclosure Framework which (1) contains the following elements: "investment and disposal plan" and "planned sources to fund the plan" and (2) sets conditions on the disclosures: (a) to the extent the financial effects of its transition plan are separately identifiable, (b) information available to the entity at the reporting date without undue cost and effort, (c) approach that is commensurate with the skills, capabilities, and resources that are available to the entity for preparing those disclosures We further believe, that the NMIG might contain as a "may" guidance in line with the TPT Disclosure Framework.	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	DRSC	(National) standard setter	Germany			I disagree	Even if scenario analyses are an important instrument for the effective assessment of opportunities and risks, the standard should make crystal clear that their use is not mandated, because it is still a highly complex exercise. To clarify this, it should first be stated whether scenario analyses were used.	E1	E1-2 - Climate-related risks and scenario analysis	
Excels	DRSC	(National) standard setter	Germany			I disagree	The requirement "base its analysis on at least one high-emission climate scenario" is not appropriate. E1 should refer to "a scenario based on scientific evidence which reflects the climate risk properly" (in this sense)	E1	E1-2 - Climate-related risks and scenario analysis	AR 5
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL: It is observed that the wording of this para indicates a net-perspective of reporting.	E1	E1-2 - Climate-related risks and scenario analysis	AR 5
Excels	DRSC	(National) standard setter	Germany			I disagree	We have some doubts that this AR is needed. Perhaps a clarification in the main body might be sufficient that only a qualitative assessment of the exposure is required. Moreover, the wording regarding the anticipated financial effects has to be aligned. If Option 2 in ESRS 2 is adopted, a quantification will not be required.	E1	E1-2 - Climate-related risks and scenario analysis	AR 7
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL: As this information is already required by IRO-1 and IRO-2, the wording of this para should be further streamlined. (The undertaking shall disaggregate the disclosures provided in accordance with ESRS 2 IRO-1 and IRO-2 into (a) climate-related hazards [...])	E1	E1-2 - Climate-related risks and scenario analysis	18.
Excels	DRSC	(National) standard setter	Germany			I disagree	(1) We believe that disclosures on resilience should be adressed centrally in ESRS 2. (2) The issue is not mature enough to require these detailed specifications. There is no comparability of information on business resilience. E.g., the term "Resilience analysis" is not clear. Further, we see the risk of boilderplate disclosures. (3) The DR gives rise to diverse understanding of the content which will create high efforts for both preparers and auditors. We do not see simplification and streamlining here.	E1	E1-3 - Resilience in relation to climate change	
Excels	DRSC	(National) standard setter	Germany			I disagree	The wording "shall provide its climate resilience at the reporting date" creates confusion: (1) is not clear as to what it refers to, "process" or "outcome" (2) if "process" is meant: We fail to see the relevance of this information, (3) if "outcome" is meant: It seems conceptually understandable, but such a purely reporting date-specific statement only makes sense for individual locations or individual products/services/markets. When considering location, product, and service portfolios, however, a date-specific assessment is not feasible. Furthermore, a historical analysis (which is what a reporting date analysis is) is questionable in the context of a strategically oriented disclosure such as E1-3. This will result in extensive discussions between undertakings and with auditors in this regard.	E1	E1-3 - Resilience in relation to climate change	AR 9
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG: Re the wording "the effects of current and planned investments in climate mitigation, adaptation and transition opportunities on climate resilience enhancement": (1) requirement is not clear, (2) it seems as it is an extension of the requirements in the Delegated Act. It should deleted, already for this reason.	E1	E1-3 - Resilience in relation to climate change	AR 10
Excels	DRSC	(National) standard setter	Germany			I disagree	The standard should make crystal clear that (1) Breakdown of CapEx/OpEx per time buckets (time horizons) is not required, and (2) Breakdown of CapEx/OpEx per decarbonisation lever is not required, either.	E1	E1-5 - Actions and resources in relation to climate change	24.
Excels	DRSC	(National) standard setter	Germany			I disagree	This requirements seems an extension of the existing requirements of the Delegated Act: The DR suggests a breakdown of "quantitative short- and medium-term CapEx and/or OpEx figures, as well as anticipated long-term CapEx and/or OpEx ranges." This should be deleted. See also our comments on AR 2(c)	E1	E1-5 - Actions and resources in relation to climate change	24. (c)
Excels	DRSC	(National) standard setter	Germany			I agree	In general, the Disclosure requirement E1-6 aligns with SBTi to a great extent; however, some we see some issues as noted below.	E1	E1-6 - Targets related to climate change	25.
Excels	DRSC	(National) standard setter	Germany			I disagree	This requirement is too granular. Undertakings should be granted flexibility how to set the basis for their targets. In addition, the requirement as proposed does not fit to many business activities, such as activities that involve huge assets such as power plants or combustion plants, because changes for assets can take up to 10 years from planning, permit, construction to operations. It should be allowed to take a individual appropriate base year for the undertaking. Recommendation: Delete 13b. Any guidance should be located in the NMIG if ever. Such guidance should not include precise time periods (such as "three years") but should recommend using scientific knowledge on how to set targets and to select base years. SBTi might be named as source of such scientific literature.	E1	E1-6 - Targets related to climate change	AR 13
Excels	DRSC	(National) standard setter	Germany			I disagree	The term "key change" is not defined. The standard should make clear (1) that "key change" means "significant", and (2) that this assessment of significance is up to the undertaking. E.g. (around these lines), "The undertaking may decide on changes in the reporting boundary, e.g., because of mergers and acquisitions, or changes in the target. If the undertaking concludes that these changes are significant they should be reflected in the baseline value or base year."	E1	E1-6 - Targets related to climate change	AR 13
Excels	DRSC	(National) standard setter	Germany			I disagree	(1) The DR should make crystal clear that the undertaking is not required to choose one of both alternatives mentioned in this paragraph to present its GHG reduction targets. In practice further ways and less granular presentation were applied for the 2024 reporting. (2) Examples should rather be adressed as "may" guidance in the NMIG.	E1	E1-6 - Targets related to climate change	14.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	DRSC	(National) standard setter	Germany			I disagree	The breakdown of GHG-Targets in Scope 1, 2, 3 should not be required as many undertakings are not setting targets in this way. E1 should require presentation of targets as the undertaking's management has set these (management approach). --> See also AR 16	E1	E1-6 - Targets related to climate change	26.
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG: This DR seems to include an extension of the Delegated Act where the scope of this DR is limited to high climate impact sectors. We note the reasons mentioned in the BfC (paras 257 and 128) for changing this. However, this datapoint should either be deleted or limited in scope as in the Delegated Act.	E1	E1-7 - Energy consumption and mix	29.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL: As practitioners report extensive discussions with auditors about whether a disclosure in millions is possible here, it should be clarified (probably at a central location in ESRS 1) that "millions" is allowed, too. (see also the DRSC suggestion to include a paragraph in ESRS 1 preparation... that allows undertakings to choose for each metric the units that are most meaningful)	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32.
Excels	DRSC	(National) standard setter	Germany			I disagree	seperate presentation of GHG Scope 1 emissions from regulated ETS should be limited to EU-ETS. Without this limitation, the exercise is far to complex to comply with.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32. (a)
Excels	DRSC	(National) standard setter	Germany			I disagree	The requirement to present biogenic emissions seperately should - if ever - refer to Scope 1 (delegated act), only, but not to "all scopes". In addition, the requirement should apply to "material" biogenic emissions which is not the case in the ED	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33.
Excels	DRSC	(National) standard setter	Germany			I disagree	ESRS should consistently address the financial control approach. However, we concede that the operational control approach might be relevant for a few undertakings, ESRS should refer to the GHGP (as in AR 18, Ar 19, AR 21). AR 19 should only refer to the GHGP, the other text should be deleted.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	DRSC	(National) standard setter	Germany			I disagree	Joint operations: The reference to financial risk and rewards should be deleted as this concept (1) has become obsolete in IFRS Accounting Standards, and (2) is not the basis for consolidation in every national GAAP. An alternative wording could be: "on the basis of the share the undertaking has in these assets and liabilities in its financial statements" If this wording stems from the GHGP, ESRS E1 should contain a list of aspects where the standard deviates from the GHGP.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 20
Excels	DRSC	(National) standard setter	Germany			I disagree	The undertaking shall consider the GHGP when preparing the information on GHG-Emissions. However, it remains unclear how to consider optional Scope 3 sub-categories or exemptions provided in GHGP. As an example, GHGP allows to not report scope 3.10 emissions if the company is unable to estimate the emissions as the processing of the products is unknown. It is unclear whether these exemptions can also be applied under ESRS or not (given ESRS E1.78). ESRS E1 should contain a list of aspects where the standard deviates from the GHGP.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	21. (a)
Excels	DRSC	(National) standard setter	Germany			I disagree	The leasing exemption of ESRS 1 might result in contradictions to the requirement to "consider the GHGP Corp Standard... when preparing the information for reporting GHG emissions". This is the case for operate lease arrangements. If this is intended, it should be crystal clear that this is the case. According to Table [A.1] of the GHGP the lessee does not have ownership or financial control. According to certain local GAAPs the lessee does not recognise an asset on balance (other than in IFRS financial statements). Therefore, the GHGP requires emissions associated with the use of the leased assets to classify as scope 3 emissions of the lessee. The ERSR 1 leasing exemption will result in the lessee to report scope 1 emissions. The same problem arises on the end of the lessor in case of an operate lease. ESRS E1 should contain a list of aspects where the standard deviates from the GHGP.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	8.
Excels	DRSC	(National) standard setter	Germany			I disagree	The requirement contradicts AR21(e) as biogenic emissions should be seperately presented (33) but AR21(e) requires to include them.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33.
Excels	DRSC	(National) standard setter	Germany			I disagree	Seperate presentation of GHG Scope 1 emissions from regulated ETS should be limited to EU-ETS. Without this limitation, the exercise is far too complex to comply with.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 23
Excels	DRSC	(National) standard setter	Germany			I disagree	The requirement is too granular and should be deleted. In addition, Scope 3 emissions are not directly measured. Even many scope 1 emissions are calculated, e.g. by using emission factors for fuels.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL: The wording "activity data" is misleading in this context. It shoud read "on the basis of current data", instead. In addition, as the term "GHG inventory" might be misunderstood, it should be explained in the glossary.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG: This seems an extension of the Delegated Act: "the assumptions regarding permanence".	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	35. (c)
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL: Many undertakings have carbon pricing schemes in place for decision-making, applying either several prices per tonne or variable prices per tonne. Thus, there might be more than just "one carbon price", the wording should be adjusted to read "how the entity is applying carbon pricing in decision-making".	E1	E1-10 - Internal carbon pricing	38. (a)
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL: For the reasons mentioned in our remark on 38(a), the requirement should be reworded to say "the pricing per metric tonne..."	E1	E1-10 - Internal carbon pricing	38. (b)
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG: E1-11 does not constitute a simplification for anticipated financial effects as, for example, it still refers to “monetary amount and percentage of assets”, “monetary amount and percentage of revenue”. As we strongly support Option 2 as mentioned in draft ESRS 2, we propose to design this DR as a "may" disclosure. An example for the wording could be: "If the undertaking discloses quantified anticipated financial effects it may include (a) the monetary amount and percentage of assets at material physical risk ..."	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	39.
Excels	DRSC	(National) standard setter	Germany			I disagree	Requirement on "location of key assets at material physical risks" results in unnecessarily detailed reporting, as depending on the sector, this could involve a large number of locations in all regions of the world. As an example, logistic sector undertakings have much more sites than heavy industry.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (b)

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Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	In our view, it does not appear fully effective to request the same information regarding the reporting of the transition plan in both E1-1 and E1-5. E1-1 §14 (a) refers to the key features to be disclosed in relation to the transition plan, such as decarbonisation levers, key actions and financial and investment planning. The same topics, however, are also requested in E1-5 §24 (a) and (c). In addition, E1-1 §14 (d) requires disclosure of progress in relation to the transition plan, while E1-5 §24 (b) requests disclosure of expected and achieved GHG emission reductions, which in our view appears to be overlapping as well. While AR 2 for para. 14 (a) notes that a coherent narrative should be provided "without necessarily duplicating content", it remains unclear under which Disclosure Requirement the respective information is ultimately expected. A clearer delineation between the disclosure under E1-1 and E1-5 would help avoid potential redundancies and enhance consistency. We would therefore recommend clarifying in E1-1 that the disclosure is intended to provide a high-level description, without going into detail on key actions and financial planning, as these elements are intended to be addressed in more depth in E1-5.	E1	E1-1 - Transition plan for climate change mitigation	14 (a) and (d)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	We would like to highlight potential challenges regarding the proposed requirement in ESRS E1 (as well as E1-5 (c)) to disclose detailed financial planning over the short- and medium-term, as well as investment plans and related CapEx and/or OpEx figures. Such disclosure would risk revealing sensitive strategic information and thus undermine companies' competitive position. Moreover, the draft standard does not clearly define which CapEx and OpEx figures should be included, making comparability across companies unrealistic. For large multinational groups it would be extremely difficult to aggregate consistent data across diverse business lines and geographies, while anticipated long-term planning is connected to a high level of uncertainty and would result in speculative and potentially misleading information. Finally, the requirement would impose a disproportionate administrative burden without providing a clear benefit to stakeholders. We therefore recommend limiting this disclosure to qualitative descriptions and high-level indications of financial implications, while avoiding prescriptive requirements for detailed financial forecasts.	E1	E1-1 - Transition plan for climate change mitigation	AR 2 for para. 14(a)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	In our view, it does not appear fully effective to request the same information regarding the reporting of the transition plan in both E1-1 and E1-5. E1-1 §14 (a) refers to the key features to be disclosed in relation to the transition plan, such as decarbonisation levers, key actions and financial and investment planning. The same topics, however, are also requested in E1-5 §24 (a) and (c). In addition, E1-1 §14 (d) requires disclosure of progress in relation to the transition plan, while E1-5 §24 (b) requests disclosure of expected and achieved GHG emission reductions, which in our view appears to be overlapping as well. While AR 2 for para. 14 (a) notes that a coherent narrative should be provided "without necessarily duplicating content", it remains unclear under which Disclosure Requirement the respective information is ultimately expected. A clearer delineation between the disclosure under E1-1 and E1-5 would help avoid potential redundancies and enhance consistency. We would therefore recommend clarifying in E1-1 that the disclosure is intended to provide a high-level description, without going into detail on key actions and financial planning, as these elements are intended to be addressed in more depth in E1-5.	E1	E1-5 - Actions and resources in relation to climate change	24(c)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I disagree	We would suggest including this Application Requirement in the NMIG, as it is only a "may" requirement and therefore not mandatory. To avoid confusion regarding the mandatory Disclosure Requirements, we believe it is misplaced in its current location.	E1	E1-6 - Targets related to climate change	AR 14 for para. 25
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	The Exposure Draft allows GHG emission reduction targets to be presented in a combined manner. However, in cases where combined targets are disclosed, it requires undertakings to indicate the share related to each respective GHG emission Scope. In practice, we think that this requirement is problematic for several reasons: -Decarbonization levers impact multiple scopes simultaneously, making a reliable split by scope unrealistic. -Holistic impact of reduction measures: Large multinational groups with decentralized structures implement decarbonization programs across various business units and geographies. These programs are designed to achieve overall reductions in GHG emissions, not to optimize reductions in a specific scope. Requiring a scope-by-scope allocation risks introducing artificial splits that do not reflect the actual management approach -Complexity and inconsistency risk: Estimating scope-specific shares would require assumptions, undermining comparability and reliability. -Existing disclosures already ensure clarity, as companies must specify which Scopes are covered by the target. We therefore propose deleting the wording "and the share related to each respective GHG emission scope" in §26(a), to keep the requirement both meaningful and feasible	E1	E1-6 - Targets related to climate change	26(a)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	We would like to raise concerns regarding the interpretation of AR 15 for para. 26 (GHG emissions reduction targets compatible with 1.5°C). AR 15 refers to companies applying the operational control boundary under E1-8. Yet the revised E1-8 requires the financial control boundary as the default, with operational control disclosure only where needed to avoid unfair presentation of Scope 1 and Scope 2 emissions. In general, target setting is only meaningful when based on operational control. Setting targets for leased assets (for Scopes 1 and 2) is not practical if there is no ability to influence emissions in these areas. We therefore request that the option to apply the operational control approach also be made available for E1-8, as is the case for all other Disclosure Requirements (see also comments below).	E1	E1-6 - Targets related to climate change	AR 15 for para. 26

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Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	ESRS 1, paragraph 70, clarifies that impacts, risks, and opportunities from a leased asset do not depend on legal ownership: the lessee reports impacts and related risks during the lease period, while the lessor reports them as part of its downstream value chain. This aligns with the operational control approach. However, E1-8 undermines this clarification by permitting operational control for all impacts except GHG emissions, where financial control is mandatory. This distinction is inconsistent with ESRS 1, creating avoidable ambiguity as reporting boundaries differ without justification. We therefore request that the operational control approach be permitted for GHG emissions, contrary to the current provision in AR 19, to ensure coherence and consistency with ESRS 1 and the GHG Protocol. Auditors currently interpret ESRS 1, paragraph 70, as not applying to GHG emissions, yet EFRAG has clarified at outreach events that paragraph 70 should take precedence over AR 19. We kindly request this clarification be explicitly reflected in the standard to remove ambiguity and align reporting approaches across all impact categories.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR18 for para 32
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	For the sake of clarity, we would recommend explicitly stating that the level of aggregation may, in accordance with [Draft] Amended ESRS 1, Chapter 3.7, be determined by the undertaking itself. Otherwise, we see a risk that this Application Requirement could be interpreted as imposing a requirement to disclose GHG emissions disaggregated by country, operating segment, economic activity, subsidiary, GHG, or source type in all cases.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 26 for paras. 31 & 32
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I disagree	We would suggest including this Application Requirement in the NMIG, as it is only a "may" requirement and therefore not mandatory. To avoid confusion regarding the mandatory Disclosure Requirements, we believe it is misplaced in its current location	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 27 for paras. 31 & 32
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Unclear whether included provision on EU Climate Law entails new requirements. Clarification also for audit process needed to avoid discussions.	E1	E1-1 - Transition plan for climate change mitigation	13.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Reduction targets, decarbonisation levers, key actions and the role of administrative, management and supervisory bodies are duplicated to paragraphs in E1-5, E1-6 and ESRS 2. This leads to additional work and complication even with clarification in new AR 2. Suggestion: Deletion of the requirements in the Transition Plan and additions in the named paragraphs.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	The requirement on the qualitative assessment on locked-in GHG emissions from key assets and poducts is unclear and not comparable. The recording of locked-in GHG emissions is time-consuming and generates little added value. A qualitative assessment is not comparable between companies. It is unclear what counts as key assets and products. Proposal: Deletion of the paragraph, as it offers no added value and generates a lot of effort.	E1	E1-1 - Transition plan for climate change mitigation	14. (c)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	The alignment regarding the 1.5°C target has shifted from specific taregts to a broader focus on strategy and business models. This change introduces additional effort and complexity, as the terms "strategy" and "business model" are inherently flexible and open to interpretation. This flexibility allows for extensive discussions with auditors, but it does not provide any added value compared to the previous target-oriented approach. The taregts were integral to the strategy and were already aligned with the business model. Therefore, maintaining a clear focus on the alignment of targets is essential for effective alignment and implementation.	E1	E1-1 - Transition plan for climate change mitigation	AR 1
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	AR 2: See consultation E1-14.a. AR 2(a): AR 2.b: It is not clear why the requirement was moved to ARs. Complicates the reading of the standard, as it is a mandatory specification. AR 2.c: Some of the disclosures expected by the ESRS cover sensitive information from a strategic perspective, disclosure of which could be used to their disadvantage by non-EU competitors of EU issuers that are under no such transparency obligations. The current wording of the exemption for disclosure of sensitive information should be revisited as it is currently too stringent to be used to safeguard business secrecy, especially in an international business environment that risks becoming even tenser. Information on future investment projects is sensitive, and its disclosure may have a severe impact on the competitiveness of the preparer. All data points regarding significant CapEx and OpEx amounts should be deleted. Information on future investment projects is sensitive, and its disclosure may have a severe impact on the competitiveness of the preparer. New Wording "While this information helps demonstrate the coherence and credibility of the transition plan, there is no expectation that the undertaking disclose all internal information used to manage the plan." is not solving that above named issue.	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	The requirment "explanation of the plans to manage – e.g. by transforming, decommissioning or phasing out – its GHG-intensive and energy-intensive assets and products." went from voluntary to mandatory. Additionally mandatory reporting requirements were added regarding "dependencies of future financial resources and other resources and how these may constrain the ability to implement the transition plan actions." This results in additional work to fulfill the reporting requirements. Proposal: Change to voluntary disclosures.	E1	E1-1 - Transition plan for climate change mitigation	AR 3
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Additional shall requirement to resources and actions taken imprecise. Generates high coordination efforts. Achieved and expected GHG emissions are metrics. These should not be in ARs. The inclusion of a shall statement on sector-specific standards also generates additional work in the survey. In addition, high coordination effort with the auditor due to lack of precision	E1	E1-1 - Transition plan for climate change mitigation	AR 4
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The disclosure requirement should be able to be fulfilled in the ESRS 2 section when describing material IROs. Otherwise it would be duplicated.	E1	E1-2 - Climate-related risks and scenario analysis	17.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The short-term period is limited to 1 year with reference to ESRS 1. It does not make sense to carry out a climate scenario analysis for the reporting year (physical and transitory risks), as various climate scenarios are unrealistic in one year. The short-term period should be removed from the disclosure requirement.	E1	E1-2 - Climate-related risks and scenario analysis	18.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The short-term period is limited to 1 year with reference to ESRS 1. It does not make sense to carry out a climate scenario analysis for the reporting year (physical and transitory risks), as various climate scenarios are unrealistic in one year. The short-term period should be removed from the disclosure requirement	E1	E1-2 - Climate-related risks and scenario analysis	AR 5
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	The disclosure of the entire evaluation of the resilience analysis is unrealistic, as it involves far-reaching confidential documents. Companies may experience competitive disadvantages as a result of disclosure	E1	E1-3 - Resilience in relation to climate change	AR 9
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Additional requirements that mean increased effort in carrying out the resilience analysis and providing evidence.	E1	E1-3 - Resilience in relation to climate change	AR 10
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	The information on achieved and expected GHG emissions should already be provided as part of the Transition Plan, AR 4. Duplication should be omitted. Reporting on actions and resources should be raised to the levers level for achieved and expected GHG emission reductions and quantative short and medium-term CapEx and/or OpEx figures at the level level should be made coluntary as this gets into competitive information like product plans.	E1	E1-5 - Actions and resources in relation to climate change	24. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Some of the disclosures expected by the ESRS cover sensitive information from a strategic perspective, disclosure of which could be used to their disadvantage by non-EU competitors of EU issuers that are under no such transparency obligations. The current wording of the exemption for disclosure of sensitive information should be revisited as it is currently too stringent to be used to safeguard business secrecy, especially in an international business environment that risks becoming even tenser. Information on future investment projects is sensitive, and its disclosure may have a severe impact on the competitiveness of the preparer. All data points regarding significant CapEx and OpEx amounts should be deleted. Information on future investment projects is sensitive, and its disclosure may have a severe impact on the competitiveness of the preparer.	E1	E1-5 - Actions and resources in relation to climate change	24. (c)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Absolute targets can mislead as they limit economic growth or reward market failure even for less CO2 intensive businesses. The disclosure of intensity/relative targets and the additional disclosure of the associated absolute values for the target year and the interim target year(s) means that companies must disclose the planned volume growth. This represents highly sensitive information and results in a competitive disadvantage and cannot be published. The current flexibilization of the requirement therefore does not represent the desired simplification. It should be possible to report intensity/relative targets without absolute values and also to prioritize intensity/relative targets over absolute targets.	E1	E1-6 - Targets related to climate change	26. (a)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	"In cases where the undertaking has only set a GHG intensity reduction target, it shall nevertheless disclose the associated absolute values for the target year and interim target year(s)." This requirement forces companies to disclose the planned volume growth. This puts them at a massive competitive disadvantage and cannot be published in this way.	E1	E1-6 - Targets related to climate change	AR 12
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Share of energy from nuclear sources in electricity mix should be deleted to avoid „duplication" with primary energy; little usefulness as metric is derived from statistical data only; share of nuclear energy in the electricity mix should not be part of reporting.	E1	E1-7 - Energy consumption and mix	28. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It should be kept as no additional burden for disclosing companies; Removal of disclosure on total emissions appears illogical, as both users and disclosers are likely to want to see this information published. Even though it can be calculated independently, the lack of a requirement may lead to unnecessary discussions about whether it can be provided as a voluntary additional disclosure.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	36.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	The introduced separate disclosure following the operational control approach allows for significant interpretation and is hence burdensome when aligning with auditors. EFRAG should make it clearer, that this is a "may"-disclosure.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	AR 26 in reference to ESRS 1 3.7 may result in a high number of new datapoints depending on its interpretation by auditors. EFRAG should clearly state that the disaggregation of data is voluntary ("may…") or delete the AR completely. Furthermore, this disaggregation does not provide any added value for the users of the information; instead, it leads to information overload and unjustified burdens for the disclosing company (information may not be available or only with high effort).	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 26
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We welcome the revisions especially in AR 25 (d); but the disclosure required in AR 25 (g) should be deleted as Cloud computing is only rented through the user company (Scope 3) but already disclosed by the provider (Scope 1) which leads to double counting and high efforts for verification	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	We welcome the revisions regarding the table to report on emissions and the flexibilities it allows in presenting the information.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 27
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Failure to achieve the general objective of reducing disclosure requirements. This information has not only been moved, but has been changed from may to shall. We see no added value for external readers in this information.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	35. (d)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	We believe that disclosing the monetary and percentage exposure to physical risks without considering adaptation measures is problematic. It involves high uncertainty, may overestimate risks, and could discourage proactive resilience efforts. Disclosures should account for adaptation actions to reflect a more accurate risk picture and encourage companies to invest in climate resilience.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (a)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	In many cases, adaptation measures cannot reliably be directly linked to specific assets. Doing so would require enormous effort or result in imprecise data that offers little value. Therefore, a one-to-one attribution is neither practical nor feasible.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (c)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	We believe it is nearly impossible to reliably calculate the monetary amount and percentage of net revenue at risk from physical climate impacts before considering adaptation measures. The complexity arises from the high uncertainty of climate projections, the difficulty in quantifying future physical damages, and the challenge in accurately modeling how risks will evolve over time. Additionally, the lack of standardized methodologies and reliable data further complicates such estimations.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (d)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	It is recommended to change this to voluntary disclosure. A new requirement introduces potential complexity by mandating that companies "shall" also report emissions using the "operational control" method if the financial control approach fails to provide a fair presentation. This adds ambiguity and should be an optional ("may") disclosure rather than a mandatory one.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 18
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	We believe that estimating the monetary and percentage impact on net revenue from transitional risks before considering mitigation and adaptation measures is highly challenging. Given the high uncertainty surrounding future policy changes, technological developments, and market shifts, it is more meaningful to incorporate measures into the assessment. Disclosing risks without accounting for planned actions may be misleading and fail to provide an accurate picture of the true risk exposure.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (a)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	In many cases, adaptation measures cannot reliably be directly linked to specific assets. Doing so would require enormous effort or result in imprecise data that offers little value. Therefore, a one-to-one attribution is neither practical nor feasible.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	We believe that providing a detailed breakdown of the carrying amount of real estate assets used as loan collateral by energy-efficiency classes is challenging and may not be practical. Such detailed classification requires extensive data collection and consistent assessment methods, which can be resource-intensive and may result in inconsistent or unreliable information.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (c)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	We believe that identifying potential liabilities from climate transition risks that do not meet current recognition criteria is challenging due to inherent uncertainties. Such liabilities depend on future developments and may not be reliably quantifiable or recognizeable in the financial statements at this stage.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (d)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	From our perspective, removing the intensity metric makes sense because the metric involved additional effort, and the comparability of the metric with other companies was not guaranteed.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	31.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	The lack of precise data, the variability of future scenarios, and the difficulty in accurately predicting asset devaluation make such disclosures unreliable and potentially misleading. Therefore, BMW opts not to implement or publish such estimates.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (f)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	From our perspective, removing the intensity metric makes sense because the metric involved additional effort, and the comparability of the metric with other companies was not guaranteed.	E1	E1-7 - Energy consumption and mix	27.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Such estimates are highly challenging because opportunities related to the transition are difficult to quantify accurately. Additionally, due to competitive reasons, we would prefer not to disclose such figures, as they could reveal strategic information and be misinterpreted.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	42.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	We consider the prescribed calculation approaches under AR 30—such as disclosing effects over different time horizons, including all asset types, and presenting energy efficiency classes—challenging to implement and potentially risky from a competitive perspective. Disclosing detailed, asset-specific data and estimates could reveal strategic information to competitors. High reporting burden on companies, high implementation costs.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	AR 30
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	We view the removal of the addition concerning high climate impact sectors as a positive step.	E1	E1-7 - Energy consumption and mix	29.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	We do not understand why the metric "Percentage of Scope 1 GHG emissions from regulated emission trading schemes" is being retained. We recommend removing the addendum to simplify reporting.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32. (a)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	The idea and purpose of the information regarding "share and types of contractual instruments used to purchase energy" is unclear to us and should therefore be deleted or further specified.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	24.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	We support the simplification of the requirements regarding carbon credits. This leads to a simplification of reporting, while the most important information has still been retained.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	36.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	We support the simplification of the requirements regarding Internal Carbon Pricing. This leads to a simplification of reporting, while the most important information has still been retained.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	38.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	It is recommend to change to voluntary disclosure to avoid subjective judgments, inconsistent reporting, and audit risks. The primary concern with financial disclosures is their relation to sensitive competitive information like future product plans. Regarding the new GHG boundary rule, the mandatory "shall" requirement introduces major complexity and confusion.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	For anticipated financial effects disclosures, it is critical that EFRAG releases guidance and methodology which clearly outlines how companies can quantitatively and qualitatively disclose these requirements.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	It is not clear whether biogenic emissions need to be separated between scope 1, 2 and 3 or combined. This should be clarified in the application requirement.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	There is no guidance readily available for biogenic emissions disclosed separately from scope 3. EFRAG should include this guidance in the non-mandatory implementation guidance.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21

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Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	This disclosure has been amended to specify that it only applies to real estate assets used for loan collateral. The purpose of the disclosure is still unclear. We understand that the disclosure is requested by banks to comply with Regulation EU 2022/2453; however, the disclosure will not specify the exact bank that the asset relates to or the split between EU and Non-EU which is required for Regulation EU 2022/2453. It would make more sense for banks to request this information from companies when they enter into a loan collateral agreement rather than including this as a general disclosure. It shouldn't be included within the anticipated financial effects disclosure.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (c)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	It is positive that the disclosure requirement E1-1 16g was removed to state whether the undertaking is excluded from EU Paris aligned Benchmarks. In our report, we already state that our target's are aligned with the Paris Agreement, so this statement was redundant.	E1	E1-1 - Transition plan for climate change mitigation	14.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	The amendments increase interoperability with the ISSB which is positive.	E1	E1-3 - Resilience in relation to climate change	21.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	It makes sense the the proposal removes the requirement to update the base year after every 5 years as this did not align with SBTi and should be up to the discretion of the company.	E1	E1-6 - Targets related to climate change	25.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	The amendment to include a definition for recognised quality standards is a positive amendment	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	37. (b)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Reporting on carbon credits and removals is still relatively new for companies. EFRAG should include more guidance on how to disclose these reporting requirements including which format it should be in (e.g., a table).	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	35.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	The amended disclosures for reporting on internal carbon pricing are more clear and concise than the current version.	E1	E1-10 - Internal carbon pricing	38.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	It is a positive amendment that the GHG intensity ratio was removed because net revenue is not necessarily a driver of GHG emissions.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	31.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	It is a positive amendment that the Energy consummption intensity ratio was removed because net revenue is not necessarily a driver of fuel consumption.	E1	E1-7 - Energy consumption and mix	27.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	It is positive that the disclosure requirement to address whether specific policy matters have been addressed was removed. This allows companies to tailor their policies to their specific IROs.	E1	E1-4 - Policies related to climate change	22.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Scope should be much clearer. "This Standard covers DRs related but not limited to the seven Greenhouse Gases (GHG): carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF6) and nitrogen trifluoride (NF3). It also covers DRs on how the undertaking addresses its GHG emissions as well as the associated transition risks." should be a separate paragraph and no need to be duplicated in para 12a.	E1	E1 - Objective	5.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Reduction in unnecessary duplicate wording is welcomed but impact on reporting effort is not reduced as required disclosures are largely the same.	E1	E1 - Objective	9.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Continued lack of clarity on what "compatibility with 1.5 deg scenario" means.	E1	E1-1 - Transition plan for climate change mitigation	13.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Continued lack of sector specific guidance: Climate risks and impacts vary significantly across sectors. Spending the time on sector specific scenario requirements e.g. studies into which risks are generally material by sector or industry would be far better use of time than current attempts to "simplify".	E1	E1-1 - Transition plan for climate change mitigation	14.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Objective is said to be simplified in the BfC but required disclosures are the same. This is misleading as to what is meant by simplification. If "simplification" in this disclosure requirement merely refers to consolidation of data points into one paragraph, this should be made clear so that there is no expectation that there is a reduction in disclosures and reporting effort.	E1	E1-1 - Transition plan for climate change mitigation	13.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Previous requirements re elements of transition plan to be disclosed, have been consolidated into one DR paragraph 14. However, out of 16 data points in existing standard, 14 still need to be disclosed i.e. minimal reduction in disclosures. BC states that there is a 53% reduction in datapoints – it is not clear how this has been calculated. Looks to be a reduction in words but not disclosure requirement. BfC states that this has resulted in a "principle-based approach" and "avoids unnecessary reporting burden" - not clear how this is the case when the same elements of the plan need to be disclosed.	E1	E1-1 - Transition plan for climate change mitigation	16.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Despite removing some detail required for scenario analysis disclosure, and reordering the sections to a better flow, scenario analysis requirement still not clear, and relevant disclosures across the different sections in E1 hard to follow.	E1	E1-2 - Climate-related risks and scenario analysis	19.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Reference to qualitative scenario analysis. Should it be qualitative or quantitative or doesn't matter?	E1	E1-2 - Climate-related risks and scenario analysis	AR 6
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Requirements for scenario analysis in IFRS deleted from EFRAG e.g. time horizons. Should instead be aligned. Will need to disclose IFRS anyway.	E1	E1-2 - Climate-related risks and scenario analysis	AR 6
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Removed disclosure of only significant capex and opex required for actions – refers to all capex and opex but not clear as ESRS 2 refers to significant financial resources.	E1	E1-5 - Actions and resources in relation to climate change	24. (c)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Not correct to say they're aligning with IFRS by mandating financial control. IFRS says to use GHG Protocol which allows operational control and equity share method, plus an assessment of economic substance over form. Have removed the operational control requirement i.e. reporting on JV emissions to the extent of operational control. This is necessary where it has been used before. Else the assessment of substance over form needs to be used. Proposed AR states that JV's are part of an entity's "own operations". "Own operations" is not defined (check?) so not clear what the implications are, without further context – suggest to either define own operations or don't refer to it, and instead refer to control only.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 20
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Removed requirement to report total GHG emissions: This implies that the key metrics are individual metrics of gross scope 1, 2 and 3. Not showing total emissions doesn't promote comparability with other organisations so not clear what EU is doing to advance reporting.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands				Still unclear as to how these are "metrics".	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands				Still unclear as to how these are "metrics".	E1	E1-10 - Internal carbon pricing	
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Requirement to disclose base year and base value indicated as being deleted to allow flexibility. However, this still seems to be an ESRS 2 requirement under MDR-T? Hence is not a deletion. Needs to be clarified. If not a deletion, should not be counted as a deleted disclosure requirement.	E1	E1-6 - Targets related to climate change	26.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Could you please provide more explaination on biogenic CO2 emissions?	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	We note a significant shift in the revised disclosure requirements—from previously focusing on the description of resilience analysis and its features (such as scope, methodology, and results) to now requiring granular disclosures on the strategy and business model, including how these need to adjust or adapt in response to climate-related risks and opportunities. While we support the intent to strengthen the link between climate resilience and strategic decision-making, this shift represents a material change in scope. It will require companies to develop more detailed internal processes to assess and articulate the implications of climate scenarios on their core business model and strategic direction.	E1	E1-3 - Resilience in relation to climate change	21.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	We acknowledge that the amendment to paragraph 24(c) is intended to provide relief. However, we note that the revised wording now requires disclosure of all current and future financial resources allocated, whereas the previous version focused on significant monetary amounts. We are concerned that this change may unintentionally increase the reporting burden by requiring disclosure of non-material amounts, which may not meaningfully contribute to stakeholder understanding. To maintain proportionality and focus, we recommend reintroducing the term "significant" to ensure that disclosures remain material, decision-useful, and aligned with the principle of relevance.	E1	E1-5 - Actions and resources in relation to climate change	24. (c)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	We note that the revised requirements now mandate all undertakings, regardless of sector, to disaggregate energy consumption from fossil sources by fuel category. Previously, this level of detail was only required for undertakings in high climate impact sectors. This change represents a significant increase in reporting burden for companies outside those sectors. For many, the granular breakdown by fuel type is not readily available and may require substantial effort to obtain or estimate, potentially compromising data reliability, while not providing material new information to users.	E1	E1-7 - Energy consumption and mix	38.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The amendment introduces a mandatory requirement to disclose any reversals (in tCO_2eq) that may have occurred during the reporting period, decreasing the amount of CO_2 removed and stored accordingly. This was previously embedded in a voluntary application requirement and is now proposed as a mandatory datapoint. We do not agree with the shift to a mandatory requirement, as it increases the reporting burden without sufficient justification. The log of amendments only acknowledges the datapoint moved, without explaining the change from a voluntary to a mandatory requirement.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	35. (d)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	In ESRS E1 - paragraph 36 we have found contradictory wording. It states "that it has financed or INTENDS to finance"..."if it has financed such projects". Suggest to streamline.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	36.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	The amendment introduces a requirement to disclose the monetary amount and percentage of revenue at material physical risk, now explicitly before considering climate change adaptation actions. This change aligns with IFRS S2 and may result in more extensive disclosures. While we acknowledge that this increases the reporting burden, we support the amendment as it improves interoperability with IFRS S2. In practice, undertakings likely already describe adaptation actions and their rationale, which inherently conveys the underlying risks.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (d)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	We note that AR30 has shifted from requiring an explanation of the calculation methodology used to mandating the adoption of specified calculation approaches. This change introduces stringent, prescriptive requirements that reduce flexibility and leave little room for materiality-based judgment. While standardization can enhance comparability, the new approach may not be proportionate for all undertakings, especially where certain inputs are immaterial or where alternative, well-established internal methods already provide reliable results.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	AR 30
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	We note that the previous guidance under AR73 allowed for voluntary disclosure of stranded assets, with flexibility to express values as a range including a 1.5°C-aligned scenario. The revised requirement under DR41(f) now makes this disclosure mandatory, significantly increasing the reporting burden. While we support transparency on climate related financial risks, the shift from a voluntary to a prescriptive requirement—particularly with scenario-specific expectations—may be challenging to implement, especially where data availability and internal scenario capabilities are still developing.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (f)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	We note that the revised paragraph 42 now mandates disclosure of the amount and percentage of assets and revenue aligned with climate-related opportunities. This is a significant shift from the previous requirement, which focused on undertakings considering financial effects of opportunities—such as expected cost savings or market potential, without mandated disclosures on quantification. While we support increased transparency on climate-related opportunities, the new requirement introduces a substantial increase in reporting burden, particularly for companies in the early stages of opportunity identification or where financial quantification is not yet feasible. Determining precise financial alignment with opportunities often requires complex assumptions, forward-looking data, and cross-functional input, which may not be readily available or reliable. We recommend allowing for materiality-based application or phased implementation, and retaining the option for qualitative disclosures where quantitative data is not yet mature.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	42.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	We note that AR2(c) has been significantly expanded. The previous requirement focused on an explanation and quantification of investments and funding, with reference to KPIs for taxonomy-aligned CapEx and, where relevant, CapEx plans. The revised version now mandates disclosure of quantitative short- and medium-term CapEx and OpEx figures, as well as anticipated long-term ranges. This shift introduces a more detailed and forward-looking reporting obligation, which may be difficult to substantiate with precision, especially for long-term projections. In addition, we face practical implementation challenges as investments planned for the purpose of climate change mitigation are hard to differentiate from investments made in overall product quality and efficiency, as in a truly integrated sustainability strategy, commercial and sustainable investments go hand in hand. It also increases the risk of legal exposure, as disclosing financial estimates over extended time horizons may be interpreted as commitments or forecasts, rather than indicative planning. Providing users with insight into how the transition plan links to EU Taxonomy reporting is sufficient in our view, complemented with the existing requirement irt the narrative on investment planning and financial resource allocation.	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	We disagree with the newly added disclosure requirements in AR4, which, when disclosing on progress in implementing the transition plan, now mandate detailed reporting on the deployment of resources, actions taken, GHG emission reductions achieved or expected, and the use of sector-specific metrics aligned with recognised decarbonisation standards. We believe the previous approach—allowing entities to explain progress in a flexible manner—better enabled companies to tailor disclosures to their specific context without imposing unnecessary burden. The new requirements risk becoming overly prescriptive, especially for entities not operating in sectors with well-established decarbonisation pathways or metrics.	E1	E1-1 - Transition plan for climate change mitigation	AR 4
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	We support the ongoing efforts to better align the ESRS with the IFRS Sustainability Disclosure Standards, even where this leads to an increase in reporting burden. Such alignment enhances global consistency, improves comparability, and strengthens the overall credibility of sustainability disclosures. As an example [for internal review purposes]: we support the revised disclosure requirement in AR8, which asks undertakings performing a qualitative scenario analysis to consider the implications of assessments under DRs E1-2 and E1-11 for their strategy and business model, including required actions. While this may increase the effort required, we support the alignment with IFRS S2.22(a) and the interlinking of risk assessments across different sections of the standard. This integrated approach improves coherence and supports a more strategic understanding of climate resilience.	E1	E1-3 - Resilience in relation to climate change	AR 8
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	We do not support the requirement in AR25(g) to separately report GHG emissions from purchased cloud computing and data centre services as a subset of upstream purchased goods and services, if significant (previously: if material). We believe the disaggregation principles in ESRS 1 already provide sufficient guidance for identifying and reporting material disaggregated categories. This new requirement is overly prescriptive, and even for companies where these services are significant, they may still not represent the most material emission sources. We recommend maintaining flexibility and allowing undertakings to apply materiality and disaggregation principles as appropriate.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	25.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	General comments on the Chapter: Overall, there are numerous § with limited added value, such as §5 to §11	E1	E1 - Objective	1.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Dependencies are already included under risks. The mention of dependencies should be deleted.	E1	E1 - Objective	1.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	This DP is redundant with ESRS 2 §30	E1	E1 - Objective	9. (a)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Part of this DP: "This Standard covers, but is not limited to, the seven GHGs: carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulphur hexafluoride (SF_6) and nitrogen trifluoride (NF_3)" is redundant with §5	E1	E1 - Interaction with other ESRS	12. (a)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	The following item should be added after "the role of the administrative, management and supervisory bodies", add " and whether they approved the transition plan"	E1	E1-1 - Transition plan for climate change mitigation	14.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	"and/or by providing validation through an independent third party, including information on the third party, the methodology/standard applied and the trajectory used". We do not agree with this aspect as we should not delegate the validation of the compatibility to an external body, raising significant issues on liabilities on the assessment of the compatibility, robustness of methodologies developped by unregulated actors (difference with auditors, or, in another field ESG scoring). Such a disclosure would remain possible as an entity specific disclosure.	E1	E1-1 - Transition plan for climate change mitigation	AR 2

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Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	ANC would favour a deletion of this datapoint as dependencies and locked-in emissions should be part of the explantion of the progress made in the following DP (§14d)	E1	E1-1 - Transition plan for climate change mitigation	14. (c)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	The classification between physical and transition risk is obvious and does not bring any added value, except interoperability with IFRS S2. It should be deleted.	E1	E1-2 - Climate-related risks and scenario analysis	17.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	The resilience analysis mixes elements related to both mitigation and adaptation. As a result, it significantly overlaps with information already provided on mitigation while offering limited additional insight compared to ESRS 2 SBM-3. EFRAG should avoid mixing adaptation and transition risks under resilience, as combining all climate risks will lead to overly generic information, whereas the focus should be on adaptation plans. Therefore, E1-3 should be refocused solely on adaptation. Proposed wording: "Disclosure Requirement E1-3 – Resilience in relation to climate change adaptation", "climate related risks" => "physical risks", deletion of mentions of transition plan, transition events (AR8), add in AR9 "The undertaking shall update the conclusions of its resilience analysis at least every three years or on the occurrence of significant changes since the last assessment in the external environment, individual circumstances or assessment process."	E1	E1-3 - Resilience in relation to climate change	21. (a)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Add an AR to specify that financial institutions are not required to set target in absolute terms, but are allowed to set targets in physical intensity instead, with specific provisions for sectors subject to a phase-out target: "Financial institutions may instead disclose targets in terms of physical intensity value for each invested or financed sector for which it has set a target, and, for sectors subject to a phase-out target, the related financial exposure (portfolio gross carrying amount, underwriting or asset under management)."	E1	E1-6 - Targets related to climate change	26. (a)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Delete "as well as which GHGs are covered": this brings no added value, except for the interoperability with IFRS S2	E1	E1-6 - Targets related to climate change	26. (b)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Reference made to past reductions should be added and companies should be able to keep their current base year (delete reference to before 2030 as the 5 years period has been removed) => add a new AR, derived from former AR29 with simplified and clearer wording. "The reference target value is dependent on the base year and baseline emissions of the undertaking's GHG emission reduction target. As a result, the reference target value for undertakings with a recent base year or from higher baseline emissions may be less challenging to achieve than it will be for undertakings that have already taken ambitious past actions and achieved GHG emissions reductions. Therefore, undertakings that have in the past achieved GHG emissions reductions, may account for their past achieved GHG emissions reduction when determining the reference target value, provided that these past reductions meet the quality requirements of this standard"	E1	E1-6 - Targets related to climate change	AR 13
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Set 1 required disaggregation of energy consumption from fossil sources by type of fossil fuel only for companies operating in high-impact climate sectors. This datapoint has been expanded to all companies (now ESRS E1 §29), regardless of their activity or the relevance of such information to their sector. This requirement is probably not meaningful for all companies and could remain as in Set 1	E1	E1-7 - Energy consumption and mix	29. (a)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Idem, this DP should be applicable only to undertakings active in high impact climate sectors	E1	E1-7 - Energy consumption and mix	29. (b)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Idem, this DP should be applicable only to undertakings active in high impact climate sectors	E1	E1-7 - Energy consumption and mix	29. (c)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Idem, this DP should be applicable only to undertakings active in high impact climate sectors	E1	E1-7 - Energy consumption and mix	29. (d)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Idem, this DP should be applicable only to undertakings active in high impact climate sectors	E1	E1-7 - Energy consumption and mix	29. (e)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	The mention "if applicable" should be added as production of renewables and non renewables as a non core activity is rather rare.	E1	E1-7 - Energy consumption and mix	30.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Market-based disclosure could be voluntary as undertakings purchasing green electricity will disclose it in any case. ISSB departs from the GHG Protocol (which imposes a double reporting on scope 2), requiring only location based with possibility to provide contextual information on any contractual instruments.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32. (b)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	There seems to be a contradiction between AR 21e and §33; do biogenic CO2 emissions need to be included or separated from the emissions scopes?	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	We note that the reference to net zero has been completely removed from the standard. This is regrettable, as prior to ESRS, there was a significant proliferation of net zero communications, each with varying levels of ambition. Such claims were also identified by ESMA in its greenwashing report as a prevalent issue. The inclusion of net zero in Set 1 provided a clear, uniform definition for all actors and led to substantial improvements in disclosure quality and better differentiation from neutrality claims. This concept and its definition should be maintained in the standard. Proposed wording • Add in glossary previous entry "Net-zero target" • Retain current Set 1 E1-7 §60 with clarifications regarding removals vs offsets: "In the case where the undertaking discloses a net-zero target in addition to the gross GHG emission reduction targets in accordance with Disclosure Requirement E1-6, it shall explain the scope, methodologies and frameworks applied and how the residual GHG emissions (after approximately 90-95% of GHG emission reduction with the possibility for justified sectoral variations in line with a recognised sectoral decarbonisation pathway) are intended to be neutralised by GHG removals."	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	37.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	The corresponding volume of CO2e should be added as it is useful to understand the extend of the scheme.	E1	E1-10 - Internal carbon pricing	38. (b)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	This DP should be deleted the location of key assets at material physical risks will result in long list of locations and explanations are already required in §40e.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (b)

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Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	§41f is redundant with §41a or at least a subset of 41a. These datapoints should be merged.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (f)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	"Shall consider disclosing opportunities" in Set 1 has been translated into "shall disclose amount and percentage of assets or revenue derived from its business activities aligned with climate-related opportunities, including the associated time horizons". Opportunities should not be mandatory.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	42.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	The requirement to disaggregate CapEx and OpEx by time horizon appears overly burdensome and may fail to reflect the specificities of implementation for each undertaking. Accordingly, we recommend that disclosures be limited to an aggregated amount of CapEx and OpEx, with information provided on a global basis rather than mandating a breakdown by time horizon.	E1	E1-5 - Actions and resources in relation to climate change	24. (c)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	The simplification of the requirements on transition plans is positive. The key features also provide needed clarity. However, the sentence 'how the undertaking's strategy and business model are compatible with the limiting global warming to 1.5°C' raises understandability and auditability questions as it is unclear what additional information is needed beyond the key features of the transition plan. We request EFRAG to clarify this requirement and its relation to AR 2, where compatibility of targets with 1.5 (rather than the wider compatibility of strategy and business model) is required. If the intent is that undertakings should disclose more than the key features of their transition plans, it should be made explicit. While we acknowledge the Level 1 discussions on compatibility, we encourage EFRAG to provide at least high-level guidance on elements that undertakings should consider when assessing compatibility with 1.5°C, until Level 1 regulation provides a more detailed definition. Finally, we recommend to retain the requirement in §16-i (Set 1) to indicate whether the transition plan is approved by administrative bodies. Its replacement by a description of their role weakens the strategic importance and credibility of the company's commitment to the Transition plan.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We see the inclusion of requirements on dependencies to be positive. We would encourage EFRAG to provide further guidance on how to assess dependencies (e.g. clarification on whether qualitative disclosures are sufficient, whether only key dependencies are to be disclosed or if they are required for all applicable levers disclosed). Moreover, we recommend that locked-in emissions continue to be reported on separately from dependencies, as dependencies represent conditions relied upon to implement the transition plan. The requirement for undertakings to explain their plan to manage locked-in emissions should also be retained (AR3-c in Set 1). Finally, we encourage EFRAG to provide clarifications in AR on what are key assets and products to be considered in this reporting (building on the existing guidance in AR3(a) from Set 1).	E1	E1-1 - Transition plan for climate change mitigation	14. (c)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	The clarification of the requirements on the features of the transition plan on targets, actions and resources is seen as a positive clarification. We consider positive the fact that a third-party validation is now introduced. We suggest to include the same possibility to refer to third-party validation with respect to the targets DR (E1-6) for consistency and readability purposes (see comment on §26-e). We request EFRAG to make explicit the requirement that -transition plans shall cover Scope 1, 2 and 3 emissions from the group. -the coverage of the targets, actions and financial resources need to be consistent, and the time horizons of these elements also need to be consistent (including how the time horizons in E1-1 should be consistent with the time horizons considered in E1-5).	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	We encourage EFRAG to provide a clearer definition / scope of locked-in emissions (e.g. such as what is currently indicated in AR3(a-b) in Set 1). Also, the information on locked-in emissions should be clearly articulated with the definition of stranded assets in the glossary and the related disclosure requirement in §41-f (as the reference is not made).	E1	E1-1 - Transition plan for climate change mitigation	AR 3
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We agree with the requirement and clarity provided on which elements to report on the methodology. However, while the disclosure of spatial resolution for physical risks could add valuable detail, this new requirement does not contribute to the simplification efforts and may complicate reporting requirements. This could be particularly complex given that each climate scenario might have different attributes and be evaluated by multiple climate indicators (e.g. duration of heatwave, meters of flooding, duration drought), which have different spatial resolutions, especially when multiple geographies are assessed. If this information is deemed relevant for the stakeholders, we would suggest only disclosing the range of spatial resolutions (e.g., the spatial resolutions from the underlying climate data used in the exposure assessment of Risk XYZ ranged from 2m to 10km) as an indicator of the spatial uncertainty underlying the assessment. This could be integrated in paragraph ESRS E1 - 21. (b). We recommend EFRAG to consider removing this datapoint or making it voluntary in the NMIG to describe the applied methodology. In addition to the requirement to specify the type of transition events analyzed, we suggest also reporting the type of climate hazards analyzed.	E1	E1-2 - Climate-related risks and scenario analysis	19.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We suggest that EFRAG requires companies to specify which scenarios have been used when conducting their climate risk analysis (both for physical and transition risks) to increase comparability between undertakings, understandability and transparency for users. We encourage EFRAG to provide guidance on the climate scenario that can be used when considering at least one high-emission climate scenario in order to increase comparability (e.g. IPCC's SSP5-8.5).	E1	E1-2 - Climate-related risks and scenario analysis	AR 5

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Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We suggest that EFRAG keeps requiring companies to specify which scenarios have been used when conducting their climate risk analysis (both for physical and transition risks) to increase comparability between undertakings, understandability and transparency for users (current E1.AR13a, aligned with IFRS S2.22(b)i)1). We encourage EFRAG to provide guidance on the climate scenario that can be used when considering the climate scenario in line with limiting global warming to 1.5°C in order to increase comparability (e.g. IPCC's SSP1-1.9)	E1	E1-2 - Climate-related risks and scenario analysis	AR 6
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	Depending on the outcome of the consultation regarding the option to present anticipated financial effects, this AR may cause issues. We are in favor of quantitative disclosures (see answer to question 19 in Part 2). However, we are uncertain how this AR should be applied if Option 2 is adopted. Indeed, the requirement speaks of quantification of material climate related risks which would be optional under Option 2, therefore making this requirement obsolete. The wording shall be adapted based on the outcome of the publication consultation. We suggest EFRAG to delete this AR as it is confusing. Instead we suggest that clarity is provided in E1-11 regarding the relation between estimation of anticipated financial effects and the disclosures made under E1-2 and E1-3	E1	E1-2 - Climate-related risks and scenario analysis	AR 7
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	The revised disclosure requirements removed the requirement to describe the exclusions from boundaries in the resilience analysis (previously covered in AR 6 from Set 1). We encourage EFRAG to reintroduce this requirement to provide clarity on the boundaries considered for the analysis, and whether these align with the boundaries of the scenario analysis conducted in E1-2. It would also align to IFRS S2.22b(i)7.	E1	E1-3 - Resilience in relation to climate change	21.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	It is unclear what is meant by combined assessments. We encourage EFRAG to speak of "assessments" or make explicit in E1-11 the fact that the resilience analysis is based on E1-2 and does not merely leverage on it.	E1	E1-3 - Resilience in relation to climate change	AR 8
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	Due to the wording of "the undertaking shall provide its assessment of its climate resilience at the reporting date", it can be read as requiring an annual update of the analysis. We suggest specifying that the resilience analysis does not need to be conducted on a yearly basis but shall be revised at regular intervals or whenever necessary due to specific facts and circumstances, such as changes in boundaries. The relation between the timings for the scenario analysis carried out in E1-2 and the resilience analysis in E1-3 should also be clarified.	E1	E1-3 - Resilience in relation to climate change	AR 9
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We recommend to retain an explicit reference to adaptation and mitigation actions in §23 (similar to §28 in Set 1) as the next §24 refers only to climate change mitigation actions . This clarification is needed to stress the relevance of adaptation actions (as highlighted in E1-3, paragraph 21 a), and the fact that they are as relevant as mitigation actions (specifically referred in §24).	E1	E1-5 - Actions and resources in relation to climate change	23.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	The reference to nature-based solutions was removed from the disclosure requirement and not included under the new definition of decarbonization levers. EFRAG should clarify whether these can still be considered as decarbonization levers as they are key both from a mitigation and adaptation perspective.	E1	E1-5 - Actions and resources in relation to climate change	24. (a)
Excels	Ernst & Young	Auditor	United Kingdom			I agree	The requirement does not clarify whether GHG emission reductions shall be disaggregated per decarbonization lever or per type of actions. Considering the relevance of such information, we recommend that such requirement be clarified to request this disaggregation.	E1	E1-5 - Actions and resources in relation to climate change	24. (b)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We disagree with the removal of disclosure requirements on connectivity with the financial statements. We strongly recommend that EFRAG retain the reconciliations required by Set 1. Moreover, we encourage EFRAG to clarify whether the CAPEX and OPEX shall be disclosed aggregated by type of lever or by action. Adding examples in NMIG could be useful. The revised ESRS requires disclosure of CAPEX and OPEX on explicit time horizons. However, it is not specified whether they should be consistent with the targets set and transition plan disclosures (e.g. should levers be mapped and presented in the transition plan until the target year selected?). We suggest that guidance is included. The NMIG4 clarifies that CAPEX and OPEX only need to be disclosed for key actions and only for significant amounts. We recommend EFRAG to clarify how this should be understood in relation to ESRS 2 paragraph 38 b) where it is expected that (all) financial resources are disclosed for key actions. When it comes to time horizons, NMIG4c) seems to contradict paragraph c) as it indicates that any planned future resources can be reported as ranges while the DR indicates that only long-term can be reported as ranges. This aspect should be clarified or harmonized.	E1	E1-5 - Actions and resources in relation to climate change	24. (c)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	Undertakings are no longer required to state the scope 2 method applied to their targets covering Scope 2 (currently required in Set 1 AR24), creating a risk of lack of comparability and transparency across undertakings. We encourage EFRAG to retain this information. The requirement to disclose the share of each scope is maintained which creates challenges for undertakings with combined targets. Such disaggregation is not required in recognized target setting frameworks or IFRS. We encourage EFRAG to remove this requirement, as it is not always practical to disaggregate combined targets, due to mixed effects (reducing scope 1 by electrification increases scope 2 emissions). Editorial comment: we suggest EFRAG to clarify how 26(a) applies for companies that have only set intensity GHG emission reduction targets. Based on AR 12, it is unclear whether 26(a) fully applies when only intensity targets have been set , including the coverage of the targets.	E1	E1-6 - Targets related to climate change	26. (a)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	Under E1-1 AR 2, undertakings can explain the compatibility of their transition plan's targets with limiting global warming to 1.5°C in line with the Paris Agreement by providing validation through an independent third party. We recommend EFRAG to consider adding a similar simplification with reference to an independent third-party validation in this paragraph in E1-6 or related AR16. Additionally we suggest adding the same details about the nature and qualification of the third party validation body covered in AR2-a, especially information on the independent nature of the validation.	E1	E1-6 - Targets related to climate change	26. (c)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We agree that absolute values (associated with intensity targets) shall be disclosed for non-financial undertakings as it increases transparency and comparability amongst undertakings. For financial institutions (such as banks, insurers, asset managers and asset owners), comments are provided in Part 2 question 26).	E1	E1-6 - Targets related to climate change	AR 12
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	AR 13 b is confusing. Indeed, in the first sentence, it is written that the base year should be selected from the three most recent reporting years. In the second sentence, it also states that before 2030 companies should consider existing base years or the first year of application of sustainability reporting. The 2 sentences seem to contradict one other, and it is unclear if the first sentence only applies after 2030, or if anything changes after 2030. We recommend EFRAG to clarify this statement and to keep only 2 of the criteria: 1) use of the currently applied base year for existing targets (even if potentially older than the 3 most recent years) and 2) use of a base year from the 3 most recent years of the new targets.	E1	E1-6 - Targets related to climate change	AR 13
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	The previous requirement to disclose decarbonization levers and their quantitative contribution to achieve targets was removed (previous AR 30). Instead, only AR 14 addresses this topic where a graph and table are shown and "may" be considered by undertakings to disclose this information. The fact that undertakings are not required to demonstrate how targets will be achieved will deteriorate the relevance and robustness of the disclosures on targets and transition plans. This AR should be modified to retain the current requirement to explain how the targets will be achieved in §34(f) of Set 1 (" the undertaking shall describe the expected decarbonisation levers and their overall quantitative contributions to achieve the GHG emission reduction targets") and AR 30 ("The undertaking shall present its GHG emission reduction targets together with its climate change mitigation actions (...)"). This does not prevent the use of either presentation options and therefore the option of using one or the other should be kept.	E1	E1-6 - Targets related to climate change	AR 14
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	E1-8 requires undertakings to prioritize financial control reporting and conditionally, based on specific facts and circumstances, also report emissions based on operational control to achieve fair presentation. (Note that we disagree with the proposed approach - please refer to comments made on E1-8). However, AR 15 seems to allow a choice to report targets based on operational control only. Is it the intent? We recommend that EFRAG clarifies this AR and its articulation with E1-8, and to require undertakings to disclose the boundaries on which targets were set, including whether prior targets were set using other consolidation approaches (e.g. operational control or prior ESRS approach/consolidation perimeter). Should the proposed approach in E1-8 on operational control be retained, EFRAG should clarify if setting targets based on operational control boundaries is a circumstance that should always lead to the additional reporting of GHG emissions based on operational control under E1-8 - AR 19 (which refer to 'specific facts and circumstances'). We also suggest EFRAG to clarify that targets based on operational control may also concern Scope 3 (as per requirement in paragraph 24 a).	E1	E1-6 - Targets related to climate change	AR 15
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	Editorial comment : we recommend EFRAG to remove the reference to "if it has Scope 3 GHG emissions reduction targets" as it is contradictory to E1-6 26 a) where it is required that undertakings that have set GHG targets cover Scope 1, 2 and 3. The AR should read as follows "For this purpose, the undertaking shall calculate a 1.5°C-aligned reference target value for Scope 1 and 2, and a separate one for Scope 3, against which its own GHG emission reduction targets or interim targets in the respective Scopes can be compared."	E1	E1-6 - Targets related to climate change	AR 16
Excels	Ernst & Young	Auditor	United Kingdom			I agree	We ask EFRAG to include in the standard the guidance provided in EFRAG ID 36 on how to report nuclear emissions should this datapoint be kept.	E1	E1-7 - Energy consumption and mix	28. (b)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We ask EFRAG to clarify AR 17(a) in relation to the organizational boundaries considered in E1-8. It is unclear how the concept of 'same organizational boundary perimeter applied for reporting GHG Scopes 1 and 2 emissions' should be applied due to the mandatory reporting boundary based on financial control and the additional conditional boundary based on operational control. This could be interpreted as either referring to financial control only (the default approach), or, potentially, requiring a double reporting of energy consumption (if such double reporting is required for GHG reporting based on the fair presentation concept), which would go against the principle of simplification. We also ask EFRAG to revise AR 17(j) to allow undertakings to consider as "renewable" the renewable energy in a residual mix. The current wording creates difficulties for reporting and audit, and potential misalignment between E1-7 reporting and Scope 2 reporting.	E1	E1-7 - Energy consumption and mix	AR 17
Excels	Ernst & Young	Auditor	United Kingdom			I agree	We suggest that NMIG 9 in relation to paragraph 32 is revised. It is mentioned "gross GHG emissions intensity (per unit of products and/or services)" and then "this can be expressed on the basis of production, net revenue or another relevant business metric". If net revenue can be used to express emissions intensity , we suggest to delete the "per unit of products and/or services" in the first bracket (that doesn't specify revenue, which is misleading).	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We encourage EFRAG to retain the specification that disclosure of biogenic emissions should be made separately and for each scope (rather than as one line item for total biogenic emissions for all scopes) for increased understandability as currently required in AR 43-c, AR 45-e and AR 46-j from Set 1.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	We do not support the proposed approach. We recommend to leave the choice of approach in line with the GHG Protocol and IFRS S2. Forcing a different approach creates undue restrictions and interoperability challenges for companies, especially for those with longstanding commitments on targets set under operational control, which is most widely used. Changing the approach may lead to shift of emissions from Scope 1/2 to Scope 3, reducing incentive and ambition to manage these emissions. Also, the claim that financial consolidation is in line with the financial control approach of the GHGP is inaccurate. In the financial statements, joint ventures are accounted for at equity share. That is not equivalent to the financial control approach of the GHGP, where the relative share in the JV is accounted under Scope 1 and 2. The treatment of leased assets in ESRS 1 paragraph 70 also diverges from the GHG Protocol, leading to interoperability issues as this means that an hybrid approach of financial and operational control is proposed. Lastly, we recommend EFRAG to refer back to ESRS 1 Chapter 5 instead of paragraph 59 so that it is clear that the reporting in paragraph 32 includes the value chain.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 18
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	As mentioned, we do not support financial control as a default approach. Also requiring companies to conduct an additional separate reporting of GHG emissions under operational control increases the complexity of calculations and reporting to an unreasonable extent: company would need to report four separate values for scope 2 (market based and location based both on operational and financial control). This goes against the principle of simplifying the reporting. Moreover, the criteria for when a company must disclose under operational control are too vague and require clearer definition of what fair presentation in the context of GHG emissions entails. AR 15 seems to imply that having targets set under operational control leads to reporting under operational control and meets the criteria of 'specific facts and circumstances'. If so, this should be specified. If the requirement in AR19 is retained, it should also cover scope 3 for consistency purposes. Finally, we recommend to provide additional guidance on the assessment of operational control (e.g. criteria and factors to consider). NMIG 7 can be interpreted as too restrictive. Also, we note that it includes a requirement relating to part time control which should be in the AR.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	The reporting requirement may be misinterpreted as not being GAAP agnostic. We recommend to clarify that this paragraph addresses situations where, based on applicable GAAP, joint operations are on balance sheet. Otherwise, a definition of joint operations and how they differ from joint ventures should be included in the glossary. Also, this AR seems to indicate that accounting of emissions from joint operations differs from what is expected from the GHG protocol when applying financial control (where JV, joint operations, partnerships are accounted on the basis of equity share of emissions). If this is the case, and in addition to joint operations, other differences between the concept of financial control in the revised standard and the financial control approach of the GHG Protocol should be clarified and clearly identified. There seems to be a typo in NMIG 7 which refers to AR 20 (joint operations in financial control approach) whereas this NMIG relates to entities operationally controlled (covered in AR19). Or is this NMIG meant to introduce an alternative treatment for JOs by considering operational control (reintroducing additive approach ?). We recommend EFRAG to clarify.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 20
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We suggest simplifying AR 21c to "If emission factors based on older GWP values are the most suitable or available, the undertaking can use these and explain which GWPs the GHG inventory is based on". We encourage EFRAG to make AR 21 (e) a separate AR to address paragraph 33 reporting requirements on biogenic emissions, in order to make it clear that these shall be reported separately for all Scopes (1, 2 and 3) and not only for Scope 1 (no other AR provides instructions on how to account for biogenic emissions for Scope 2 and 3), as was the case in AR 43-c, AR 45-e and AR 46-j in Set 1.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 21
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	The phrase "The EU ETS methodology may also be applied to activities in geographies and sectors that are not covered by the EU ETS" may lead to operational questions. This is because on topics such as use of biofuel certificates for Scope 1, the EU ETS may have a different approach to that retained by the GHG Protocol or widely applied frameworks such as SBTi. This creates interoperability challenges. We encourage to clarify what can be expected from this reference and criteria to consider when applying EU ETS methodology outside of activities concerned by EU ETS. It is also unclear whether this sentence means that EU ETS methodology may be applied (in geographies and sectors not covered by EU ETS) for undertakings with at least one EU ETS installation or also to undertakings with no EU ETS installation at all.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 22
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We suggest adding in NMIG the precisions in the previous AR 43a in Set 1 on the identification of Scope 1 sources (stationary combustion, mobile combustion, process emissions and fugitive emissions) to guide first time reporting companies.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 23
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We encourage EFRAG to specify the requirement in AR 24 b) to "reflect the share and types of contractual instruments" or consider removing the requirement. The requirement should be made on the basis of energy consumption and not on the basis of emissions. Thus, we question its placement in E1-8 instead of E1-7. Having examples of ways to report this information would be useful to understand what share and types of instruments may be considered when disaggregating the energy consumption. We suggest to include those examples (including specific reference to PPA, GOO, etc) in NMIG 8 where contractual instruments are further explained.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 24

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Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We consider positive the modification from EFRAG to indicate that undertakings shall adopt the calculation approaches of the GHG Protocol. We encourage EFRAG to modify this AR on the following: - AR 25a EFRAG should clarify that companies should include optional reporting boundaries from the GHG Protocol based on materiality, - Clarify whether Scope 3 of investments ("scope 3 of scope 3") needs to be included in category 15, like in IFRS S2 requirements on financed emissions. This AR should retain the previous requirement to justify any exclusions from Scope 3 inventory (previous AR 46 i) as this is a key information in terms of transparency.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	Ernst & Young	Auditor	United Kingdom			I agree	We encourage EFRAG to make the reporting table mandatory for comparability of reporting and ease of reading by users of the sustainability statements.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 27
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	The removal of any mention of Net zero targets (previously included in E1-7, paragraph 60) and lack of definition is damaging for the transparency and comparability of related disclosures. EFRAG's definition of net zero target is a key tool against greenwashing, where net zero targets are the gold standard to be achieved by companies. Having specific disclosures on the matter levels the playing field for reporting, by ensuring comparability of reporting and not misleading users of sustainability statements. We recommend EFRAG to reintroduce the deleted provisions on net zero targets in E1 §60 (Set 1) and the glossary, by clarifying that the net zero target is composed of a reduction in scope 1, 2 and 3 emissions of 90-95% before neutralisation of residual emissions. This would be in line with the long-term targets Net zero Standard of SBTi and with ISO Net Zero Guidelines (IWA 42:2025). EFRAG should also specify that neutralisation can occur through carbon removals both inside and outside of the value chain. We also suggest EFRAG to request a clear articulation between this information and the net zero target they have set in ESRS E1-6 for improved connectivity.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	34.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	Even though not necessarily related to carbon credits, insets are also an emerging mechanism used by many companies to offset or reduce emissions in the upstream/downstream value chain. The standard should include clarifications on whether these should be seen as carbon credits (with no implications on gross emissions) or whether these could be considered decarbonization levers with effects on gross emissions.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	36.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	This paragraph mentions the possibility of using carbon credits for neutrality claims. Considering possible deviation and interpretations around what it means to have a carbon neutrality claim, we suggest that EFRAG includes the definition of carbon neutrality in an AR or in the glossary . See previous comment on reintroduction of net zero target disclosures.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	37.
Excels	Ernst & Young	Auditor	United Kingdom			I agree	We suggest that EFRAG specifies in the NMIG examples of "other factors necessary to understand the credibility and integrity of the carbon credits".	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	37. (b)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We note greater convergence with other EU text, which gives credibility and coherence to EU Green Deal directives. However, we note that references to GHGP Land sector guidance have been removed, raising questions about whether this expected GHG Protocol guidance shall be considered (when approved). It also poses the question of whether the Carbon Removals and Carbon Farming Certification is the only accounting method accepted. AR 28 b) indicates that removals can be from operations that the undertaking "owns, controls or contributes". We request EFRAG to clarify what "contributes" mean by providing examples in the NMIG (as per previous AR 59). EFRAG removed the sentence of the previous AR 58(c) stating 'if applicable, explain the role of removals for its climate change mitigation policy'. We encourage EFRAG to reintroduce this statement in order for preparers to consider and explain how removals play a role in their climate change mitigation policies.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	AR 28
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	EFRAG removed the sentence of the previous AR 63(b) stating 'if applicable, explain the role of carbon credits in its climate change mitigation policy'. We encourage EFRAG to reintroduce this statement in order for preparers to consider and explain how carbon credits play a role in their climate change mitigation policies.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	AR 29
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	For all of paragraph 40, regarding time horizons, the new wording shifts from a mandatory disclosure of physical risks over the short, medium and long term to a more flexible approach that allows companies to "consider" these time horizons (AR 30a). We encourage EFRAG to modify this requirement, to require instead the disclosure of anticipated financial effects linked to physical risks on all three time horizons (similar to IFRS 2 requirements). The requirement would read as "consider and disclose the time horizons (short, medium and long term) over which the effects of each climate-related risk and opportunity could reasonably be expected to occur". See also comment on skill and capabilities in question 19 of PART 2.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	See our comment on time horizons. We encourage EFRAG to provide guidance on assessing key assets to foster comparability, including for the financial sector and how to consider when an asset is at risk. To avoid confusion for preparers and auditors, we suggest EFRAG to clarify that percentage of assets should be understood in terms of value and not number of assets.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (a)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We encourage EFRAG to provide guidance and examples on how to disclose the location of assets. We foresee this point to be difficult for preparers as the level of granularity isn't specified and the question is commercially sensitive. We however agree with the proposition. We suggest providing examples on how to disclose this to foster comparability. To avoid confusion for preparers and auditors, we suggest EFRAG to clarify that percentage of assets should be understood in terms of value and not number of assets.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (b)

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Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	See comment on time horizons	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (c)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	See comment on time horizons We suggest that EFRAG specifies revenue as being the net revenue disclosed in the financial statements.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (d)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We encourage EFRAG to state that the analysis should be based on the scenario analysis conducted in E1-2 instead of the requirement to explain how the company leverages on the assessment.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (e)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	For all of paragraph 41, regarding time horizons, the new wording shifts from a mandatory disclosure of transition risks over the short, medium and long term to a more flexible approach that allows companies to "consider" these time horizons (AR 30a). We encourage EFRAG to modify this requirement, to require instead the disclosure of anticipated financial effects linked to transition risks on all three time horizons (similar to IFRS 2 requirements). The requirement would read as "consider and disclose the time horizons (short, medium and long term) over which the effects of each climate-related risk and opportunity could reasonably be expected to occur". Moreover, we recommend to make an explicit reference to ESRS 1 §79 on the possibility to adopt different definition for medium and long term time horizons. See also comment on skill and capabilities in question 19 of PART 2.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	See comment on time horizons We encourage EFRAG to provide guidance on assessing key assets to foster comparability, including for the financial sector.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (a)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	While we have noted the guidance included in the NMIG on the type of events that could lead to "potential liabilities" to be disclosed, we encourage EFRAG to provide guidance on what is a potential liability from a sustainability reporting perspective. ESRS should be GAAP agnostic, yet, we note that some standards for financial statements provide for some criteria for recognition of liabilities and, if applicable, disclosures of "contingent liabilities" (e.g. in IAS 37). The wording of 41(d) referring to "do not meet recognition criteria but may have to be recognized in financial statements" suggests an analysis of the possibility to meet accounting criteria and adds confusion. EFRAG should clarify for example whether potential liabilities are distinct from 'contingent liabilities' in some framework.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (d)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	See comment on time horizons We suggest that EFRAG specifies revenue as being the net revenue disclosed in the financial statements.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (e)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	See comment on time horizons	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (f)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We encourage EFRAG to state that the analysis should be based on the scenario analysis conducted in E1-2 instead of the requirement to explain how the company leverages on the assessment.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (g)
Excels	Dragerwerk AG &Co.KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Market based emission factors are often not available. DR should be changed to either '(location-based or market-based)' or '(location-based and - if available -market-based)'.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Unclear whether included provision on EU Climate Law entails new requirements. Clarification also for audit process needed to avoid discussions.	E1	E1-1 - Transition plan for climate change mitigation	13.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Reduction targets, decarbonisation levers, key actions and the role of administrative, management and supervisory bodies are duplicated to paragraphs in E1-5, E1-6 and ESRS 2. This leads to additional work and complication even with clarification in new AR 2. Suggestion: Deletion of the requirements in the Transition Plan and additions in the named paragraphs.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The requirement on the qualitative assessment on locked-in GHG emissions from key assets and poducts is unclear and not comparable. The recording of locked-in GHG emissions is time-consuming and generates little added value. A qualitative assessment is not comparable between companies. It is unclear what counts as key assets and products. Proposal: Deletion of the paragraph, as it offers no added value and generates a lot of effort.	E1	E1-1 - Transition plan for climate change mitigation	14. (c)

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Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The alignment regarding the 1.5°C target has shifted from specific taregts to a broader focus on strategy and business models. This change introduces additional effort and complexity, as the terms "strategy" and "business model" are inherently flexible and open to interpretation. This flexibility allows for extensive discussions with auditors, but it does not provide any added value compared to the previous target-oriented approach. The taregts were integral to the strategy and were already aligned with the business model. Therefore, maintaining a clear focus on the alignment of targets is essential for effective alignment and implementation.	E1	E1-1 - Transition plan for climate change mitigation	AR 1
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	AR 2: See consultation E1-14.a. AR 2(a): AR 2.b: It is not clear why the requirement was moved to ARs. Complicates the reading of the standard, as it is a mandatory specification. AR 2.c: Some of the disclosures expected by the ESRS cover sensitive information from a strategic perspective, disclosure of which could be used to their disadvantage by non-EU competitors of EU issuers that are under no such transparency obligations. The current wording of the exemption for disclosure of sensitive information should be revisited as it is currently too stringent to be used to safeguard business secrecy, especially in an international business environment that risks becoming even tenser. Information on future investment projects is sensitive, and its disclosure may have a severe impact on the competitiveness of the preparer. All data points regarding significant CapEx and OpEx amounts should be deleted. Information on future investment projects is sensitive, and its disclosure may have a severe impact on the competitiveness of the preparer. New Wording "While this information helps demonstrate the coherence and credibility of the transition plan, there is no expectation that the undertaking disclose all internal information used to manage the plan." is not solving that above named issue.	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The requirment "explanation of the plans to manage – e.g. by transforming, decommissioning or phasing out – its GHG-intensive and energy-intensive assets and products." went from voluntary to mandatory. Additionally mandatory reporting requirements were added regarding "dependencies of future financial resources and other resources and how these may constrain the ability to implement the transition plan actions." This results in additional work to fulfill the reporting requirements. Proposal: Change to voluntary disclosures.	E1	E1-1 - Transition plan for climate change mitigation	AR 3
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Additional shall requirement to resources and actions taken imprecise. Generates high coordination efforts. Achieved and expected GHG emissions are metrics. These should not be in ARs. The inclusion of a shall statement on sector-specific standards also generates additional work in the survey. In addition, high coordination effort with the auditor due to lack of precision	E1	E1-1 - Transition plan for climate change mitigation	AR 4
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The disclosure requirement should be able to be fulfilled in the ESRS 2 section when describing material IROs. Otherwise it would be duplicated.	E1	E1-2 - Climate-related risks and scenario analysis	17.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The short-term period is limited to 1 year with reference to ESRS 1. It does not make sense to carry out a climate scenario analysis for the reporting year (physical and transitory risks), as various climate scenarios are unrealistic in one year. The short-term period should be removed from the disclosure requirement.	E1	E1-2 - Climate-related risks and scenario analysis	18.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The short-term period is limited to 1 year with reference to ESRS 1. It does not make sense to carry out a climate scenario analysis for the reporting year (physical and transitory risks), as various climate scenarios are unrealistic in one year. The short-term period should be removed from the disclosure requirement	E1	E1-2 - Climate-related risks and scenario analysis	AR 5
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The disclosure of the entire evaluation of the resilience analysis is unrealistic, as it involves far-reaching confidential documents. Companies may experience competitive disadvantages as a result of disclosure	E1	E1-3 - Resilience in relation to climate change	AR 9
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Additional requirements that mean increased effort in carrying out the resilience analysis and providing evidence. Consideration of the points listed offers no added value for external stakeholders like investors.	E1	E1-3 - Resilience in relation to climate change	AR 10
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The information on achieved and expected GHG emissions should already be provided as part of the Transition Plan, AR 4. Duplication should be omitted	E1	E1-5 - Actions and resources in relation to climate change	24. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Some of the disclosures expected by the ESRS cover sensitive information from a strategic perspective, disclosure of which could be used to their disadvantage by non-EU competitors of EU issuers that are under no such transparency obligations. The current wording of the exemption for disclosure of sensitive information should be revisited as it is currently too stringent to be used to safeguard business secrecy, especially in an international business environment that risks becoming even tenser. Information on future investment projects is sensitive, and its disclosure may have a severe impact on the competitiveness of the preparer. All data points regarding significant CapEx and OpEx amounts should be deleted. Information on future investment projects is sensitive, and its disclosure may have a severe impact on the competitiveness of the preparer.	E1	E1-5 - Actions and resources in relation to climate change	24. (c)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Absolute targets can mislead as they limit economic growth or reward market failure even for less CO2 intensive businesses. The disclosure of intensity/relative targets and the additional disclosure of the associated absolute values for the target year and the interim target year(s) means that companies must disclose the planned volume growth. This represents highly sensitive information and results in a competitive disadvantage and cannot be published. The current flexibilization of the requirement therefore does not represent the desired simplification. It should be possible to report intensity/relative targets without absolute values and also to prioritize intensity/relative targets over absolute targets.	E1	E1-6 - Targets related to climate change	26. (a)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	"In cases where the undertaking has only set a GHG intensity reduction target, it shall nevertheless disclose the associated absolute values for the target year and interim target year(s)." This requirement forces companies to disclose the planned volume growth. This puts them at a massive competitive disadvantage and cannot be published in this way.	E1	E1-6 - Targets related to climate change	AR 12

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Share of energy from nuclear sources in electricity mix should be deleted to avoid „duplication" with primary energy; little usefulness as metric is derived from statistical data only; share of nuclear energy in the electricity mix should not be part of reporting.	E1	E1-7 - Energy consumption and mix	28. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	E1 - 36 (d) should be kept as no additional burden for disclosing companies; Removal of disclosure on total emissions appears illogical, as both users and disclosers are likely to want to see this information published. Even though it can be calculated independently, the lack of a requirement may lead to unnecessary discussions about whether it can be provided as a voluntary additional disclosure.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The introduced separate disclosure following the operational control approach allows for significant interpretation and is hence burdensome when aligning with auditors. EFRAG should make it clearer, that this is a "may"-disclosure.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	E1 AR 26 in reference to ESRS 1 3.7 results in a high number of new datapoints (e.g. big corporations with operations in >50 countries times approx. 15 CO2e categories plus various segments etc.). EFRAG should clearly state that the disaggregation of data is voluntary ("may…") or delete the AR completely. Furthermore, this disaggregation does not provide any added value for the users of the information; instead, it leads to information overload (multiple pages of disaggregated emissions data) and unjustified burdens for the disclosing company (information may not be available or only with high effort).	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 26
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	We welcome the revisions especially in AR 25 (d); but the disclosure required in AR 25 (g) should be deleted as Cloud computing is only rented through the user company (Scope 3) but already disclosed by the provider (Scope 1) which leads to double counting and high efforts for verification	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We welcome the revisions regarding the table to report on emissions and the flexibilities it allows in presenting the information.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 27
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Failure to achieve the general objective of reducing disclosure requirements. This information has not only been moved, but has been changed from may to shall. We see no added value for external readers in this information.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	35. (d)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We believe that disclosing the monetary and percentage exposure to physical risks without considering adaptation measures is problematic. It involves high uncertainty, may overestimate risks, and could discourage proactive resilience efforts. Disclosures should account for adaptation actions to reflect a more accurate risk picture and encourage companies to invest in climate resilience.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (a)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	In many cases, adaptation measures cannot reliably be directly linked to specific assets. Doing so would require enormous effort or result in imprecise data that offers little value. Therefore, a one-to-one attribution is neither practical nor feasible.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (c)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We believe it is nearly impossible to reliably calculate the monetary amount and percentage of net revenue at risk from physical climate impacts before considering adaptation measures. The complexity arises from the high uncertainty of climate projections, the difficulty in quantifying future physical damages, and the challenge in accurately modeling how risks will evolve over time. Additionally, the lack of standardized methodologies and reliable data further complicates such estimations.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40. (d)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We believe that estimating the monetary and percentage impact on net revenue from transitional risks before considering mitigation and adaptation measures is highly challenging. Given the high uncertainty surrounding future policy changes, technological developments, and market shifts, it is more meaningful to incorporate measures into the assessment. Disclosing risks without accounting for planned actions may be misleading and fail to provide an accurate picture of the true risk exposure.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (a)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	In many cases, adaptation measures cannot reliably be directly linked to specific assets. Doing so would require enormous effort or result in imprecise data that offers little value. Therefore, a one-to-one attribution is neither practical nor feasible.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We believe that providing a detailed breakdown of the carrying amount of real estate assets used as loan collateral by energy-efficiency classes is challenging and may not be practical. Such detailed classification requires extensive data collection and consistent assessment methods, which can be resource-intensive and may result in inconsistent or unreliable information.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (c)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We believe that identifying potential liabilities from climate transition risks that do not meet current recognition criteria is challenging due to inherent uncertainties. Such liabilities depend on future developments and may not be reliably quantifiable or recognizeable in the financial statements at this stage.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (d)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The lack of precise data, the variability of future scenarios, and the difficulty in accurately predicting asset devaluation make such disclosures unreliable and potentially misleading. Therefore, BMW opts not to implement or publish such estimates.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (f)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Such estimates are highly challenging because opportunities related to the transition are difficult to quantify accurately. Additionally, due to competitive reasons, we would prefer not to disclose such figures, as they could reveal strategic information and be misinterpreted.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	42.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	BMW considers the prescribed calculation approaches under AR 30—such as disclosing effects over different time horizons, including all asset types, and presenting energy efficiency classes—challenging to implement and potentially risky from a competitive perspective. Disclosing detailed, asset-specific data and estimates could reveal strategic information to competitors. High reporting burden on companies, high implementation costs.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	AR 30
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	ED ¶14(c) & AR 3 vs. 2023 ¶16(d) & AR 3. Re-brands former SBM-3 content as a climate-specific DR. Increase rather than reduce/simplify disclosure burden.	E1	E1-1 - Transition plan for climate change mitigation	13.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	ED - text deleted (was 2023 ¶ 16(g) & (i). Partial simplification of removing two datapoints (Deletes former requirement to disclose (i) exclusion from Paris-aligned benchmarks and (ii) governance approval status of the transition plan)	E1	E1-1 - Transition plan for climate change mitigation	14.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Certain companies in business sectors that cannot develop a transition plan without relying on a high degree of assumptions that are out of their direct control. This opens the company up to greenwashing and economic hardship. To avoid greenwashing, companies must substantiate their environmental claims. Within the mobility field, we cannot achieve net-zero by 2050 unless (1) the grid in all the countries where we operate is 100% fossil fuel free, and (2) all vehicles are powered by carbon free fuel (or electricity). Any assumptions we make in a transition plan will be based on predicting the global grid in 2050 and the adoption of EVs and other technologies by the public. This is completely out of our control and would be purely speculative. Moreover, imposing an obligation on companies to align their business model with the 1.5C aspirational goal is highly problematic, given that the Nationally Determined Contributions (NDCs) of states under the Paris Agreement do not to respect the 2C target (the UN Environment Programme estimates the current trajectory to be at 2.6-3.1C). Strengthened collective efforts are needed, but the proposed transition plans expect companies to fulfil an obligation they do not have full control over.	E1	E1-1 - Transition plan for climate change mitigation	13.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Requirement for explanation of TP "decarbonization levers identified and key actions planned" (by reference to E1-3) is not feasible for FIs for whom Scope 3 Cat 15 is most relevant, given lack of direct control and inability to quantify amount of client decarbonization directly resulting from bank decarbonization "actions". ARs should recognize inability of FIs to quantify expected GHG reductions as part of TP and permit disclosure of TPs without this detail. It is recommend to change to voluntary disclosure to avoid subjective judgments, inconsistent reporting, and audit risks. The primary concern with financial disclosures is their relation to sensitive competitive information like future product plans. Regarding the new GHG boundary rule, the mandatory "shall" requirement introduces major complexity and confusion.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Disclosure of resources associated with any transition plan necessarily requires a clear picture of the underlying plan itself. As noted in response to E1-1, multiple external variables make it challenging for mobility companies to publish transition plans that meet a strict rubric for included disclosures. Given the flexibility required to be associated with any transition plan, it is difficult to implement a transition plan with clear financial resources attached to any specific category. Accordingly, it would be beneficial for these data points to be streamlined with a set of financial reporting requirements that is tied only to the information (if any) disclosed as part of any company's designed transition plan.	E1	E1-1 - Transition plan for climate change mitigation	14. (a)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Reporting on dependencies is logical but requiring firms to report on locked-in GHG emissions will lead to undue cost and burden, especially for those firms not in the energy sector. Recommend removing the locked-in emissions DR and maintaining the transition plan dependencies DR. This change provides the same level of information that stakeholders are interested in, yet avoids too granular of a disclosure which is not actionable or comparable. ED ¶14(c) & AR 3 vs. 2023 ¶16(d) & AR 3. Adds explicit requirement to disclose "dependencies" (e.g., technology deployment, market demand, policy assumptions) on which the transition plan relies. Increase rather than reduce/simplify disclosure burden; qualifying language ("shall include") remains prescriptive and does not create real flexibility.	E1	E1-1 - Transition plan for climate change mitigation	14. (c)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Undertakings which do not have a TP need to indicate whether and – if so – when it will adopt a TP. TPs meeting ESRS requirements may be a new concept and also something guided by applicable law; therefore it is hard for firms to give a precise date for when an ESRS-compliant TP will be adopted. So as to not lead to imprecise answers given the shifting nature of mandatory transition plans, it would be more appropriate for this DR to not ask when firms will adopt TPs (particularly when legislative regimes requiring TPs – such as CSDDD – have had their application dates delayed). Disclosure is redundant and should be removed. Agree with comments that if a transition plan is not disclosed then the undertaking does not have one. Requiring an undertaking to make an affirmative disclosure implies they are required to adopt a climate transition plan.	E1	E1-1 - Transition plan for climate change mitigation	15.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				CapEx and Opex should be optional AR 2 refers to ESRS E1-6 AR 17 which does not seem to exist. Does this Application Requirement imply that validation of climate targets through a third-party is required?	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	ED ¶14(c) & AR 3 vs. 2023 ¶16(d) & AR 3. Introduces explicit requirement to provide a "qualitative assessment of locked-in emissions" and an explanation of how these may jeopardise target achievement (previously this was guidance only). Narrative elements increase rather than reduce/simplify disclosure burden; qualifying language ("shall include") remains prescriptive and does not create real flexibility.	E1	E1-1 - Transition plan for climate change mitigation	AR 3
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The requirement to classify climate risk as phsyical or transition risk appears to require more granular detail than what has been stated in ESRS 1 and ESRS 2 regarding DMA granularity. ED ¶¶17-19 & AR 5-7 vs. 2023 ¶¶18-21 & AR 11-15 (distributed). Consolidates but also formalizes previously voluntary methodological detail into mandatory datapoints, expanding scope. Moving content that was previously dispersed across ESRS 2 IRO-1/IRO-2 and AR paragraphs into a distinct DR does not lessen work effort; formalising methodology elements increases compliance complexity	E1	E1-2 - Climate-related risks and scenario analysis	17.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	We would ask to reconsider FI specific definitions for upstream and downstream Requires disclosure of "key elements of the methodology" including spatial resolution for physical risks and scenario sets for transition risks. Moving content into a distinct DR does not lessen work effort; formalising methodology elements increases compliance complexity	E1	E1-2 - Climate-related risks and scenario analysis	18.

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Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	In original ESRS E1 IRO-1, we suggested changing "When disclosing the information required under paragraphs 20 (b)and 20 (c) the undertaking shall explain how it has used climate-related scenario analysis…." to "… how or if…" as it should not be implied that the identification of E1 IROs be restricted to the use of scenario analysis. This has not been changed in the exposure draft	E1	E1-2 - Climate-related risks and scenario analysis	19.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Alignment with IFRS S2.22 in DR21 may be complicated to narrate as it askes for risks and opportunities that could reasonable affect the entity's cash flows, access to finance or cost of capital in S-M-L term horizons. This is similar to anticipated financial effects. So we don't think it should be aligned here. Moreover, we would request the consideration of FI specific clauses for references to upstream and downstream value chains.	E1	E1-2 - Climate-related risks and scenario analysis	21.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Doesn't appear to be any revision to account specifically for the FI sector, and the "areas of uncertainty" concept now has been included in the substantive requirement under §21 (when we think it should be excluded). KOCH - ED ¶21(a)-(c) & AR 8-10 vs. 2023 ¶19 & AR 6-8. Adds two new qualitative datapoints (requirement to disclose "significant areas of uncertainty" in resilience assessment and "capacity to adjust" business model). New uncertainty and capacity disclosures add subjective narrative burden without reciprocal relief elsewhere.	E1	E1-3 - Resilience in relation to climate change	21.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Clarification need on if all undertakings shall disclose the energy efficiency of their real estate, including udnertakings with only leased offices. If all undertakings are reqired to report, this may lead to the reporting of non material information (e.g. if undertakings only have leased offices which are small offices in a large building, therefore they will have little control of the overall efficiency of said building)	E1	E1-3 - Resilience in relation to climate change	AR 30
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	No substantative content change. Merely relabels former DR E1-2. Administrative change only.	E1	E1-4 - Policies related to climate change	22.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				24. Recommend making this optional in some manner - Removes obligation to reconcile CapEx/OpEx to Taxonomy KPIs (2023 ¶29(c) ii-iii). "shall include the achieved GHG emission reduction and should include the expected GHG emission reduction"	E1	E1-5 - Actions and resources in relation to climate change	24.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	From the original ESRS, E1 §29(b) required disclosure of "achieved and expected GHG reductions" resulting from actions for climate change mitigation. AR 19(c) required disclosure of key mitigation actions alongside GHG targets. Disaggregated by decarbonization lever. These disclosures not possible and not useful in the context of Scope 3 Category 15 Financed Emissions for banks. Bank actions for CCM will not result in direct and calculable GHG reductions. While can show achieved reductions, not possible to attribute those to specific bank actions/decarbonization levers since reductions stem from client activity. §29(b) should recognize the impracticability described above and disclosure of achieved/expected GHG reductions should be required only "where reasonably calculable". The revised drafts retain largely the same language as before, without any qualification language.	E1	E1-5 - Actions and resources in relation to climate change	24. (b)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				24.c Make inclusion of CapEx and OpEx optional. Active CapEx/OpEx beyond what's already included in financial disclosures might be business sensitive and challenging. Anticipated CapEx/OpEx would be hard to quantify and sensitive to disclose, especially at certain levels of granularity. - Requiring future financial resources contradicts ESRS 2 that says only communicated amounts may be disclosed. Recommend aligning to that since oftentimes asking companies to report future spend can lead to undue cost and burden and legal concerns. Additionally breaking out CapEx and OpEx is not feasible for all companies, especially professional services based firms. Introduces mandatory disclosure of "quantitative short- and medium-term CapEx/OpEx figures and anticipated long-term ranges. Replacement of reconciliations with forward-looking CapEx/OpEx ranges still demands modelling effort; simplification limited. It is recommend to change to voluntary disclosure to avoid subjective judgments, inconsistent reporting, and audit risks. The primary concern with financial disclosures is their relation to sensitive competitive information like future product plans. Regarding the new GHG boundary rule, the mandatory "shall" requirement introduces major complexity and confusion.	E1	E1-5 - Actions and resources in relation to climate change	24. (c)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	We believe these disclosures are burdensome and it is not practicable to meet all GDR-T and E1-6 disclosures for long-term (usually 2050) Net Zero Commitments or Targets. These are typically managed through a focus on the relevant interim targets along the pathway to Net Zero. Items expected by GDR-T and E1-6 will not be available for target set 25 years out resulting in non-decision useful information that is unlikely to meet the Quality of information requirements of ESRS 1. Undertakings that have made long-term Net Zero commitments should be able to limit disclosure to their interim targets which corresponds to how this is managed. Can EFRAG clarify this either in the standards or the NMIG since the Glossary definition of "target" will still pick up firms' 2050 net zero commitments. KOCH - Deletes the fixed obligation to publish 2030 and 2050 target values (2023 ¶34(d)). Removes two prescriptive datapoints, allowing undertakings to define interim horizons but does not alleviate bulk of target-related calculations; other prescriptive elements retained.	E1	E1-6 - Targets related to climate change	25.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Net disclosure effort unchanged. Additional qualitative disclosures offset minor deletion. Retains science-based pathway benchmarking and makes narrative explanation more detailed, requiring disclosure of underlying policy scenarios and assumptions	E1	E1-6 - Targets related to climate change	26.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	AR 23 of the original ESRS required an entity that has set only an intensity GHG reduction target to also disclose associated absolute values for target and interim years. Estimating future absolute values for financed emissions targets at a portfolio level is subject to numerous assumptions that reduce the decision-usefulness and potential accuracy of the metric. None of ISSB, NZBA or SBTi require this for banks' finance emissions targets EFRAG should revise AR 23 to make "conversion" of intensity targets to absolute values a "may" rather than "shall" requirement or clarify that banks calculating portfolio level financed emissions targets may do so in either absolute or intensity terms. In the latest exposure drafts, there is still a requirement for the disclosure of absolute values for target and interim years. It is unclear if undertakings should also disclose intensity based targets in this section or if they are required to convert an intensity target to an absolute target. If conversion is required, that will lead to undue cost and burden since the conversion requires assumptions and the metric may not be decision useful due to the inherent data challenges.	E1	E1-6 - Targets related to climate change	26. (a)

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Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	The multiple dimensions of information required in order to meet Scope 3 targets makes it difficult for private companies to disclose without showing business growth projections/ information on how the business may evolve, which can be highly sensitive for private businesses. Given this, and the "double-" or "multiple-counting" of emissions that often occurs when seeking to comply with the Scope 3 Emissions requirements, additional effort should be taken to limit Scope 3 reporting obligations to only require total amounts not to require breakdowns from each separate Scope 3 category.	E1	E1-6 - Targets related to climate change	26. (a)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Previous ESRS E1 §34(b) required that disclosed GHG reduction targets be gross targets not including removal, credits or avoided emissions. But Net Zero targets assume a certain amount of residual emissions will be neutralized by these means—as was recognized in E1-7 §60. It should be clarified if Net Zero targets are NOT subject E1-4 and only MDR-Ts. This should be clarified and previous §34(b) and §60 should reconcile better - we note however this has not been clarified in the exposure draft, moved the requirement to report gross into AR 11, and deleted the prior E1-7 §60.	E1	E1-6 - Targets related to climate change	26. (b)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	For the previous ESRS 1 §34(e), we sought guidance on what's needed to show targets are "science-based and compatible with limiting global warming to 1.5C."; guidance on this does not seem to have been provided in the exposure drafts.	E1	E1-6 - Targets related to climate change	26. (c)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Requiring translation of intensity targets to absolute targets may require competitive and confidential information and is not always useful to end users of the sustainability statement. For example, for high growth firms, the more important metric for most investors is that GHG emissions are being decoupled from growth, not that absolute emissions have gone down (which would imply the firm is experience low growth or contraction)	E1	E1-6 - Targets related to climate change	AR 12
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				AR 16. Requiring separate 1.5C aligned reference target values for Scope 1&2 and Scope 3 would be inefficient. Allow for consolidated cross emission pathway compatible targets.	E1	E1-6 - Targets related to climate change	AR 16
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Exposure draft drops subsection on energy-intensity per revenue (2023 ¶¶40-43 & AR 36-38). Eliminates one quantitative KPI & reconciliation; tangible reduction in burden (especially for service entities). Simplification is isolated – comparable deletions for other intensity metrics (GHG intensity) needed to yield meaningful simplification.	E1	E1-6 - Targets related to climate change	27.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	ED ¶28-30 vs. 2023 ¶37-39 & AR 33-35. Retains energy-mix breakdown but no longer mandates disaggregation by high-impact sectors. Proposal to remove sector-specific split can reduce complexity for diversified groups but the sector filter removal marginally eases data gathering requirements due to the retention of the extensive fuel-type granularity required.	E1	E1-7 - Energy consumption and mix	28.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				"origin" here may be misinterpreted as requiring physical delivery of the electricity, which is impossible to guarantee in a electrical grid. It also isn't correct to refer to "purchased energy" as the actual energy isn't the thing that conveys the right to claim the renewable nature - the environmental attribute certificate is the purchased item that achieves that. Recommend changing to: "…may only consider these energy consumptions as deriving from renewable sources if the nature of the purchased environmental attribute is clearly defined in the contractual arrangements with its suppliers…"	E1	E1-7 - Energy consumption and mix	AR 17
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				Point 14 a (16 amended) requires disclosure about 'financial and investment planning.' Recommend that this aligns and potentially helps comply with a similar requirement in Empowering Consumers Directive (ECD) on future claims	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	14. (a)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				E1-8 requires reporting of absolute GHG emissions, excluding any GHG removals from activities within the organizational boundary. E1-9 requires reporting of GHG removal and storage projects, which by definition are increases in removals compared to a baseline. This creates a gap, where removals that happen due to general activities within the organizational boundary (e.g. biogenic carbon in products) are not able to be reported anywhere. A building supply company making tables out of bamboo grown on-site would thus report their energy emissions of manufacturing as a positive emission, but cannot report the carbon removal of their bamboo harvest even though it is locked in product for 20-30 years. Recommend including in E1-8 either including an additional reporting column for GHG removals within the boundary of the organization or value chain (excluding projects or financed credits), or allowing such removals to be summed with GHG emissions.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				The organizational boundary to be used in disclosing paragraph 32 shall consider aligning with either ISO 14064-1 or GHGP Corporate Standard (2004), allowing companies the option to choose between a financial-control or operational-control boundary. AR 18 19 and 21 be aligned when it comes to reporting boundary.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	20.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				AR 25.g. Requiring separate disclosure of "purchased cloud computing and data center services" should be optional and not required. Table in AR27 suggests it would be optional, but language in AR25 suggests not. Recommend clarifying this should be optional and align requirements across ARs.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	25.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I agree	Removes mandatory disclosure of a single "Total GHG emissions" figure (2023 ¶44(d) & ¶52). Total-GHG removal simplifies reporting	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	31.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Deletes mandatory GHG-intensity per revenue KPI (2023 ¶¶53-55 & AR 53-55). Meaningful simplification to remove a commly crtiized intensity metric and related financial reconciliation however comparable datapoints persist elsewhere (e.g., energy).	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	31.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The updates reduce the clarity on how to report Biogenic CO2 emissions. As written, the new DR could be read as requiring a single line item of total Biogenic CO2 emissions (direct, indirect, and value chain). However, this would deveate from common practice, as such, I believe the intention is to require disclosure of Biogenic CO2 emissions as a separate item for direct, indirect, and value chain as three separate line items. Additional updates can help clarify this.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				AR 18 for para. 32 Corporates should be able to choose between financial control and operational control baesd on which is more appropriate for the organization, It is recommended to change this to voluntary disclosure. A new requirement introduces potential complexity by mandating that companies "shall" also report emissions using the "operational control" method if the financial control approach fails to provide a fair presentation. This adds ambiguity and should be an optional ("may") disclosure rather than a mandatory one.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 18

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				The organizational boundary to be used in disclosing paragraph 32 shall consider aligning with either ISO 14064-1 or GHGP Corporate Standard (2004), allowing companies the option to choose between a financial-control or operational-control boundary. AR 18 19 and 21 be aligned when it comes to reporting boundary.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 18
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Requiring a financial control boundary will pose undue cost and burden on firms that currently use an operational control approach and whose GHG emissions targets are based on an operational control approach. Recommending providing flexibility here for undertakings to choose the approach that best aligns to their circumstances and providing rationale for that approach. For example, many professional services firms lease their offices and under a financial control approach all of the emissions associated with leased offices would be captured under Scope 3. Under an operational control approach these emissions would be categorized under Scope 1 and 2, which is also how undertakings have set their climate targets. Requiring a financial control approach will lead to confusion for the reader and does not add any decision useful information, in fact it may lead to information that is not decision useful (e.g. in the example of firms with leased offices they would report almost no Scope 1 and 2 emissions).	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 18
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				The organizational boundary to be used in disclosing paragraph 32 shall consider aligning with either ISO 14064-1 or GHGP Corporate Standard (2004), allowing companies the option to choose between a financial-control or operational-control boundary. AR 18 19 and 21 be aligned when it comes to reporting boundary.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Requiring firms to disclose both financial control and operational control due to specific facts and circumstances will lead to undue cost and burden for undertakings that are in scope since calculating GHG emissions inventories is a time consuming and expensive exercise usually involving hiring consultants or purchasing expensive software. Additionally it will not lead to more decision useful data and instead lead to too many data points that are too granular for investors and other stakeholders to make a decision on.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Deletes mandatory GHG-intensity per revenue KPI (2023 ¶¶53-55 & AR 53-55). Meaningful simplification to remove a commly crtiized intensity metric and related financial reconciliation however comparable datapoints persist elsewhere (e.g., energy).	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	31.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				AR 28 for para 35 (a) The EU CRCF will not universally apply to all carbon credits, e.g. those that are in projects outside of the jurisdiction of the CRCF. This should be an example, not a requirement. (Also, the CRCF isn't a "consensus method"…) Change to "….are available and where appropriate, such as the EU Carbon Removals and Carbon Farming Certification (CRCF) Regulation6, ICVCM Core Carbon Principles, GHG Protocol Land Sector and Removals Guidance, and/or other internationally recognized guidances and methodologies."	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	AR 28
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				AR 29 for para 36 (b) This item excludes from consideration credits issued from projects within the undertaking's own operations, but this doesn't consider the possibility of the undertaking keeping ownership of those issued credits and retiring them. Just because a credit is issued doesn't mean the undertaking can't be the one to receive them - they might be registering their own project on a registry specifically to increase transparency and credibility of their removal initiative. AR 28 for para 35 (b) has language around removals from own-operations that makes it conditional on whether the credits have been sold to another party. That same language should be mirrored here. Change to: "not include … upstream and downstream value chain and have been sold to another party to avoid double counting…"	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	AR 29
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				AR 29 for para 36 (b) This item excludes from consideration credits issued from projects within the undertaking's own operations, but this doesn't consider the possibility of the undertaking keeping ownership of those issued credits and retiring them. Just because a credit is issued doesn't mean the undertaking can't be the one to receive them - they might be registering their own project on a registry specifically to increase transparency and credibility of their removal initiative. AR 28 for para 35 (b) has language around removals from own-operations that makes it conditional on whether the credits have been sold to another party. That same language should be mirrored here. Change to: "not include … upstream and downstream value chain and have been sold to another party to avoid double counting…"	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	AR 29
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I agree	Agree with providing flexibility to undertakings on how to report their GHG emissions and not mandating the use of the table, instead making the table optional	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 27
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	ESRS E1 does not include sufficient clarity on what contractual instruments can be applied and what counts as regulated contractual instruments (recognizing that AR28(a) provides GHG removal guidance). Given the volume of third-party contractual instruments and the differences in markets and where government entities do or do not monitor contractual instruments, the clarity of what can and cannot be applied is critical.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	34.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Need clarification on what is considered "in" its operations, upstream or downstream value chain versus "out". Introduces new quantitative datapoint adding complexity. Makes disclosure of "reversals" of removals mandatory where previously it was optional guidance.	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	35.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	ED preamble note; deletion of acute/chronic split; ED ¶40-42. Persisting asset-location & energy-class breakdowns remain highly granular; relief only postpones, not removes, compliance effort.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40.

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Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Clarification needed that this metric for net revenues from fossil fuel sector clients should only be disclosed if material	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (d)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Clarification need this metric is subject to materiality . Additionally do all revenues from fossil fuel sector companies need to be disclosed? What if a firm is providing HR training to such a firm? Should that be disclosed even if it has nothing to do with the extraction, production or use of fossil fuels?	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (f)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Clarification need that the quantification of financial effects is subject to a materiality threshold, otherwise information that is not useful will be provided (e.g. for low emitting sectors this number is likely not material)	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	AR 7
Excels	European Construction Industry Federation (FIEC)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The need for transparency on energy consumption by large undertakings subject to mandatory disclosure requirements is acknowledged. At the same time, it should be emphasised that in the construction sector the value chain is predominantly composed of SMEs operating on temporary and mobile construction sites, which, although not subject to the CSRD, will nevertheless be required to provide energy data to contractors, when they operate as subcontractors. In order to avoid disproportionate burdens, it is considered appropriate to limit the request for detailed information (i.e., distinguishing between specific fossil fuel sources) to undertakings directly subject to the obligation, while allowing non-listed SMEs to report aggregated data (not beyond the level of total renewable vs. non-renewable consumption), also by means of simplified templates that might be provided by parent companies or contracting authorities	E1	E1-7 - Energy consumption and mix	7.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	The consideration of energy as a disclosure requirement increases complexity	E1	E1 - Objective	4.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	More clarification is needed on the reporting of CO2	E1	E1 - Interaction with other ESRS	12.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	former 10. (b) it needs to be clarified that undertakings may cross reference to other topicl standards, if neccessary . Combining all topics will highly increase workload and diverge from the material topics	E1	E1-1 - Transition plan for climate change mitigation	13.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	former 10. (b) it needs to be clarified that undertakings may cross reference to other topicl standards, if neccessary . Combining all topics will highly increase workload and diverge from the material topics	E1	E1-1 - Transition plan for climate change mitigation	13.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It needs to be clarified that this cannot be laid out in detail as technological development is highly dynamic and only projects that have been board approved, can be reported	E1	E1-1 - Transition plan for climate change mitigation	AR 4
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	needs to be specified that reporting level needs to be on topic level	E1	E1-1 - Transition plan for climate change mitigation	13.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I agree	The disclosure requirement on climate change actions seems streamlined	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	23.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	Providing absolute value related to intensity targets can imply disclosing confidential information	E1	E1-6 - Targets related to climate change	26. (a)
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Alignment between operational control boundaries and organisational boundaries might be difficult to achieve	E1	E1-6 - Targets related to climate change	AR 15
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	Disclosing separately Scope 1,2 and 3 increases granularity	E1	E1-6 - Targets related to climate change	32.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	anticipated financial effects are hypothetical to anticpate before measures have been taken and do not contain any valuable information	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	40.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	Same as above	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	An estimation of monetary amount and percentage of assets can make the process more complex	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (f)
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	undertakings need to be able to communicate past achievements	E1	E1-6 - Targets related to climate change	25.

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Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	If a company has not adopted a climate transition plan it should not be required to explicitely disclose this fact. Not making any disclosures in this regard is sufficient for the users of the sustainability report to understand that no climate transition plan exists. Otherwise, companies that do not have a climate transition plan would be "put on the spot" which would result in a de facto comply-or-explain-mechanism. Moreover, the mandatory obligation to adopt and put into effect a climate transition plan for companies in scope of the CSDDD is currently re-negotiated on EU level. Hence, the ESRS should not go beyond or preempt the result of these parallel political negotiations.	E1	E1-1 - Transition plan for climate change mitigation	15.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				Point 14 a (16 amended) requires disclosure about 'financial and investment planning.' Recommend that this aligns and potentially helps comply with a similar requirement in Empowering Consumers Directive (ECD) on future claims	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	14. (a)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				24. Recommend making this optional in some manner - "shall include the achieved GHG emission reduction and should include the expected GHG emission reduction"	E1	E1-5 - Actions and resources in relation to climate change	24.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				"origin" here may be misinterpreted as requiring physical delivery of the electricity, which is impossible to guarantee in a electrical grid. It also isn't correct to refer to "purchased energy" as the actual energy isn't the thing that conveys the right to claim the renewable nature - the environmental attribute certificate is the purchased item that achieves that. Recommend changing to: "…shall only consider these energy consumptions as deriving from renewable sources if the nature of the purchased environmental attribute is clearly defined in the contractual arrangements with its suppliers…"	E1	E1-7 - Energy consumption and mix	AR 17
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				E1-8 requires reporting of absolute GHG emissions, excluding any GHG removals from activities within the organizational boundary. E1-9 requires reporting of GHG removal and storage projects, which by definition are increases in removals compared to a baseline. This creates a gap, where removals that happen due to general activities within the organizational boundary (e.g. biogenic carbon in products) are not able to be reported anywhere. A building supply company making tables out of bamboo grown on-site would thus report their energy emissions of manufacturing as a positive emission, but cannot report the carbon removal of their bamboo harvest even though it is locked in product for 20-30 years. Recommend including in E1-8 either including an additional reporting column for GHG removals within the boundary of the organization or value chain (excluding projects or financed credits), or allowing such removals to be summed with GHG emissions.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				AR 28 for para 35 (a) The EU CRCF will not universally apply to all carbon credits, e.g. those that are in projects outside of the jurisdiction of the CRCF. This should be an example, not a requirement. (Also, the CRCF isn't a "consensus method"…) Change to "…are available and where appropriate, such as the EU Carbon Removals and Carbon Farming Certification (CRCF) Regulation6, ICVCM Core Carbon Principles, GHG Protocol Land Sector and Removals Guidance, and/or other internationally recognized guidances and methodologies."	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	AR 28
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				AR 29 for para 36 (b) This item excludes from consideration credits issued from projects within the undertaking's own operations, but this doesn't consider the possibility of the undertaking keeping ownership of those issued credits and retiring them. Just because a credit is issued doesn't mean the undertaking can't be the one to receive them - they might be registering their own project on a registry specifically to increase transparency and credibility of their removal initiative. AR 28 for para 35 (b) has language around removals from own-operations that makes it conditional on whether the credits have been sold to another party. That same language should be mirrored here. Change to: "not include … upstream and downstream value chain and have been sold to another party to avoid double counting…"	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	AR 29
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				AR 29 for para 36 (b) This item excludes from consideration credits issued from projects within the undertaking's own operations, but this doesn't consider the possibility of the undertaking keeping ownership of those issued credits and retiring them. Just because a credit is issued doesn't mean the undertaking can't be the one to receive them - they might be registering their own project on a registry specifically to increase transparency and credibility of their removal initiative. AR 28 for para 35 (b) has language around removals from own-operations that makes it conditional on whether the credits have been sold to another party. That same language should be mirrored here. Change to: "not include … upstream and downstream value chain and have been sold to another party to avoid double counting…"	E1	E1-9 - GHG removals and GHG mitigation projects financed through carbon credits	AR 29
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				AR 18 for para. 32 Corporates should be able to choose between financial control and operational control baesd on which is more appropriate for the organization	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 18
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				CapEx and Opex should be optional	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				24.c Make inclusion of CapEx and OpEx optional. Active CapEx/OpEx beyond what's already included in financial disclosures might be business sensitive and challenging. Anticipated CapEx/OpEx would be hard to quantify and sensitive to disclose, especially at certain levels of granularity.	E1	E1-5 - Actions and resources in relation to climate change	24. (c)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				AR 16. Requiring separate 1.5C aligned reference target values for Scope 1&2 and Scope 3 would be inefficient. Allow for consolidated cross emission pathway compatible targets.	E1	E1-6 - Targets related to climate change	AR 16
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				AR 25.g. Requiring separate disclosure of "purchased cloud computing and data center services" should be optional and not required. Table in AR27 suggests it would be optional, but language in AR25 suggests not. Recommend clarifying this should be optional and align requirements across ARs.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	25.

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Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				The organizational boundary to be used in disclosing paragraph 32 shall consider aligning with either ISO 14064-1 or GHGP Corporate Standard (2004), allowing companies the option to choose between a financial-control or operational-control boundary. AR 18 19 and 21 be aligned when it comes to reporting boundary.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				The organizational boundary to be used in disclosing paragraph 32 shall consider aligning with either ISO 14064-1 or GHGP Corporate Standard (2004), allowing companies the option to choose between a financial-control or operational-control boundary. AR 18 19 and 21 be aligned when it comes to reporting boundary.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 18
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				The organizational boundary to be used in disclosing paragraph 32 shall consider aligning with either ISO 14064-1 or GHGP Corporate Standard (2004), allowing companies the option to choose between a financial-control or operational-control boundary. AR 18 19 and 21 be aligned when it comes to reporting boundary.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				The organizational boundary to be used in disclosing paragraph 32 shall consider aligning with either ISO 14064-1 or GHGP Corporate Standard (2004), allowing companies the option to choose between a financial-control or operational-control boundary. AR 18 19 and 21 be aligned when it comes to reporting boundary.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	20.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	Quantitative disclosure of CapEx/OpEx for the short and medium term, as well as disclosure of investment plans, is being required; however, investment plans pertain to information related to corporate/undertaking strategies and provide advantageous insights to competitors, so whether to disclose this information should be left to the company's discretion.	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	Since the company cannot verify the amount of energy supplied from nuclear power, we request to delete this requirement.	E1	E1-7 - Energy consumption and mix	28. (b)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	Emissions related to liabilities are classified as part of the company's own operation. Since the GHG Protocol does not cover emissions related to liabilities, we request to delete this requirement.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 20
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is required that the data has been verified should be given priority.We request to clarify that the definition of "the data has been verified" will be determined at the discretion of the company.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is required to conduct calculation for all type of assets including right-of-use assets. Some right-of-use assets such as intellectual property rights and copyrights do not involve GHG emissions. We request to exclude right-of-use assets that do not emit any GHG from AR30(b).	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	AR 30
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	Information on the potential locked-in emsission provides limited material insights on a company's decarbonization pathway with information difficult to obtain. We suggest to remove this requirement.	E1	E1-1 - Transition plan for climate change mitigation	14. (c)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	The disclosure of "financial and investment planing (including the short- and medium-term financial and investment plan)" and "financial resources supporting the implementation and strategic ambition of its transition plan for climate change mitigation, including quantitative short- and medium-term CapEx, and/or OpEx figures, as well as anticipated long-term CapEx and/or OpEx ranges" go beyond the initial requirements and the changes therefore go against the aim of simplifying the ESRS. Additionally, it is unclear how the short-/medium-term and long-term time horizons are defined considering also the respective GHG targets defined by the companies. Does long-term refer to 2050? Disclosing any investment figures until 2050 is not feasible and the information would not be reliable. Requirements related to Transition Plans should be closely aligned with existing international frameworks.	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	The current formulation of the AR indicate behavior obligations in how to conduct the scenario analysis going against ESRS 2 (ED) para. 5. Particularly the mandatory use of geospatial data and detailed methodological requirements related to supply chain lead to unnecessary complexity in the overall requirements. Reformulation needed (previously "This description shall include its process in relation to [...]").	E1	E1-2 - Climate-related risks and scenario analysis	AR 5
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	The current formulation of the AR indicate behavior obligations in how to conduct the scenario analysis going against ESRS 2 (ED) para. 5. Reformulation needed (previously "This description shall include its process in relation to [...]").	E1	E1-2 - Climate-related risks and scenario analysis	AR 6
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	The required information provides limited material insights with data difficult to obtain. Suggestion to delete requiremetns	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	33.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	While also a requirement of the IFRS Sustainability Disclosure Standards, the lack of clear and harmonized guidance on calculating anticiapted financial effects linked to individual climate-related risks and opportunities leads to inconsistent and unreliable information. The complexity and lack of integration between sustainability and financial systems make such quantification impractical. Additionally, by going beyond the requirements of the ISSB, the disclosure requirement can also reveal sensitive strategic information, leading to competitive disadvantages for European companies.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	39.
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I disagree	Market-Based must be optional as like GHG Protocol	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	32. (b)
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	The disaggregation must be optional as like GHG Protocol	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 26
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	This information has a completely different meaning depending on the type of industrial activity, and makes absolutely no sense for electricity and heat producers.	E1	E1-7 - Energy consumption and mix	28.
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I disagree	This indicator shall be Low/Zero carbon sources and not renewable only to enable technological neutrality	E1	E1-7 - Energy consumption and mix	28. (c)
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	Does it relate to the industrial company's own consumption (in which case see the previous comment on 'own operations')? If the aim is to highlight part of a industrial's consumption mix, the raw renewable data must be put into perspective with the industrial's overall consumption mix. It makes no sense as such.	E1	E1-7 - Energy consumption and mix	30.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I disagree	In our sector, revenue is not a meaninful indicator as it is driven mostly by external effects such as commodity prices. Companies shall be able to report for example on production at risk which would be much meaninful to understand what is really at risk. We suggest to delete this indicator and to let company disclose on entity specific indicators.	E1	E1-11 - Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	41. (f)
Excels	Reclaim Finance	NGO	France			I agree	This is an essential datapoint that provides critical information on whether entities are investing in coal, oil and gas. Yet, we an additional level of granularity could help interpet this information and its implications on climate impact and risk. Indeed, the impact of fossil fuel investment is overall negative and detrimental to climate and EU sustainability goals but varies depending on the specific investment. For example, science shows investment in new coal, oil and gas production - whether in existing or new fields/mines - in new coal power capacity and in liquified natural gas infrastructure are especially at odds with climate mitigation goals, as recently ackownledged in the SBTi FINZ standard. Requiring entities to identify more precisely what type of projects they are investing in (coal power, coal mine, oil and gas fields, LNG export, LNG import, pipeline, maintenance of existing infrastructure..) and how much provides useful information to better grasp the strategy of companies, its impact and exposure to risks.	E1	E1-1 - Transition plan for climate change mitigation	14. (b)
Excels	Reclaim Finance	NGO	France			I partially agree and partially disagree	Looking at locked-in emissions and how they can jeopardize the achievement of the transition plan and drive risk is essential. Providing the difficulties in assessing and estimating locked-in emissions, it is reasonable to focus on "key assets and products". Yet, the DR and AR do not clearly define what this would mean. It is important to ensure that assets/products that are responsible for significant volumes of emissions and assets/products that are responsible for a significant share of the emissions of the entity are both considered. For companies involved in fossil fuels, it is important to link this DR with the above DR 14.(b) to ensure locked-in emissions from fossil fuel investments are fully considered.	E1	E1-1 - Transition plan for climate change mitigation	14. (c)
Excels	Reclaim Finance	NGO	France			I agree	For "1.5°C reference target value", the AR links "[Draft] Amended ESRS E1-6, AR 17". I believe this is a typo error as AR 17 do not deal with this issue, it should probably be AR16.	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	Reclaim Finance	NGO	France			I agree	The AR notes that "Information on dependencies relate to, e.g. deployment of certain technologies, market demand or policies". The final mention of "policies" is highly relevant but we note that the DR and AR do not require entities to provide elements on how their public advocacy activities and the activities of their representative bodies align with their plans and/or assumptions. This gap should be adressed in the transition planning section.	E1	E1-1 - Transition plan for climate change mitigation	AR 3
Excels	Reclaim Finance	NGO	France			I partially agree and partially disagree	The fact that the AR solely requires a qualitative assessment limits the relevance of this datapoint. We suggest the Efrag (i) considers a phased-in approach to a quantiative assessment in general and (ii) immediately introduce a quantitative assessment for assets and products tied to coal, oil and gas. Furthermore, as mentioned regarding DR E1 14. (c), the DR and AR do not clearly define the "key assets and products" subject to this assessment are. Yet, it is important to ensure that assets/products that are responsible for significant volumes of emissions and assets/products that are responsible for a significant share of the emissions of the entity are both considered. For companies involved in fossil fuels, it is important to link this DR with the above DR 14.(b) to ensure locked-in emissions from fossil fuel investments are fully considered.	E1	E1-1 - Transition plan for climate change mitigation	AR 3
Excels	Reclaim Finance	NGO	France			I agree	AR 5 rightfully requires entities to use at least one high emission scenario. Following the same logic, we suggest the Efrag also introduces the notion of tail risk tied to climate and environmental tipping points. Indeed, high emission scenarios do not always represent the highest level of risk and scenario where sudden changes appear are often sources of additional risks. The litterature on tipping points and climate risk has been rapidly developing in recent years and requiring entities to use such hypothesis in their assessment could significantly contribute to climate risk management.	E1	E1-2 - Climate-related risks and scenario analysis	AR 5
Excels	Reclaim Finance	NGO	France			I partially agree and partially disagree	AR 6 requires an entity to "base its analysis on at least one climate scenario in line with limiting global warming to 1.5°C with no, or limited, overshooting". Here, an important criteria for selecting a relevant scenario is missing. Indeed, there is a wide range of 1.5°C no/low overshoot scenarios, and these scenarios do not rely on the same hypothesis. They especially vary on how much negative emission (i.e emission absorbed by natural or technological means) they rely on. High reliance on negative emissions preserve high carbon activities and - to some extent - prolong the use of fossil fuels. This has a significant impact on the assessment of transition risk and can artificially lower the risk exposure of high emitters. We therefore highlight the need for the Efrag to require 1.5°C no/low overshoot scenarios relying on a limited volume of negative emissions to be used. When identifying scenarios with limited volumes of negative emissions, one should start by excluding those which use of biomass energy with carbon capture and storage (BECCS) and/or fossil fuels with carbon capture and storage (CCS) is categorized by the IPCC as raising medium to high feasibility concerns. Such concerns appear when removal levels exceed respectively 3 Gt CO2/year for BECCS and 3.8 Gt CO2/ year for fossil CCS by 2050. Scenarios should also be screened to exclude those including forest carbon dioxide removal (CDR) above the IPCC's estimate of maximum sustainable potential of 3.6 Gt CO2/year by 2050. The IEA NZE scenario passes these checks, as well as 26 of the IPCC scenarios.	E1	E1-2 - Climate-related risks and scenario analysis	AR 6
Excels	Reclaim Finance	NGO	France			I partially agree and partially disagree	The selected base year should not only be recent, but also be representative (i.e not a year where emissions were anormaly different from other years, for example due to an external shock like the Covid pandemic).	E1	E1-6 - Targets related to climate change	AR 13
Excels	Reclaim Finance	NGO	France			I partially agree and partially disagree	Proposed presentation methods are highly relevant and will help stakeholder use the reported information. It should therefore be mandatory for companies to use at least one of them.	E1	E1-6 - Targets related to climate change	AR 14

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Reclaim Finance	NGO	France			I partially agree and partially disagree	Pathways compatible with limiting global warming to 1.5°C should be strictly defined as 1.5°C no/low overshoot pathways that rely on a limited volume of negative emissions. All climate scenarios rely on negative emissions to some extent as some of the Earth's natural processes trap emissions. However, there are massive differences in the extent to which scenarios rely on the deployment of negative emission technologies – such as carbon capture and storage – and the potential for natural capture – including through land-use change and reforestation. The more a scenario makes room for negative emissions, the slower it requires emissions to be reduced, so increasing the reliance on negative emissions is an easy way to retain heavy emitting industries for as long as possible. Yet, there are major difficulties with large-scale deployment of negative emission technologies and so-called "nature-based solutions". Unrealized captured volumes could easily push the planet past 1.5°C. Therefore, climate scenarios should only rely on a limited volume of negative emissions. When identifying scenarios with limited volumes of negative emissions, one should start by excluding those which use of biomass energy with carbon capture and storage (BECCS) and/or fossil fuels with carbon capture and storage (CCS) is categorized by the IPCC as raising medium to high feasibility concerns. Such concerns appear when removal levels exceed respectively 3 Gt CO2/year for BECCS and 3.8 Gt CO2/ year for fossil CCS by 2050. Scenarios should also be screened to exclude those including forest carbon dioxide removal (CDR) above the IPCC's estimate of maximum sustainable potential of 3.6 Gt CO2/year by 2050. The IEA NZE scenario passes these checks, as well as 26 of the IPCC scenarios.	E1	E1-6 - Targets related to climate change	AR 16
Excels	Reclaim Finance	NGO	France			I disagree	Reclaim Finance has conducted a detailed study of the decarbonisation targets of banks (see: https://reclaimfinance.org/site/en/the-need-to-redesign-bank-decarbonization-targets/) and is now studying investor targets. The NGO also contributed to work around target setting on insurers. This work notably showed that current methodologies - mostly based on PCAF - for financed emissions are largely inadequate, insofar as they are not related to real emission and not likely to induce change in the real economy. One of the key problem with the PCAF methodology for financed emissions is the use of an attribution factor that leads to change in financed emissions due to changes in the value of companies and not of their emissions. This problem is somewhat acknowledged by PCAF itself and by its users. Yet, solutions exist and other metrics used do not reproduce this mistake and are more directly linked to real-economy practices and emissions: 1) For all sectors except the fossil fuel sector, financial institutions can notably rely on physical intensity targets (or so-called "weighted average physical intensity" WAPI). This metric type is already used by many financial institutions. 2) For the fossil fuel sector, that must in time be phased-out, financial institutions can rely on targets to reduce the volume of financing. If emission targets are to be used, absolute targets should be used but they should not rely on attribution factors, and thus simply reflect the absolute emission of all companies financed in the sector. We therefore highlight that the current standard and consultation questions do not tackle the most pressing issue with financial institution target setting and emission reporting. We urge the Efrag to integrate in the ESRS requirement to: - Report on WAPI sectoral targets for all sector except fossil fuels; - Report on absolute emissions without attribution for fossil fuels.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	25.
Excels	Reclaim Finance	NGO	France			I agree	We strongly agree with the requirement to disclose in absolute terms for all scopes, with the possibility to also disclose intensity targets. We note this requirement should be adjusted for financial institutions as explained in our comment on E1-25.	E1	E1-6 - Targets related to climate change	26.
Excels	Reclaim Finance	NGO	France			I agree	We strongly agree with the need to keep carbon credits, avoided emissions and removals out of target calculations.	E1	E1-6 - Targets related to climate change	AR 11
Excels	Reclaim Finance	NGO	France			I agree	We note this highly relevant disclosure requirement is not adapted to financial institutions, whose support to fossil fuels does not come through capex and manifest through different types of financial services beyond investment (lending, bond underwriting, insurance coverage, financial advice..). An additional AR should be set that clarifies that financial institutions shall disaggregate their support to fossil fuels by types of financial services provided. Financial services provided to new coal, oil and gas projects and to the companies that develop them should especially be disclosed.	E1	E1-1 - Transition plan for climate change mitigation	14. (b)
Excels	Reclaim Finance	NGO	France			I agree	We note this highly relevant disclosure requirement is not adapted to financial institutions. An additional AR could be added to clarify that financial institutions shall disclose their financial services to renewable vs non renewable electrictity production. This could also take the form of an energy supply ratio (see the methodology developed by the Institut Louis Bachelier).	E1	E1-7 - Energy consumption and mix	30.
Excels	Reclaim Finance	NGO	France			I disagree	We warn about the reduced reporting of emissions under operational control under AR 19. This reporting should not be limited to cases were it is deemed necessary for fair presentation and should cover all emission scopes.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	ASD					I agree	In E2-4, the current paragraph 26 that requires undertaking to disclose the microplastics it generates or uses was deleted in the Exposure Draft. Moreover, the new paragraph 16 of the Exposure Draft requires to report information on secondary microplastics in a qualitative or quantitative manner, including through estimates. We welcome EFRAG proposed changes.	E2	E2-4 - Pollution of air, water and soil	16.
Excels	ASD					I partially agree and partially disagree	The disclosure has been simplified. Instead of multiple datapoints by source, sector or location, undertakings only need to report material pollutant emissions to air, water and soil from their own operations and incidents. However, a threshold of relevance should be included, to prevent reporting burden	E2	E2-4 - Pollution of air, water and soil	4.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Disproportionate costs; Redundancy with existing regulation (IED, EPRTR); For non-EU scope and some sectors not concerned by EPRTR the data is not currently available/concerns about data reliability.	E2	E2-4 - Pollution of air, water and soil	16. (a)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Disproportionate costs; Data not currently available; Lack of a common methodology.	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It should be made clearer that only those metrics are to be reported for sub-topics that have been assessed as essential in the context of the DMA (see e.g. ESRS E4-5, DR 20)	E2	E2-4 - Pollution of air, water and soil	15.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Information on SVHCs (Substances of Very High Concern) is unproblematic, as their definition is clear and based directly on applicable EU law, making them easily identifiable. The situation is different for SoCs (Substances of Concern): there is currently no uniform, legally binding definition for this group of substances, nor is there an official list of substances. The term is used in various EU initiatives such as the Ecodesign Regulation and the EU Taxonomy, but remains context-dependent and open to interpretation. Due to this lack of clarity, mandatory information on SoC should be removed from the ESRS, as it cannot be reliably implemented by companies.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	New explicit data point secondary microplastic without methodology Problem: Lack of harmonized measurement methods and reporting guidelines The amended provisions require companies to disclose information on secondary microplastics, while it is acknowledged that no harmonized measurement methods or reporting guidelines currently exist. Reliance on qualitative disclosures and company-specific estimates introduces uncertainty and risks undermining reporting integrity.	E2	E2-4 - Pollution of air, water and soil	15.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	No clear alignment of reporting methodology for primary microplastic between REACH-SPM and ESRS Problem: Need for clarification on methodological alignment with existing EU rules Disclosure of primary microplastics is already comprehensively regulated in the EU through the REACH SPM restriction (Reg. 2023/2055) and the forthcoming Pellet-Loss Regulation. While the ESRS draft does not conflict with this framework, it does not explicitly state that the same methodological basis applies, which would create complexity and uncertainty for companies.	E2	E2-4 - Pollution of air, water and soil	15.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	- Disproportionate costs. - Substances of concern: Data not currently available and continous changing classification/ uncertainties; status of labeling/ substance of concern can change during processing as reactive groups disappear leading to a non labelled article for users at the end. - Disclosure requirement E2-5 on substances of concern (SoCs) and substances of very high concern (SVHCs) also risks becoming excessively burdensome and does not adequately provide an understanding of the impact of the undertaking on health and on the environment. Disclosing total amounts of substances is not necessarily a proxy for actual and potential environmental impacts, as for each substance it is necessary to consider its use, its application, and how it is handled. - It is suggested to qualify this requirement as qualitative or to consider adopting a phase-in approach.	E2	E2-5 - Substances of concern and substances of very high concern	17.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	- Disproportionate costs; Data not currently available; high effort needed to extract & compile data; Lack of commomn methodology. - It is suggested to qualify this requirement as qualitative or to consider adopting a phase-in approach. - Furthermore, it is recommended to harmonize the scope, approach and reporting of substances of concern defined within ESRS with existing EU chemical regulations such as REACH and RoHS to ensure a consistent approach to risk assessment and maintain appropriate focus on SVHC.	E2	E2-5 - Substances of concern and substances of very high concern	18. (a)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	- Disproportionate costs; Data not currently available; high effort needed to extract & compile data; Lack of commomn methodology. - It is suggested to qualify this requirement as qualitative or to consider adopting a phase-in approach. - Furthermore, it is recommended to harmonize the scope, approach and reporting of substances of concern defined within ESRS with existing EU chemical regulations such as REACH and RoHS to ensure a consistent approach to risk assessment and maintain appropriate focus on SVHC.	E2	E2-5 - Substances of concern and substances of very high concern	18. (b)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Reporting companies should not be obliged to report on releases of SoCs/SVHCs into the environment (air, water and soil) that go beyond what they already are reporting according to approval of production sites and according to requirements from regulations on emissions, e.g. IED, IEPR. "Including any unintentional releases from leaks or spills" should at least be changed to "including relevant unintentional releases from leaks or spills".	E2	E2-5 - Substances of concern and substances of very high concern	18. (c)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Problem: Unclear and disproportionate obligations The revised drafting introduces extensive role-differentiation (manufacturer/importer and user). While under REACH companies may also hold multiple roles, these apply to specific substances and do not require duplicate reporting of the same material flow. By contrast, the ESRS wording could be read as requiring companies to report identical flows multiple times under different roles. This creates duplication and complexity that appear to go beyond the legislator's stated intention, which was to provide relief for non-chemical companies. In practice, the text risks tightening obligations for chemical companies, creating unnecessary complexity and diverging from the intended objective. Problem: Lack of consistent thresholds creates legal uncertainty The ESRS draft introduces disclosure obligations for SVHC and SoC without consistently applying clear, harmonized thresholds. While a 0.1% threshold is foreseen for SVHC in articles, no uniform rule exists for SVHC in mixtures or for SoC. This inconsistency creates uncertainty for companies in determining which concentration levels would trigger reporting duties.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	AR 7 allows for presenting the information on SVHCs as a percentage of the total amount of SoC whereas AR 8 requires that the substances shall (!) be reported in mass unit. This is contradictory.	E2	E2-5 - Substances of concern and substances of very high concern	AR 7
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	We agree that users of substances shall only disclose the total weight of SVHC. But, in that sense, chemical manufactures, importers and formulators are also only users of their raw materials. Chemical manufacturers, formulators, distributors also have difficulties to obtain data on SoCs from suppliers. On Safety Data Sheets usually only concentration ranges for SoCs are supplied not concrete values. By calculating with either the average or the upper value of the concentration range values for the amount of SoCs that are procured are distorted and don't reflect the true contents of SoCs. For substances that are procured also chemical manufacturers are users of these substances and should fall under ESRS E2 - 19.	E2	E2-5 - Substances of concern and substances of very high concern	19.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Wastewater discharge to municipalities for further treatment should not be considered as pollution.	E2	E2-1 - Policies related to pollution	AR 4

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Michelin	Preparer (non-financial preparing a sustainability report)	France			I disagree	Focus should be done exclusively on SVHC considering the disproportionate list of SoC, the mix of unharmornized and harmonized substances of concern making the comparability between corporates impossible.	E2	E2-5 - Substances of concern and substances of very high concern	17.
Excels	Michelin	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	The notion of importers is quite unclear and should be removed. Focus shoud be put on manufacturers and procurers.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	Michelin	Preparer (non-financial preparing a sustainability report)	France			I disagree	Remove the requirement on quantities sold due to a disproportionate associated burden. Priority should be given to incoming materials.	E2	E2-5 - Substances of concern and substances of very high concern	19.
Excels	Michelin	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	The 0,1% threshold should also apply to substances and not only to components or articles. This will allow considering raw materials that are not necessarily component or article.	E2	E2-5 - Substances of concern and substances of very high concern	20. (a)
Excels	Michelin	Preparer (non-financial preparing a sustainability report)	France			I disagree	Remove the requirement on quantities sold due to a disproportionate associated burden. Priority should be given to incoming materials.	E2	E2-5 - Substances of concern and substances of very high concern	20. (b)
Excels	Michelin	Preparer (non-financial preparing a sustainability report)	France			I disagree	Requiring split by hazard class is not the first information required by stakeholdhers. Priority should be disclosing global information on SVHC in quantity.	E2	E2-3 - Targets related to pollution	AR 7
Excels	Michelin	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	Pollutants to be considered are first the ones from Annex II of EU 2024/1244 and only if relevant the ones identified by the undertaking. Additional disclosure should be only done if relevant.	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	Issue: We end up re-writing policy content that already sits in environmental permits or in our public policy. It duplicates ESRS 2. Proposed simplification: Let the permit-driven policy stand as the disclosure; cross-reference the permit/policy instead of repeating text. Proposed text (add AR/NMIG): “Where pollution prevention and control is implemented through environmental permits (including BAT conditions), the undertaking may present its policy by reference to those permits and add a short summary of how the mitigation hierarchy (avoid/reduce/control/restore) is applied.” Why it helps: One authoritative source, less duplication, easier to audit (policy = permit) and clearer for readers.	E2	E2-1 - Policies related to pollution	12.
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	Issue: Actions/resources are already set in permits (abatement, monitoring, emergency plans). Writing it all again is repetitive. Proposed simplification: allow references to environmental permit for the detailed actions Proposed text: “Where key actions (abatement, monitoring, incident prevention…) are defined in permits, the undertaking may refer to the environmental permits.” Why it helps: Keeps detailed lists where the regulator keeps them.	E2	E2-2 - Actions and resources related to pollution	13.
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	Issue: Targets often duplicate legal limits in permits; site-level targets everywhere can bloat the report. Proposed simplification: Permit-based targets (e.g., “meet or outperform permit limits”), with site-level targets only where material; put detailed site targets in an annex. Proposed text: “Where legal limits apply, targets may be stated as ‘meet or outperform permit limits’, optionally with internal margins by site. Detailed site targets are shown only where material and may be placed in an annex.” Why it helps: Aligns with real compliance management; keeps the main narrative concise.	E2	E2-3 - Targets related to pollution	14.
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	E2-4 — Pollution of air, water and soil (§16(a)) + AR 2–5; NMIG 6 Issue: Pollutant tables are already filed in IEPR (ex-E-PRTR) and permit reports. Re-building them in ESRS is heavy and error-prone. Proposed simplification: “Register-first, delta-only.” Link the IEPR/permit pages and show in ESRS just the changes vs last year and any incidents; use appendix C of taxonomy. Proposed text: “For pollutants subject to IEPR/permit reporting, the undertaking may reference the official records and present in ESRS only a delta log (changes vs prior year, breaches, corrections) and material context.” Why it helps: Removes re-keying, focuses on what changed, and uses a clear, defendable filter.	E2	E2-4 - Pollution of air, water and soil	16.

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Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	E2-4 — Microplastics (§16(b)) + AR 6 Issue: Methods are still maturing; forcing precise numbers can be unrealistic. Proposed simplification: Trigger-based approach; allow qualitative/estimated info where appropriate. Proposed text: "If operations/products are not linked to primary or material secondary microplastics, a short negative statement suffices; otherwise, qualitative or estimated information is acceptable under AR 6." Why it helps: Practical and proportionate.	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	E2-5 — Substances of concern (SoC) & SVHC (§§18–20) + AR 8 Issue: Chemicals tables are very heavy and repeat what is already screened under Taxonomy DNSH and REACH/CLP processes. Proposed simplification: Make EU Taxonomy Appendix C (DNSH for chemicals) the first-step screen and disclose it by reference. Then report SoC/SVHC quantities only for residual, material cases, grouped by hazard class with a clear totals rule (no double counting). Proposed text: "First disclose compliance with EU Taxonomy Appendix C by reference (scope, method, exceptions). Then provide quantities only for residual, material SoC/SVHC, grouped by hazard class, avoiding double counting as per AR 8–9." Why it helps: One DNSH screen for chemicals; tables only where it matters most; consistent with Taxonomy and REACH/CLP evidence.	E2	E2-5 - Substances of concern and substances of very high concern	AR 8
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	Where official registers (IEPR/permits) and EU Taxonomy evidence (including Appendix C for chemicals) already exist, ESRS E2 should allow incorporation by reference, with the ESRS statement focused on material changes, compliance events and clear links to Article 8 KPIs.	E2	E2 - Interaction with other ESRS	11.
Excels	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States			I disagree	The generation of secondary microplastics though equipment wear is extremely difficult to calculate, even qualitatively. Microplastic generation should be defined in terms of equipment manufacturer's plastic content and manufacturer's end of life treatment. Making this a general requirement for all organization's risks significant double counting, and the lack of a defined qualitative assessment standards or methodologies will cast doubt on the ability to compare results across companies. This requirement should be removed	E2	E2-4 - Pollution of air, water and soil	AR 5
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The new version of DR E2-1 refers to DR GDR-P, adopting a more standardised and cross-cutting approach to the disclosure of general policies. This change promotes greater consistency and comparability across companies and topics. However, it may reduce visibility on specific areas such as substances of concern and high concern, as well as the control of accidents and emergencies involving contamination. While standardisation facilitates reporting, it requires extra attention to ensure that critical topics are not underrepresented, especially in sectors with high pollution risk. It may be helpful to recommend optional disclosures or sector-specific guidance to preserve relevance and completeness.	E2	E2-1 - Policies related to pollution	12.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The current disclosure adopts a more simplified perspective, following the cross-cutting approach of the GDR-A. This change promotes greater standardisation and comparability across companies and topics. However, it may lead to a loss of detail in critical areas such as environmental preservation and restoration, as well as the mitigation hierarchy of actions. To ensure that essential topics are not overlooked, especially in sectors with high environmental impact, it may be helpful to recommend optional disclosures or sector-specific guidance. This would help maintain relevance and depth while benefiting from the simplified structure.	E2	E2-2 - Actions and resources related to pollution	13.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The current disclosure of targets follows a more simplified perspective, in line with the GDR-T approach. While this promotes greater standardisation and comparability across companies and topics, it may lead to a loss of detail in critical areas, such as the connection between targets and specific types of pollution, ecological boundaries, and whether the targets are mandatory or voluntary. To preserve the relevance and depth of disclosures, especially in high-impact sectors, it may be helpful to recommend optional reporting on the nature and scope of targets. This would ensure that key environmental dimensions remain visible within the simplified framework.	E2	E2-3 - Targets related to pollution	14.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The current disclosure adopts a more simplified format, aligned with the GDR-I approach. While this change facilitates reporting and promotes greater comparability, it may lead to a loss of technical detail, particularly regarding measurement methodologies, emissions consolidation, and transparency around uncertainties and estimates. That said, the inclusion of microplastics within the value chain is a positive development, as it helps capture downstream impacts of the plastics managed by the company. To balance simplicity with depth, it may be helpful to recommend optional disclosures on methodologies and uncertainty management, especially for companies with complex value chains.	E2	E2-4 - Pollution of air, water and soil	15.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I agree	The new version of DR E2-5 maintains its focus on substances of concern, while introducing a more segmented and operational structure that clearly distinguishes between manufacturers, importers, and users. This approach improves the clarity and accuracy of reporting, particularly in relation to REACH regulation obligations. The level of granularity has increased, with specific requirements for different types of economic actors and forms of environmental release.	E2	E2-5 - Substances of concern and substances of very high concern	17.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	European Plastics Converters	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The Disclosure Requirement E2-4 Article 16(b)(i) aimed at disclosing the total volume of microplastics manufactured or used in products, based on the REACH definition and scope, will impose a significant additional burden on companies. Operators are already required by Commission Regulation (EU) 2023/2055 to provide detailed disclosures, including annual emission estimates of synthetic polymer microparticles to ECHA. In addition, the new Pellet Loss Regulation (based on the provisional agreement of 13 May 2025) will require operators to disclose on the quantities of pellets handled and released to the environment. This requirement effectively adds another layer to existing legal obligations, further increasing the gap in harmonization between regulations, which will ultimately create confusion and resource burden for operators, especially for SMEs, potentially undermining efforts to comply consistently and effectively. Better alignment and integration with existing legal frameworks such as REACH and the Pellet Loss Regulation would support clarity, reduce duplicative efforts, and improve data quality and comparability for all stakeholders.	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	European Plastics Converters	Business association (other than association of financial institution)	Belgium			I disagree	Regarding the newly added Disclosure Requirement E2-4 in Article 16(b.ii) to report on secondary microplastics, we respectfully recommend to remove the proposal as it is (1) inconsistent with the EC's mandate to streamline and clarify ESRS reporting obligations, and (2) there is a lack of scientifically validated measurement methodology which means such estimates will vary widely, risking public distrust and a perception of "greenwashing" rather than genuine transparency.	E2	E2-4 - Pollution of air, water and soil	AR 6
Excels	European Plastics Converters	Business association (other than association of financial institution)	Belgium			I disagree	Additionally, under application requirements 6 for paragraph 16 (b), unintentional pellet losses are considered as secondary microplastics, however these should be categorized and reported as primary microplastics, consistent with their definitions and treatment under REACH and Pellet Loss regulations.	E2	E2-4 - Pollution of air, water and soil	AR 6
Excels	European Plastics Converters	Business association (other than association of financial institution)	Belgium			I disagree	While we support the objective of improving transparency on substances in products to improve product circularity and sustainability, the reporting of SoCs by manufacturers of plastic articles and users of mixtures proves to be quite challenging. The main difficulties include: •Regulatory complexity •Access to confidential information by downstream users, •Continuous monitoring needs, given that according to ESPR, 12,000 chemical substances out of 23,000 registered in the EU could potentially be labelled "substances of concern". •Ambiguity in terminology, definitions such as substances "negatively affecting the re-use and recycling", which are open to interpretation and risk inconsistent application •Identifying SoCs should be communicated to customers, through product regulation, standard or ESPR product group provisions. The current drafting, as well as the former DR 33, introduces duplication with existing legislation and disproportionate complexity. ESRS should build on existing frameworks (such as Product Regulation, REACH and ESPR) rather than extend or reinterpret them. This would improve coherence, administrative burden and reliability of reported data. Therefore, the current provisions addressing SVHC are deemed adequate, whereas introducing via CSRD an additional category of SoC would create complexity and ambiguity in the whole supply chain and among the relevant stakeholders.	E2	E2-5 - Substances of concern and substances of very high concern	17.
Excels	European Plastics Converters	Business association (other than association of financial institution)	Belgium			I disagree	In addition to these difficulties, Disclosure Requirement E2-5 goes beyond the scope of existing regulation, in particular Article 33 of the REACH Regulation, which requires, as a minimum, disclosure of the name of the relevant substance. By contrast, E2-5 obliges disclosure of the total weight or quantity of substances under several provisions: · Article 18, requires manufacturers and importers of mixtures to disclose the total weight of SoCs and SVHCs under multiple conditions; In line with the 0.1% w/w threshold for SVHC under REACH Article 33, a clear and reasonable cut-off limit, for example 10% w/w, should be set for mixtures containing Substances of Concern (SoC) to avoid ambiguity and ensure consistent interpretation in reporting.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	European Plastics Converters	Business association (other than association of financial institution)	Belgium			I disagree	In addition to these difficulties, Disclosure Requirement E2-5 goes beyond the scope of existing regulation, in particular Article 33 of the REACH Regulation, which requires, as a minimum, disclosure of the name of the relevant substance. By contrast, E2-5 obliges disclosure of the total weight or quantity of substances under several provisions: · Article 19, requires users of mixtures to disclose the total weight of SVHCs used in production and released into the environment;	E2	E2-5 - Substances of concern and substances of very high concern	19.
Excels	European Plastics Converters	Business association (other than association of financial institution)	Belgium			I disagree	In addition to these difficulties, Disclosure Requirement E2-5 goes beyond the scope of existing regulation, in particular Article 33 of the REACH Regulation, which requires, as a minimum, disclosure of the name of the relevant substance. By contrast, E2-5 obliges disclosure of the total weight or quantity of substances under several provisions: · Article 20, requires manufacturers, importers, and users of articles containing SVHCs to disclose the quantities of such substances in procured components or articles above the 0.1% threshold set in REACH Article 33, as well as in sold components or articles above this threshold.	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	In the Log of Amendments, it is stated that ESRS E2 now includes pollution from waste (one source of pollution used to estimate emissions to air), since ESRS E5 has no specific requirement on pollution generated by waste. However as the standard only requires air pollution from own operations, we suggest clarifying which waste-related emissions should be accounted for, as some may be downstream emissions (e.g., waste sent to landfills managed by third parties). In ESRS E3 on water, AR 4 clarifies that transfers of water pollutants to external treatment plants qualify as pollution in the downstream value chain.	E2	E2 - Interaction with other ESRS	11. (d)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We agree with facilitating the reporting of non-EU locations as this facilitates alignment with GRI. For example, GRI 101-6-c is not limited to the pollutants listed in Annex II of Regulation (EC) No 166/2006 of the European Parliament and of the Council(57)(European Pollutant Release and Transfer Register "E-PRTR Regulation"). However, it is unclear what 'regular operations' means and how it differs from 'own operations' - we suggest this be clarified.	E2	E2-4 - Pollution of air, water and soil	16.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	With the amendments it has become unclear whether undertakings shall report the amount of each pollutant separately or the total amount of all air pollutant emissions combined. We suggest this be clarified.	E2	E2-4 - Pollution of air, water and soil	16. (a)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I agree	We agree with the provision that the pollutants to be considered be complemented by pollutants the undertaking measures and monitors based on environmental permits and that it can include additional pollutants that it considers material. This is aligned with GRI 305-7-a-vii.	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We suggest clarifying whether the amended requirement now focuses only on the substances that are within the scope of the REACH Regulation or whether it covers any substance.	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	This comment refers to ESRS E2 - 16. (d). This is an additional disclosure compared to the previous version. This change seems to go against the intended goal of simplification, as it adds complexity rather than streamlining the process. In addition: - quantitative estimation is currently not feasible, as there are no widely accepted methodologies in place. Such estimates are highly variable, as they are based on assumptions regarding a significant number of variables (e.g. manufacturing processes, usage phase, conditions of usage, etc.) - in this case, qualitative information may not meet the necessary comparability requirements to ensure a meaningful and effective disclosure.	E2	E2-4 - Pollution of air, water and soil	16.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We still believe that SOC (in particular) and SVHC are still very difficoult disclosure and, as such, verify the request. The DR should focus of which SOC/SVHC is manufactured rather than the quantity. The widespread inability of Wave 1 companies to report on Substances of Concern provides clear evidence that this disclosure requirement is practically unworkable in its current form. This challenge stems directly from the lack of a harmonized definition and the immense scope, which requires companies to assess thousands of substances whose 'concern' status is highly dependent on specific product use and context. Without clear and consistent criteria, any reported data would be based on individual company interpretations, making it inherently non-comparable across the market. Mandating this disclosure would therefore force the generation of low-quality, potentially misleading information, which undermines the CSRD's core objective of providing reliable data. Furthermore, these data would be collected only for the European market, as outside Europe there are different definitions of SOC/SVHC. A full consolidation of these data worldwide would not be possible. Additionally, The notion of importers is quite unclear and should be removed. Focus shoud be put on manufacturers and procurers.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	New para 16 (a) requires disclosure for any MATERIAL POLLUTANT in air, water and soil. For the way AR 2 is written, the auditor could ask to collect the data of each polluntant from the list of Annex II (Reg 2024/1244), as well as from the permitting to demonstrate the materiality of few of the? Our suggestion is to clarify in AR3 that A comprehensive materiality assessment based on specificity of business processes and operations can establish relevant pollutants for the business to be disclosed without the collection of all the data. Furthermore, it has been introduced the request to collect pollutants also from the permitting that is an addition and is not highlighted in question 24 of the Survey. As such, should be eliminated.	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	AR3 allows for the use of thresholds that apply exclusively to the E-PRTR pollutant list. However, there is a potential risk that auditors may request reporting of pollutants from permitting without applying any thresholds as it is not mentioned. It should be clarified that thresholds may also be applicable to pollutants from permitting. Our suggestion is to clarify in AR3 that a comprehensive materiality assessment—based on the specificity of business processes and operations—can determine which pollutants are relevant for disclosure. We agree that only those pollutants emitted by technical installations from Annex II of 2024/1244 have to be reported. Comment: It is not clearly defined what is meant with "applicable to the undertaking". Suggestion: Focusing on environmental installation permits and the relevant installations/ Activities (in Accordance with Annex I of 2024/1244; Policy 2010/75/EU Annex I) would facilitate a globally consistent approach and would justify the selection of pollutants that need to be measured. Suggested text: "The pollutants to be considered for reporting under E2-4, paragraph 16 (a) are those from Annex II of Regulation (EU) 2024/1244 (Industrial Emissions Portal Regulation) that are applicable to the undertaking in accordance with measurement requirements based on environmental permits or Annex I of Regulation (EU) 2024/1244 (Industrial Emissions Portal Regulation). It can include additional pollutants that it considers material."	E2	E2-4 - Pollution of air, water and soil	AR 3
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Manufacturing and use of microplastic should not be included in this DR as the production of microplastics is not a pollutant per se and, as such, it should be treated (in case) as a key product in E5-5 Resource outflows. Primary microplastic production and use could be sensitive and confidential, in fact also in the proposal of Reg. on preventing plastic pellet losses it was added "ensuring that confidential business information is safeguarded". Please note that Regulation 2023/2055/ already include a mandatory reporting only on the quantity of synthetic polymer microparticles released to the environment and introduce a ban for intentionally added microplastic in final products, recognizing that is not relevant on manufacturing data.	E2	E2-4 - Pollution of air, water and soil	15.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	1. Microplastic definition included in the glossary should be reviewed to align with REACH Regulation: The definition of primary microplastic should be limited to cases involving the intentional use of microplastics in a substance, mixture, or borderline article—i.e. an article designed to intentionally release microplastics (e.g. leggings containing encapsulated hyaluronic acid). It should never apply to articles where microplastics are merely fixed to the surface and/or designed to not release microplastics. Under the REACH restriction, articles with fixed microplastics (e.g. a t-shirt with glitter or a candle with glitter) fall outside the scope of the regulation and are not subject to labelling or reporting requirements. Additionally, in the case of primary microplastic in mixtures (cosmetic) there is a duplicity in reporting with the current requirements of reporting to ECHA established REACH restriction on entry 78. 2. It is necessary to align the terminologies used in the datapoint to the ones used 3.The DR should be replaced by "microplastics release" as per the comment above. "release" Should be added also in the text of AR 1 Para. 16	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	This comment refers to ESRS E2 - 16. (c). These data could be considered sensitive for some companies (e.g the ones operating in the chemical sector), as they may represent core production activities. Furthermore,it is unclear whether this refers to an intentional release or an accidental one. Additionally, it should be specified whether, in the case of an accidental release, the actual quantity released or only the quantity remaining after remediation activities should be considered.	E2	E2-4 - Pollution of air, water and soil	16.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Disclosure Requirement E2-4 on primary microplastic can include the quantity of plastic pellet and/or additional microplastic released that it considers material. The calculation methodology on plastic pellet release should be consistency with one used for REG. (EU) 2023/2055 reporting obligation. Data on primary microplastic release could be provide as percentage respect produced or used microplastics	E2	E2-4 - Pollution of air, water and soil	AR 1
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We still believe that SOC (in particular) and SVHC are still very difficoult disclosure and, as such, verify the request. The DR should focus of which SOC/SVHC is manufactured rather than the quantity.	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Focus should be done exclusively on SVHC considering the disproportionate list of SoC, the mix of unhamornized and harmonized substances of concern making the comparability between corporates impossible.	E2	E2-5 - Substances of concern and substances of very high concern	17.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Remove the requirement on quantities sold due to a disproportionate associated burden. Priority should be given to incoming materials.	E2	E2-5 - Substances of concern and substances of very high concern	19.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The 0,1% threshold should also apply to substances and not only to components or articles. This will allow considering raw materials that are not necessarily component or article.	E2	E2-5 - Substances of concern and substances of very high concern	20. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Remove the requirement on quantities sold due to a disproportionate associated burden. Priority should be given to incoming materials.	E2	E2-5 - Substances of concern and substances of very high concern	20. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Requiring split by hazard class is not the first information required by stakeholdhers. Priority should be disclosing global information on SVHC in quantity.	E2	E2-3 - Targets related to pollution	AR 7
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	We support the simplification of the requirement, as this avoids duplication with some overarching requirements in ESRS 2.	E2	E2-1 - Policies related to pollution	12.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	We support the simplification of the requirement, as this avoids duplication with some overarching requirements in ESRS 2.	E2	E2-2 - Actions and resources related to pollution	13.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	We support the simplification of the requirement, as this avoids duplication with some overarching requirements in ESRS 2.	E2	E2-3 - Targets related to pollution	14.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The location-based approach to environmental impacts proposed in the standards is disproportionate and should be entirely eliminated. It introduces unnecessary complexity, increases the reporting burden, and does not align with the principles of relevance and proportionality.	E2	E2 - Objective	10.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is not clearly defined what is meant with "applicable to the undertaking". Suggestion: Focusing on environmental installation permits and the relevant installations/ Activities (in Accordance with Annex I of 2024/1244; Policy 2010/75/EU Annex I) would facilitate a globally consistent approach and would justify the selection of pollutants that need to be measured. Suggested text: "The pollutants to be considered for reporting under E2-4, paragraph 16 (a) are those from Annex II of Regulation (EU) 2024/1244 (Industrial Emissions Portal Regulation) that are applicable to the undertaking in accordance with measurement requirements based on environmental permits or Annex I of Regulation (EU) 2024/1244 (Industrial Emissions Portal Regulation). It can include additional pollutants that it considers material."	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	16 a): AR2 and AR3 in the amended ESRS E2 still provide no clear guidance on how to apply Annex I and II of E-PRTR. AR2 mentions the pollutants of Annex II that are "applicable to the undertaking". Please specify what this means. AR3 recommends that the undertaking "can consider" the thresholds of Annex II to determine materiality. In case of our undertaking, only about three out of 85 pollutants are near the threshold. However in practice, the auditor demands proof that the other ~80 pollutants are not material. This bottom-up approach means unproportional effort. Most of the pollutants play no material role except for high emission industries. Please include some kind of sector specific top-down instruction, e.g. reference to E-PRTR Annex I.	E2	E2-4 - Pollution of air, water and soil	16. (a)
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	16 b): "the quantities of primary microplastics manufactured or used in products" - please specify if this applies to producing undertakings only or to retailers aswell. Retailers should not be obliged to report on products manufactured by other undertakings, since this imposes unproportionate burden and most likely doubles with manufacturers disclosures.	E2	E2-4 - Pollution of air, water and soil	16. (b)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	Some regulatory references listed in the paragraph 9 are only mentioned as optional methodological guidance in the disclosure requirements of ESRS E2, such as the IEPR Regulation (AR 2 and AR 3 to the DR E2-4). Therefore, it could be misleading to state that the objective of this standard is to "enable users of the sustainability statement to understand the plans and capacity of the undertaking to adapt its strategy and business model in line with" the different regulations listed, while some of them are only mentioned for guidance purposes, and will not necessarily be used by reporting undertakings. We recommend clarifying the objective of ESRS E2 with regard to the different European regulations mentioned and ensure, overall, the consistency of the Standard.	E2	E2 - Objective	9.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	Points (c) and (d) that refer to reporting on primary and secondary microplastics shall be presented as sub-§ of points (b). Besides, we recommend clarifying what "directly released into the environment" refers to with respect to the requirement of a "separate" reporting on primary microplastics. The definition of the latter concept that is included in the ESRS glossary implies indeed that all primary microplastics result in a release into the environment.	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We recommend clarifying that the reference to the Regulation 2024/1244 to identify pollutants to be considered is an optional methodological guidance, as specified by EFRAG in the E2 log of amendments and the basis for conclusions, and not a mandatory methodological step. The AR currently states "The pollutants to be considered for reporting under E2-4, paragraph 16 (a) are those from Annex II of Regulation (EU)2024/1244 (Industrial Emissions Portal Regulation)" which could be misleading and imply that this reference is mandatory.	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We invite EFRAG to clarify whether transfers of water pollutants to external treatment plants shall be included in pollutants reporting under § 16(a) even though they are part of the downstream value chain as indicated under AR 4. The comments provided in the log of amendments in relation to this AR seem to imply that it could be a case of extension to value chain information though the metric is formally to be calculated on own operations only. It is worth noted that such inclusion would be consistent with monitoring practices and legal requirements as these pollutants remain under the responsibility of the polluter.	E2	E2-4 - Pollution of air, water and soil	AR 4
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We recommend clarifying the definition of secondary microplastics as AR 5 covers unintentional sources, beyond the breakdown of larger pieces of plastics, that are not included in §16(b)(ii) and the ESRS glossary.	E2	E2-4 - Pollution of air, water and soil	AR 5
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We recommend providing a definition of the concerned company categories i.e. manufacturers and importers, such as by referring to the applicable NACE codes (if relevant), to avoid any ambiguity or subjective interpretation.	E2	E2-5 - Substances of concern and substances of very high concern	AR 6
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We recommend clarifying that double counting of SVHC shall be avoided when an undertaking acts both as an importer and a user during the reporting period.	E2	E2-5 - Substances of concern and substances of very high concern	AR 7
Excels	Triodos Bank N.V.	Bank	Netherlands			I agree	We agree with the addition of secondary microplastics.	E2	E2-4 - Pollution of air, water and soil	4.
Excels	Triodos Bank N.V.	Bank	Netherlands			I agree	We agree to direct the requirements on substances of concern at manufacturers and imports and to align the thresholds to REACH	E2	E2-5 - Substances of concern and substances of very high concern	5.
Excels	Triodos Bank N.V.	Bank	Netherlands			I disagree	I see no reference to targets anymore. All indicators seem to be deleted. I propose to keep the requirement to disclose a target in.	E2	E2-3 - Targets related to pollution	3.
Excels	Triodos Bank N.V.	Bank	Netherlands			I partially agree and partially disagree	Information about methodologies, assumptions and tools used for identifying pollution-related impacts including results of materiality assessments is key for investors to understand the data. This is also relevant for ESRS-E3, ESRS-E4 and ESRS-E5.	E2	E2 - Objective	1.
Excels	Triodos Bank N.V.	Bank	Netherlands			I disagree	We recommend to keep a policy to manage material impacts, risks and opportunities related to pollution in.	E2	E2-1 - Policies related to pollution	1.
Excels	BDO	Auditor	Belgium			I partially agree and partially disagree	The guidance of the TNFD LEAP approach has been removed for reduction purposes from E2/3/4/5, but could at least be included in NMIG. The current reference in ESRS 2 AR 22 currently refers to explanation of the LEAP approach in TNFD, which is an external document and is not part of the ESRS.	E2	E2 - Interaction with other ESRS	1.
Excels	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	We are not 100% sure that it is not anymore required to disclose the amounts of each pollutant above the threshold from Annex II of the Industrial Emissions Portal Regulation. This is due to possible different interpretation of "The pollutants TO BE CONSIDERED for reporting ..." in AR 2. Please clarify or re-formulate "to be considered" in the application requirement.	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	AR 4 leaves room for interpretation in our opinion. Does it mean that the emissions to water are excluded from the reporting scope of E2-4 (which is defined as own operations in § 16 a) when the wastewater is not treated internally but send to an external treatment plant? Or should they nevertheless be reported even if they "qualify" as downstream pollution? Please clarify.	E2	E2-4 - Pollution of air, water and soil	AR 4
Excels	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	So far, there are no reliable methods to measure emissions of primary microplastics. There must be agreed methods to be able to comply with this disclosure requirement. Information from relevant suppliers about microplastics in there products is currently lacking and their mandatory reporting is starting only. Information on secondary microplastic in the downstream value chain is very challenging and will be very unprecise, especially for companies with a multi-tier downstream value chain. In general, the ESRS requirements for microplastics reporting should be in line, also timewise, with the REACH restriction for intentionally and unintentionally added microplastics and other microplastic-related reporting regulations. Please consider to add this DR to the NMIG list for now.	E2	E2-4 - Pollution of air, water and soil	16. (b)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Anthesis Group	Consultant (including software vendor)	United Kingdom			I agree	This topical standard is targeting i.a. companies that are subject to regulations around chemicals, it is worth aligning the definitions with the EU REACH and CLP. The current wording "manufacturers of substances on their own and in mixtures" is not comparable with the REACH definitions of manufacturer and downstream users under REACH, and generates confusion. Under REACH, "manufacturer" of a substance is a company that through chemical synthesis manufacturers a substance (e.g. manufacturer of a pigment from petrochemical derivatives). Under REACH, the manufacturer of a mixture is typically a downstream user, which physically mixes chemicals, e,.g mixing a pigment with other chemicals to make a paint. The current wording "manufacturers of substances on their own and in mixtures" is ambiguous: while an upstream manufacturer is clearly in scope, a formulator (e.g, cosmetics, detergent, etc) may say that they are not manufacturer of substances, hence out of scope. I don't think this is the intention. Suggestion 1 change the wording in art 18 (e.g. Manufacturers and importers of substances on their own, and manufacturer, users and importer of substances in mixtures shall disclose), suggestion 2: in the glossary write how align between art 18 and the REACH definitions.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	Anthesis Group	Consultant (including software vendor)	United Kingdom			I agree	improved wording. The elimination fo the obligation to split into main hazard classess reduces the preparatory work for companies	E2	E2-5 - Substances of concern and substances of very high concern	19.
Excels	Anthesis Group	Consultant (including software vendor)	United Kingdom			I agree	consistent with current REACH obligations	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	Anthesis Group	Consultant (including software vendor)	United Kingdom			I agree	consistent with current REACH obligations	E2	E2-4 - Pollution of air, water and soil	16. (a)
Excels	Anthesis Group	Consultant (including software vendor)	United Kingdom			I disagree	This refers to a type of microplastics for which definitions and measurement methods are still in development. It should be lest out, as it risk being addressed in generic qualitative terms by all.	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	Anthesis Group	Consultant (including software vendor)	United Kingdom			I agree	this is a significant simplification.	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	Jernkontoret	Business association (other than association of financial institution)	Sweden			I partially agree and partially disagree	It is very much welcomed to limit the reporting of Substance of Concern (SoC). However, the proposed text does not sufficiently clearly specify that only manufacturers and importers within the chemical industry are covered by this paragraph as explained in AR to be the aim. There are several other industries manufacturing or importing chemical substances as a minor part of their business for example to use in their production processes or produced as by-products. The SoC information is typically not readily available in those companies for all other chemicals throughout the company. Proposed wording: "The requirements in paragraph 18 apply to the undertaking that, as main activity, manufactures chemical substances, formulates chemical mixtures and/or operates in the retail of chemical substances. The requirements in paragraph 18 do not apply to the undertaking that, as main activity, manufactures non-chemical products."	E2	E2-5 - Substances of concern and substances of very high concern	AR 6
Excels	Jernkontoret	Business association (other than association of financial institution)	Sweden			I partially agree and partially disagree	For the sake of clarity, please change the word 'substances' to 'SoC and/or SVHCs', and add words 'those' to clarify what to report. Proposed wording: "18. Manufacturers and importers of SoCs and/or SVHCs on their own and in mixtures shall disclose the total weight of those SoCs, and separately, the total weight of those SVHCs, that are:"	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	Jernkontoret	Business association (other than association of financial institution)	Sweden			I partially agree and partially disagree	A further suggestion is to exclude SoC reporting for all companies as the SoC definition in ESPR is very wide and the information is not readily available.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	Jernkontoret	Business association (other than association of financial institution)	Sweden			I partially agree and partially disagree	The word 'procured' should be replaced with 'imported' to ensure alignment with REACH and clear interpretation by the company chemical experts on what is covered by this paragraph. Proposed text: "18. Manufacturers and importers of SoCs and/or SVHCs on their own and in mixtures shall disclose the total weight of those SoCs, and separately, the total weight of those SVHC, that are: (a) imported or manufactured as substances of their own or in mixtures;"	E2	E2-5 - Substances of concern and substances of very high concern	18. (a)
Excels	Jernkontoret	Business association (other than association of financial institution)	Sweden			I partially agree and partially disagree	The word 'sold' should be replaced with 'placed on the market' to ensure alignment with REACH and clear interpretation by the company chemical experts on what is covered by this paragraph. Proposed text: "18. Manufacturers and importers of SoCs and/or SVHCs on their own and in mixtures shall disclose the total weight of those SoCs, and separately, the total weight of those SVHC, that are: (a) imported or manufactured as substances of their own or in mixtures; (b) placed on the market as substances on their own or in mixtures; and"	E2	E2-5 - Substances of concern and substances of very high concern	18. (b)
Excels	Jernkontoret	Business association (other than association of financial institution)	Sweden			I partially agree and partially disagree	Remove 'users' from the scope of SVHC reporting as the SVHC information is not readily available for users of articles. Proposed text: "20. Manufacturers and importers of articles with SVHC shall disclose the quantities of those substances that are..."	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	Jernkontoret	Business association (other than association of financial institution)	Sweden			I partially agree and partially disagree	After aligning the terminology with REACH, the points (a) and (b) can be combined. Remove 'procured components' and 'sold components' as those terms are not used in REACH. 'Procured components' as well as 'sold components' are considered articles in REACH. Both situations are covered by specifying the obligations to 'producers and importers' and 'placing on the market' of articles. Proposed wording: "20. Producers and importers of articles with SVHC shall disclose quantities of those substances that are part of articles placed on the market for levels above the 0,1% threshold of Art 33 of the REACH Regulation."	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Highly welcome clarification for pollution – Materiality assessment and reporting can be focused on emissions originating from the undertakings operations / processes. It is also welcomed that the text leaves room for judging on the adequate level of aggregation for the reporting.	E2	E2 - Objective	7
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Also applies to ESRS E2.16b,c,. We welcome that the revised standard explicitly refers to the REACH restriction. In our view this allows to report one set of data for two purposes and avoids redundancies. It should also be noted that the REACH restriction addresses primary microplastic exclusively.	E2	E2 - Objective	9f
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	9f addresses primary microplastic exclusively. By requesting information on secondary microplastic, DR 16d is not in line with the definition of 9f and should be deleted, accordingly.	E2	E2-4 - Pollution of air, water and soil	16. (d)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	9f addresses primary microplastic exclusively. By requesting information on secondary microplastic, DR 16d is not in line with the definition of 9f and should be deleted, accordingly.	E2	E2-4 - Pollution of air, water and soil	AR 5
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Disclosure requirement E2-5 on substances of concern (SoCs) and substances of very high concern (SVHCs) is redundant - please remove. The disclosed information is not adequate for providing an understanding of the impact of the undertaking on health and on the environment. Disclosing total amounts of substances is a poor proxy for actual and potential environmental impacts, since use, application, safety measures and resulting exposure are not considered.	E2	E2-4 - Pollution of air, water and soil	17
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	This requirement leads to excessive detail on differentiating SoC and SVHC according to hazard classes. This information needs deep expertise to interpret and hence is of little use for corporate reporting. We suggest less granularity for this disclosure requirement. This can be achieved by not reporting all hazard classes of a chemical but only the most severe hazard class for human health and for environment per substance. That will also eliminate the double counting issue.	E2	E2-5 - Substances of concern and substances of very high concern	AR 7
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	As a clarification, companies need more certainty to ensure information required under this paragraph, combined with the paragraph 3.1 from ESRS 1, let the operator the possibility to report only relevant emissions of specific substances and not all emissions coming from all substances.	E2	E2-4 - Pollution of air, water and soil	16. (a)
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	It should be noted that the Regulation (UE) 2024/1244, which introduces three new pollutants in its Annex II, will enter into force at 1st january 2028. In addition, the sentence "It can include additional pollutants that it considers material" should be deleted in order to avoid unnecessary debates. This provision is not considered necessary, since undertakings can disclose entity-specific information if they want to do so.	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	The thresholds for releases defined in Annex II of Regulation (EU) 2024/1244 apply to EU activities listed in the Annex I. To ensure international data comparability, it could be relevant to specify that these thresholds also apply to activities listed in the Annex I, regardless of their location (i.e. inside or outside EU).	E2	E2-4 - Pollution of air, water and soil	AR 3
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	We note that paragraphs 9(b) to 9(g) have been added. We request a guarantee that these additions do not introduce new disclosures requirements (e.g. thresholds, list of pollutants to be considered…).	E2	E2 - Objective	9.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	This datapoint supposes that undertaking shall justify the local materiality of pollutants. As a clarification, it should be specified that aggregation at the group level remains possible.	E2	E2 - Objective	10.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	It must be reminded that the definition of secondary microplastics is not officially established, and their impacts are not yet clearly addressed by science. Companies wish that are entitled to refer to the relief on uncertainty when they consider official information is incomplete on this issue.	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	Reporting on SoC must be suppressed as there is no official, stabilised definition. Moreover, to require undertakings to disclose SoC goes beyond what is required by REACH and creates a significant additional burden (over three thousand substances should be considered). Therefore, we call for the suppression of the reporting on SoC, as proposed by the French Accounting Standards Authority.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	This datapoint asks for a disclosure that goes beyond what is requiered by Article 33 of the REACH Regulation. Indeed, Art 33 does not compel operators to quantify SVHC, but only to specify the substances concerned by nam. Therefore, this paragraph should be amended accordingly.	E2	E2-5 - Substances of concern and substances of very high concern	20. (a)
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	This datapoint asks for a disclosure that goes beyond what is requiered by Article 33 of the REACH Regulation. Indeed, Art 33 does not compel operators to quantify SVHC, but only to specify the substances concerned by nam. Therefore, this paragraph should be amended accordingly.	E2	E2-5 - Substances of concern and substances of very high concern	20. (b)
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	The notion of "importer" should be cleraly defined.	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	General comment: EFRAG should develop comprehensive non-mandatory implementation guidance for each topical standard, including ESRS E2. The guidance should comprise instructions and examples how to conduct the materiality assessment for the topic, how to apply the disclosure requirements, and to calculate the metrics. Sectoral examples could be added, where appropriate.	E2	E2 - Objective	1.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	There may be data availability issues for the amounts of SVHC in articles (para. 20), because REACH does not require suppliers to transfer the exact quantities of SVHC contained in articles. Therefore, EFRAG should consider to explicitly allow estimations or ranges to fulfil the requirement in para. 20.	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I disagree	The statement in AR 4 is incorrect and incompatible with the provisions of the E-PRTR/IEP Regulation. Transfers of water pollutants to external treatment plants need to be considered in paragraph 16 (a). Change text to: "Transfers of water pollutants to external treatment plants qualify as emissions to be accounted for under para. 16 (a)."	E2	E2-4 - Pollution of air, water and soil	AR 4
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	We note that the pollution-specific requirements for reporting on actual and anticipated financial effects (current ESRS E1-6, para. 40 and 41), for example regarding revenues from products that contain substances of very high concern, from OpEx and CapEx related to major incidents or costs from environmental protection and remediation of pollution, are proposed to be deleted. Since these pollution-related costs can be substantial, they should be considered in reporting on actual and anticipated financial effects under ESRS 2 SBM-3. If it proofs difficult to reinstate them as part of ESRS 2, they should at the least be included in the non-mandatory guidance.	E2	E2 - Objective	1.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	The split between primary (intentional) and secondary (from breakdown) is now aligned with REACH. However, there is a scope inconsistency: paragraph 16(b)(ii) seems to restrict secondary microplastics to breakdown of larger plastics, while AR 6's definition is broader (including unintentional production during lifecycle, e.g. pellet loss). We recommend EFRAG to resolve definition inconsistency on secondary microplastics by aligning §16(b)(ii) wording with AR 6 to ensure the definition covers all unintentional sources, including pellet loss and lifecycle abrasion, not only breakdown of large plastics.	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	The current text "procured or manufactured" is ambiguous. It is unclear whether undertakings should report the sum of "procured or manufactured" quantities or according to their specific role. We recommend specifying calculation requirements in the AR.	E2	E2-5 - Substances of concern and substances of very high concern	18. (a)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	The concept of "released into the environment" lacks a harmonised wording and is different from microplastics requirement (para. 16(b)). We suggest adopting a harmonised definition of "release" across all pollutant-related DRs, covering intentional and unintentional releases.	E2	E2-5 - Substances of concern and substances of very high concern	18. (c)
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	Many undertakings act in more than one capacity for the same substance within the same period (e.g., importing a substance and then using it in production). There is no clear guidance on whether such quantities should be reported twice in different datapoints. We recommend clarifying what quantities should be reported in the application requirements.	E2	E2-5 - Substances of concern and substances of very high concern	19.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	The requirement for users of SVHC refers to "use during production" without defining "production". The scope is undefined, creating uncertainty for service sectors such as water and waste treatment. We recommend defining "production" and clarifying its applicability to service-sector processes involving SVHC.	E2	E2-5 - Substances of concern and substances of very high concern	19.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	Practical differentiation between "mixture" and "article" is complex. We recommend providing definitions and/or AR examples distinguishing mixtures from articles.	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	New para 16 (a) requires disclosure for any MATERIAL POLLUTANT in air, water and soil. For the way AR 2 is written, the auditor could ask to collect the data of each pollutant from the list of Annex II (Reg 2024/1244), as well as from the permitting to demonstrate the materiality of few of the? Our suggestion is to clarify in AR3 that A comprehensive materiality assessment based on specificity of business processes and operations can establish relevant pollutants for the business to be disclosed without the collection of all the data. Furthermore, it has been introduced the request to collect pollutants also from the permitting that is an addition and is not highlighted in question 24 of the Survey. As such, should be eliminated.	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	AR3 allows for the use of thresholds that apply exclusively to the E-PRTR pollutant list. However, there is a potential risk that auditors may request reporting of pollutants from permitting without applying any thresholds as it is not mentioned. It should be clarified that thresholds may also be applicable to pollutants from permitting. Our suggestion is to clarify in AR3 that a comprehensive materiality assessment—based on the specificity of business processes and operations—can determine which pollutants are relevant for disclosure.	E2	E2-4 - Pollution of air, water and soil	AR 3
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	Manufacturing and use of microplastic should not be included in this DR as the production of microplastics is not a pollutant per se and, as such, it should be treated (in case) as a key product in E5-5 Resource outflows. Primary microplastic production and use could be sensitive and confidential, in fact also in the proposal of Reg. on preventing plastic pellet losses it was added "ensuring that confidential business information is safeguarded". Please note that Regulation 2023/2055/ already include a mandatory reporting only on the quantity of synthetic polymer microparticles released to the environment and introduce a ban for intentionally added microplastic in final products, recognizing that is not relevant on manufacturing data.	E2	E2-4 - Pollution of air, water and soil	15.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	The DR should be replaced by "microplastics release" as per the comment above. "release" Should be added also in the text of AR 1 Para. 16	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	This comment refers to ESRS E2 - 16. (c). These data could be considered sensitive for some companies (e.g the ones operating in the chemical sector), as they may represent core production activities. Furthermore,it is unclear whether this refers to an intentional release or an accidental one. Additionally, it should be specified whether, in the case of an accidental release, the actual quantity released or only the quantity remaining after remediation activities should be considered.	E2	E2-4 - Pollution of air, water and soil	5. (b)
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	this comment refers to point 16 (d). The disclosure of secondary microplastics is an additional disclosure compared to the previous version. This change seems to go against the intended goal of simplification, as it adds complexity rather than streamlining the process. In addition: - quantitative estimation is currently not feasible, as there are no widely accepted methodologies in place. Such estimates are highly variable, as they are based on assumptions regarding a significant number of variables (e.g. manufacturing processes, usage phase, conditions of usage, etc.) - in this case, qualitative information may not meet the necessary comparability requirements to ensure a meaningful and effective disclosure.	E2	E2-4 - Pollution of air, water and soil	16.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	Disclosure Requirement E2-4 on primary microplastic can include the quantity of plastic pellet and/or additional microplastic released that it considers material. The calculation methodology on plastic pellet release should be consistency with one used for REG. (EU) 2023/2055 reporting obligation. Data on primary microplastic release could be provide as percentage respect produced or used microplastics	E2	E2-4 - Pollution of air, water and soil	AR 1
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	We still believe that SOC (in particular) and SVHC are still very difficoult disclosure and, as such, verify the request. The DR should focus of which SOC/SVHC is manufactured rather than the quantity. The widespread inability of Wave 1 companies to report on Substances of Concern provides clear evidence that this disclosure requirement is practically unworkable in its current form. This challenge stems directly from the lack of a harmonized definition and the immense scope, which requires companies to assess thousands of substances whose 'concern' status is highly dependent on specific product use and context. Without clear and consistent criteria, any reported data would be based on individual company interpretations, making it inherently non-comparable across the market. Mandating this disclosure would therefore force the generation of low-quality, potentially misleading information, which undermines the CSRD's core objective of providing reliable data. Furthermore, these data would be collected only for the European market, as outside Europe there are different definitions of SOC/SVHC. A full consolidation of these data worldwide would not be possible.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	#8 needs further improvement to ensure common understanding of how to assess.Equinor suggests limiting obligation for users to report on SVHC to instances when the use is related to deliberate handling or application of a substance, not incidental presence.	E2	E2 - Objective	8.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	E2-4 Secondary microplastics - Equinor strongly disagrees with the new requirement on secondary microplastics. The inclusions of secondary microplastics in §16 is not a simplification, but a large additional burden on companies. This was not included in the original ESRS and involves significant challenges related to methodologies for quantifying secondary microplastics, data availability and what we consider undo efforts needed for compliance. Hence, we suggest deleting the "secondary microplastics" requirement.	E2	E2-4 - Pollution of air, water and soil	16.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I agree	Paragraph 20 is a good clarification of thresholds. We assume and it could be clarified that it is still based on a materiality assessment.	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I agree	Para. 18 and 19 - Equinor welcomes the proposed approach in paragraphs 18 and 19 to limit the reporting of Substances of Concern (SoC) to manufacturers (chemical producers), assigning the full reporting obligation to chemical producers (paragraph 18) while excluding users from this requirement (para 19). Considering the breadth of the SoC list and the significant, potentially disproportionate reporting burden for actors outside the chemical sector, we regard this as a reasonable and proportionate solution.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I disagree	The ESRS project eliminated the analysis of exceedances of E-PRTR threshold values. The simplified ESRS refers to "the amounts of any material pollutant emissions to air, water, and soil from its regular operations and incidents during the reporting period." From an auditor's perspective, this approach is very difficult to assess due to the lack of identification of what constitutes a significant quantity. The auditor will have no tools to verify the company's judgment.	E2	E2-4 - Pollution of air, water and soil	16. (a)
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	This section is unclear. We propose clarifying how this translates into DMA (in paragraph 16 letter a for own operations).	E2	E2-4 - Pollution of air, water and soil	AR 4
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	There is no definition of "Manufacturers and importers of substances on their own and in mixtures." It is unclear whether this is compliant with the REACH regulation.	E2	E2-4 - Pollution of air, water and soil	18.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I disagree	The proposal for a simplified ESRS E2 includes disclosure requirements for microplastics (new paragraph 16(b-d)). This wording is difficult to understand (items c and d refer to item b – the previous wording used in the ESRS, e.g., b i, b ii, seems clearer). AR 5 also includes a reference to 16(b)(ii), but in practice such a paragraph does not exist (it is currently marked as 16(d)).	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	what about "noise"? should it be considered a subtopic?	E2	E2 - Objective	4.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	to be clarified if this is limited to undertaking's emission or also value chain emissions should be included	E2	E2 - Objective	7.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	what about risks and opportunities? why this is not mentioned?	E2	E2 - Objective	8.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	we would suggest to align this disclosure requirement to GRI 305-7	E2	E2-4 - Pollution of air, water and soil	15.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	to be added "where applicable"	E2	E2-4 - Pollution of air, water and soil	16.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	We recommend including the standard units to be considered for each type of pollutant to ensure consistency and comparability of the data.	E2	E2-4 - Pollution of air, water and soil	AR 1
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS E2 Pollution, when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, and targets (if in place), dependencies when relevant, metrics and financial effects Suggestion: When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS E2 Pollution, when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, metrics and targets (if in place), dependencies when relevant, metrics and financial effects.	E2	ESRS E2 - Objective	1.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Unnecessary duplication: The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M. In particular: (a) if the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact; (b) the undertaking may present the description of its material impacts, risks and opportunities, in accordance with [Draft] Amended ESRS 2 IRO-2, alongside information about its policies, actions, targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative Suggestion: The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M. In particular: (a)if the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact; (b)the undertaking may present the description of its material impacts, risks and opportunities, in accordance with [Draft] Amended ESRS 2 IRO-2, alongside information about its policies, actions, targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative .	E2	ESRS E2 - Objective	5.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I agree	Removal is welcome as other regulation already drives the requirements regarding ESG risk management and there is no need to further address this within ESRS, especially for the financial services sector.	E2	Disclosure Requirement E2-6 - Anticipated financial effects from material pollution-related risks and opportunities	n/a

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We disagree with this new (l) data point. As a matter of principle, no new data points should be included in the revised ESRS. This data point also places a heavy additional burden on companies, as the reporting level would become highly disaggregated if reporting had to be done at the location or asset level. Furthermore, information on PAT is generally not specific to a location or asset level, but rather at a higher level. Reporting at such a low level of aggregation would therefore not be effective.	E2	E2 - Objective	10.
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	According to IEPR, the first data must be published in 2028 for the reporting year 2027.The ESRS should not preempt this schedule and should not require earlier reporting according to IEPR.	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	At the end of the sentence the following should be added "and indicate all identified material negative impacts and risks that remained unaddressed by actions during the reporting year"	E2	E2-2 - Actions and resources related to pollution	13.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	At the end of the sentence the following should be added "against each action disclosed under DR G1-2".	E2	E2-3 - Targets related to pollution	14.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	With regard to pollutant emissions, only significant emissions need to be disclosed, rather than E-PRTR-related emissions as was previously the case. Reducing the scope of reporting may lead to the omission of key substances and emissions that are particularly important locally. The lack of clear guidelines on "significant pollutants" creates the risk that entities will omit key emissions if they do not consider them significant.	E2	E2-4 - Pollution of air, water and soil	16. (a)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	The division of microplastics into primary and secondary – a valid simplification that will allow for better visualization of information. A clear distinction between primary and secondary microplastics and a more precise definition will greatly facilitate the work of entities that are required to assess microplastic emissions from products or packaging. However, the ESRS still does not specify a methodology for estimating the level of plastic microbead emissions. This may result in the use of estimates that are difficult to compare.	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	The breakdown of disclosures by manufacturer/importer/user is entirely justified and appropriate, with point 20 – as a rule, correctly refers to the provisions of REACH and SCIP issues, indicating a threshold of 0.1% content as a possible indicator – although obtaining such information and aggregating it for the purpose of preparing disclosures is currently very difficult	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom			I partially agree and partially disagree	The disclosure of dependencies has been further weakened (to 'when relevant') in the new paragraph 1. The TNFD suggests to remove the specification 'when relevant' in paragraph 1 and reinstate, either at the level of ESRS 2 or at the level of the individual topical standard, a similar text to the Set 1 paragraphs, such as the one asking for disclosure of 'the nature, type and extent of the undertaking's material (…) dependencies (…) related to [pollution], and how the undertaking manages them'.	E2	E2 - Objective	1.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Please note that this comment relates to objective 9 (can not be inserted / selected in this file): It shows several legislations but there is no data-point referencing to it afterwards. As this only should be discloses when relevant and material, this probably will be adressed if it is relevant. It might be misleading to include the frameworks in the objective as it could lead to reporting immaterial information. In the log of amendments file I read it that it is now included because it was used as a source for the standard, then it can better be included in the standard as a source then as an objective.	E2	E2-1 - Policies related to pollution	12.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Please note that this comment relates to objective objective 11 - c: first this paragraph was ended with 'this standard' (which was read by some as E4 is in this sentence), and how it is referring to E2. For undertakings in (Agri)food based on the old standard the emission of Nitrogen (at the farm, in the upstream part of the value chain) was then linked to E4. Based on the amended ESRS we would link the pollution of Nitrogen under E2. Based on ESRS 2 then the disclosure requirements as included in objective paragraph 5 apply. It is likely that the undertaking will respond from the perspective of nitrogen as being a driver of biodiversity loss. Additional, then the amended E2 will be applied. E2-4 (based on paragraph 16) only related to emissions related to its own operations, which gives the impression that E2-4 only focusses on the pollution caused by own operations. Is this correct? Then for this example, emission of nitrogen in the upstream part of the value chain will not lead to E2 disclosures. If E2 only means to focusses on pollution caused by own operations, then this should also be mentioned in the objective?	E2	E2-1 - Policies related to pollution	12.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I disagree	typo error, c and d should be part of b instead of seperate items.	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	It would be relevant to request the undertaking to include whether when setting targets ecological thresholds and entitiy specific allocations were taken into consideration (as was included in the original ESRS E2-3 paragraph 24).	E2	E2-3 - Targets related to pollution	14.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	it is not clear if the standard only covers pollution caused by own operations, or the whole value chain. C9	E2	E2-3 - Targets related to pollution	12.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Objective 9.) with 7 references to other EU Regulations increase complexity and uncertaintiy for preparer of sustainability statement. Please delete these references.	E2	E2-1 - Policies related to pollution	12.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Direct reference to PRTR list gone but according to this paragraph, PRTR is still the minimum list of emissions to be tracked. I see no improvement here, the paragraph additional opens up the field for additional pollutants. This will result in discussions with auditors about scope and materiality.	E2	E2-2 - Actions and resources related to pollution	16. (a)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	- Disproportionate costs; Missing data for secondary microplastics/ missing access to data, standards are still under development.	E2	E2-4 - Pollution of air, water and soil	AR 5
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	- The definition of microplastics included in the ESRS in the context of the disclosure requirement E2-4 is not fit for purpose (i.e. "small pieces of plastics, usually smaller than 5mm"). Such a description could also capture the polymers manufactured by chemical companies, a high-quality intermediate for the production of final polymers that are placed in the market through downstream value chains. The production of such polymers is usually carried out under strict loss schemes (e.g. OCS principles). - There are no standardized sampling procedures, officially recognized analysis methods, or clear limit values set by authorities or legislators for wastewater emission measurements. Furthermore, there are diffenrent analysis method of microplastics in terms of particle size.	E2	E2-4 - Pollution of air, water and soil	16. (b)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	- It should be clearly stated that pollutants which are reported according to the IED Regulation is sufficient to report it in the sustainability statement in regards to pullutants, aggregation level, etc. - This would lead to even more inconsistent reporting if all substances listed in a permit at any of the sites had to be reported. Also unclear: would this apply only to the sites for which the substance is listed in the permit?	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Current approach: The interface through which emissions caused by our production are released into the environment is relevant for "emissions from our own operations." Accordingly, this also includes emissions that are caused by us but released into the environment by a third-party wastewater treatment plant. From our perspective, this is the appropriate way to look at it. If we don't produce, the emissions don't exist. Additionally: the external treatment plant provides a service for us, for which we pay → the treatment plant is a supplier and therefore not "downstream" (even though, physically, the water of course flows in that direction...).	E2	E2-4 - Pollution of air, water and soil	AR 4
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	New explicit data point secondary microplastic without methodology Problem: Lack of harmonized measurement methods and reporting guidelines The amended provisions require companies to disclose information on secondary microplastics, while it is acknowledged that no harmonized measurement methods or reporting guidelines currently exist. Reliance on qualitative disclosures and company-specific estimates introduces uncertainty and risks undermining reporting integrity.	E2	E2-4 - Pollution of air, water and soil	15.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	No clear alignment of reporting methodology for primary microplastic between REACH-SPM and ESRS Problem: Need for clarification on methodological alignment with existing EU rules Disclosure of primary microplastics is already comprehensively regulated in the EU through the REACH SPM restriction (Reg. 2023/2055) and the forthcoming Pellet-Loss Regulation. While the ESRS draft does not conflict with this framework, it does not explicitly state that the same methodological basis applies, which would create complexity and uncertainty for companies.	E2	E2-4 - Pollution of air, water and soil	15.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	- Disproportionate costs. - Substances of concern: Data not currently available and continous changing classification/ uncertainties; status of labeling/ substance of concern can change during processing as reactive groups disappear leading to a non labelled article for users at the end. - Disclosure requirement E2-5 on substances of concern (SoCs) and substances of very high concern (SVHCs) also risks becoming excessively burdensome and does not adequately provide an understanding of the impact of the undertaking on health and on the environment. Disclosing total amounts of substances is not necessarily a proxy for actual and potential environmental impacts, as for each substance it is necessary to consider its use, its application, and how it is handled. - It is suggested to qualify this requirement as qualitative or to consider adopting a phase-in approach. - Suppliers outside Europe typically follow local chemical regulations, meaning EU-specific regulations are not legally recognized or applied. For the sake of simplification and consistency, SoCs should not be included as a general requirement for all stakeholders.	E2	E2-5 - Substances of concern and substances of very high concern	17.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	- Disproportionate costs; Data not currently available; high effort needed to extract & compile data; Lack of commomn methodology. - It is suggested to qualify this requirement as qualitative or to consider adopting a phase-in approach. - Furthermore, it is recommended to harmonize the scope, approach and reporting of substances of concern defined within ESRS with existing EU chemical regulations such as REACH and RoHS to ensure a consistent approach to risk assessment and maintain appropriate focus on SVHC.	E2	E2-5 - Substances of concern and substances of very high concern	18. (a)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	- Disproportionate costs; Data not currently available; high effort needed to extract & compile data; Lack of commomn methodology. - It is suggested to qualify this requirement as qualitative or to consider adopting a phase-in approach. - Furthermore, it is recommended to harmonize the scope, approach and reporting of substances of concern defined within ESRS with existing EU chemical regulations such as REACH and RoHS to ensure a consistent approach to risk assessment and maintain appropriate focus on SVHC.	E2	E2-5 - Substances of concern and substances of very high concern	18. (b)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Reporting companies should not be obliged to report on releases of SoCs/SVHCs into the environment (air, water and soil) that go beyond what they already are reporting according to approval of production sites and according to requirements from regulations on emissions, e.g. IED, IEPR. "Including any unintentional releases from leaks or spills" should at least be changed to "including relevant unintentional releases from leaks or spills".	E2	E2-5 - Substances of concern and substances of very high concern	18. (c)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Problem: Unclear and disproportionate obligations The revised drafting introduces extensive role-differentiation (manufacturer/importer and user). While under REACH companies may also hold multiple roles, these apply to specific substances and do not require duplicate reporting of the same material flow. By contrast, the ESRS wording could be read as requiring companies to report identical flows multiple times under different roles. This creates duplication and complexity that appear to go beyond the legislator's stated intention, which was to provide relief for non-chemical companies. In practice, the text risks tightening obligations for chemical companies, creating unnecessary complexity and diverging from the intended objective. Problem: Lack of consistent thresholds creates legal uncertainty The ESRS draft introduces disclosure obligations for SVHC and SoC without consistently applying clear, harmonized thresholds. While a 0.1% threshold is foreseen for SVHC in articles (REACH obligation and ESPR framework regulation), we support this since it is also in line with , no uniform rule exists for SVHC in mixtures or for SoC. This inconsistency creates uncertainty for companies in determining which concentration levels would trigger reporting duties.	E2	E2-5 - Substances of concern and substances of very high concern	18.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	AR 7 allows for presenting the information on SVHCs as a percentage of the total amount of SoC whereas AR 8 requires that the substances shall (!) be reported in mass unit. This is contradictory.	E2	E2-5 - Substances of concern and substances of very high concern	AR 7
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	We agree that users of substances shall only disclose the total weight of SVHC. But, in that sense, chemical manufactures, importers and formulators are also only users of their raw materials. Chemical manufacturers, formulators, distributors also have difficulties to obtain data on SoCs from suppliers. On Safety Data Sheets usually only concentration ranges for SoCs are supplied not concrete values. By calculating with either the average or the upper value of the concentration range values for the amount of SoCs that are procured are distorted and don't reflect the true contents of SoCs. For substances that are procured also chemical manufacturers are users of these substances and should fall under ESRS E2 - 19.	E2	E2-5 - Substances of concern and substances of very high concern	19.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I agree		E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	General comment: EFRAG should develop comprehensive non-mandatory implementation guidance for each topical standard, including ESRS E2. The guidance should comprise instructions and examples how to conduct the materiality assessment for the topic, how to apply the disclosure requirements, and to calculate the metrics. Sectoral examples could be added, where appropriate.	E2	E2 - Objective	1.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	There may be data availability issues for the amounts of SVHC in articles (para. 20), because REACH does not require suppliers to transfer the exact quantities of SVHC contained in articles. Therefore, EFRAG should consider to explicitly allow estimations or ranges to fulfil the requirement in para. 20.	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I disagree	The statement in AR 4 is incorrect and incompatible with the provisions of the E-PRTR/IEP Regulation. Transfers of water pollutants to external treatment plants need to be considered in paragraph 16 (a). Change text to: "Transfers of water pollutants to external treatment plants qualify as emissions to be accounted for under para. 16 (a)."	E2	E2-4 - Pollution of air, water and soil	AR 4
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	We note that the pollution-specific requirements for reporting on actual and anticipated financial effects (current ESRS E1-6, para. 40 and 41), for example regarding revenues from products that contain substances of very high concern, from OpEx and CapEx related to major incidents or costs from environmental protection and remediation of pollution, are proposed to be deleted. Since these pollution-related costs can be substantial, they should be considered in reporting on actual and anticipated financial effects under ESRS 2 SBM-3. If it proofs difficult to reinstate them as part of ESRS 2, they should at the least be included in the non-mandatory guidance.	E2	E2 - Objective	1.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	New paragraph 16(a) requires disclosure of material pollutants to air, water and soil. As drafted, AR2 could be interpreted during assurance as obliging companies to collect and report data for every pollutant in Annex II of Regulation (EU) 2024/1244 as well as all pollutants monitored under permits, simply to demonstrate materiality. This would represent a disproportionate new requirement and create a significant additional burden. We recommend clarifying in AR3 that Annex II and permit pollutants are reference points for consideration in a company's materiality assessment, but that a comprehensive materiality assessment, based on the specificity of business processes and operations, is sufficient to identify relevant pollutants without collecting data for all listed items.	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	AR3 allows for the use of thresholds that apply exclusively to the E-PRTR pollutant list. However, there is a potential risk that auditors may request reporting of pollutants from permitting without applying any thresholds as it is not mentioned. It should be clarified that thresholds may also be applicable to pollutants from permitting. Our suggestion is to clarify in AR3 that a comprehensive materiality assessment—based on the specificity of business processes and operations—can determine which pollutants are relevant for disclosure.	E2	E2-4 - Pollution of air, water and soil	AR 3
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Manufacturing and use of microplastics should not be included in this DR in their current form, as this disclosure duplicates obligations already established in Set 1 of ESRS and under Regulation (EU) 2023/2055 (REACH), as well as industry frameworks such as Operation Clean Sweep (OCS). Production is not a pollutant per se and should instead be addressed, if relevant, as a key product in E5-5 Resource outflows. Primary microplastic production and use may also be sensitive and confidential. For example, in the proposal for the Regulation on preventing plastic pellet losses it was explicitly noted that "confidential business information is safeguarded." Regulation (EU) 2023/2055 already requires mandatory reporting on the quantity of synthetic polymer microparticles released into the environment and introduces a ban on intentionally added microplastics in final products, recognising that manufacturing data is not the relevant focus.	E2	E2-4 - Pollution of air, water and soil	15.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Manufacturing and use of microplastic should not be included in this DR as the production of microplastics is not a pollutant per se and, as such, it should be treated (in case) as a key product in E5-5 Resource outflows. Primary microplastic production and use could be sensitive and confidential. "release" Should be added also in the text of AR 1 Para. 16	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	This comment refers to ESRS E2-16 (c). Disclosure of quantities of manufactured or used microplastics could be considered sensitive for some companies (e.g. those operating in the chemical sector), as such data may represent core production activities. Furthermore, it is unclear whether this refers to an intentional release or an accidental one. Additionally, it should be specified whether, in the case of an accidental release, the actual quantity released or only the quantity remaining after remediation activities should be considered. These concerns mirror those already raised in ESRS E2-15, and are compounded by the overlap with existing legislation (Regulation 2023/2055 under REACH and OCS), which risks duplication and inconsistent reporting obligations.	E2	E2-4 - Pollution of air, water and soil	16.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Removed.	E2	E2-4 - Pollution of air, water and soil	16.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I agree	Support the revision of pollutant emissions reporting to focus on material pollutants, and amend the reference to Annex II of Regulation (EU) 2024/1244 (Industrial Emissions Portal Regulation) from a mandatory list to a reference for consideration in determining material pollutants (AR 2 and 3). This adjustment simplifies the reporting process, enhances flexibility, and improves applicability for entities operating outside the EU.	E2	E2-4 - Pollution of air, water and soil	16. (a)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Disclosure Requirement E2-4 on primary microplastic can include the quantity of plastic pellet and/or additional microplastic released that it considers material. The calculation methodology on plastic pellet release should be consistent with the one used for regulation 2023/2055. Data on primary microplastic release could be provided as percentage respect produced or used microplastics	E2	E2-4 - Pollution of air, water and soil	AR 1
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Support the removal of point (iii) from the definition of "Substances of Concern" in Annex II. However, it introduces a new definition of Substances of Concern that is not aligned with existing frameworks, creates confusion and contradicts the ESRS review's objective of simplification. EFRAG's proposal does not consider sustainability-related aspects and focuses on hazard properties only, an area where REACH should remain the primary legislative framework The broad scope of point (ii) would make information gathering highly challenging, creating additional administrative burden – especially for non-European operated sites SVHCs ((i)) are well-defined hazard categories, with existing processes for substances that pose significant, scientifically recognized risks to human health or the environment. Referencing SVHCs ensures clarity, consistency, regulatory alignment, and practical usability for businesses operating within or exporting to the EU. This approach promotes risk awareness, encourages substitution, maintains regulatory control, and protects environmental health. The SVHC Candidate List is regularly updated by ECHA, ensuring the definition remains relevant and reflects the latest scientific and regulatory developments. It is therefore recommended to remove the definition of SoC from the list of definitions and to limit the disclosure obligations under E2-5 (items 17, 18, 19, and 20) to SVHCs as defined under REACH.	E2	E2-5 - Substances of concern and substances of very high concern	17.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	It is recommended that the disclosure requirement E2-5 (18, 19) is streamlined to focus on SVHCs only. The list of SoC is too fluid for reporting purposes. Next to that the concept of SoC is EU focused and complex to apply outside EU. The broad scope of SoC would make information gathering highly challenging, creating additional administrative burden – especially for non-European operated sites SVHCs are already well-defined hazard categories, with existing processes for substances that pose significant, scientifically recognized risks to human health or the environment. Referencing SVHCs ensures clarity, consistency, regulatory alignment, and practical usability for businesses operating within or exporting to the EU. This approach promotes risk awareness, encourages substitution, maintains regulatory control, and protects environmental health. The SVHC Candidate List is regularly updated by ECHA, ensuring the definition remains relevant and reflects the latest scientific and regulatory developments	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	We still believe that SOC (in particular) and SVHC are very difficult to disclose and, as such, to verify the request. The DR should focus on which SOC/SVHC is manufactured rather than the quantity. The widespread inability of Wave 1 companies to report on Substances of Concern provides clear evidence that this disclosure requirement is practically unworkable in its current form. This challenge stems directly from the lack of a harmonised definition and the immense scope, which requires companies to assess thousands of substances whose "concern" status is highly dependent on specific product use and context. Without clear and consistent criteria, any reported data would be based on individual company interpretations, making it inherently non-comparable across the market. Mandating this disclosure would therefore force the generation of low-quality, potentially misleading information, which undermines the CSRD's core objective of providing reliable data. Furthermore, these data would be collected only for the European market, as outside Europe there are different definitions of SOC/SVHC. A full consolidation of these data worldwide would not be possible. To reduce administrative burden and ensure comparability, the disclosure requirement should be streamlined to focus on SVHCs only, where established processes already exist.	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I agree	We support the changes proposed.	E2	E2-2 - Actions and resources related to pollution	2.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I agree	We support the changes proposed, and also the deletion of current paragraph 29.	E2	E2-4 - Pollution of air, water and soil	16. (a)
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We support the deletion of point (iii) of the definition of "substances of concern" and the addition of thresholds aligned with REACH in [DRAFT] ESRS E2-5 paragraph 20. However, introducing a new definition of Substances of Concern (SOC) that is not aligned with existing frameworks creates confusion and contradicts the ESRS review's objective of simplification. EFRAG's proposal does not consider sustainability-related aspects and focuses on hazard properties only, an area where REACH should remain the primary legislative framework.The broad scope of point (ii) would make information gathering highly challenging, creating additional administrative burden – especially for non-European operated sites SVHCs (point (i)) are already well-defined hazard categories, with existing processes for substances that pose significant, scientifically recognized risks to human health or the environment. Referencing SVHCs ensures clarity, consistency, regulatory alignment, and practical usability for businesses operating within or exporting to the EU. This approach promotes risk awareness, encourages substitution, maintains regulatory control, and protects environmental health. The SVHC Candidate List is regularly updated by ECHA, ensuring the definition remains relevant and reflects the latest scientific and regulatory developments. The definition of SoCs and the related disclosure requirements should therefore be removed or reconsidered.	E2	E2-5 - Substances of concern and substances of very high concern	5.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	DR references to defined users (bold) – which is defined as the user of the sustainability statement/information; and not as the user of the substances	E2	E2-5 - Substances of concern and substances of very high concern	18.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	[1] We do not support an additional disclosure requirement on secondary microplastics. EFRAG presents this new datapoint as a clarification of the existing disclosure requirement, however, it significantly extends its scope to downstream value chain. This entails a significant increase in the reporting burden and goes against the goal of burden reduction and simplification. Estimating the downstream microplastic emissions required in [DRAFT] paragraph 16(b)(ii) would be considerably challenging and potentially impracticable given i) the absence of a robust calculation methodology for secondary microplastics (i.e. those generated unintentionally through degradation or wear under highly context-dependent circumstances) and should therefore be removed. Disclosure requirements should focus on what companies are able to control and measure. It would not be feasible be to predict what the secondary microplastic generation of plastic articles would be, as it would substantially depend on how it was managed down the value chain including end of life. this obligation creates a risk of double counting. From manufacturers to end providers, repeated calculations of an uncertain amount of microplastic leakage result in incoherence	E2	E2-4 - Pollution of air, water and soil	16.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	[2] In addition, we understand that the amended definition for microplastics draws from the current restriction under Annex XVII REACH (entry 78). However, we note how the REACH restriction goes beyond microplastics (i.e. synthetic polymer microparticles), therefore the definition in this context is not fit-for-purpose, as its broader than microplastics. The ESRS should then refer to “synthetic polymer microparticles” in order to have alignment. The new datapoint also poses challenges as regards auditability since materiality assessments require traceability, measurability, and risk characterization. No existing risk-based framework allows undertakings to evaluate how their activities, or actors in a company’s value chain, may contribute to downstream potential harms from secondary microplastics. For primary microplastics (i.e. [DRAFT] ESRS E2-4 paragraph 16(b)(i)), reporting is already required in the EU under the REACH restriction addressing the use of intentional synthetic polymeric microparticles (Annex XVII, Entry 78), and also in the future regulation on preventing plastic pellet losses. This causes additional burden for EU companies, through multiple reporting.	E2	E2-4 - Pollution of air, water and soil	16.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	[3] The disclosure requirements in E2-4 should focus on microplastics leaving the undertaking's facilities as emissions rather than products. The DR should be replaced by "microplastics release" as per the comments above. "release" Should be added also in the text of AR 1 Para. 16. In sum, we recommend EFRAG to delete the proposed disclosure requirement on secondary microplastics in ESRS E2 paragraph 16(d) alongside the definition of secondary microplastics in Annex II.	E2	E2-4 - Pollution of air, water and soil	16.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	Disclosure Requirement E2-4 on primary microplastic can include the quantity of plastic pellet and/or additional microplastic released that it considers material. The calculation methodology on plastic pellet release should be consistency with one used for REG. (EU) 2023/2055 reporting obligation. Data on primary microplastic release could be provide as percentage of produced or used microplastics. Additionally, calculation methodologies on plastic pellet release should be harmonized for all reporting on this topic, in order to avoid possible misalignment on data, risk of errors (same site, seme operators but different method to be compliance with) and administrative burdens. Reporting data as % respect microplastic production or use could be a more suitable metrics respect the stand alone data, since this KPI is not affected by production fluctuation and could allow different years comparison.	E2	E2-4 - Pollution of air, water and soil	AR 1
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	Reporting companies should not be obliged to report on releases of SoCs/SVHCs into the environment (air, water and soil) that go beyond what they already are reporting according to approval of production sites and according to requirements from regulations on emissions, e.g. IED, IEPR. "Including any unintentional releases from leaks or spills" should at least be changed to "including relevant unintentional releases from leaks or spills".	E2	E2-5 - Substances of concern and substances of very high concern	18. (c)
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	SOCs (in particular) and SVHC are still very difficoult disclosure and, as such, verify the request. The DR should focus on which SOC/SVHC is manufactured rather than the quantity. The widespread inability of Wave 1 companies to report on Substances of Concern provides clear evidence that this disclosure requirement is practically unworkable in its current form. This challenge stems directly from the lack of a harmonized definition and the immense scope, which requires companies to assess thousands of substances whose 'concern' status is highly dependent on specific product use and context. Without clear and consistent criteria, any reported data would be based on individual company interpretations, making it inherently non-comparable across the market. Mandating this disclosure would therefore force the generation of low-quality, potentially misleading information, which undermines the CSRD's core objective of providing reliable data. Furthermore, these data would be collected only for the European market, as outside Europe there are different definitions of SOC/SVHC. A full consolidation of these data worldwide would not be possible.	E2	E2-5 - Substances of concern and substances of very high concern	AR 7
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We agree that users of substances shall only disclose the total weight of SVHC. But, in that sense, chemical manufactures, importers and formulators are also only users of their raw materials. Chemical manufacturers, formulators, distributors also have difficulties to obtain data on SoCs from suppliers. On Safety Data Sheets usually only concentration ranges for SoCs are supplied not concrete values. By calculating with either the average or the upper value of the concentration range values for the amount of SoCs that are procured are distorted and don't reflect the true contents of SoCs. For substances that are procured also chemical manufacturers are users of these substances and should fall under ESRS E2 - 19.	E2	E2-5 - Substances of concern and substances of very high concern	19.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	We note that ESRS E2 AR 2 expands the pollutant reporting under E2-4 §16(a) to include not only Annex II of Regulation (EU) 2024/1244 (Industrial Emissions Portal) but also pollutants from environmental permits. This would significantly increase the reporting burden, requiring companies to track and assess pollutants without clear thresholds, unlike the E-PRTR list, and would complicate materiality assessments.	E2	E2-4 - Pollution of air, water and soil	AR 2

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	The revised drafting introduces extensive role-differentiation (manufacturer/importer and user). While under REACH companies may also hold multiple roles, these apply to specific substances and do not require duplicate reporting of the same material flow. By contrast, the ESRS wording could be read as requiring companies to report identical flows multiple times under different roles. This creates duplication and complexity that appear to go beyond the legislator's stated intention, which was to provide relief for non-chemical companies. In practice, the text risks tightening obligations for chemical companies, creating unnecessary complexity and diverging from the intended objective. In other words, There is an inconsistency between the proposed definition of "manufacturers and importers" in ESRS ED and the definition outlined in REACH for formulating companies, which will put these companies in conflicting categories under the two regulations. This inconsistency will lead to significant additional reporting requirements. We therefore request EFRAG to align the definition, exceptions and reporting requirements under the ESRS ED fully with REACH.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	The reporting of SoC constitutes an unjustified burden, as only a portion of these substances are harmful to the environment. Furthermore, many SoC are often essential to ensuring the circularity, durability, safety, and sustainability of a mixture, product or article. Reporting on the large number (several thousand) of SoC throughout the entire life cycle of complex uses are not practically feasible. In addition, SoC are typically indicated in Safety Data Sheets (SDS) or product labels not as a quantitative figure, frequently only as an upper threshold or range of concentration within a mixture, and such mixtures may behave very differently compared to their individual hazardous ingredients.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It should be made clearer that only those metrics are to be reported for sub-topics that have been assessed as essential in the context of the DMA (see e.g. ESRS E4-5, DR 20)	E2	E2-4 - Pollution of air, water and soil	15.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	inclusion of the 0.1% threshold (as per REACH) for substances in articles simplifies information obligations for articles, since REACH regulation already requires this information to be exchanged between suppliers and their clients.	E2	E2-5 - Substances of concern and substances of very high concern	20. (a)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	inclusion of the 0.1% threshold (as per REACH) for substances in articles simplifies information obligations for articles, since REACH regulation already requires this information to be exchanged between suppliers and their clients.	E2	E2-5 - Substances of concern and substances of very high concern	20. (b)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	Information on SVHCs (Substances of Very High Concern) is unproblematic, as their definition is clear and based directly on applicable EU law, making them easily identifiable. The situation is different for SoCs (Substances of Concern): there is currently no uniform, legally binding definition for this group of substances, nor is there an official list of substances. The term is used in various EU initiatives such as the Ecodesign Regulation and the EU Taxonomy, but remains context-dependent and open to interpretation. Due to this lack of clarity, mandatory information on SoC should be removed from the ESRS, as it cannot be reliably implemented by companies.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	Including metrics on microplastics for renewables activities is likely to result in undue effort/costs/complexity, and not likley to result in a meaningful indicator.	E2	E2-4 - Pollution of air, water and soil	15.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	Including metrics on microplastics for renewables activities is likely to result in undue effort/costs/complexity, and not likley to result in a meaningful indicator.	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	ArcelorMittal	Preparer (non-financial preparing a sustainability report)	Luxembourg			I partially agree and partially disagree	Suggest modifying paragraph 18, point (a), to: "imported or manufactured as substances on their own or in mixtures;" ==> Justification ==> 'Procured' is not a term used under REACH. To have a better alignment with REACH terminology, it is recommended to replace 'procured' by 'imported'.	E2	E2-5 - Substances of concern and substances of very high concern	18. (a)
Excels	ArcelorMittal	Preparer (non-financial preparing a sustainability report)	Luxembourg			I partially agree and partially disagree	Suggest modifying the first line of paragraph 18 to: "Manufacturers and importers of SoCs and/or SVHCs on their own and in mixtures shall disclose the total weight of those SoCs, and separately, the total weight of those SVHCs, that are:" ==> Justification ==> If the intention of paragraph 18 is indeed to focus on SoCs and SVHCs manufactured, imported, or released to the environment, the proposed change to this paragraph would make it clearer (together with the suggested change to replace 'procured' by 'imported').	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	ArcelorMittal	Preparer (non-financial preparing a sustainability report)	Luxembourg			I partially agree and partially disagree	Suggest modifying paragraph 18, point (b), to: "placed on the market as substances on their own or in mixtures." ==> Justification ==> The replacement of 'sold' by 'placed on the market' is suggested to align with REACH terminology.	E2	E2-5 - Substances of concern and substances of very high concern	18. (b)
Excels	ArcelorMittal	Preparer (non-financial preparing a sustainability report)	Luxembourg			I partially agree and partially disagree	Suggest modifying paragraph 20 to: "Producers and importers of articles with SVHC shall disclose the quantities of those substances that are part of articles placed on the market for levels above the 0.1% threshold of Art. 33 of the REACH Regulation. Importers of articles that are not further placed on the market to third parties shall not have to disclose." ==> Justification ==> 1) The replacement of 'Manufacturers' by 'Producers' is made to align with REACH terminology. In REACH, to avoid confusion with manufacturers of substances, 'producers of articles' is used to describe article manufacturers. 2) It is suggested to omit 'users' from this paragraph, as it is extremely difficult for downstream users of articles to gather information on SVHCs in all articles used. 3) Replacement of 'sold' by 'placed on the market' is to align with REACH terminology. 4) It is suggested to omit the term 'components' as this also concerns articles (articles to be used as parts in larger articles). It is also not a term specified under REACH. 5) The last sentence is a suggested clarification on the absence of reporting duties for importers of articles that use the imported articles themselves (within the group responsible for reporting).	E2	E2-5 - Substances of concern and substances of very high concern	20.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ArcelorMittal	Preparer (non-financial preparing a sustainability report)	Luxembourg			I partially agree and partially disagree	In case no modifications are made to paragraph 18, it is highly recommended to modify paragraph AR6 to: "The requirements in paragraph 18 apply to the undertaking that, as main activity, manufactures chemical substances, formulates chemical mixtures and/or operates in the retail of chemical substances. The requirements in paragraph 18 do not apply to the undertaking that, as main activity, manufactures non-chemical products." ==> Justification ==> Companies typically have multiple roles in the supply chain for different activities. For instance, companies that are article manufacturers for their main activity (i.e., considered as downstream users in REACH terminology), might also bring by-products of their article production process on the market as substances under REACH. They are therefore also manufacturer, although this is not their main activity. It is understood from the justifications for amendment that such companies are not expected to fulfill the requirements of paragraph 18 (full SoC + SVHC reporting). Indeed, companies that do not manufacture chemicals as their main business (even if they are considered manufacturer or importer for some substances under REACH) normally do not have access to SoC information. It is therefore recommended to more clearly limit the reporting requested in paragraph 18 to chemical companies.	E2	E2-5 - Substances of concern and substances of very high concern	AR 6
Excels	ArcelorMittal	Preparer (non-financial preparing a sustainability report)	Luxembourg			I partially agree and partially disagree	It is important to include definitions for terminology used, and where necessary, align with existing definitions such as under REACH. This specifically holds for the terminology for supply chain actors or related to activities of supply chain actors used in paragraph 18, 19, 20 and AR6 (manufacturer, importer, user, 'formulates', 'operates in the retail of chemical substances', ...). The terminology under REACH is manufacturer, importer, downstream user, producer of an article, formulator, distributor. Also, the terminology 'placed on the market' instead of 'sold' is encouraged.	E2	E2-5 - Substances of concern and substances of very high concern	5.
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	As a clarification, companies need more certainty to ensure information required under this paragraph, combined with the paragraph 3.1 from ESRS 1, let the operator the possibility to report only relevant emissions of specific substances and not all emissions coming from all substances.	E2	E2-4 - Pollution of air, water and soil	16. (a)
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	It should be noted that the Regulation (UE) 2024/1244, which introduces three new pollutants in its Annex II, will enter into force at 1st january 2028. In addition, the sentence "It can include additional pollutants that it considers material" should be deleted in order to avoid unnecessary debates. This provision is not considered necessary, since undertakings can disclose entity-specific information if they want to do so.	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	The thresholds for releases defined in Annex II of Regulation (EU) 2024/1244 apply to EU activities listed in the Annex I. To ensure international data comparability, it could be relevant to specify that these thresholds also apply to activities listed in the Annex I, regardless of their location (i.e. inside or outside EU).	E2	E2-4 - Pollution of air, water and soil	AR 3
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	We note that paragraphs 9(b) to 9(g) have been added. We request a guarantee that these additions do not introduce new disclosures requirements (e.g. thresholds, list of pollutants to be considered...).	E2	E2 - Objective	9.
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	This datapoint supposes that undertaking shall justify the local materiality of pollutants. As a clarification, it should be specified that aggregation at the group level remains possible.	E2	E2 - Objective	10.
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	Neither the definition of secondary microplastics nor the associated risk assessment along the value chain are officially established. Their impacts are not yet clearly addressed by science. Given the lack of robust and consistent methodologies to date, this item must be suppressed.	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	Reporting on SoC must be suppressed as there is no official, stabilised definition. Moreover, to require undertakings to disclose SoC goes beyond what is required by REACH and creates a significant additional burden (over three thousand substances should be considered). Therefore, we call for the suppression of the reporting on SoC, as proposed by the French Accounting Standards Authority.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	This datapoint asks for a disclosure that goes beyond what is requiered by Article 33 of the REACH Regulation. Indeed, Art 33 does not compel operators to quantify SVHC, but only to specify the substances concerned by nam. Therefore, this paragraph should be amended accordingly.	E2	E2-5 - Substances of concern and substances of very high concern	20. (a)
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	This datapoint asks for a disclosure that goes beyond what is requiered by Article 33 of the REACH Regulation. Indeed, Art 33 does not compel operators to quantify SVHC, but only to specify the substances concerned by nam. Therefore, this paragraph should be amended accordingly.	E2	E2-5 - Substances of concern and substances of very high concern	20. (b)
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	The notion of "importer" should be clearly defined.	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	BDO Poland	Auditor	Poland			I disagree	The Exposure Draft requires companies to explain how their transition plan is "compatible with limiting global warming to 1.5°C." However, the absence of a clear methodology for assessing compatibility may result in inconsistent interpretation across companies. While a qualitative assessment of locked-in emissions is valuable, it will be challenging for many companies to conduct without sector-specific guidance. To enhance comparability and auditability, the Standard should require reference to a recognised set of pathways (e.g., sectoral 1.5°C pathways or a defined methodology) or, at a minimum, mandate disclosure of the exact pathway(s), model(s), and key parameter choices used to support the compatibility claim.	E1	E1-1 - Transition plan for climate change mitigation	14.
Excels	BDO Poland	Auditor	Poland			I partially agree and partially disagree	The revised drafting convention counts "shall disclose" datapoints in main body and places methodology in ARs (which are still mandatory methodological guidance but not counted as datapoints). This distinction is subtle and could cause inconsistent recording of required datapoints and confusion for assurance scope (what counts as a disclosure datapoint vs methodology).	E1	E1-1 - Transition plan for climate change mitigation	AR 1
Excels	BDO Poland	Auditor	Poland			I disagree	AR2 asks for consolidated narrative linking targets, actions, CapEx/OpEx and governance, but allows that internal management information need not all be disclosed. The threshold of what constitutes "key features" vs. confidential internal modelling is ambiguous. Companies will struggle to balance transparency with commercially sensitive detail; auditors will struggle to know whether withheld details are material.	E1	E1-1 - Transition plan for climate change mitigation	AR 2
Excels	BDO Poland	Auditor	Poland			I disagree	The requirement to disclose geospatial coordinates for company assets and, where relevant, supply-chain nodes (AR5(b), presents a significant implementation challenge. Many suppliers are unlikely to have such data readily available, which may necessitate extensive procurement and IT projects to collect, validate, and maintain geospatial information. Without phased guidance or minimum data standards, this requirement risks imposing disproportionate costs and may limit comparability across undertakings.	E1	E1-2 - Climate-related risks and scenario analysis	AR 5

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	BDO Poland	Auditor	Poland			I disagree	The primary boundary is the financial consolidation (reporting undertaking) but AR19 requires operational-control reporting if the financial boundary fails to fairly present operated assets. No clear tests or quantitative thresholds for when the "fails to convey a fair presentation" trigger applies. That creates inconsistent choices and reconciliation issues (Scope 1/2 reported on two boundaries) that auditors will need to assess.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 19
Excels	BDO Poland	Auditor	Poland			I disagree	AR25(e) requires updating Scope 3 categories every year for significant categories and full inventory at least every three years, but the screening rules for "significant" categories are wide (magnitude + other criteria). The lack of clearer thresholds (e.g., % of total emissions, spend thresholds) will create year-to-year comparability problems and put heavy supplier data collection burdens on companies. Auditors will have to rely heavily on estimates and sampling with limited guidance on acceptable estimation techniques.	E1	E1-8 - Gross Scopes 1, 2, 3 emissions	AR 25
Excels	ASSIREVI	Auditor	Italy			I disagree	We propose to re-integrate the reference to E-PRTR , which was described in the existing point 28.a, in the current AR 2 and AR 3 relative to ESRS E2-4,because otherwise there would be no reference regarding the reporting of pollutants, making it more difficult to understand and comply with the regulatory requirements	E2	E2-4 - Pollution of air, water and soil	16.
Excels	ASSIREVI	Auditor	Italy			I disagree	With reference to ESRS E2-5 points 18 (a, b, c) and 19, we recommend integrating the table from NMIG (NMIG 10 for paras. 18, 19 and 20 - Substances of concern and substances of very high concern) into the associated AR 7, in order to facilitate users during completion by providing them with a reference template.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	ASSIREVI	Auditor	Italy			I disagree	With reference to ESRS E2-5 points 18 (a, b, c) and 19, we recommend integrating the table from NMIG (NMIG 10 for paras. 18, 19 and 20 - Substances of concern and substances of very high concern) into the associated AR 7, in order to facilitate users during completion by providing them with a reference template [The same comment has been included in the following ESRS: E2-18 (a, b, c) and E2-19].	E2	E2-5 - Substances of concern and substances of very high concern	18. (a)
Excels	ASSIREVI	Auditor	Italy			I disagree	With reference to ESRS E2-5 points 18 (a, b, c) and 19, we recommend integrating the table from NMIG (NMIG 10 for paras. 18, 19 and 20 - Substances of concern and substances of very high concern) into the associated AR 7, in order to facilitate users during completion by providing them with a reference template [The same comment has been included in the following ESRS: E2-18 (a, b, c) and E2-19].	E2	E2-5 - Substances of concern and substances of very high concern	18. (b)
Excels	ASSIREVI	Auditor	Italy			I disagree	With reference to ESRS E2-5 points 18 (a, b, c) and 19, we recommend integrating the table from NMIG (NMIG 10 for paras. 18, 19 and 20 - Substances of concern and substances of very high concern) into the associated AR 7, in order to facilitate users during completion by providing them with a reference template [The same comment has been included in the following ESRS: E2-18 (a, b, c) and E2-19].	E2	E2-5 - Substances of concern and substances of very high concern	18. (c)
Excels	ASSIREVI	Auditor	Italy			I disagree	With reference to ESRS E2-5 points 18 (a, b, c) and 19, we recommend integrating the table from NMIG (NMIG 10 for paras. 18, 19 and 20 - Substances of concern and substances of very high concern) into the associated AR 7, in order to facilitate users during completion by providing them with a reference template [The same comment has been included in the following ESRS: E2-18 (a, b, c) and E2-19].	E2	E2-5 - Substances of concern and substances of very high concern	19.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We support the simplification of the requirement, as this avoids duplication with some overarching requirements in ESRS 2.	E2	E2-1 - Policies related to pollution	12.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We support the simplification of the requirement, as this avoids duplication with some overarching requirements in ESRS 2.	E2	E2-2 - Actions and resources related to pollution	13.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We support the simplification of the requirement, as this avoids duplication with some overarching requirements in ESRS 2.	E2	E2-3 - Targets related to pollution	14.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We agree that only those pollutants emitted by technical installations from Annex II of 2024/1244 have to be reported. Comment: It is not clearly defined what is meant with "applicable to the undertaking". Suggestion: Focusing on environmental installation permits and the relevant installations/ Activities (in Accordance with Annex I of 2024/1244; Policy 2010/75/EU Annex I) would facilitate a globally consistent approach and would justify the selection of pollutants that need to be measured. Suggested text: "The pollutants to be considered for reporting under E2-4, paragraph 16 (a) are those from Annex II of Regulation (EU) 2024/1244 (Industrial Emissions Portal Regulation) that are applicable to the undertaking in accordance with measurement requirements based on environmental permits or Annex I of Regulation (EU) 2024/1244 (Industrial Emissions Portal Regulation). It can include additional pollutants that it considers material."	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We agree that the material pollutants to be considered for reporting can be defined by the thresholds for releases in Annex II of 2024/1244.	E2	E2-4 - Pollution of air, water and soil	AR 3
Excels	PwC International Limited	Auditor	United Kingdom			I agree	ESRS E2 paragraph 16(d) requires an entity to provide information connected to the downstream value chain related to secondary microplastics resulting from a breakdown of its products. Neither ESRS E2 paragraph 16(c) nor 16(d), however, mention secondary microplastics produced by the entity itself (for example, through wear and tear of car tyres used by the entity). We recommend that EFRAG expand ESRS E2 paragraph 16(d) to require information about secondary microplastics both in an entity's own operations and in the downstream value chain.	E2	E2-1 - Policies related to pollution	16.
Excels	PwC International Limited	Auditor	United Kingdom			I agree	It is not clear from ESRS E2 AR 7 how an entity is meant to treat substances of concern and substances of high concern that have more than one hazard class in the CLP regulation. ESRS E2 AR 7 states, "This implies that a single substance needs to be counted under multiple hazard classes." This guidance, however, is insufficient because the word 'implies' neither provides a requirement nor permission to exclude the information. It is not clear how an entity is expected to both disclose substances under the 'implication' that a single substance is counted under multiple hazard classes but also avoid double counting in the total amounts. The optional example table in the Non-mandatory Illustrative Guidance ESRS E2 NMIG 10 provides some clarity by stating that "the total is the amount of substances and not the sum of all hazard classes". We recommend that EFRAG include this clarification in the standard.	E2	ESRS E2 Pollution AR 7	AR 7

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The objective described in para. 1 of each draft topical ESRS is inconsistent with Draft ESRS 1. The statement about "dependencies when relevant" and "financial effects" should be deleted to make it consistent with ESRS 1. Change the wording to: "When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS E2 Pollution, when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, metrics and targets (if in place)."	E2	E2 - Objective	1.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Remove parts (a) and (b) and keep the introductory paragraph to avoid unnecessary duplication. Paragraph 5 should read as follows: "The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M."	E2	E2 - Objective	5.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	ESRS E2 para 16 (d) constitutes a clear instance of scope expansion, as the reference to the downstream value chain was not present in the original ESRS text. Consequently, this addition cannot be regarded as a simplification. "connected to the undertaking's downstream value chain, information on secondary microplastics resulting from the breakdown of larger plastic items from the products of the undertaking"	E2	E2-4 - Pollution of air, water and soil	16.
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We request to clarify the basis and methodology for calculating the amount of microplastic emissions.	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We request to clarify the basis and methodology for calculating the amount of microplastic emissions.	E2	E2-4 - Pollution of air, water and soil	AR 5
Excels	ETSA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Under the revised ESRS E2, users of substances are obliged to only report on SVHCs (total weight, quantities for substances > 0.1% threshold of REACH). In its February 2025 response to JRC Workstream 2 on SoCs in textiles, ETSA stressed its reliance on chemical industry disclosures, as testing finished textiles is highly complex and further complicated by recycled materials.	E2	E2-5 - Substances of concern and substances of very high concern	20. (a)
Excels	ETSA	Business association (other than association of financial institution)	Belgium			I agree	ETSA also warned that allowing companies to use their own methods for pollutant reporting risks poor comparability and suggested aligning measurement with recognized local and national legislation.	E2	E2-5 - Substances of concern and substances of very high concern	AR 6
Excels	ETSA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	When it comes to the calculation and reporting of pollutants emitted, ETSA members express concerns about allowing companies to use their own methodologies for measurement and reporting. While flexibility can be beneficial, it could lead to a lack of comparability. A suggested solution would be to mandate measurement practices according to local and national legislations, which are already officially recognized and account for the local context.	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	TEPPFA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The Disclosure Requirement E2-4 Article 16(b)(i) aimed at disclosing the total volume of microplastics manufactured or used in products, based on the REACH definition and scope, will impose a significant additional burden on companies. Operators are already required by Commission Regulation (EU) 2023/2055 to provide detailed disclosures, including annual emission estimates of synthetic polymer microparticles to ECHA. In addition, the new Pellet Loss Regulation (based on the provisional agreement of 13 May 2025) will require operators to disclose on the quantities of pellets handled and released to the environment. This requirement effectively adds another layer to existing legal obligations, further increasing the gap in harmonization between regulations, which will ultimately create confusion and resource burden for operators, especially for SMEs, potentially undermining efforts to comply consistently and effectively. Better alignment and integration with existing legal frameworks such as REACH and the Pellet Loss Regulation would support clarity, reduce duplicative efforts, and improve data quality and comparability for all stakeholders.	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	TEPPFA	Business association (other than association of financial institution)	Belgium			I disagree	Regarding the newly added Disclosure Requirement E2-4 in Article 16(b.ii) to report on secondary microplastics, we recommend to remove the proposal as it is (1) inconsistent with the EC's mandate to streamline and clarify ESRS reporting obligations, and (2) there is a lack of scientifically validated measurement methodology which means such estimates will vary widely, risking public distrust and a perception of "greenwashing" rather than genuine transparency.	E2	E2-4 - Pollution of air, water and soil	AR 6
Excels	TEPPFA	Business association (other than association of financial institution)	Belgium			I disagree	Additionally, under application requirements 6 for paragraph 16 (b), unintentional pellet losses are considered as secondary microplastics, however these should be categorized and reported as primary microplastics, consistent with their definitions and treatment under REACH and Pellet Loss regulations.	E2	E2-4 - Pollution of air, water and soil	AR 6
Excels	TEPPFA	Business association (other than association of financial institution)	Belgium			I disagree	While we support the objective of improving transparency on substances in products to improve product circularity and sustainability, the reporting of SoCs by manufacturers of plastic articles and users of mixtures proves to be quite challenging. The main difficulties include: •Regulatory complexity •Access to confidential information by downstream users, •Continuous monitoring needs, given that according to ESPR, 12,000 chemical substances out of 23,000 registered in the EU could potentially be labelled "substances of concern". •Ambiguity in terminology, definitions such as substances "negatively affecting the re-use and recycling", which are open to interpretation and risk inconsistent application •Identifying SoCs should be communicated to customers, through product regulation, standard or ESPR product group provisions. The current drafting, as well as the former DR 33, introduces duplication with existing legislation and disproportionate complexity. ESRS should build on existing frameworks (such as Product Regulation, REACH and ESPR) rather than extend or reinterpret them. This would improve coherence, administrative burden and reliability of reported data. Therefore, the current provisions addressing SVHC are deemed adequate, whereas introducing via CSRD an additional category of SoC would create complexity and ambiguity in the whole supply chain and among the relevant stakeholders.	E2	E2-5 - Substances of concern and substances of very high concern	17.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	TEPPFA	Business association (other than association of financial institution)	Belgium			I disagree	In addition to these difficulties, Disclosure Requirement E2-5 goes beyond the scope of existing regulation, in particular Article 33 of the REACH Regulation, which requires, as a minimum, disclosure of the name of the relevant substance. By contrast, E2-5 obliges disclosure of the total weight or quantity of substances under several provisions: · Article 18, requires manufacturers and importers of mixtures to disclose the total weight of SoCs and SVHCs under multiple conditions; In line with the 0.1% w/w threshold for SVHC under REACH Article 33, a clear and reasonable cut-off limit, for example 10% w/w, should be set for mixtures containing Substances of Concern (SoC) to avoid ambiguity and ensure consistent interpretation in reporting.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	TEPPFA	Business association (other than association of financial institution)	Belgium			I disagree	In addition to these difficulties, Disclosure Requirement E2-5 goes beyond the scope of existing regulation, in particular Article 33 of the REACH Regulation, which requires, as a minimum, disclosure of the name of the relevant substance. By contrast, E2-5 obliges disclosure of the total weight or quantity of substances under several provisions: · Article 19, requires users of mixtures to disclose the total weight of SVHCs used in production and released into the environment;	E2	E2-5 - Substances of concern and substances of very high concern	19.
Excels	TEPPFA	Business association (other than association of financial institution)	Belgium			I disagree	In addition to these difficulties, Disclosure Requirement E2-5 goes beyond the scope of existing regulation, in particular Article 33 of the REACH Regulation, which requires, as a minimum, disclosure of the name of the relevant substance. By contrast, E2-5 obliges disclosure of the total weight or quantity of substances under several provisions: · Article 20, requires manufacturers, importers, and users of articles containing SVHCs to disclose the quantities of such substances in procured components or articles above the 0.1% threshold set in REACH Article 33, as well as in sold components or articles above this threshold.	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	The current design of the SoC/SVHC disclosure risks missing its stated objective of helping users understand material impacts on health and the environment. Reporting overall hazard-based volumes without exposure or risk context can mislead stakeholders, as it ignores whether risks are effectively controlled. For instance, many metals are intrinsically classified as hazardous but are used safely under strict exposure controls. This creates reputational risks, especially for Green Deal-critical materials such as cobalt, nickel, lead, and PGMs, which are essential for renewable energy and recycling but are still flagged as hazardous. It remains unclear whether the disclosure is intended to map potential regulatory risk (substances likely to face restrictions) or to quantify hazardous flows in society. In its current form, it achieves neither goal effectively and risks undermining both comparability and stakeholder understanding.	E2	E2 - Objective	8.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	The current design of the SoC/SVHC disclosure risks missing its stated objective of helping users understand material impacts on health and the environment. Reporting overall hazard-based volumes without exposure or risk context can mislead stakeholders, as it ignores whether risks are effectively controlled. For instance, many metals are intrinsically classified as hazardous but are used safely under strict exposure controls. This creates reputational risks, especially for Green Deal-critical materials such as cobalt, nickel, lead, and PGMs, which are essential for renewable energy and recycling but are still flagged as hazardous. It remains unclear whether the disclosure is intended to map potential regulatory risk (substances likely to face restrictions) or to quantify hazardous flows in society. In its current form, it achieves neither goal effectively and risks undermining both comparability and stakeholder understanding.	E2	E2-5 - Substances of concern and substances of very high concern	17.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	Disclosing the total weight of SoC and SVHC, especially in mixtures, adds an excessive burden on companies and does not help understand if a company works sustainably. Perhaps reporting SoC and SVHC under a qualitative statement may help.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	Same as above	E2	E2-5 - Substances of concern and substances of very high concern	19.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	This amendment can help align this DR to the REACH regulation. However, the burden on companies to disclose SVHC does not change	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	Disclosing SoC and SVHC by hazard class is heavily burdensome for companies because it will require companies to report in double counting	E2	E2-5 - Substances of concern and substances of very high concern	AR 7
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The structure of disclosure requirements of pollution-related policies might be streamlined, but the burden has not been reduced	E2	E2-1 - Policies related to pollution	12.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The structure of disclosure requirements of pollution-related actions might be streamlined, but the burden has not been reduced	E2	E2-1 - Policies related to pollution	13.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The structure of disclosure requirements of pollution-related targets might be streamlined, but the burden has not been reduced	E2	E2-3 - Targets related to pollution	14.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	This DR on pollution related to site-specific locations increases the burden since pollutants differ from one site to another.	E2	E2 - Objective	10.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	- Companies in the scope of the Industrial Emission Directive shall reported under Regulation (EU) 2024/1244 (Industrial Emissions Portal Regulation). This would ensure legal consistency, avoid regulatory overlap and reduce the reporting burden. There is no need to include any additional pollutants. - While pollutant selection based on materiality is reasonable, expanding disclosures to include local-level environmental permits massively broadens the scope of emissions and prevents standardisation across companies.	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	Thresholds for pollutants are now less clear, as they are framed as optional ('they can be considered'), which weakens comparability.	E2	E2-4 - Pollution of air, water and soil	AR 3
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	- Reporting on transfers of water pollutants to external treatment plants creates double reporting. - Classifying transfers to water treatment plants as pollution is illogical, since these facilities exist precisely to remove contaminants.	E2	E2-4 - Pollution of air, water and soil	AR 4

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	The addition of a new disclosure layer on microplastics in the downstream, introduces unnecessary reporting burden.	E2	E2-4 - Pollution of air, water and soil	16.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	All new datapoints are acceptable except for E2-4, which does not offer more clarity as claimed, and only increases the burden of reporting.	E2	E2-4 - Pollution of air, water and soil	15.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Suppliers do not have any legal obligation to provide SoC / SVHC volumes to downstream users. Therefore, volume information provided by Wave 1 companies cannot be verified and is potentially misleading as a reported figure. Existing requirements under the EU REACH Regulation 1907/2006 require EU importers to report any substances above 1 ton per annum. This will provide a more accurate picture of the volume of substances used in the EU. Therefore, CSRD should either: 1.Mandate the accurate provision of SVHC and SoC volume data in substances, mixtures and articles supplied to downstream users by suppliers, or 2.Require suppliers to declare the presence of SVHC >0.1% in products (aligned with EU REACH Article 33) and look to substance data collected under the EU REACH Registration requirements to gather volume data. EU REACH is shortly due for revision, the requirements to declare 'types of products' associated with volumes could be introduced here for more granularity. If the above 2 points are not followed, Wave 1 companies can only report data provided by suppliers, without any validation of accuracy and should therefore be given the allowance to do so within the legal text, e.g. under ESRS 1 general disclosures 'reliefs' section 7.4, paragraph 91.	E2	E2-5 - Substances of concern and substances of very high concern	18. (a)
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Suppliers do not have any legal obligation to provide SoC / SVHC volumes to downstream users. Therefore, volume information provided by Wave 1 companies cannot be verified and is potentially misleading as a reported figure. Existing requirements under the EU REACH Regulation 1907/2006 require EU importers to report any substances above 1 ton per annum. This will provide a more accurate picture of the volume of substances used in the EU. Therefore, CSRD should either: 1.Mandate the accurate provision of SVHC and SoC volume data in substances, mixtures and articles supplied to downstream users by suppliers, or 2.Require suppliers to declare the presence of SVHC >0.1% in products (aligned with EU REACH Article 33) and look to substance data collected under the EU REACH Registration requirements to gather volume data. EU REACH is shortly due for revision, the requirements to declare 'types of products' associated with volumes could be introduced here for more granularity. If the above 2 points are not followed, Wave 1 companies can only report data provided by suppliers, without any validation of accuracy and should therefore be given the allowance to do so within the legal text, e.g. under ESRS 1 general disclosures 'reliefs' section 7.4, paragraph 91.	E2	E2-5 - Substances of concern and substances of very high concern	18. (b)
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Suggestions: - Same as described for paragraph 18. (a) -It may be worth considering specifying a threshold to support the definition of material unintentional releases. Without a clearly defined threshold, it is difficult to compare KPIs across companies, as each may apply its own criteria. One possible approach is to adopt the definition of "incidents resulting in fines or penalties exceeding $10,000 USD", which are classified as significant under the Rating+ criteria.	E2	E2-5 - Substances of concern and substances of very high concern	18. (c)
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Suggestions: - Same as described for paragraph 18. (a) -It may be worth considering removing the distinction between materials used and procured for companies already reporting procured amounts under 18(a). For companies where in practice, the amounts procured and used within the fiscal year are typically very similar, the effort required to differentiate between them is disproportionately high compared to the environmental benefit gained. Therefore, treating them as equivalent for reporting purposes would enhance efficiency without compromising the integrity of the data.	E2	E2-5 - Substances of concern and substances of very high concern	19.
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	As a clarification, companies need more certainty to ensure information required under this paragraph, combined with the paragraph 3.1 from ESRS 1, let the operator the possibility to report only relevant emissions of specific substances and not all emissions coming from all substances.	E2	E2-4 - Pollution of air, water and soil	16. (a)
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	It should be noted that the Regulation (UE) 2024/1244, which introduces three new pollutants in its Annex II, will enter into force at 1st january 2028. In addition, the sentence "It can include additional pollutants that it considers material" should be deleted in order to avoid unnecessary debates. This provision is not considered necessary, since undertakings can disclose entity-specific information if they want to do so.	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	The thresholds for releases defined in Annex II of Regulation (EU) 2024/1244 apply to EU activities listed in the Annex I. To ensure international data comparability, it could be relevant to specify that these thresholds also apply to activities listed in the Annex I, regardless of their location (i.e. inside or outside EU).	E2	E2-4 - Pollution of air, water and soil	AR 3
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	We note that paragraphs 9(b) to 9(g) have been added. We request a guarantee that these additions do not introduce new disclosures requirements (e.g. thresholds, list of pollutants to be considered…).	E2	E2 - Objective	9.
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	This datapoint supposes that undertaking shall justify the local materiality of pollutants. As a clarification, it should be specified that aggregation at the group level remains possible.	E2	E2 - Objective	10.
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	Neither the definition of secondary microplastics nor the associated risk assessment along the value chain are officially established. Their impacts are not yet clearly addressed by science. Given the lack of robust and consistent methodologies to date, this item must be suppressed.	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	Reporting on SoC must be suppressed as there is no official, stabilised definition. Moreover, to require undertakings to disclose SoC goes beyond what is required by REACH and creates a significant additional burden (over three thousand substances should be considered). Therefore, we call for the suppression of the reporting on SoC, as proposed by the French Accounting Standards Authority.	E2	E2-5 - Substances of concern and substances of very high concern	18.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	This datapoint asks for a disclosure that goes beyond what is requiered by Article 33 of the REACH Regulation. Indeed, Art 33 does not compel operators to quantify SVHC, but only to specify the substances concerned by nam. Therefore, this paragraph should be amended accordingly.	E2	E2-5 - Substances of concern and substances of very high concern	20. (a)
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	This datapoint asks for a disclosure that goes beyond what is requiered by Article 33 of the REACH Regulation. Indeed, Art 33 does not compel operators to quantify SVHC, but only to specify the substances concerned by nam. Therefore, this paragraph should be amended accordingly.	E2	E2-5 - Substances of concern and substances of very high concern	20. (b)
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	The notion of "importer" should be clearly defined.	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	The definition of 'article' is missing. It would help adding it, based on Reach.	E2	E2-5 - Substances of concern and substances of very high concern	5.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	We propose to re-integrate the reference to E-PRTR , which was described in the existing point 28.a, in the current AR 2 and AR 3 relative to ESRS E2-4,because otherwise there would be no reference regarding the reporting of pollutants, making it more difficult to understand and comply with the regulatory requirements.	E2	E2-4 - Pollution of air, water and soil	16.
Excels	DRSC	(National) standard setter	Germany			I disagree	Disaggregation will lead to too much detail level and will increase reporting workload. Although "appropriate disaggregation" is worded, a definition of "appropiate level" is needed.	E2	E2 - Objective	10.
Excels	DRSC	(National) standard setter	Germany			I disagree	The amendment to "any material pollutant" without a reference to the EU-PRTR (as in E2.28) and without reference to "facilities for which the applicable threshold value specified in Annex II of Regulation (EC) No 166/2006 is exceeded" (E2.29) imposes a signficant increase in practical burden: (1) Undertakings have used the definition of the EU-PRTR for "facility" because of the reference to the EU-PRTR in ESRS E2; this will become subject to discussions with auditors in case the reference is deleted. (2) The provisions in ESRS E2 allow undertakings to refer to facilities that are covered by the EU-PRTR. With the proposed amendment, undertakings will need to consider all of their facilities.(Background: For the operating license of a facility the EU law takes the facility's capacity and maximum pollution into account. In case the facility will - due to its capacity and other specifications - not exceed the thresholds of the EU-PRTR, this facility is not in the PRTR-scope. Based on the requirement in ESRS E2, the undertaking can therefore already exclude these facilities.)	E2	E2-4 - Pollution of air, water and soil	16. (a)
Excels	DRSC	(National) standard setter	Germany			I disagree	"secondary microplastics" should be aligned with REACH SPM-Regulation and Pellet-loss Regulation.	E2	E2-4 - Pollution of air, water and soil	16.
Excels	DRSC	(National) standard setter	Germany			I disagree	Transfers of water pollutants to external treatment plants should not qualify as pollution in downstream value chain.	E2	E2-4 - Pollution of air, water and soil	AR 4
Excels	DRSC	(National) standard setter	Germany				Disclosure requirement E2-5 on substances of concern (SoCs) and substances of very high concern (SVHCs) also risks becoming excessively burdensome and does not adequately provide an understanding of the impact of the undertaking on health and on the environment. Disclosing total amounts of substances is not necessarily a proxy for actual and potential environmental impacts, as for each substance it is necessary to consider its use, its application, and how it is handled.	E2	E2-5 - Substances of concern and substances of very high concern	
Excels	DRSC	(National) standard setter	Germany			I disagree	We doubt that transition risks can be covered by the metrics proposed.	E2	E2-5 - Substances of concern and substances of very high concern	17.
Excels	DRSC	(National) standard setter	Germany			I disagree	"Manufacturers and importers of substances" --> The concept of importers is new in ESRS, (1) it needs to be clear which party counts as an importer, (2) The BfC (para 306) states to explain why the concept of importers was introduced, however, the term remains unclear anyway.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL: This para adresses both SOC and SVHC. For a better understanding both aspects should be seperated.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL: Clarification is needed that only information on releases from relevant leaks or spills have to be disclosed.	E2	E2-5 - Substances of concern and substances of very high concern	18. (c)
Excels	DRSC	(National) standard setter	Germany			I disagree	Undertakings should not be obliged to report on releases of SoCs/SVHCs into the environment (air, water and soil) that go beyond what they already are reporting according to approval of production sites and according to requirements from regulations on emissions, e.g. IED, IEPR.	E2	E2-5 - Substances of concern and substances of very high concern	18. (c)
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL: "present the information on quantities of SVHC as a percentage of the total amount of SoC by hazard class, instead of the total weight." --> contradiction	E2	E2-5 - Substances of concern and substances of very high concern	AR 7
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL: Clarification is needed how groups with subsidiaries in non-EU states should handle this requirement as those subsidiaries might lack information because their business partners and themselves are not subject to CLP/REACH.	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL: Prescribing the reporting in mass units contains a contradiction to AR 7b where it is allowed to present SVHC as a share of the amount of SoC	E2	E2-5 - Substances of concern and substances of very high concern	AR 8
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	We support the simplification of the requirement, as this avoids duplication with some overarching requirements in ESRS 2.	E2	E2-1 - Policies related to pollution	12.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	We support the simplification of the requirement, as this avoids duplication with some overarching requirements in ESRS 2.	E2	E2-2 - Actions and resources related to pollution	13.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	We support the simplification of the requirement, as this avoids duplication with some overarching requirements in ESRS 2.	E2	E2-3 - Targets related to pollution	14.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	N.a.	E2	E2-4 - Pollution of air, water and soil	15.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	N.a.	E2	E2-4 - Pollution of air, water and soil	16.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	N.a.	E2	E2-4 - Pollution of air, water and soil	16. (a)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is recommended to remove microplastics mandate and change to voluntary disclosure. Secondary microplastics disclosure, though only required qualitatively, still poses challenges due to lack of mature methodology.	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	N.a.	E2	E2-4 - Pollution of air, water and soil	AR 1
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	We agree that only those pollutants emitted by technical installations from Annex II of 2024/1244 have to be reported. Comment: It is not clearly defined what is meant with "applicable to the undertaking". Suggestion: Focusing on environmental installation permits and the relevant installations/ Activities (in Accordance with Annex I of 2024/1244; Policy 2010/75/EU Annex I) would facilitate a globally consistent approach and would justify the selection of pollutants that need to be measured. Suggested text: "The pollutants to be considered for reporting under E2-4, paragraph 16 (a) are those from Annex II of Regulation (EU) 2024/1244 (Industrial Emissions Portal Regulation) that are applicable to the undertaking in accordance with measurement requirements based on environmental permits or Annex I of Regulation (EU) 2024/1244 (Industrial Emissions Portal Regulation). It can include additional pollutants that it considers material."	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	We agree that the material pollutants to be considered for reporting can be defined by the thresholds for releases in Annex II of 2024/1244.	E2	E2-4 - Pollution of air, water and soil	AR 3
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Please eliminate the need to report on downstream water pollution for external water treatment plants as this represents an additional reporting burden and does not fit the approach of only reporting on own operation metrics. Additionally, wastewater discharge to municipalities for further treatment should not be considered as pollution.	E2	E2-4 - Pollution of air, water and soil	AR 4
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	N.a.	E2	E2-4 - Pollution of air, water and soil	AR 5
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	N.a.	E2	E2-5 - Substances of concern and substances of very high concern	17.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	N.a.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	N.a.	E2	E2-5 - Substances of concern and substances of very high concern	18. (a)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	N.a.	E2	E2-5 - Substances of concern and substances of very high concern	18. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	N.a.	E2	E2-5 - Substances of concern and substances of very high concern	18. (c)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	N.a.	E2	E2-5 - Substances of concern and substances of very high concern	19.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	N.a.	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	N.a.	E2	E2-5 - Substances of concern and substances of very high concern	20. (a)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	N.a.	E2	E2-5 - Substances of concern and substances of very high concern	20. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	N.a.	E2	E2-5 - Substances of concern and substances of very high concern	AR 6
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	New link to 'ESRS S3 affected communities' where statement of a 'human right to a clean, healthy and sustainable envonment'. The UN resolution states a 'human right to clean water and air', but not to a 'healthy or sustainable environment'. Human rights under the CSRD are understood to be internationally recognised human rights. The right to clean, healthy sustainable environment', has not been incorporated in any international human rights instrument, nor any EU framework.Remove the reference to the 'right to clean, healthy sustainable environment'.	E2	Interactions with other ESRS	11(e)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Potential issues with added focus on, increased scope of and unclear (new) definition for microplastics as a pollutant increasing reporting burden.	E2	Pollution Metrics - Microplastics	16(b)-(d)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	"Trading" is included in the objective only and should be out of scope, as the act of trading (a term which also lacks sufficient clarity and definition) does not carry with it significant and tangible actual or potential impacts, risks or opportunities. We recommend removing it from the standard. Also, it is not clear why SoCs are removed from the requirements for users only, while manufacturers and importers (a term which also lacks sufficient clarity and definition) are still in scope for reporting this metric. We recommend removing the reporting of SOCs from the standard altogether.	E2	Pollution Metrics - SoC/SVHC	17-18, AR7
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The proposed definition of 'manufacturers and importers' is different from that outlined in REACH for formulating companies (part of the so-called downstream users). This creates a mismatch that will place many companies in conflicting categories under REACH versus ESRS ED. This inconsistency will lead to additional reporting requirements for many companies whereas under REACH there are no such obligations. For example, the ED definitions on substances of concern will lead to unnecessary additional analysis, cost and effort for companies in the Chemicals industry. We therefore request EFRAG to align the definition and reporting requirements under the ESRS ED fully with REACH.	E2	E2-5 - Substances of concern and substances of very high concern	AR 6

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The current ESRS definition of microplastics diverges from REACH. The ED partially aligns the two but the ED does not include the derogations in place under REACH. For example, for paint and coatings, film-forming processes as part of application mean that certain microplastics are subsequently no longer classified as such under REACH. As there are no such derogations under the ED this will result in a significantly wider scope and materially increased reporting requirements. We therefore request EFRAG to align the definition and reporting requirements under the ESRS ED fully with REACH.	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	It is not technically feasible for chemical manufacturers to quantify secondary microplastic emissions arising from wear, tear and abrasion of articles once their substances have been transformed or incorporated into other products during downstream manufacturing. Research on microplastics formation over time on finished articles incorporating coatings is costly and unfortunately remains minimal. In addition, due to the absence of standardized methods even qualitative or estimated disclosures offer little insight. This creates a heavy reporting burden with limited to no added value.	E2	E2-4 - Pollution of air, water and soil	AR 5
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	We would recommend to separate disclosure requirements for subtopics on substances of concern and substances of very high concern, given different groups of users. Hypothetically, undertakings now run the risk of identifying a material topic on substances of concern, without having prescribed metrics to report on as they are not one of the user groups specified by par. 18 to disclose on this.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	We welcome the proposed revision and applaud the effort to further align with the REACH Regulation. However, we believe the alignment should go further to ensure reliable reporting of the data for the group 'users of articles with SVHC'. Under REACH Article 33, suppliers are required to inform consumers when an article contains SVHCs above the 0.1% threshold, but they are not obligated to disclose the actual quantity (e.g., 0.2%, 10%, 20%). As a result, even with the revised requirement, users will still struggle to obtain reliable and consistent data needed to report on the proposed metric (quantitative kilos/tonnes of SVHC). We recommend revising the requirement to include qualitative disclosure of SVHC content, in line with information that suppliers are obligated to inform users on under REACH.	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	We do not see the added value of requiring a breakdown of SVHC data per hazard class. All substances of very high concern are, by definition, harmful, and reporting at a total level provides sufficient insight for users. Introducing this level of granularity increases complexity without delivering proportionate benefits in terms of decision-useful information.	E2	E2-5 - Substances of concern and substances of very high concern	AR 7
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Mention the connection with AR 22 of ESRS 2 (e.g., local considerations such as air, water, and soil quality), and include 'pollutant incidents and deposits with material impacts' as an additional example (and potential item for disaggregation)	E2	E2 - Objective	10.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Reintroduce the three datapoints on current financial effects related to pollution in E2-4 Actions, as some users of sustainability statements find them particularly useful. The first two are easy to obtain from financial statements and are crucial to reflect financial materiality and ensure connectivity. The third is essential to reflect impact materiality and its link to financial materiality. Proposed wording: "The undertaking shall disclose (a) material operating and capital expenditures incurred during the reporting period in relation to major incidents and deposits; (b) material provisions for environmental protection and remediation costs; and (c) description of material incidents and deposits that occurred during the reporting year.	E2	E2 - Objective	1.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	ANC acknowledges EFRAG's simplification efforts on microplastics: quantitative information is limited to primary microplastics, which are manufactured, purchased, or sold by the company and therefore generally known. For secondary microplastics, only qualitative information is required, which reflects the greater difficulty for undertakings and a proportionate approach. Companies have raised concerns about the absence of an official definition of secondary microplastics and the limited scientific knowledge of their impacts, stressing the need for guidance and public support.	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Propose presenting SVHC quantities as a percentage of the total amount of SoC on an optional basis, alongside the disclosure of absolute values (instead of as an alternative), as users specifically request absolute values to facilitate data processing and comparability	E2	E2-5 - Substances of concern and substances of very high concern	AR 7
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	We had previously requested the removal of the data points on substances of concern, due to the lack of a clear definition and the challenges in implementation. Alternatively, ANC proposes to: - Introduce a phase-in period for substances of concern due to the challenges outlined. - Clarify the scope defined in AR 6, as it is currently ambiguous – specifically whether it applies only to companies with chemical expertise ("chemists") or to any undertaking handling chemicals. A clear definition of "chemical substances" and "chemical mixtures" should be provided to ensure consistent understanding and application across all undertakings. - Provide methodological guidance on how to report substances outside the EU, given regulatory divergences regarding substances of concern (definitions and associated requirements). Reporting may not yet be established in some jurisdictions, and certain countries may lack the infrastructure needed for pollutant data analysis. - Narrow the scope to substances that are significant and strategic for the company, by adding the following Application requirements: "Information to be disclosed under this paragraph applies for those substances the undertaking has prioritised (e.g., for management attention, resource allocation, and monitoring), due to their relevance for achieving sustainability-related objectives covered by its policies, actions and targets (if any)."	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Reporting of SoC and SVHC grouped by hazard class should be limited to SVHC.	E2	E2-5 - Substances of concern and substances of very high concern	AR 7
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Gap with ANC proposal : new data point on substances of very high concern that are procured or sold above the 0.1% threshold of Art. 33 of the REACH Regulation. This requirement appears burdensome, as REACH only requires disclosure of the substance name, not the quantity, contrary to what EFRAG envisages. Delete it.	E2	E2-5 - Substances of concern and substances of very high concern	20.

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Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	Clarification is needed on the term "regular operations" which isn't defined.	E2	E2 - Objective	6.
Excels	Ernst & Young	Auditor	United Kingdom			I agree	This comment is on E2.16(d). The distinction between the disclosures required for primary (where quantitative information will be necessary) and secondary (where only qualitative information will be requested) microplastics improves clarity on the definition of microplastics which therefore includes those intentionally manufactured/used, and those (unintentionally) generated from the products, thus enhancing comprehensibility and applicability. In addition, guidance on the identification, assessment and quantification of secondary microplastic would improve topic clarity and applicability.	E2	E2-4 - Pollution of air, water and soil	16.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	This comment is on E2.16(d). There appears to be an inconsistency in the scope between paragraph 16d and AR 5, as in paragraph 16d, secondary microplastics refer only to a breakdown of larger plastics while AR 6's definition include unintentionally produced microplastics, including through the loss of plastic pellets. We ask EFRAG to resolve these inconsistencies by aligning the definitions and ensuring all unintentional sources, such as pellet loss and abrasion are included on top of breakdown of large plastics.	E2	E2-4 - Pollution of air, water and soil	16.
Excels	Ernst & Young	Auditor	United Kingdom			I agree	We encourage EFRAG to clarify the treatment of the same substance for several capacities within a single reporting period. For example a substance that is procured, manufactured in production and then sold need to be reported in both 18 and in 18b. In our view, reporting the same quantity under multiple relevant datapoints can enhance transparency by providing a fuller view of the substance's lifecycle and operational context, as long as the overlaps are clearly explained to avoid misinterpretation. Likewise for release into the environment. Furthermore, the notions of "manufacturers" and "importers" are not defined in the ESRS. We encourage EFRAG to provide a definition of these new terms and there could be overlap.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	The current text refers to 'procured or manufactured'. We encourage EFRAG to specify whether the figures reported should be the sum of procured and manufactured, or if the substances need to be reported separately based on whether they are procured or manufactured.	E2	E2-5 - Substances of concern and substances of very high concern	18. (a)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	It is also unclear how the substances need to be reported when a company is a manufacturer/importer and a user. We encourage EFRAG to clarify that the substances should be reported once per flow (i.e. report for the role as manufacturer / importer, and for the role as user), disaggregated when relevant. User of substances or articles is highlighted in bold but the only definition in the Glossary makes references to users of sustainability statements. We suggest to align the wording of 19 to 18c with respect to release – by including the reference to "unintentional releases" in §19. In addition, the notion of user that is highlighted in bold refers to the definition of "user of sustainability statements" in the glossary. We encourage EFRAG to include a definition of "user of substances" in the glossary applicable to different sectors and substances.	E2	E2-5 - Substances of concern and substances of very high concern	19.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	The wording of the revised ESRS states that undertakings shall disclose "the amounts of any material pollutant emissions to air, water and soil from its regular operations and incidents in the reporting period". The notion of material pollutant emissions raises interpretation issues, as to what qualifies as a material pollutant. Especially, it can raise application questions in relation to AR 2 which requires reporting on pollutants listed in Annex II of IEPR and those pollutants that it measures and monitors based on environmental permits. It is unclear if a company can consider a "non material" a pollutant that is tracked under IEPR if the company considers it non material.	E2	E2-4 - Pollution of air, water and soil	16. (a)
Excels	Dragerwerk AG &Co.KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Quantities of SVHC in articles are not communicated along the supply chain. Even with very complex queries, this value cannot be determined with audit certainty, as the query options are severely restricted due to the new regulations for avoiding 'trickle-down'.	E2	E2-5 - Substances of concern and substances of very high concern	20. (a)
Excels	Dragerwerk AG &Co.KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Quantities of SVHC in articles are not communicated along the supply chain. Even with very complex queries, this value cannot be determined with audit certainty, as the query options are severely restricted due to the new regulations for avoiding 'trickle-down'.	E2	E2-5 - Substances of concern and substances of very high concern	20. (b)
Excels	Dragerwerk AG &Co.KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	There is currently no uniform, legally binding definition for this group of substances, nor is there an official list of substances. Some hazard classes according to CLP regulation are not introduced in other parts of the world. The term is used in various EU initiatives such as the Ecodesign Regulation and the EU Taxonomy, but remains context-dependent and open to interpretation. Due to this lack of clarity, mandatory information on SoC should be removed from the ESRS, as it cannot be reliably implemented by companies.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E2	E2-1 - Policies related to pollution	12.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E2	E2-2 - Actions and resources related to pollution	13.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E2	E2-3 - Targets related to pollution	14.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E2	E2-4 - Pollution of air, water and soil	15.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E2	E2-4 - Pollution of air, water and soil	16.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E2	E2-4 - Pollution of air, water and soil	16. (a)

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Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E2	E2-4 - Pollution of air, water and soil	AR 1
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E2	E2-4 - Pollution of air, water and soil	AR 3
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Please eliminate the need to report on downstream water pollution for external water treatment plants as this represents an additional reporting burden and does not fit the approach of only reporting on own operation metrics.	E2	E2-4 - Pollution of air, water and soil	AR 4
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E2	E2-4 - Pollution of air, water and soil	AR 5
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E2	E2-5 - Substances of concern and substances of very high concern	17.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E2	E2-5 - Substances of concern and substances of very high concern	18. (a)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E2	E2-5 - Substances of concern and substances of very high concern	18. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E2	E2-5 - Substances of concern and substances of very high concern	18. (c)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E2	E2-5 - Substances of concern and substances of very high concern	19.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E2	E2-5 - Substances of concern and substances of very high concern	20. (a)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E2	E2-5 - Substances of concern and substances of very high concern	20. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E2	E2-5 - Substances of concern and substances of very high concern	AR 6
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Wastewater discharge to municipalities for further treatment should not be considered as pollution.	E2	E2-1 - Policies related to pollution	AR 4
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Microplastics are to be reported for down stream value chain, however down stream impact of pollutants listed under regulation 2024/1244 is out of scope (e.g. fertilizer production)	E2	E2-4 - Pollution of air, water and soil	16.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				16. Item (a) is only those "material" pollutant emissions, but it is unclear if (b) has the same leeway for microplastics. As written, it seems companies would have to report the total # tonnes of plastic produced and just assume that it all becomes microplastics, which seems inaccurate and unhelpful for the intended audience. Recommend making (b)-(d) sub-items under (a)	E2	E2-4 - Pollution of air, water and soil	16. (a)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is recommended to remove microplastics mandate and change to voluntary disclosure. Secondary microplastics disclosure, though only required qualitatively, still poses challenges due to lack of mature methodology.	E2	E2-4 - Pollution of air, water and soil	16. (b)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	ED §17(b)-18 vs 2023 §40(a)(iii)-(g), §40(b)-(d). Partial simplification. Retains fossil fuel/chemicals/controversial weapons/tobacco statement. Eliminated revenue table, headcount and reconciliation. Revenue breakdown by ESRS sector deleted; only "list of significant sectors" now required. Headcount by geography, banned products, explicit sustainability goals, and IFRS 8 reconciliation deleted.	ESRS2	ESRS 2 - SBM-1 - Strategy, business model and value chain	17. (b)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The definition states "its facilities and facilities of key suppliers", this is inconsistent with the general description of the scope of DMA and disclosure. We would prefer if there was clarity if this is about stakeholders or business relations in the same catchment and it this appliers to any material pollution related IRO included.	E2	E2-4 - Pollution of air, water and soil	AR 3
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				AR 4 for para 16(a) Treating the transfer of water pollutants to an external treatment plant as "pollution" is incredibly inappropriate, if not dangerous. It treats an uncontrolled discharge to surface water as the same as controlled transfer to a dedicated off-site facility for processing, when the latter is exactly the kind of behavior that this exercise should be trying to incentivize. The only way in which this clause is appropriate is if the receiving treatment plant is incapable of processing the pollutant in question and releases it back into the natural environment. Change to: "Transfers of water pollutants to external treatment plants that are incapable of properly treating said pollutant qualify as pollution in downstream value chain."	E2	E2-4 - Pollution of air, water and soil	AR 4

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Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				For 20 — in some cases articles may have many varying levels of an SVHC in a specific product. It would be extremely time consuming and also very challenging to report the amount fo SVHC in every single article imported into the EU. Recommend that the requirement is to report that a substance is present in a product above the 0.1% threshold rather than having to report on the specific quantity of the substance in each article. It is unclear whether the 'manufacturing' obligations in disclosure requirement 20 only apply to manufacturing operations located in the EU. Recommend clarifying that it only applies within the EU.	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				It is unclear whether the 20(a) obligation to disclose the quantity of SVHCs above 0.1% w/w in procured components only apply to components that procured in the EU. Recommend clarifying that it only applies within the EU.	E2	E2-5 - Substances of concern and substances of very high concern	20. (a)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				It is unclear whether the 20(b) obligation to disclose the quantity of SVHCs above 0.1% w/w on sold articles only apply to the products that are imported into the EU. Recommend clarifying that it only applies within the EU.	E2	E2-5 - Substances of concern and substances of very high concern	20. (b)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				AR 4 for para 16(a) Treating the transfer of water pollutants to an external treatment plant as "pollution" is incredibly inappropriate, if not dangerous. It treats an uncontrolled discharge to surface water as the same as controlled transfer to a dedicated off-site facility for processing, when the latter is exactly the kind of behavior that this exercise should be trying to incentivize. The only way in which this clause is appropriate is if the receiving treatment plant is incapable of processing the pollutant in question and releases it back into the natural environment. Change to: "Transfers of water pollutants to external treatment plants that are incapable of properly treating said pollutant qualify as pollution in downstream value chain."	E2	E2-4 - Pollution of air, water and soil	AR 4
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	The current design of the SoC/SVHC disclosure risks missing its stated objective of helping users understand material impacts on health and the environment. Reporting overall hazard-based volumes without exposure or risk context can mislead stakeholders, as it ignores whether risks are effectively controlled. For instance, many metals are intrinsically classified as hazardous but are used safely under strict exposure controls. This creates reputational risks, especially for Green Deal-critical materials such as cobalt, nickel, lead, and PGMs, which are essential for renewable energy and recycling but are still flagged as hazardous. It remains unclear whether the disclosure is intended to map potential regulatory risk (substances likely to face restrictions) or to quantify hazardous flows in society. In its current form, it achieves neither goal effectively and risks undermining both comparability and stakeholder understanding.	E2	E2 - Objective	8.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	The current design of the SoC/SVHC disclosure risks missing its stated objective of helping users understand material impacts on health and the environment. Reporting overall hazard-based volumes without exposure or risk context can mislead stakeholders, as it ignores whether risks are effectively controlled. For instance, many metals are intrinsically classified as hazardous but are used safely under strict exposure controls. This creates reputational risks, especially for Green Deal-critical materials such as cobalt, nickel, lead, and PGMs, which are essential for renewable energy and recycling but are still flagged as hazardous. It remains unclear whether the disclosure is intended to map potential regulatory risk (substances likely to face restrictions) or to quantify hazardous flows in society. In its current form, it achieves neither goal effectively and risks undermining both comparability and stakeholder understanding.	E2	E2-5 - Substances of concern and substances of very high concern	17.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	Disclosing the total weight of SoC and SVHC, especially in mixtures, adds an excessive burden on companies and does not help understand if a company works sustainably. Perhaps reporting SoC and SVHC under a qualitative statement may help.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	Same as above	E2	E2-5 - Substances of concern and substances of very high concern	19.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	This amendment can help align this DR to the REACH regulation. However, the burden on companies to disclose SVHC does not change	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	Disclosing SoC and SVHC by hazard class is heavily burdensome for companies because it will require companies to report in double counting	E2	E2-5 - Substances of concern and substances of very high concern	AR 7
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The structure of disclosure requirements of pollution-related policies might be streamlined, but the burden has not been reduced	E2	E2-1 - Policies related to pollution	12.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The structure of disclosure requirements of pollution-related actions might be streamlined, but the burden has not been reduced	E2	E2-1 - Policies related to pollution	13.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The structure of disclosure requirements of pollution-related targets might be streamlined, but the burden has not been reduced	E2	E2-3 - Targets related to pollution	14.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	This DR on pollution related to site-specific locations increases the burden since pollutants differ from one site to another.	E2	E2 - Objective	10.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	- Companies in the scope of the Industrial Emission Directive shall reported under Regulation (EU) 2024/1244 (Industrial Emissions Portal Regulation). This would ensure legal consistency, avoid regulatory overlap and reduce the reporting burden. There is no need to include any additional pollutants. - While pollutant selection based on materiality is reasonable, expanding disclosures to include local-level environmental permits massively broadens the scope of emissions and prevents standardisation across companies.	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	Thresholds for pollutants are now less clear, as they are framed as optional ('they can be considered'), which weakens comparability.	E2	E2-4 - Pollution of air, water and soil	AR 3
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	- Reporting on transfers of water pollutants to external treatment plants creates double reporting. - Classifying transfers to water treatment plants as pollution is illogical, since these facilities exist precisely to remove contaminants.	E2	E2-4 - Pollution of air, water and soil	AR 4

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	The addition of a new disclosure layer on microplastics in the downstream, introduces unnecessary reporting burden.	E2	E2-4 - Pollution of air, water and soil	16.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				It is unclear whether the 'manufacturing' obligations in disclosure requirement 20 only apply to manufacturing operations located in the EU. Recommend clarifying that it only applies within the EU.	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				It is unclear whether the 20(a) obligation to disclose the quantity of SVHCs above 0.1% w/w in procured components only apply to components that procured in the EU. Recommend clarifying that it only applies within the EU.	E2	E2-5 - Substances of concern and substances of very high concern	20. (a)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				It is unclear whether the 20(b) obligation to disclose the quantity of SVHCs above 0.1% w/w on sold articles only apply to the products that are imported into the EU. Recommend clarifying that it only applies within the EU.	E2	E2-5 - Substances of concern and substances of very high concern	20. (b)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				For 20 — in some cases articles may have many varying levels of an SVHC in a specific product. It would be extremely time consuming and also very challenging to report the amount fo SVHC in every single article imported into the EU. Recommend that the requirement is to report that a substance is present in a product above the 0.1% threshold rather than having to report on the specific quantity of the substance in each article.	E2	E2-5 - Substances of concern and substances of very high concern	20.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				16. Item (a) is only those "material" pollutant emissions, but it is unclear if (b) has the same leeway for microplastics. As written, it seems companies would have to report the total # tonnes of plastic produced and just assume that it all becomes microplastics, which seems inaccurate and unhelpful for the intended audience. Recommend making (b)-(d) sub-items under (a)	E2	E2-4 - Pollution of air, water and soil	16. (a)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				AR 4 for para 16(a) Treating the transfer of water pollutants to an external treatment plant as "pollution" is incredibly inappropriate, if not dangerous. It treats an uncontrolled discharge to surface water as the same as controlled transfer to a dedicated off-site facility for processing, when the latter is exactly the kind of behavior that this exercise should be trying to incentivize. The only way in which this clause is appropriate is if the receiving treatment plant is incapable of processing the pollutant in question and releases it back into the natural environment. Change to: "Transfers of water pollutants to external treatment plants that are incapable of properly treating said pollutant qualify as pollution in downstream value chain."	E2	E2-4 - Pollution of air, water and soil	AR 4
Excels	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	It is unclear whether the obligation to disclose information in points (a–c) applies only to producers and importers of potentially hazardous substances and substances of very high concern, while downstream users should only report emissions during production or services. Further clarification is also needed for cases where substances are only transported but not used or purchased by the company.	E2	E2-5 - Substances of concern and substances of very high concern	18.
Excels	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	The disclosure requirement and related AR 2 does not specify which PAHs should be reported. PAHs cover many organic compounds, while Annex II to the E-PRTR Regulation refers only to five substances (benzo(a)pyrene, benzo(b)fluoranthene, benzo(k)fluoranthene, indeno(1,2,3-cd)pyrene). Clarification is needed whether companies should report only the sum of these five substances or total PAH emissions.	E2	E2-4 - Pollution of air, water and soil	16. (a)
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	This datapoint supposes that undertaking shall justify the local materiality of pollutants. As a clarification, it should be specified that aggregation at the group level remains possible.	E2	E2 - Objective	10.
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	As a clarification, we need more certainty to ensure information required under this paragraph, combined with the paragraph 3.1 from ESRS 1, let the operator the possibility to report only relevant emissions of specific substances and not all emissions coming from all substances.	E2	E2-4 - Pollution of air, water and soil	16. (a)
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	It should be noted that the Regulation (UE) 2024/1244, which introduces three new pollutants in its Annex II, will enter into force at 1st january 2028. In addition, the sentence "It can include additional pollutants that it considers material" should be deleted in order to avoid unnecessary debates. This provision is not considered necessary, since undertakings can disclose entity-specific information if they want to do so.	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	The thresholds for releases defined in Annex II of Regulation (EU) 2024/1244 apply to EU activities listed in the Annex I. To ensure international data comparability, it could be relevant to specify that these thresholds also apply to activities listed in the Annex I, regardless of their location (i.e. inside or outside EU).	E2	E2-4 - Pollution of air, water and soil	AR 3
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	We note that paragraphs 9(b) to 9(g) have been added. We request a guarantee that these additions do not introduce new disclosures requirements (e.g. thresholds, list of pollutants to be considered…).	E2	E2 - Objective	9.
Excels	ASD					I partially agree and partially disagree	We call to delete E3-4_02 because it is redundant	E3	E3-4 - Water metrics	17. (b)
Excels	ASD					I partially agree and partially disagree	We call to delete E3-4_03 and E3-4_04 because they are redundant	E3	E3-4 - Water metrics	17. (e)
Excels	ASD					I agree	E3-4_05 and E3-4_06 were deleted. We welcome EFRAG proposed change.	E3	E3-4 - Water metrics	4.
Excels	ASD					I agree	E3-4_07 and E3-4_08 were deleted. We welcome EFRAG proposed change.	E3	E3-4 - Water metrics	4.
Excels	ASD					I partially agree and partially disagree	The definition provided for calculating water consumption has been updated, but it does not seem completely clear. In particular, we suggest to provide clarification on water storage	E3	E3-4 - Water metrics	17.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	A specific narrative content will complicate the structure of a generic GDR-A. Suggestion: Create an AR to specify content (without a specific DP): "The undertaking shall specify, which, if any key actions and resources, are related to areas at water risk, including areas of high-water stress."	E3	E3-2 - Actions and resources related to water	14.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It should be made clearer that only those metrics are to be reported for sub-topics that have been assessed as essential in the context of the DMA. The list of sub-topics and the metrics should therefore match each other - currently a metric for total water recycled or reused is required, but there is no sub-topic related to this. C) and d) seem to be an extension of the Delegated Act.	E3	E3-4 - Water metrics	17.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	ESRS E3 – Chapter: Metrics (§17, AR 1–3) Issue: The requirement to report multiple water metrics (consumption, withdrawal, discharge, recycling, storage) can be burdensome, especially when some are not material. Proposed simplification: Allow undertakings to omit metrics that are not material to their activities, with a simple justification. Proposed text: "Undertakings may omit water metrics that are not material, provided they disclose the rationale for omission." Why it helps: This reduces reporting burden and ensures disclosures are relevant to stakeholders.	E3	E3-4 - Water metrics	17.
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	ESRS E3 – Metrics and Targets (Chapter: E3-3 Targets, E3-4 Metrics, AR 1–3) Issue: The current ESRS E3 V1.6 does not explicitly reference the EU Taxonomy criteria for water (Substantial Contribution or DNSH), nor does it allow companies to directly use these criteria as a basis for their water-related actions, policies, and targets. Proposed simplification: Add an explicit cross-reference to the EU Taxonomy for water-related activities. Allow undertakings that already apply Substantial Contribution (SC) or Do No Significant Harm (DNSH) criteria under the Taxonomy to use these as the reference for their ESRS E3 disclosures on actions, policies, and targets. Proposed text: "Where undertakings apply the EU Taxonomy criteria for water (Substantial Contribution or Do No Significant Harm) to their activities, they may use these criteria as the reference for their water-related actions, policies, and targets under ESRS E3. In such cases, undertakings should indicate the alignment and provide a cross-reference to the relevant Taxonomy criteria." Why it helps: This approach ensures regulatory coherence, reduces double reporting, and enables companies to leverage existing compliance work. It also increases comparability and clarity for stakeholders by aligning ESRS E3 disclosures with established EU sustainability frameworks.	E3	E3-3 - Targets related to water	15.
Excels	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	text should be amended to identify that disclosure of water related targets should only be required if they are established - this should not be a mandatory disclosure	E3	E3-3 - Targets related to water	15.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The new version adopts a more simplified and cross-cutting approach, aligned with GDR-P. While this change promotes greater standardisation and facilitates reporting, it reduces the depth and specificity of the required information, particularly in areas such as: • Prevention of water pollution; • Sustainable product and service design; • Specific commitments in water-stressed areas; • Policies on sustainable oceans and seas. This simplification may compromise the visibility of critical practices, especially in sectors with strong dependence on or impact over water and marine resources. Optional disclosures or sector-specific guidance could help preserve relevance.	E3	E3-1 - Policies related to water	11.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The new version adopts a more simplified and cross-cutting approach, aligned with GDR-A. While this change facilitates reporting and promotes comparability, it reduces technical depth, particularly by removing the reference to the water mitigation hierarchy (avoid, reduce, reuse, restore). To maintain clarity and ambition, it may be helpful to recommend voluntary disclosure of mitigation strategies, especially in water-intensive sectors.	E3	E3-2 - Actions and resources related to water	13.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The new version adopts a more simplified and cross-cutting approach, aligned with GDR-T. While this facilitates reporting and comparability, it reduces the depth and specificity of the information required, especially regarding: • The link between targets and water risk areas or marine resource management; • The consideration of ecological thresholds and specific allocations; • The distinction between mandatory and voluntary targets. This simplification may compromise the visibility of critical environmental commitments. Optional disclosures could help ensure that key water-related ambitions remain transparent and traceable.	E3	E3-3 - Targets related to water	15.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The new version retains the main indicators but adopts a more simplified and standardised structure, with less demand for technical context. The exclusion of elements such as water intensity and methodological details may reduce comparability and understanding of water efficiency. On the positive side, the explicit inclusion of water intake and discharge reinforces an integrated view of water management. This could be further supported by encouraging sector-specific metrics where relevant.	E3	E3-4 - Water metrics	17.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	It is stated that the term 'water' refers to surface water, and groundwater and marine waters. GRI 303-3 requires to report the following water withdrawal sources: surface water, groundwater, seawater, produced water and third-party water. We propose aligning the scope of water with the water withdrawal sources in GRI 303-3, which are also closely aligned with the water withdrawal sources used by CDP. This feedback also applies to NMIG 5 for para 17.	E3	E3 - Objective	7.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I disagree	We propose changing the unit of measurement from cubic meters to megaliters, for alignment with GRI 303: Water and Effluents. Using megaliters is also in alignment with CDP.	E3	E3-4 - Water metrics	AR 2

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Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Please clarify the quality of water. Total water generally refers to the sum of all water volumes of all qualities (e.g. fresh, brackish, …); while this metric (the sum of all water volumes of whatever quality) seems less appicable to storage or recycling or consumption (in particular if related to a freshwater aspect such as water stress). A clear reference to freshwater in the metrics would be in line with NMIG 4 for para.15 relative to the targets.	E3	E3-4 - Water metrics	17.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The location-based approach to environmental impacts proposed in the standards is disproportionate and should be entirely eliminated. It introduces unnecessary complexity, increases the reporting burden, and does not align with the principles of relevance and proportionality.	E3	E3 - Objective	9.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	From our perspective, removing the intensity metric makes sense because the metric involved additional effort, and the comparability of the metric with other companies was not guaranteed.	E3	E3-4 - Water metrics	16.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	We consider it a positive step that the disclosure "changes in water storage" has been removed. This simplifies the reporting process.	E3	E3-4 - Water metrics	17. (f)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	We support the simplification of the requirement, as this avoids duplication with some overarching requirements in ESRS 2.	E3	E3-1 - Policies related to water	11.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	We support the simplification of the requirement, as this avoids duplication with some overarching requirements in ESRS 2.	E3	E3-2 - Actions and resources related to water	13.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	We support the simplification of the requirement, as this avoids duplication with some overarching requirements in ESRS 2.	E3	E3-3 - Targets related to water	15.
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We suggest EFRAG specify that areas at water risk, including areas of high-water stress, referred to in ESRS E3 with respect to the disclosures of key actions and water consumption concerns only areas that are currently affected. Areas that could be affected by water risks in the future should however be considered in the climate resilience analysis that is reported upon under DR E1-3.	E3	E3 - Interaction with other ESRS	10. (a)
Excels	Triodos Bank N.V.	Bank	Netherlands			I agree	We agree to make total water withdrawal and total water discharges a mandatory requirement.	E3	E3-4 - Water metrics	4.
Excels	Triodos Bank N.V.	Bank	Netherlands			I disagree	We recommend to keep policies related to water and marine sources in.	E3	E3-1 - Policies related to water	1.
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Disclosure of reasons for not having adopted policies in areas of high-water stress shall be deleted	E3	E3-1 - Policies related to water	12.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	We note that paragraphs 8(b) to 8(e) have been added. We request a guarantee that these additions do not introduce new disclosures requirements.	E3	E3 - Objective	8.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	Companies consider the data for water withdrawal is not possible to provide as there are no corresponding water meters. Most industrial companies calculate their water consumption through estimations and modelling rather than by using the water balance approach (i.e., the difference between water withdrawals and discharges). Consequently, turning this "may" datapoint into "shall" datapoint does not align with the principle of simplification. On the contrary, it would introduce greater complexity, particularly in the context of audits. We request that this datapoint be included in the NMIG.	E3	E3-4 - Water metrics	17. (c)
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	Companies consider the data for water discharge is not possible to provide as there are no corresponding water meters. Most industrial companies calculate their water consumption through estimations and modelling rather than by using the water balance approach (i.e., the difference between water withdrawals and discharges). Consequently, turning this "may" datapoint into "shall" datapoint does not align with the principle of simplification. On the contrary, it would introduce greater complexity, particularly in the context of audits. We request that this datapoint be included in the NMIG.	E3	E3-4 - Water metrics	17. (d)
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	Most industrial companies calculate their water consumption through estimations and modelling rather than by using the water balance approach (i.e., the difference between water withdrawals and discharges). Consequently, this AR should be amended as follow "if relevant, water consumption can be calculated using a water balance approach […]".	E3	E3-4 - Water metrics	AR 1
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	General comment: EFRAG should develop comprehensive non-mandatory implementation guidance for each topical standard, including ESRS E3. The guidance should comprise instructions and examples how to conduct the materiality assessment for the topic, how to apply the disclosure requirements, and to calculate the metrics. Sectoral examples could be added, where appropriate.	E3	E3 - Objective	1.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	The role of marine water in ESRS E3 needs to be clarified. The objective section of the standard suggests that marine water is part of the term "water" and consequently to be considered in all disclosure requirements. However, it is not common nor useful to conflate marine water and freshwater in metrics for water withdrawal, consumption and waste water (E3-4). Further, the concepts of "areas at water risk" or "area of high water stress" are not applicable to marine water. We recommend to introduce application requirements that clearly state how to calculate the metrics. If marine water is used by the undertaking, it should generally be reported separately from freshwater.	E3	E3-4 - Water metrics	17.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	The [Draft] requirement on water policies should refer to areas of high-water stress. The concept of "areas at water risk" should instead be moved to the provisions for the materiality assessment (see comments for ESRS 2 IRO-1).	E3	E3-1 - Policies related to water	12.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	The [Draft] disclosure requirements on water-related actions should refer to sites located in areas of high water stress instead of areas at water risk. The concept of "areas at water risk" should instead be moved to the provisions for the materiality assessment (see comments for ESRS 2 IRO-1).	E3	E3-2 - Actions and resources related to water	14.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	The concept of "area of high water stress" should be further strengthened in the standard. We recommend to reinstate the disclosure of a list of sites located in areas of high water stress (ESRS E3, AR 15 (a)), as these are by definition prone to significant water-related risks and/or impacts. The [Draft] disclosure requirements for policies (para. 12) and actions (para. 14) should then link to the sites located in these areas.	E3	E3-4 - Water metrics	17.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	The water metrics proposed in amended E3-4 need to be specified and clarified to avoid diverging interpretations: 1.The definition of water withdrawals should explicitly mention the sources to be included in the metric, i.e. surface water, groundwater, municipal water, marine water, collected rainwater, reclaimed water from external sources. 2.Water withdrawals should be disaggregated by source as the water source significantly determines the related environmental and social impact (e.g. water withdrawn from groundwater vs. reclaimed water from a business partner). Especially, marine water withdrawn, consumed or discharged should be reported separately from freshwater. 3. Water consumption should be separately reported for areas of high-water stress (instead of areas at water risk). 4.Delete the distinction between water reused and recycled as it is not necessary (both relate to the reuse of water within an undertaking's organizational boundaries). 5.Total water stored could be deleted as individual disclosure requirement;	E3	E3-4 - Water metrics	17.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Introduce a definition for "reclaimed water" (see comment above) in the Glossary. The definition should rely on that of Regulation (EU) 2020/741 on minimum requirements for water reuse.	E3	E3-4 - Water metrics	17. (a)
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	EFRAG should consider to include guidance developed for the purpose of the Voluntary SME Standard (VSME) on water withdrawals, water consumption and areas of high water stress (p. 30 ff.) in the ESRS' non-mandatory implementation guidance (NMIG).	E3	E3-4 - Water metrics	17.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	This comment relates to the definition of areas of high water risk (the questionnaire does not allow to comment on terms and definitions). We recommend to sharpen the definition in accordance with the respective concepts in the WRI Aqueduct Water Risk Atlas and WWF Water Risk Filter. It should be changed as follows: "high water stress in an area is assessed using either of the following indicators and their thresholds: i.The ratio of total annual water withdrawal to total available annual renewable water supply is high (40-80%) or extremely high (>80%); ii.The ratio of water consumption-to-availability is: (a) moderate (dry-year depletion, annual average is 25-75% depleted, but at least 3 out of 30 years had at least one month with monthly depletion ratio >75%); (b) high (seasonal depletion, annual average is 25-75% depleted, but at least one month every year, the monthly depletion ratio is >75%;) or (c) very high (ongoing depletion, where the depletion ratio on average is >75%)."	E3	E3-4 - Water metrics	17. (b)
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	Please clarify the quality of water. Total water generally refers to the sum of all water volumes of all qualities (e.g. fresh, brackish, ...); are we sure that we want all these metrics as the sum of all water volumes of whatever quality? It doen't seem a useful information for storage or recycle or consumption. A clear reference to freshwater in the metrics would be more relevant and in line with NMIG 4 for para.15 relative to the targets.	E3	E3-4 - Water metrics	17.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially agree We find it important that clear guidance is offered as to whether this and other DRs are required to be disclosed, if it is not a material issue that a particular site is located in an area at water risk incl. areas of high-water stress. The clear guidance should help qualify for instance that facilities located in a water-stress area are not material if they are not using or dependent on withdrawal of water (for instance it is not required to report on a specific site if an entity has a store or a production facility in such an area if they are not dependent on water withdrawals.	E3	E3-1 - Policies related to water	12.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	We find that the changes in the disclosure requirements to require a mandatory "water balance approach" is excessive. Water consumption in an area, where there is no risk of "water stress" should not require a full "water balance approach". We note that more "may"-datapoints than the ones highlighted in Q23 are effectively changed to shall and we believe that the requirement for a full mandatory "water balance approach" needs to be more specifically narrowed down to the "areas of high-water stress" or closer linked to the actual, identified IRO. We would also like to note, that for certain IRO's, it may not be the consumption, that is the key issue, but the specific water discharges (frequency or intensity in a river for instance) or the storage of water (for instance in a dam) that are relevant to the identified IRO. Hence, we do not agree with the change to a mandatory "water balance approach".	E3	E3-4 - Water metrics	17.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	It is unclear whether, if a company does not have a water policy (and discloses this fact under ESRS 2 new point 30), it should also disclose that it has sites located in areas at water risk, including areas of high-water stress (if it has such sites). Given the amended definition of "sites," it is unclear whether this also includes temporary locations related to water abstraction (e.g., construction sites).	E3	E3-1 - Policies related to water	13.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	When disclosing indicators regarding "total water consumption in areas at water risk," the imprecise definition of these areas and the lack of methods for identifying them may be problematic. The definition mentions "one or more water bodies," but it is unclear whether this refers only to status of surface water, groundwater, or both.	E3	E3-4 - Water metrics	17. (b)
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	Looking at the definition of "recycled and reused water," it seems unclear how this water and wastewater are included in a company's water balance. Should "recycled and reused water" be considered part of total water withdrawal or total water discharges?	E3	E3-4 - Water metrics	17. (e)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	while a reference to GDR is included in the standard to support undertakings on how to report about policies, actions, metrics and targets, no reference to financial effects related requirement is included. This could cause confusion.	E3	E3 - Objective	1.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	we would suggest to align these definitions and requirements to the ones defined by GRI 303. In this regard, GRI mentions seawater (instead marine waters). we would suggest also to include a definition of marine waters, following GRI clarifications: seawater water in a sea or in an ocean Source: International Organization for Standardization. ISO 14046:2014. Environmental management — Water footprint — Principles, requirements and guidelines. Geneva: ISO, 2014; modified	E3	E3 - Objective	7.

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Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	to be aligned with E3-1, I would suggest to include a mention to areas of high-water stress	E3	E3 - Objective	9.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	we would suggest to add in AR some public and available tools that allow undertakings to identify areas at water risk	E3	E3-3 - Targets related to water	11.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	To be added " when applicable"	E3	E3-2 - Actions and resources related to water	14.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	should also be requested to disclose total water withdrawal in areas at water risk, including areas of high-water stress?	E3	E3-4 - Water metrics	17. (c)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	minor comment. in the annex II (glossary) a reference to Water (recycled and reused) is made. Could both sources be aligned?	E3	E3-4 - Water metrics	17. (e)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS E3 Water, when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, and targets (if in place), dependencies when relevant, metrics and financial effects Suggestion: When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS E3 Water, when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, metrics and targets (if in place), dependencies when relevant, metrics and financial effects.	E3	ESRS E3 - Objective	1.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Unnecessary duplication: The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M. In particular: (a) if the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact; (b) the undertaking may present the description of its material impacts, risks and opportunities, in accordance with [Draft] Amended ESRS 2 IRO-2, alongside information about its policies, actions, targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative Suggestion: The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M. In particular: (a)if the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact; (b)the undertaking may present the description of its material impacts, risks and opportunities, in accordance with [Draft] Amended ESRS 2 IRO-2, alongside information about its policies, actions, targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative .	E3	ESRS E3 - Objective	5.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I agree	Removal is welcome as other regulation already drives the requirements regarding ESG risk management and there is no need to further address this within ESRS, especially for the financial services sector.	E3	Disclosure Requirement E3-5 - Anticipated financial effects from material water and marine resources-related risks and opportuniPes	n/a
Excels	Allianz SE	Insurance	Germany			I partially agree and partially disagree	"If the undertaking has sites located in areas at water risk, including areas of highwater stress that are not covered by its water-related policies, it shall disclose this fact." The wording should be crystal clear that it refers to the sites in what the undertaking considers own operations according to ESRS 1 ("undertaking has sites") --> Example: E4.14 (E4-2 Policies…) refers to "sites in its own operations"	E3	E3-1 - Policies related to water	12.
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We disagree with this new (!) data point. As a matter of principle, no new data points should be included in the revised ESRS. This data point also places a heavy additional burden on companies, as the reporting level would become highly disaggregated if reporting had to be done at the location or asset level. Furthermore, information on PAT is generally not specific to a location or asset level, but rather at a higher level. Reporting at such a low level of aggregation would therefore not be effective.	E3	E3 - Objective	9.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	At the end of the sentence the following should be added "and indicate all identified material negative impacts and risks that remained unaddressed by actions during the reporting year"	E3	E3-2 - Actions and resources related to water	13.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	At the end of the sentence the following should be added "against each action disclosed under DR G1-2".	E3	E3-3 - Targets related to water	15.
Excels	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom			I partially agree and partially disagree	The disclosure of dependencies has been further weakened (to 'when relevant') in the new paragraph 1. The TNFD suggests to remove the specification 'when relevant' in paragraph 1 and reinstate, either at the level of ESRS 2 or at the level of the individual topical standard, a similar text to the Set 1 paragraphs, such as the one asking for disclosure of 'the nature, type and extent of the undertaking's material (…) dependencies (…) related to [water], and how the undertaking manages them'.	E3	E3 - Objective	1.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Please note that this comment relates to objectivee 8 (can not be inserted / selected in this file): It shows several legislations but there is no data-point referencing to it afterwards. As this only should be discloses when relevant and material, this probably will be adressed if it is relevant. It might be misleading to include the frameworks in the objective as it could lead to reporting immaterial information. In the log of amendments file I read it that it is now included because it was used as a source for the standard, then it can better be included in the standard as a source then as an objective.	E3	E3-1 - Policies related to water	11.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	It would be relevant to request the undertaking to include whether when setting targets ecological thresholds and entiticy specific allocations were taken into consideration (as was included in the original ESRS E3-3 paragraph 24).	E3	E3-3 - Targets related to water	15.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Objective 8.) with 5 references to other EU Regulations increase complexity and uncertaintiy for preparer of sustainability statement. Please delete these references.	E3	E3-1 - Policies related to water	11.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	9) Disaggregation will lead to too much detail level and will increase reporting workload. Definition of "appropiate level" is needed	E3		
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Methodology needs to be less precise in order to provide invidual solutions for undertakings	E3		AR 1
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Comment to deleted AR1 (Set 1 as per DA 2023): Reference to ESRS 1 AR 7 is wrong, there should be a reference to ESRS 2 AR 22	E3		
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Statements/information referring to the entirety of sites located in water-stressed areas are acceptable. However, it should not be required that we report at site level or explicitly list the individual sites.	E3	E3-4 - Water metrics	11.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Statements/information referring to the entirety of sites located in water-stressed areas are acceptable. However, it should not be required that we report at site level or explicitly list the individual sites.	E3	E3-4 - Water metrics	AR 2
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	General comment: EFRAG should develop comprehensive non-mandatory implementation guidance for each topical standard, including ESRS E3. The guidance should comprise instructions and examples how to conduct the materiality assessment for the topic, how to apply the disclosure requirements, and to calculate the metrics. Sectoral examples could be added, where appropriate.	E3	E3 - Objective	1.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	The role of marine water in ESRS E3 needs to be clarified. The objective section of the standard suggests that marine water is part of the term "water" and consequently to be considered in all disclosure requirements. However, it is not common nor useful to conflate marine water and freshwater in metrics for water withdrawal, consumption and waste water (E3-4). Further, the concepts of "areas at water risk" or "area of high water stress" are not applicable to marine water. We recommend to introduce application requirements that clearly state how to calculate the metrics. If marine water is used by the undertaking, it should generally be reported separately from freshwater.	E3	E3-4 - Water metrics	17.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	The [Draft] requirement on water policies should refer to areas of high-water stress. The concept of "areas at water risk" should instead be moved to the provisions for the materiality assessment (see comments for ESRS 2 IRO-1).	E3	E3-1 - Policies related to water	12.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	The [Draft] disclosure requirements on water-related actions should refer to sites located in areas of high water sterss instead of areas at water risk. The concept of "areas at water risk" should instead be moved to the provisions for the materiality assessment (see comments for ESRS 2 IRO-1).	E3	E3-2 - Actions and resources related to water	14.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	The concept of "area of high water stress" should be further strengthened in the standard. We recommend to reinstate the disclosure of a list of sites located in areas of high water stress (ESRS E3, AR 15 (a)), as these are by definition prone to significant water-related risks and/or impacts. The [Draft] disclosure requirements for policies (para. 12) and actions (para. 14) should then link to the sites located in these areas.	E3	E3-4 - Water metrics	17.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	The water metrics proposed in amended E3-4 need to be specified and clarified to avoid diverging interpretations: 1.The definition of water withdrawals should explicitly mention the sources to be included in the metric, i.e. surface water, groundwater, municipal water, marine water, collected rainwater, reclaimed water from external sources. 2.Water withdrawals should be disaggregated by source as the water source significantly determines the related environmental and social impact (e.g. water withdrawn from groundwater vs. reclaimed water from a business partner). Especially, marine water withdrawn, consumed or discharged should be reported separately from freshwater. 3. Water consumption should be separately reported for areas of high-water stress (instead of areas at water risk). 4.Delete the distinction between water reused and recycled as it is not necessary (both relate to the reuse of water within an undertaking's organizational boundaries). 5.Total water stored could be deleted as individual disclosure requirement;	E3	E3-4 - Water metrics	17.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Introduce a definition for "reclaimed water" (see comment above) in the Glossary. The definition should rely on that of Regulation (EU) 2020/741 on minimum requirements for water reuse.	E3	E3-4 - Water metrics	17. (a)
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	EFRAG should consider to include guidance developed for the purpose of the Voluntary SME Standard (VSME) on water withdrawals, water consumption and areas of high water stress (p. 30 ff.) in the ESRS' non-mandatory implementation guidance (NMIG).	E3	E3-4 - Water metrics	17.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	This comment relates to the definition of areas of high water risk (the questionnaire does not allow to comment on terms and definitions). We recommend to sharpen the definition in accordance with the respective concepts in the WRI Aqueduct Water Risk Atlas and WWF Water Risk Filter. It should be changed as follows: "high water stress in an area is assessed using either of the following indicators and their thresholds: i.The ratio of total annual water withdrawal to total available annual renewable water supply is high (40-80%) or extremely high (>80%); ii.The ratio of water consumption-to-availability is: (a) moderate (dry-year depletion, annual average is 25-75% depleted, but at least 3 out of 30 years had at least one month with monthly depletion ratio >75%); (b) high (seasonal depletion, annual average is 25-75% depleted, but at least one month every year, the monthly depletion ratio is >75%;) or (c) very high (ongoing depletion, where the depletion ratio on average is >75%)."	E3	E3-4 - Water metrics	17. (b)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Please clarify the quality of water. Total water generally refers to the sum of all water volumes of all qualities (e.g. fresh, brackish, ...); while this metric (the sum of all water volumes of whatever quality) seems less appicable to storage or recycling or consumption (in particular if related to a freshwater aspect such as water stress). A clear reference to freshwater in the metrics would be in line with NMIG 4 for para. 15 relative to the targets.	E3	E3-4 - Water metrics	17.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I agree	We support the changes proposed.	E3	E3-2 - Actions and resources related to water	2.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I agree	We support the changes proposed.	E3	E3-4 - Water metrics	17. (d)
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	While not updated; the definition of areas at water risk - relates to a definition in a EU regulation. This definition and concept is practically not replicable across non-EU countries due to varying data availability and definitions. While the concept of areas at water stress is clearly definied with thresholds, areas at water risk bear a high risk of different interpretation across organizations and countries. We would suggest to specify, how an organization can determine when an area is to be considered at water risk more concretely. "Issues" in this context are very broad, it is not clear if this is intended to relate to the financial impact side of things (i.e. regulatory/reputational issues).	E3	E3-4 - Water metrics	17. (b)
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Meters in factories are not flow meters, which makes it difficult to estimate discharges to calculate consumption.	E3	E3-3 - Targets related to water	17. (d)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It should be made clearer that only those metrics are to be reported for sub-topics that have been assessed as essential in the context of the DMA. The list of sub-topics and the metrics should therefore match each other - currently a metric for total water recycled or reused is required, but there is no sub-topic related to this.	E3	E3-4 - Water metrics	17.
Excels	SAIM GmbH	Consultant (including software vendor)	Germany			I agree	The removal of marine resources (except for marine waters) in the various contexts from the E3 standard makes a lot of sense as a simplification.	E3	E3 - Objective	3.
Excels	SAIM GmbH	Consultant (including software vendor)	Germany			I agree	We agree that water intensity is not a highly useful datapoint and can be deleted.	E3	E3-4 - Water metrics	17. (f)
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	We note that paragraphs 8(b) to 8(e) have been added. We request a guarantee that these additions do not introduce new disclosures requirements.	E3	E3 - Objective	8.
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	Companies consider the data for water withdrawal is not possible to provide as there are no corresponding water meters. Most industrial companies calculate their water consumption through estimations and modelling rather than by using the water balance approach (i.e., the difference between water withdrawals and discharges). Consequently, turning this "may" datapoint into "shall" datapoint does not align with the principle of simplification. On the contrary, it would introduce greater complexity, particularly in the context of audits. We request that this datapoint be included in the NMIG.	E3	E3-4 - Water metrics	17. (c)
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	Companies consider the data for water discharge is not possible to provide as there are no corresponding water meters. Most industrial companies calculate their water consumption through estimations and modelling rather than by using the water balance approach (i.e., the difference between water withdrawals and discharges). Consequently, turning this "may" datapoint into "shall" datapoint does not align with the principle of simplification. On the contrary, it would introduce greater complexity, particularly in the context of audits. We request that this datapoint be included in the NMIG.	E3	E3-4 - Water metrics	17. (d)
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	Most industrial companies calculate their water consumption through estimations and modelling rather than by using the water balance approach (i.e., the difference between water withdrawals and discharges). Consequently, this AR should be amended as follow "if relevant, water consumption can be calculated using a water balance approach [...]".	E3	E3-4 - Water metrics	AR 1
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We propose to restore the reference to areas at water risk and areas of high-water stress (ex. Par. 23(a) and 23(c)) when disclose the water-related targets. We suggest to re-integrate this provision since it is also requested for amended data point on water-related policies, actions and metrics, and to enable organizations to disclose and demonstrate which targets and efforts relate to areas at water risk and areas of high-water stress.	E3	E3-3 - Targets related to water	15.
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We propose to restore the reference to contextual information (ex. Par. 28(e) when disclose the water-related metrics. Although some contextual information is adequately covered by ESRS 2 GDR-M, the amended water metrics remove the requirement to report qualitative contextual information on the status of water basins or the types of water withdrawal sources. Such information are relevant for organizations that directly manage water resources and helps the reader to better contextualise the reported metrics.	E3	E3-4 - Water metrics	17.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	From our perspective, removing the intensity metric makes sense because the metric involved additional effort, and the comparability of the metric with other companies was not guaranteed.	E3	E3-4 - Water metrics	16.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We consider it a positive step that the disclosure "changes in water storage" has been removed. This simplifies the reporting process.	E3	E3-4 - Water metrics	17. (f)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We support the simplification of the requirement, as this avoids duplication with some overarching requirements in ESRS 2.	E3	E3-1 - Policies related to water	11.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We support the simplification of the requirement, as this avoids duplication with some overarching requirements in ESRS 2.	E3	E3-2 - Actions and resources related to water	13.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We support the simplification of the requirement, as this avoids duplication with some overarching requirements in ESRS 2.	E3	E3-3 - Targets related to water	15.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The objective described in para. 1 of each draft topical ESRS is inconsistent with Draft ESRS 1. The statement about "dependencies when relevant" and "financial effects" should be deleted to make it consistent with ESRS 1. Change the wording to: "When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS E3 Water, when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, metrics and targets (if in place)."	E3	E3 - Objective	1.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Remove parts (a) and (b) and keep the introductory paragraph to avoid unnecessary duplication. Paragraph 5 should read as follows: "The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M."	E3	E3 - Objective	5.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	The justification provided for these datapoints does not sufficiently clarify why these additional datapoints are required for users. The EBA's guidelines on the management of ESG risks require the collection of energy and water demand and/or consumption, either in terms of economic factor inputs or revenue base, but it's not clear whether these new datapoints have been added to comply with EBA guidelines or for other purposes. As discussed above in Q20, EFRAG should take this opportunity to coordinate with the EBA, holistically consider which datapoints are required for effective risk management and streamline the reporting requirements horizontally across legislation.	E3	E3-4 - Water metrics	17.
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	(2 amended) The term 'water' refers to surface water, groundwater and marine waters: Could you also provide a definition for 'marine water'?	E3	E3 - Objective	7.
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is reasonable to keep the requirement for disclosure of policies targeting sites located in areas with high water risk/stress. However, we request to specify and clarify below two points; 1. Specify an asseeement tool (e.g., Baseline Water Stress in WRI Aqueduct: High = 40–80%, Extremely High = >80%, etc.) 2. Clarify to allow that companies can choose their own assessment tools, and the tools, thresholds, and assessment years are sufficient conditions for disclosure	E3	E3-1 - Policies related to water	12.
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We agree with the simplification. However, regarding the disclosure of "resources," since the financial information such as CAPEX and OPEX is confidential, we request that flexible disclosure options be set in AR, etc., as follows; 1. Allow to disclose of amounts in ranges. 2. Allow to disclose by using non-financial information (e.g., number of facilities, capacity, operating hours, etc.). 3. From a competitive perspective, allow to present as totals for multiple sites or by regional aggregation.	E3	E3-2 - Actions and resources related to water	13.
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We agree with keeping it. We also support to disclose actions and resources related to high water stress areas. However, we request to specify flexible options such an amount in ranges, non-financial information, aggregation level. (The intention is similar to ESRS E3–13)	E3	E3-2 - Actions and resources related to water	14.
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We request to clarify the definition and assessment methods for "water risk/stress areas." . (The intention is similar to ESRS E3–12)	E3	E3-4 - Water metrics	17. (b)
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We request below three points; 1. Clarify the scope of "total water storage" (e.g., process water temporarily retained in raw water tanks, emergency/firefighting water reservoirs, rainwater storage tanks, etc.). 2. Set an importance threshold (e.g., mandate only for in case of total water intake exceeds 5% or in regions with high water stress) to avoid excessive administrative burden. 3. Allow initial phased introduction and clarify safe harbor.	E3	E3-4 - Water metrics	17. (f)
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We request to clarify the definition of "total water storage" to avoid excessive administrative burden for analysing "changes in water storage". The intention is similar to E3-17(f).	E3	E3-4 - Water metrics	AR 1
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	- Considering disaggregation in location-specific considerations can increase the level of detail required. - Reporting at the site level is unacceptable, as it would dramatically increase the reporting burden without providing commensurate value to stakeholders. Such granularity multiplies the volume of datapoints, creates inconsistencies across sites with differing local conditions, and undermines the comparability and usability of disclosures at company level.	E3	E3 - Objective	9.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The amendment streamlines the DRs E3-1, but did not really reduce the burden.	E3	E3-1 - Policies related to water	11.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I agree	The requirement to explain why there is no policy for water risk areas and to explain wheter there is ocean or sea has been removed	E3	E3-1 - Policies related to water	12.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The mention of "key" rather than "comprehensive" might be helpful, but more clarity is needed for "key"	E3	E3-2 - Actions and resources related to water	13.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The amendment streamlines the DRs E3-3, but did not really reduce the burden.	E3	E3-3 - Targets related to water	15.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	The methodology calculations for water consumption need more flexibility	E3	E3-4 - Water metrics	AR 1
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	This obligation may require breaking down metrics by key sites	E3	E3-4 - Water metrics	AR 2
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	Agree with water withdrawal and water discharge as mandatory KPIs, and with changes of stored water removed.	E3	E3-4 - Water metrics	4.
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	We note that paragraphs 8(b) to 8(e) have been added. We request a guarantee that these additions do not introduce new disclosures requirements.	E3	E3 - Objective	8.
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	Companies consider the data for water withdrawal is not possible to provide as there are no corresponding water meters. Most industrial companies calculate their water consumption through estimations and modelling rather than by using the water balance approach (i.e., the difference between water withdrawals and discharges). Consequently, turning this "may" datapoint into "shall" datapoint does not align with the principle of simplification. On the contrary, it would introduce greater complexity, particularly in the context of audits. We request that this datapoint be included in the NMIG.	E3	E3-4 - Water metrics	17. (c)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	Companies consider the data for water discharge is not possible to provide as there are no corresponding water meters. Most industrial companies calculate their water consumption through estimations and modelling rather than by using the water balance approach (i.e., the difference between water withdrawals and discharges). Consequently, turning this "may" datapoint into "shall" datapoint does not align with the principle of simplification. On the contrary, it would introduce greater complexity, particularly in the context of audits. We request that this datapoint be included in the NMIG.	E3	E3-4 - Water metrics	17. (d)
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	Most industrial companies calculate their water consumption through estimations and modelling rather than by using the water balance approach (i.e., the difference between water withdrawals and discharges). Consequently, this AR should be amended as follow "if relevant, water consumption can be calculated using a water balance approach […]".	E3	E3-4 - Water metrics	AR 1
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially agree We find it important that clear guidance is offered as to whether this and other DRs are required to be disclosed, if it is not a material issue that a particular site is located in an area at water risk incl. areas of high-water stress. The clear guidance should help qualify for instance that facilities located in a water-stress area are not material if they are not using or dependent on withdrawal of water (for instance it is not required to report on a specific site if an entity has a store or a production facility in such an area if they are not dependent on water withdrawals.	E3	E3-1 - Policies related to water	12.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	We find that the changes in the disclosure requirements to require a mandatory "water balance approach" is excessive. Water consumption in an area, where there is no risk of "water stress" should not require a full "water balance approach". We note that more "may"-datapoints than the ones highlighted in Q23 are effectively changed to shall and we believe that the requirement for a full mandatory "water balance approach" needs to be more specifically narrowed down to the "areas of high-water stress" or closer linked to the actual, identified IRO. We would also like to note, that for certain IRO's, it may not be the consumption, that is the key issue, but the specific water discharges (frequency or intensity in a river for instance) or the storage of water (for instance in a dam) that are relevant to the identified IRO. Hence, we do not agree with the change to a mandatory "water balance approach".	E3	E3-4 - Water metrics	17.
Excels	DRSC	(National) standard setter	Germany			I disagree	Disaggregation will lead to too much detail level and will increase reporting workload. Although "appropriate disaggregation" is worded, a definition of "appropiate level" is needed.	E3	E3 - Objective	9.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL: "If the undertaking has sites located in areas at water risk, including areas of highwater stress that are not covered by its water-related policies, it shall disclose this fact." The wording should be crystal clear that it refers to the sites in what the undertaking considers own operations according to ESRS 1 ("undertaking has sites") --> Example: E4.14 (E4-2 Policies…) refers to "sites in its own operations"	E3	E3-1 - Policies related to water	12.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	The requirement to specify any actions and resources related to areas at water risk, including areas of high-water stress can be interpreted to have a much broader scope that the requirement to disclose "key actions" and "significant resources". The formulation should be changed to clarify that key actions and resources related to areas at water risk are meant.	E3	E3-1 - Policies related to water	14.
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG: This is an extension of the Delegated Act: Points (c) and (d) require disclosure of water withdrawals and water discharges. This is a "may" disclosure in the delegated act (E3.AR32). We note that this is not intended to impose an additional burden (as mentioned in paragraph 127 of the BfC), but the change to "shall" does in fact impose an additional burden, regardless of EFRAG's intention to the contrary.	E3	E3-4 - Water metrics	17.
Excels	DRSC	(National) standard setter	Germany			I disagree	REF FLAG: Seems an extension of the Delegated Act: The calculation formula for water consumption contains an additional KPI on "changes in water storage".	E3	E3-4 - Water metrics	AR 1
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL: "Water metrics under paragraph 17(a)(f) are expressed in cubic meters (m3)." The metric expressed in "million cubic meters" should be allowed, too. This should be clarified at a central location in ESRS (e.g. ESRS 1)	E3	E3-4 - Water metrics	AR 2
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	From our perspective, removing the intensity metric makes sense because the metric involved additional effort, and the comparability of the metric with other companies was not guaranteed.	E3	E3-4 - Water metrics	16.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	We consider it a positive step that the disclosure "changes in water storage" has been removed. This simplifies the reporting process. However it is currently unclear how to report the metric related to recycled or reused water. According to the definition, recycled water refers to reuse within the same process, while reused water refers to use in a different process within the same facility or in another facility of the undertaking. This distinction suggests that the two cases should be reported separately, especially since an undertaking may have both types of water reuse. We recommend clarifying whether separate disclosure is required to ensure consistency and comparability across reporting entities.	E3	E3-4 - Water metrics	17. (f)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	We support the simplification of the requirement, as this avoids duplication with some overarching requirements in ESRS 2.	E3	E3-1 - Policies related to water	11.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	We support the simplification of the requirement, as this avoids duplication with some overarching requirements in ESRS 2.	E3	E3-2 - Actions and resources related to water	13.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	We support the simplification of the requirement, as this avoids duplication with some overarching requirements in ESRS 2.	E3	E3-3 - Targets related to water	15.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	The metric disclosures in the draft are aligned with CDP, improving interoperability	E3	E3-4 - Water metrics	16.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	It is a positive amendment that the water consumption intensity ratio was removed as net revenue is not necessarily a driver of water consumption. For example, at HEINEKEN our production volumes are a more accurate driver.	E3	E3-4 - Water metrics	16.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	In the definition of "Area of high-water stress," it is not clear whether it is mandatory to use one of the 2 approaches for assessing water stress or if a separate approach could be included. E.g., one that also includes water quality and regulatory considerations. This definition should include "shall" if it is a requirement or "may" if it is not mandatory.	E3	E3-4 - Water metrics	17. (b)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	It is positive that the disclosure requirement to address whether specific matters have been addressed in the policies has been removed. This allows companies to link their policies to their specific IROs.	E3	E3-1 - Policies related to water	11.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	It is currently unclear how to report the metric related to recycled or reused water. According to the definition, recycled water refers to reuse within the same process, while reused water refers to use in a different process within the same facility or in another facility of the undertaking. This distinction suggests that the two cases should be reported separately, especially since an undertaking may have both types of water reuse. We recommend clarifying whether separate disclosure is required to ensure consistency and comparability across reporting entities.	E3	E3-4 - Water metrics	17. (e)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	It is very difficult to report robust figure on water storage.	E3	E3-4 - Water metrics	17. (f)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Mention the connection with AR 22 of ESRS 2 (e.g., local considerations such as water availability in areas at water risk)	E3	E3 - Objective	9.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Replace "sites" with "locations" in line with the approach of ESRS E4	E3	E3-1 - Policies related to water	12.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I agree	ANC supports mandatory datapoints on water withdrawal and discharges, as they provide a more accurate reflection of the water cycle and support impact materiality. For some companies, these datapoints are already calculated to determine water consumption and therefore add little additional burden (i.e., withdrawals minus discharges, a mandatory disclosure). For others, water consumption is estimated through modelling rather than the water balance approach, which can make reporting these datapoints more challenging. New reliefs allow such companies to estimate water withdrawals and discharges over relevant scopes where direct measurement is not feasible. Users highlight that these metrics are among the most mature for French companies, reflecting long-standing practices and providing reliable information on water management. Water withdrawal is already required under the VSME standard, so extending this requirement to large companies ensures consistency.	E3	E3-4 - Water metrics	17. (c)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I agree	See above	E3	E3-4 - Water metrics	17. (d)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I agree	Add definition of 'water balance' in the glossary	E3	E3-4 - Water metrics	AR 1
Excels	Ernst & Young	Auditor	United Kingdom			I agree	This requirement will not create an additional burden, as reporting water consumption already relies on understanding the water balance, including both withdrawals and discharges; the change from optional to mandatory is in line with the importance of these metrics in completing the water balance equation and ensuring fair presentation of material IROs.	E3	E3-4 - Water metrics	17. (c)
Excels	Ernst & Young	Auditor	United Kingdom			I agree	As indicated above, this requirement will not create an additional burden, as reporting water consumption already relies on understanding the water balance, including both withdrawals and discharges; the change from optional to mandatory is in line with the importance of these metrics in completing the water balance equation and ensuring fair presentation of material IROs.	E3	E3-4 - Water metrics	17. (d)
Excels	Ernst & Young	Auditor	United Kingdom			I agree	We suggest EFRAG to provide methodological guidance in Application requirements on how to calculate water recycled or reused, including examples.	E3	E3-4 - Water metrics	17. (e)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	While the water balance AR1 provides a general framework, it remains too high-level and might not be reflective of the different categories of water use, especially during the production process (water withdrawal for production processes, for operational office activities, water storage from the previous period). Additionally, water reuse and water storage adjustments can be complex – especially when reused water originates from the previous period, or from / used for technological processes…). A simple equation may not be sufficient to verify the accuracy of calculations and completeness of the figures . We recommend further guidance on the matter, including explanations about how to account for the adjustment about the water storage.	E3	E3-4 - Water metrics	AR 1
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				There can be drawn a clear difference between recycled water at intake (ex: municipal recycled water from a common treatment plant), and water recycled at an onsite treatment plant at discharge, and water recirculated through multiple use phases. Different industries (FATP, enclosures, battery) and different business function types (commercial, residential, industrial) have varied ability to make use of these functions based on the nature of the business cycle and capital investment practicalities. It may be beneficial to add these measures so that it's clear where fit-for-purpose water consumption is occurring, and where onsite conservation / efficiency is occurring from onsite reuse/recirculation.	E3	E3-4 - Water metrics	14.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	- Considering disaggregation in location-specific considerations can increase the level of detail required. - Reporting at the site level is unacceptable, as it would dramatically increase the reporting burden without providing commensurate value to stakeholders. Such granularity multiplies the volume of datapoints, creates inconsistencies across sites with differing local conditions, and undermines the comparability and usability of disclosures at company level.	E3	E3 - Objective	9.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The amendment streamlines the DRs E3-1, but did not really reduce the burden.	E3	E3-1 - Policies related to water	11.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I agree	The requirement to explain why there is no policy for water risk areas and to explain wheter there is ocean or sea has been removed	E3	E3-1 - Policies related to water	12.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The mention of "key" rather than "comprehensive" might be helpful, but more clarity is needed for "key"	E3	E3-2 - Actions and resources related to water	13.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The amendment streamlines the DRs E3-3, but did not really reduce the burden.	E3	E3-3 - Targets related to water	15.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	The methodology calculations for water consumption need more flexibility	E3	E3-4 - Water metrics	AR 1
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	This obligation may require breaking down metrics by key sites	E3	E3-4 - Water metrics	AR 2

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Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				See water definitions in glossary feedback in Word, question #33, page 34	E3		
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				There can be drawn a clear difference between recycled water at intake (ex: municipal recycled water from a common treatment plant), and water recycled at an onsite treatment plant at discharge, and water recirculated through multiple use phases. Different industries (FATP, enclosures, battery) and different business function types (commercial, residential, industrial) have varied ability to make use of these functions based on the nature of the business cycle and capital investment practicalities. It may be beneficial to add these measures so that it's clear where fit-for-purpose water consumption is occurring, and where onsite conservation / efficiency is occurring from onsite reuse/recirculation.	E3	E3-4 - Water metrics	14.
Excels	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	The definition of "water consumption" is unclear. According to the glossary at the end of the standard, water consumption is the amount of water withdrawn on the premises (or site) and not returned to the aquatic environment or third parties during the reporting period. It is therefore not clear how to treat stormwater and meltwater that enter the organisation and are used, in particular whether this water should be included in the calculation of total consumption. In addition, a recurring problem in calculating total water consumption under the application requirement (AR 1) to paragraph 17a is that the volume of water withdrawn is often smaller than the volume of wastewater discharged. In such cases, the consumption value would be negative. This also leads to problems in calculating water intensity, since the consumption value would again be negative.	E3	E3-4 - Water metrics	17. (a)
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I disagree	As other industrial companies, we calculate our water consumption through estimations and modelling rather than by using the water balance approach (i.e., the difference between water withdrawals and discharges). Consequently, this AR should be amended as follow "if relevant, water consumption can be calculated using a water balance approach [...]".	E3	E3-4 - Water metrics	AR 1
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I disagree	we consider the data for water withdrawal is not possible to provide as there are no corresponding water meters. As most industrial companies, we calculate our water consumption through estimations and modelling rather than by using the water balance approach (i.e., the difference between water withdrawals and discharges). Consequently, turning this "may" datapoint into "shall" datapoint does not align with the principle of simplification. On the contrary, it would introduce greater complexity, particularly in the context of audits. We request that this datapoint should be included in the NMIG.	E3	E3-4 - Water metrics	17. (c)
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I disagree	We consider the data for water discharge is not possible to provide as there are no corresponding water meters. As most industrial companies, we calculate our water consumption through estimations and modelling rather than by using the water balance approach (i.e., the difference between water withdrawals and discharges). Consequently, turning this "may" datapoint into "shall" datapoint does not align with the principle of simplification. On the contrary, it would introduce greater complexity, particularly in the context of audits. We request that this datapoint should be included in the NMIG.	E3	E3-4 - Water metrics	17. (d)
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	We suggest to put this indicator into "May" as recycled/reused volumes are a lever but not a measure of the pressure activities have on water	E3	E3-4 - Water metrics	17. (e)
Excels	ASD					I partially agree and partially disagree	We suggested to significantly reduce the required datapoints, and provide more detailed guidance to companies on how to perform the disclosure: the Exposure Draft seems to have considered this. However, the introduction of the concept of "near" related to the sites analysis is unclear, and we suggest to remove it.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	19.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Lack of a common methodology; Absence of science-based metrics; Data not currently available.	E4	E4-1 - Transition plan for biodiversity and ecosystems	11.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Lack of a common methodology; Absence of science-based metrics; Data not currently available. In any case, it should be maintained that reporting on the transition plan is only required once the transition plan has been implemented and published. The introduction of such a transition plan should remain voluntary. On the positive side, the disclosure requirement in ESRS E4 only applies if a company voluntarily draws up a transition plan for biodiversity and ecosystems. However, I take a critical view of the transition plan itself: as soon as biodiversity is identified as a material issue, there is indirect pressure to draw up a plan or to justify why no plan is in place. In contrast to the climate transition plan, there is a lack of reliable data, standardised methods and key performance indicators for biodiversity. The complexity of ecological relationships, the high cost of monitoring and the lack of standardisation make the transition plan difficult to implement and potentially ineffective.	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Lack of a common methodology. Disproportionate costs. (1) For multinational corporations operating many sites globally, providing a list of material sites and the respective information defined would result in an extensive and complex disclosure; (2) Additionally, there is no standardized or globally accepted method to assess ecological status for industrial sites. Existing environmental compliance and monitoring already ensure that the company meets all legal requirements, making additional ecological breakdowns redundant.	E4	E4-1 - Transition plan for biodiversity and ecosystems	20. (c)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Lack of a common methodology. Disproportionate costs.	E4	E4-1 - Transition plan for biodiversity and ecosystems	20. (b)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Lack of a common methodology.	E4	E4-1 - Transition plan for biodiversity and ecosystems	AR 6
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Disproportionate costs.	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (b)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Extension of Delegated Act.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	FPIC reporting should be risk-based and focus on management systems.	E4	E4-4 - Targets related to biodiversity and ecosystems	AR 5
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	It is recommended this disclosure be made voluntary as it adds compliance burden without providing more decision-useful information.	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (a)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	The term "not feasible" is too subjective, creating significant audit risk. We recommend EFRAG provide further guidance to clarify this threshold.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 10
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Recommend EFRAG provide guidance that allows the use of practical alternatives like high-quality estimates.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 11
Excels	The Biodiversity Footprint Intelligence Company	Consultant (including software vendor)	France			I partially agree and partially disagree	The use "and/or" could allow undertakings could interpret para. 20 does not apply if a site does not meet all 3 criteria. Instead, any of the 3 criteria (and in particular (a) or (c)) should be enough to trigger the disclosure. Use "or" instead of "and/or".	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 7
Excels	The Biodiversity Footprint Intelligence Company	Consultant (including software vendor)	France			I partially agree and partially disagree	The simplification and alignment of language with NPI, TNFD and GRI is very welcome. It should go further to provide more clarity and reduce the burden of reporting against divergent definitions and standards: - (b): "species extinction risk (the state of species)" - (c): "the extent and condition of terrestrial (for which condition should be broken down into site and landscape condition), freshwater and marine ecosystems" This precision could be considered additional but it actually reduces reporting burden by providing clarity and aligning with NPI/TNFD/GRI data points, limiting both the time required to understand what to report and to report against multiple standards. Freshwater ecosystems should be included in (c), as in our suggestion above. Note: the use of "metrics" may be confusing (e.g. MSA is a metric; 100 MSA.km2 is a value) => clarify "include measures (and associated metrics) [...]".	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	Reference: E4-4 (§17), E4-5 (§21), Application Requirement AR 22, NMIG 10, NMIG 11 Issue: ESRS E4 does not explicitly allow undertakings to use the EU Taxonomy's criteria for biodiversity as a reference for their actions, policies, and targets. This can lead to double reporting and regulatory misalignment for companies already applying these criteria. Proposed simplification: Add an explicit cross-reference to the EU Taxonomy for biodiversity. Move the reference to SC and DNSH criteria from NMIG to the main body of ESRS E4, making it a clear option for undertakings. Proposed text: "Where undertakings apply the EU Taxonomy criteria for biodiversity (Substantial Contribution or Do No Significant Harm) to their activities, they may use these criteria as the reference for their biodiversity-related actions, policies, and targets under ESRS E4. In such cases, undertakings should indicate the alignment and provide a cross-reference to the relevant Taxonomy criteria." Why it helps: This approach ensures regulatory coherence, reduces double reporting, and enables companies to leverage existing compliance work. It increases comparability and clarity for stakeholders by aligning ESRS E4 disclosures with established EU sustainability frameworks.	E4	E4-4 - Targets related to biodiversity and ecosystems	17.
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	E4-3 Actions and Resources (§15, NMIG 8) Issue: Actions and resources related to biodiversity and ecosystems (E4-3, NMIG 8) may overlap with Taxonomy-aligned CapEx and OpEx disclosures, but the standard does not explicitly allow cross-referencing. Proposed simplification: Allow undertakings to refer to their Taxonomy-aligned CapEx and OpEx KPIs and CapEx plans when reporting on actions and resources under ESRS E4. Proposed text: "When disclosing actions and resources related to biodiversity and ecosystems, undertakings may refer to their Taxonomy-aligned CapEx and OpEx key performance indicators and, if applicable, the CapEx plan required by Commission Delegated Regulation (EU) 2021/2178." Why it helps: This reduces reporting burden, avoids duplication, and ensures consistency between ESRS E4 and EU Taxonomy disclosures.	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	15.
Excels	BDEW	Other - please specify (required)	Germany			I agree	Is now proposed as a mandatory requirement (DA, E4.15 "The undertaking may disclose its transition plan...") BfC.127 Da geknüpft an die Bedingung, dass der TP öffentlich ist, bedeutet dies keinen zusätzlichen Aufwand.	E4	E4-1 - Transition plan for biodiversity and ecosystems	general
Excels	BDEW	Other - please specify (required)	Germany			I agree	"sites in its own operations that are in or near a biodiversity sensitive area" --> simplification questionable as this is still a huge, work-intensive disclosure	E4	E4-2 - Policies related to biodiversity and ecosystems	14 (b)
Excels	BDEW	Other - please specify (required)	Germany			I agree	The para contains the term "action plan" (the undertaking shall describe the biodiversity offsets used in its action plans); however, "action plan" is not adressed in ESRS 2 GDR-A which this para refers to.	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	16
Excels	BDEW	Other - please specify (required)	Germany			I agree	Add a clarification that this DR is related to actual impacts only.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20 (a) - (c)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	BDEW	Other - please specify (required)	Germany			I agree	(1) Contains the term "direct operations" without saying what it is. (2) Wording: "impacts, risks and opportunities arising from its direct operations": impacts typically arise from the undertakings operations. In other words: The undertaking is the cause, and the effect results from this cause. The direction of the effect is: Undertaking -> Impact. For risks and opportunities this direction the opposite. Risks and opportunities - in most cases - have (financial) impacts on the undertaking but do not arise from the undertaking. Therefore, it should not be worded (all across the ESRS) that IROs arise from operations/undertaking etc. since the use of the term "arise" is correct for impacts only. Better word "impacts, risks and opportunities associated with or related to the undertaking/own operations etc."	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 7 (a)
Excels	BDEW	Other - please specify (required)	Germany			I agree	AR suggests the worst case if the site is in a biodiversity sensitive area "is highly likely that ist activities will negatively affect the area" --> appropriate assumption?	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8
Excels	BDEW	Other - please specify (required)	Germany			I agree	AR makes prejudging assumptions for the DMA which contradict the DMA principles.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8
Excels	BDEW	Other - please specify (required)	Germany			I agree	The guidance to be complied with by undertakings when determining whether a site is near a sensitive are makes more complex than before.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8 (b)
Excels	BDEW	Other - please specify (required)	Germany			I agree	Additional metric requirement. Although "drivers of [...] ecosystem change" is mentioned in the delegated act (ESRS E4.AR20f), it is not a metric requirement in the delegated act.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9 (a)
Excels	BDEW	Other - please specify (required)	Germany			I agree	Additional metric requirement. Although "ecosystem services" is mentioned in the delegated act in several instances, it is not a metric requirement in the delegated act.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9 (d)
Excels	BDEW	Other - please specify (required)	Germany			I agree	The meaning of the first sentence is not clear.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 10
Excels	BDEW	Other - please specify (required)	Germany			I agree	The meaning of this para is not clear. Probably it is meant to say that if an undertaking monitors an issue frequently by using a measure/a metric, this might indicate this metric is a material information.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 11a
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The paragraph contains the term "action plan"; however "action plan" is not adressed in ESRS 2 GDR-A which this paragraph refers to. This inconsistency should be addressed	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	16.
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	It is not clear from the presentation of the standard whether paragraph 21 refers only to own operations or whether it also includes the value chain. Since paragraph 21 refers to paragraph 20, which refers to own operations/locations, we assume that this limitation also applies to paragraph 21, but we would prefer a clarification within the standard.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	21.
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Prioritization of locations to be disclosed according to relevance (e.g., location size, volume) is welcome.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 7
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Requirement regarding determination of buffer zones is set up very complex and mandatory, and seems to be more complex than before the amendments rather than simplified. We would prefer an optional determination or rather the set up of more general determined buffer zones.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The new version significantly simplifies the requirement, focusing solely on the existence and disclosure of a transition plan aligned with the Kunming-Montreal Global Biodiversity Framework. This change removes the need for strategic resilience analysis, systemic risk assessment, and stakeholder engagement. While this promotes clarity and action-oriented reporting, it may compromise the understanding of how robust a company's strategy is in facing biodiversity challenges, especially in sectors with high ecological impact. Optional disclosures could help preserve strategic depth.	E4	E4-1 - Transition plan for biodiversity and ecosystems	11.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The new version significantly simplifies the requirement, concentrating on two operational aspects: traceability and the location of operations in sensitive areas. This change removes the need to report on comprehensive policies and sustainable practices, social impacts, systemic risks, and alignment with global strategies such as the EU Biodiversity Strategy for 2030. It promotes clarity and facilitates implementation and verification. This simplification may limit visibility into the strategic maturity of companies regarding biodiversity, reduce the integration of biodiversity across business policies, and weaken incentives for transformative practices, especially in sectors with complex value chains or high ecological impact. Sector-specific guidance could help address these gaps.	E4	E4-2 - Policies related to biodiversity and ecosystems	13.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The new version substantially simplifies the requirement, removing key elements such as: • The mitigation hierarchy, which guides environmental action prioritisation; • The integration of local and Indigenous knowledge, essential for contextual and inclusive approaches; • The promotion of nature-based solutions, internationally recognised as effective and sustainable. While the new wording promotes clarity and measurability, it may reduce ecological ambition, limit innovation and inclusion, and compromise strategic transparency by focusing only on compensations and financial resources. This simplification may suit companies with direct, measurable actions, but fails to capture the complexity needed to address biodiversity challenges in high-impact or sensitive socio-environmental contexts.	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	15.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The new version significantly simplifies the requirement, removing key elements needed to understand strategic ambition and coherence: • It no longer requires explanation of ecological thresholds, alignment with global and EU policies, or links to identified impacts and risks; • It omits aspects such as the geographic scope of targets and their connection to the mitigation hierarchy. While this facilitates reporting and focuses on action (especially regarding offsets), it compromises transparency and comparability, making it harder to assess the robustness, relevance, and strategic alignment of defined targets. In the context of a global ecological crisis, this approach may be insufficient to ensure that corporate targets are scientifically grounded, territorially relevant, and aligned with global biodiversity goals.	E4	E4-4 - Targets related to biodiversity and ecosystems	17.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I disagree	The new version simplifies and reorganises the requirement, focusing on: • The location and characterisation of impacts in sensitive areas; • Reduced granularity of required metrics; • Removal of specific metrics on land use, invasive species, species status, and ecosystem condition. While this reduces technical complexity and promotes geographic focus, it compromises analytical depth. The absence of robust ecological indicators may hinder: • Comparability across companies and sectors; • Monitoring of corporate contributions to global biodiversity targets; • Identification of relevant ecological trends, such as connectivity loss or population decline. In sectors with a strong ecological footprint, this approach may be seen as insufficient to ensure transparency and environmental accountability.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I agree	The amendments provide greater clarity on the list of sub-topics covered by the Standards and strengthen alignment with the GRI Biodiversity Standard. This alignment is beneficial as it enhances consistency across reporting frameworks, improves comparability of disclosures, and helps reduce the reporting burden for undertakings using both Standards.	E4	E4 - Objective	4.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We support the emphasis on providing location-specific information, given the nature of biodiversity impacts. However, the proposed language ("it is important to consider appropriate disaggregation") may suggest that site-level reporting is optional. In the context of biodiversity, it is essential, not optional, to disaggregate by site, as impacts cannot be meaningfully assessed without reference to the specific ecological setting. For example, the severity of impacts may be much higher in ecosystems close to tipping points or in areas where threatened species are present. Clearer requirements for site-level disclosure would strengthen alignment with other standards and frameworks, including the GRI Biodiversity Standard.	E4	E4 - Objective	9.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We recommend aligning the Annex II definition of operational 'site' with the definition included in GRI 101: Biodiversity: "Sites include sites owned, leased, or managed by the organization and locations where it conducts its activities. Examples are a mine site owned by an organization or a fishing ground where an organization operates. Sites also include those for which future operations have been announced but not yet started, as well as those no longer active. Sites include subsurface infrastructures under the land or seabed surface, such as underground mining tunnels, cables, and pipelines." The GRI definition explicitly covers different organizational control contexts (owned, leased, or managed sites), includes current, future, and inactive sites to ensure continuity of reporting across the site lifecycle, and captures subsurface infrastructure, which is often material for biodiversity impacts but easily overlooked.	E4	E4 - Objective	9.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	The phrase "transition implied by the Global Biodiversity Framework" is vague and could lead to inconsistent interpretation across preparers and assurance providers. The GBF sets global goals and targets that governments and companies can contribute to, but it does not prescribe a single "transition." We recommend revising the wording to: "the undertaking's response and contribution to the transition consistent with the goals and targets of the Global Biodiversity Framework." This would enhance clarity, align with international policy language, and improve comparability of disclosures. We also note that alignment with GBF goals and targets is relevant not only in the context of transition plans but also in the setting of policies and targets.	E4	E4-1 - Transition plan for biodiversity and ecosystems	11.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We understand the rationale for moving former paragraphs AR 15(a) and (b) to the NMIG to streamline data points. However, this weakens the responsibility of undertakings in ensuring appropriate management of issues related to the access and use of genetic resources. We suggest retaining references to access and benefit-sharing and to the free, prior and informed consent (FPIC) for access to genetic resources in AR3, as examples of policies that undertakings may cover when describing the content of their policies.	E4	E4-2 - Policies related to biodiversity and ecosystems	13.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	The definition of biodiversity sensitive areas under E4 only partially aligns with GRI's definition of ecologically sensitive areas, particularly with regard to areas of biodiversity importance. We recommend closer alignment with the definitions used by GRI and TNFD by also including: (i) areas of high ecosystem integrity, (ii) areas of rapid decline in integrity, (iii) areas important for ecosystem service delivery, and (iv) areas of physical water risk. This would ensure greater consistency across standards and improve the relevance of disclosures.	E4	E4-2 - Policies related to biodiversity and ecosystems	14.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	Similar to AR 5 for paragraph 17, we suggest adding an Application Requirement for paragraph 15. Specifically, when disclosing actions and resources related to biodiversity and ecosystems, the undertaking should be required to specify: the need to obtain the free, prior, and informed consent (FPIC) of Indigenous Peoples and local communities; the need for appropriate consultations; and the obligation to respect the decisions of these communities.	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	15.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We understand the removal of the former paragraph 28 (a) "may disclose how it has applied the mitigation hierarchy with regard to its actions" to streamline data points. However, this unintentionally emphasizes offsets, which can mislead reporting. Best practice requires offsets only as a last resort, after avoidance, minimization, and restoration. Without this context, undertakings may focus disproportionally on offsets, undermining earlier stages of the mitigation hierarchy. Stakeholder engagement in developing the GRI Biodiversity Standard confirmed disclosure on the full mitigation hierarchy is decision-useful and provides essential safeguards. We recommend including an Application Requirement clarifying that offsets are to be disclosed only as the final step. Finally, AR33 for paragraph 37 in ESRS 2 makes classification of actions according to the mitigation hierarchy optional ('can'), which weakens recognition of the hierarchy as international best practice and fails to provide adequate safeguards to ensure appropriate use of offsets within E4.	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	16.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	The amendments delete the disclosure of how targets are informed by or aligned with the GBF (former 32 (b)) and move it to the NMIG 10. As noted in the comment on paragraph 11, the link to the GBF extends beyond transition plans and applies to all policies and targets set by companies, which are more widespread than transition plans. We recommend revising the DR, or adding a note in the Application Requirements, to strengthen and clarify this point, so that undertakings can demonstrate whether and how they contribute to the global goals and targets to halt and reverse biodiversity loss.	E4	E4-4 - Targets related to biodiversity and ecosystems	17.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	As noted in the comment on paragraph 16, the Application Requirements should clarify that undertakings explain how offsets used in target-setting are applied within the context of the mitigation hierarchy, to ensure they are reported as part of the full hierarchy rather than in isolation.	E4	E4-4 - Targets related to biodiversity and ecosystems	18.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We note that considerations on the need to obtain the free, prior, and informed consent (FPIC) of Indigenous Peoples and Local Communities; the need for appropriate consultations; and the obligation to respect the decisions of these communities, are currently referenced in the context of target-setting. While relevant to targets, these considerations are more directly applicable to the actions and resources that undertakings implement to address biodiversity and ecosystem impacts. FPIC and consultations are practical processes that must accompany concrete actions, rather than target-setting, to ensure legitimacy and respect for rights. We therefore recommend relocating this reference to paragraph 15 (actions and resources) and its Application Requirements. It may also be relevant not only to "consider" but also to "specify" how the undertaking has taken IPLC FPIC and consultations into account in its actions.	E4	E4-4 - Targets related to biodiversity and ecosystems	AR 5
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We support the amendments in the context of streamlining data points. However, the amendments removed the requirement to report the area of sites (former paragraph 35), further reducing alignment with GRI 101-5-a. Information on spatial footprint is decision-useful as it enables, in combination with other disclosures (e.g., activities taking place at the sites), to assess the actual or potential impacts of the undertaking. While not always a relevant proxy for all organizations, it remains important for many, particularly those unable to easily measure ecosystem conversion or condition.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I disagree	The GRI Biodiversity Standard (Disclosure 101-5) requires reporting on the location of individual sites. Aggregation of location information across a group of sites is not permitted under GRI requirements. Therefore, the distinction made between "location" and "site" in the Log of Amendments is not consistent with the GRI Standards, contrary to what is claimed.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I disagree	We note that paragraph 21 has been reduced to a generic requirement to disclose material metrics, without further guidance. While we understand the rationale of reducing prescription in light of methodological maturity, the absence of any reference point leaves undertakings without clear direction and risks undermining comparability. We recommend either: - including a minimum set of metrics aligned with established standards, in particular GRI 101: Biodiversity 2024 disclosures 101-6 Direct drivers of biodiversity loss and 101-7 Changes to the state of biodiversity, which received stakeholder support during consultation and cover metrics on direct drivers of biodiversity loss, ecosystem size/extent, and condition; or - referring explicitly to GRI 101 in the Application Requirements as a source of metrics that have already been tested through extensive stakeholder consultation and are decision-useful for users of sustainability information. This would balance flexibility with comparability, and strengthen alignment with other Standards and Frameworks such as GRI, TNFD, and NPI.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	21.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I disagree	AR7 allows undertakings to select one of the three types of locations covered by (a), (b), and (c). This option enables undertakings to omit reporting on locations where material impacts occur or could occur. To ensure comprehensive coverage, we recommend revising the text to: "Information to be disclosed under this paragraph applies to locations that meet all of the following criteria (a), (b), and (c)." This change would close potential reporting gap and ensure that disclosures capture all relevant locations.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 7
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	The language to identify if a site near a sensitive area is likely to affect this area is currently unclear. We suggest to amend as follows: "If the undertaking's site is in *or near* a biodiversity sensitive area, it is highly likely that its activities will negatively affect the area. For sites located outside a biodiversity-sensitive area, whether they are considered 'near' and likely to affect such an area shall be determined:".	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	AR 8 refers to the IBAT tool, which is indeed often used by undertakings in practice but whose functionalities are not all freely accessible. We suggest adding a reference to equivalent publicly available tools as follows: "(b) Buffer zones can be determined following industry best practice and science-based recommendations, using tools such as the Integrated Biodiversity Assessment Tool (IBAT) or other equivalent publicly available tools, or based on findings of a site-level survey."	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	The phrase “Depending on which sub-topic is assessed to be material” is unclear. If a location is assessed as material for biodiversity, all four metrics on direct drivers, state of biodiversity and ecosystem services are relevant to understand the undertaking's impacts.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	To ensure that undertakings report decision-useful metrics, they should not only consider but also specify the baseline information used for their monitoring.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 11
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	1) The sentence "Transition plans for biodiversity and ecosystems are expected to address similar elements than transition plans for climate change mitigation" shall be removed\cancelled. The reference to similarity with climate transition plans is not appropriate: the two areas are fundamentally different, as are the related requirements. Climate transition plans rely on globally available metrics and quantitative pathways, whereas for biodiversity, such methodologies and comparable targets do not exist at a global level. 2) the compatibility with GBF shall be removed or explained in detail. The text requires that any transition plan be compatible/aligned with the targets of the GBF. A similar formulation exists for climate (referring to compatibility with the 1.5°C target), which is currently under discussion, as it is considered not directly applicable to companies. The same issue arises here with biodiversity. The GBF objectives are designed to guide public policies and national action plans, not to be directly applied to corporate business models. In this context, it is unclear what it means for a company to have a strategy or business model “compatible” with such objectives. The requirement is difficult to interpret and cannot be verified.	E4	E4-1 - Transition plan for biodiversity and ecosystems	AR 1
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	With this new wording it is not clear which site should be reported (please see comment on AR 7 below). The term "location" is not very clear, please clarify if "location" refer to single sites or an aggregation of type of activities or geographies. It is recommended to use consistent wording in all the environmental ESRS . Moreover, para. 20 should only refer to impacts.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The criteria identified in letter a), b), c) seems to require the disclosure on all the location with IRO + all the sites prioritised internally + the assets (and is not clear why we are not referring anymore to locations) with negative interactions with biodiversity areas. The interaction of the 3 points could lead to a ling ist of location to disclose. It should be clarified that the intention is not to require disclosure for every single site, but rather a limited number of representative sites selected according to prioritisation criteria defined by the company	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 7
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	In an attempt to clarify the concept of “near,” the text paradoxically ends up considering as near any site “not inside” a sensitive area. This would effectively imply conducting ad hoc analyses for hundreds of sites (all those not overlapping), in order to identify a science-based buffer based on the ecological specificities of each site. This represents an operational and documentation burden that is entirely disproportionate to the goal of simplification. Moreover, IBAT does not provide a buffer on a scientific basis; it is the user who enters the desired buffer to perform the mapping. Finally, it should be noted that ESRS is a disclosure standard, designed to harmonize reporting across companies, not to prescribe detailed operational management of impacts, which is addressed through other regulatory frameworks. The current wording of AR 8 risks turning the standard into a de facto operational requirement, going beyond the intended purpose of ESG disclosure.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	8.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The amendments are highly welcome. Please make clear that a reference to a transition plan is only necessary if there is a transition plan in place. If the undertaking does not have a transition plan in place it does not consequently have to disclose that this is the fact.	E4	E4-1 - Transition plan for biodiversity and ecosystems	11.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The amendments are highly welcome. Please make clear that a reference to a transition plan is only necessary if there is a transition plan in place. If the undertaking does not have a transition plan in place it does not consequently have to disclose that this is the fact.	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The added para. 14 is not necessary and should be removed as the reference to ESRS 2 GDR-P is sufficient. Otherwise it would differ from the structure of the other ESRS E standards.	E4	E4-2 - Policies related to biodiversity and ecosystems	14.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The added para. 14 is not necessary and should be removed as the reference to ESRS 2 GDR-P is sufficient. Otherwise it would differ from the structure of the other ESRS E standards.	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The added para. 14 is not necessary and should be removed as the reference to ESRS 2 GDR-P is sufficient. Otherwise it would differ from the structure of the other ESRS E standards.	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The added para. 14 is not necessary and should be removed as the reference to ESRS 2 GDR-P is sufficient. Otherwise it would differ from the structure of the other ESRS E standards.	E4	E4-2 - Policies related to biodiversity and ecosystems	AR 2
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	AR 3 for para. 13 should be removed as it only adds irrelevant additional information. At least please make clear that AR 3 does not require a “not applicable” disclosure.	E4	E4-2 - Policies related to biodiversity and ecosystems	AR 3
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	AR 4 for para. 13 can be removed as it brings no additional information.	E4	E4-2 - Policies related to biodiversity and ecosystems	AR 4
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree		E4	E4-3 - Actions and resources related to biodiversity and ecosystems	15.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The added para. 16 is not necessary and should be removed as the reference to ESRS 2 GDR-P is sufficient. Otherwise it would differ from the structure of the other ESRS E standards. At least, please make clear that the undertaking does not have to disclose the fact that it does not have any offsets in place.	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	16.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree		E4	E4-4 - Targets related to biodiversity and ecosystems	17.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The added para. 18 is not necessary and should be removed as the reference to ESRS 2 GDR-P is sufficient. Otherwise it would differ from the structure of the other ESRS E standards.	E4	E4-4 - Targets related to biodiversity and ecosystems	18.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	AR 5 for para. 17 should make clear that this is only an information but no disclosure requirement.	E4	E4-4 - Targets related to biodiversity and ecosystems	AR 5
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree		E4	E4-5 - Metrics related to biodiversity and ecosystems change	19.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Para. 20 should only refer to impacts.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Please make clear that para. 21 only refers to metrics for the own operations.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	21.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Para. 20 should only refer to impacts.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 6
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Para. 20 should only refer to impacts.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 7
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	AR 8 should make clear that IBAT is only one of many different tools to examine biodiversity sensitive areas.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The way it is currently phrased, this AR is making it mandatory for the undertaking to create metrics. It should be amended to require disclosure of metrics 'if the undertaking has any'. This change would align the standard with its purpose of transparency on existing practices, rather than imposing an undue burden by forcing metric creation in a field where measurement is still emerging.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree		E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 10
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree		E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 11
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The location-based approach to environmental impacts proposed in the standards is disproportionate and should be entirely eliminated. It introduces unnecessary complexity, increases the reporting burden, and does not align with the principles of relevance and proportionality.	E4	E4 - Objective	9.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Check the consistency of the subtopics (Appendix A: List of topics). "Direct exploitation of organisms" is not included in the list, nor are Climate Change and Pollution. Moreover, here it is stated that the driver Climate Change is covered under E1, while in E1 it is stated that is covered in E4. The same inconsistency applies to Pollution	E4	E4 - Interaction with other ESRS	10.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	In the other sections, it is not specified that the impacts are attributed to the company. This difference in wording should be clarified in order to avoid misinterpretation with the previous requirements (10. a-d)	E4	E4 - Interaction with other ESRS	10. (e)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	An explanation what is meant by "biodiversity offsets" would be helpful. Either in the ESRS E4 or in the glossary.	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	18.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The section requires reporting metrics on "relevant" concepts (e.g., drivers of biodiversity loss, species status, ecosystems, ecosystem services), but does not specify which metrics to adopt or the level of detail required. On one hand, this allows for flexibility; on the other, in a disclosure context subject to assurance, it is problematic because it leaves wide room for subjective interpretation and does not ensure comparability between companies. Moreover, it does not provide parameters to assess the adequacy of the selected metrics. It is recommended to specify whether we are referring to impact metrics (of the company on these topics) or to ecological status metrics of the area and species.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	18.
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	"Some amendmends which reduce burden. However it is still a work-intensive disclosure that requires a lot of preparation and data collection and analysis. Site surveys are not feasible for big undertakings (which are the scope of the CSRD) with tens of thousands of locations. It would be desirable to specify the AR 8 for Par. 20 with more detailed information on what type of activities are relating to species and BSA and therefore determine the buffer zones. What is ""industry best practice and science-based recommendations"" in the field of biodiversity, which is less developed than other topics. These specifications leave a lot of room for interpretation regarding the distance to BSAs. The notes in the log of amendments seems to state that near=if company ""impacts"" BSA - this does not clarify the concept in our view The AR prematurely claims that sites in/near BSAs will ""highly likely (...) negatively affect the area"". This seems to pre-determine a materiality not assessed by DMA. Who determines if an office 3km away from an BSA has an impact or not? "	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	IPBES identifies five direct drivers of biodiversity loss to which it was explicitly referred to in the current standard: land and sea use change, direct exploitation of species, pollution, invasive alien species, and climate change. We recommend reintroducing all these five drivers and clarifying their connection to the E4 sub-topics. This could be done in the NMIG.	E4	E4 - Objective	4.
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We recommend clarifying how to consider the international frameworks to which it is referred to in the different DRs/DPs of ESRS E4, such as the reference made to the Kunming-Montreal Global Biodiversity Framework within the transition plan for biodiversity and ecosystems disclosures.	E4	E4 - Objective	8.
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We welcome the overall simplification of the DR E4-1 and the alignment with the structure of the DR E1-1 (i.e. reporting on "key features"). However, we recommend including a definition of a biodiversity transition plan in the ESRS glossary. We also note that assessing the alignment of a transition plan for biodiversity with the GBF currently raises many difficulties in practice. Besides, we recommend using the term "compatible" instead of "aligned" to be consistent with ESRS E1.	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We recommend specifying in the NMIG that undertakings may disclose transition plans that are in place but not yet public, using the sustainability statement as a means of publication. Besides, we encourage EFRAG to clarify what is meant by "publicly released".	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	While AR 8 provides a detailed definition of how 'near' should be interpreted in relation to paragraph 20, no such clarification is offered for §14(b). We recommend either specifying the definition directly in relation to this paragraph or including a reference to this § in AR 8 to ensure consistency and clarity. Besides, we recommend including in this AR additional guidance from ID 1172 to help the undertaking assess how impacts from its activities negatively affect ecosystems and biodiversity and at what distance, since proximity to biodiversity sensitive area is of course to be considered but may not be conclusive in itself.	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (b)
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	This § should be amended as follows to cover material IROs and not only material impacts, consistently with the related rationale provided in the log of amendments: "... the undertaking shall report metrics related to its material impacts, risks and opportunities on biodiversity and ecosystems..."	E4	E4-5 - Metrics related to biodiversity and ecosystems change	21.
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We recommend integrating the following improvements in wording: (a) referring to "own operations" instead of "direct operations" to avoid any confusion; (b) specifying "where the undertaking has prioritised them..."; (c) specifying "where the assets and/or activities...".	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 7
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We recommend amending the first sentence of this AR as follows, to clearly highlight the requirement to also consider sites near a biodiversity sensitive area: "If the undertaking's site is in or near a biodiversity sensitive area, it is highly likely that its activities will negatively affect such area."	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8
Excels	Triodos Bank N.V.	Bank	Netherlands			I partially agree and partially disagree	We welcome mandatory requirement for the transition plan for biodiversity and ecosystems. As proposed, this is only applicable when a plan exists. We want to stress the importants that all high risk sectors should be forced to have a transition plan or take steps to reduce negative impact on ecosystems and biodiversity. The way it is proposed now is too voluntary.	E4	E4-1 - Transition plan for biodiversity and ecosystems	1.
Excels	Triodos Bank N.V.	Bank	Netherlands			I disagree	We propose to keep targets related to biodiversity and ecosystems to remain in place.	E4	E4-4 - Targets related to biodiversity and ecosystems	4.
Excels	Triodos Bank N.V.	Bank	Netherlands			I agree	Location-based disclosures in or near biodiversity-sensitive areas should be considered a minimum requirement and we supporting that this stays. As any biodiversity impact is highly dependent on the local ecological context, transparency on the locations of business activities of coorporations is highly important. Further location-based information is a minimum requirement as an input for a meaningful biodiversity impact indicator and also helps to keep corporates accountable.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	5.
Excels	BDO	Auditor	Belgium			I partially agree and partially disagree	The current wording remains too generic and lacks practical guidance. It could be beneficial to use similar appoach to generate metrics for ESRS E4 as the approach covered in the TNFD's metric framework to address location specific aspect of the ESRS E4. TNFD provides a clearer, science-based structure with pressure, state, and response indicators, which are more actionable than the broad metric categories currently listed in ESRS E4. (https://tnfd.global/metrics/)	E4	E4-5 - Metrics related to biodiversity and ecosystems change	21.
Excels	UNEP-WCMC	NGO	United Kingdom			I disagree	Para 4 mentions the sub-topics drivers of biodiversity and ecosystem change, state of species, extent and condition of terrestrial and marine ecosystems, ecosystem services. Para 3 states that "when only one of the sub-topics covered by this Standard is material, the undertaking shall report only on that sub-topic". However, the sub-topics are closely interrelated and it is likely that if one is material, others are too. We recommend adding a comment that acknowledges this.	E4	E4 - Objective	3.
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	Highlighting the importance of disaggregating information by site, asset, location etc., is useful. For companies to know how to implement this objective, we recommend elaborating on which disclosure requirements require site/asset/location level reporting and which can be reported at the company level.	E4	E4 - Objective	9.
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	Para 10 on the direct drivers of biodiversity and ecosystem change: We recommend referring IPBES to justify the list of drivers mentioned.	E4	E4 - Interaction with other ESRS	10.
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	Replace "Global Biodiversity Framework" with "Kunming-Montreal Global Biodiversity Framework"	E4	E4-1 - Transition plan for biodiversity and ecosystems	11.
Excels	UNEP-WCMC	NGO	United Kingdom			I disagree	We recommend removing the condition on publicly released TP. All data points should be applied to all companies that have, in their materiality assessment, identified high risks and dependencies on nature.	E4	E4-1 - Transition plan for biodiversity and ecosystems	AR 1
Excels	UNEP-WCMC	NGO	United Kingdom			I agree	Para 14a is useful and important and it reflects the best practice promoted by TNFD, SBTN and GRI.	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (a)
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	Given that for most companies, especially those based in the EU, the most material impacts on biodiversity are likely to be found in the upstream part of their value chain, UNEP-WCMC would recommend adding the wording "sites in its own operations and its key sourcing locations that are in or near a biodiversity sensitive area".	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (b)
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	Please clarify whether this AR means that financial institutions do not need to report policies on how they are reducing financed impacts on biodiversity.	E4	E4-2 - Policies related to biodiversity and ecosystems	AR 2
Excels	UNEP-WCMC	NGO	United Kingdom			I agree	It is good that ESRS 2 GDR-A defined "key actions" through their potential to address material impacts, risks and opportunities.	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	15.
Excels	UNEP-WCMC	NGO	United Kingdom			I agree	Good that in ESRS 2 GDR-A, companies are asked to describe the expected outcomes of the key actions.	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	16.
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	It would be useful to add the following wording to explain how the provisions of ESRS 2 GDR-T should be applied for biodiversity and ecosystem targets: "For impact-related targets on biodiversity and ecosystems, the undertaking shall specify whether the target is related to its impact drivers/pressures or impact (i.e. change in biodiversity or ecosystem state)."	E4	E4-4 - Targets related to biodiversity and ecosystems	17.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	This is an important addition and likely to be relevant to targets related to other environmental topics. In the interest of simplification, we recommend moving this application requirement to the ESRS 2 GDR-T so that it applies to all targets (this would be similar to the Indigenous People's application requirement for key actions in ESRS 2 GDR-A).	E4	E4-4 - Targets related to biodiversity and ecosystems	AR 5
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	The wording "biodiversity and ecosystems change-related impacts, risks and opportunities" is unclear. Should it be "biodiversity- and ecosystems change-related"? I.e. both biodiversity-related and ecosystems change-related?	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20.
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	It is not clear whether "negatively affected" means "negative effects wholly attributable to the company" or also "negative effects to which the company is contributing". For example, fertilizer run-off from multiple agricultural sites in an aquifer is affecting species in a river flowing through a Natura2000 site. Should a company report this as a biodiversity-sensitive area negatively affected by them, even though they are just one of many contributors to the risk? AR7 attempts to clarify this, but it is not clear what is meant by "significant drivers of material impacts, risks and opportunities" or what it means to "interact negatively with biodiversity sensitive areas".	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20. (b)
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	Given that Paragraph 20 refers to impacts, risks and opportunities, and risks and opportunities include potential future damage, we could recommend changing the wording in Para 20b from "for those locations, if applicable, a list of biodiversity-sensitive area(s) negatively affected" to "or those locations, if applicable, a list of biodiversity-sensitive area(s) that may be negatively affected".	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20. (b)
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	We would recommend clarifying that "(name and type)" means "(name, type of biodiversity-sensitive area and type of impact, risk or opportunity)".	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20. (b)
Excels	UNEP-WCMC	NGO	United Kingdom			I disagree	Limiting reporting to option (b) alone would be insufficient. Organizations should prioritize approaches (a) and/or (c), with option (b) serving as a potential supplement, to guarantee that disclosure adequately addresses significant nature-related impacts and dependencies and not only sustainability-related objectives covered by its policies, actions and targets.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 7
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	Thanks for referencing the buffer zone approach from IBAT. The definition of what 'near' means is not clear. We recommend adapting similar language to TNFD's definition of Areas of influence and referring to IFC PS6, Good Practices in Collection of Biodiversity Baseline Data, and sector-specific standards, such as GRI Sector Standards or TNFD sector-specific guidance. "Nature-related impacts can arise beyond the immediate site boundary of an activity. Corporates (and financial institutions involved in project finance) should seek to understand areas of influence, noting that the size of the area may vary, depending on the nature of its activities and/or assets, and on the biome, and is often larger than the footprint of the site itself. It includes areas in which there is subject to direct and indirect impacts that may be positive or negative, depending on the site activity. When an organisation's area of influence overlaps with those of other organisations, cumulative impacts should also be considered. A comprehensive approach to outlining a project's area of influence is included in several good practice guidelines, such as IFC Performance Standard 6 and the Good Practices for the Collection of Biodiversity Baseline Data."	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	ESRS 2 GDR-M refers to metrics that the company uses to evaluate its performance in relation to material impacts, risks and opportunities. Para 21 in ESRS E4 complements this by stating that, in addition to this, the company should report metrics related to its material impacts on biodiversity and ecosystems. We recommend clarifying whether it is necessary to also include material biodiversity and ecosystem risks and opportunities.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	21.
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	Change the wording "the undertaking shall indicate which material impacts concern land degradation, desertification or soil sealing, and operations that affect threatened species" to "the undertaking shall indicate which material impacts are related to land degradation, desertification, soil sealing or threatened species".	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 6
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	UNEP-WCMC recommends that, alongside any metrics of drivers of biodiversity and ecosystem change, companies also report metrics on ecosystem extent, condition and species risk in the location of those pressures. We recommend that EFRAG reviews the concept of "sub-topics" in this standard. We welcome that in the ESRS 2 GDR-M, there is the requirement "for environmental metrics, the specific environmental conditions and characteristics of the area where the impact is occurring".	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	UNEP-WCMC	NGO	United Kingdom			I partially agree and partially disagree	Ideally, the standard itself would propose metrics, but we understand that the simplification process has required leaving out some details. However, ESRS E4 should make a reference to the related NMIG for para. 21, because that is where companies can find a list of metrics that can be used for reporting in line with AR9 for para. 21 in ESRS E4.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	UNEP-WCMC	NGO	United Kingdom			I disagree	Where possible, measurement of impacts on biodiversity and ecosystems should be based on primary data. This includes data collected on site or remote sensing data. Where primary data is not available, the company may estimate its impacts (i.e. changes in the state of nature it causes) using primary data on impact drivers and primary or secondary data on the state of nature.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 10
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Delete. With the GDR-P this will be sufficiently transparent	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (a)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Delete. With the GDR-P this will be sufficiently transparent	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (b)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Delete. With the GDR-P this will be sufficiently transparent	E4	E4-2 - Policies related to biodiversity and ecosystems	AR 3
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Proposition to delete, it's very detailed information with limited decision relevance for stakeholders	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 6
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	While we acknowledge the intention to provide further guidance on what 'near' a biodiversity sensitive area means, the additional requirements on the definition of a buffer zone „specific to the type of activity and the species and ecosystems in the area" will significantly increase the complexity of calculations and lead to high auditor alignments. We propose a simpler approach, e.g. a definition of 2km as a definition of what "near" means.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	The notion of "transition plan" is not yet clearly defined. Companies are currently exploring the best ways to develop action plans on this highly complex subject, whether through national or international initiatives, but no official certification of such analyses and plans exists to date. Making this datapoint mandatory, even with precautions (i.e. if the company has a transition plan and has published it), would discourage companies from taking initiatives, as it would trigger compulsory verification by auditors without existing auditing standards. Furthermore, "so it is aligned" with the Global Biodiversity Framework (GBF) lacks clarity. It would be more appropriate to refer instead to "consistency" with the objectives of the GBF.	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	The distinction between a "transition plan" and an "action plan" remains unclear and has already led to numerous discussions with auditors during the first reporting exercise, even in the case of climate transition plan. Moreover, as previously suggested, we propose to refer to "consistency" with relevant global goals, rather than "to become compatible with" them.	E4	E4-1 - Transition plan for biodiversity and ecosystems	AR 1
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	We would appreciate further clarification on the following points: what exactly is meants by the "action plans" reffered to? Should offsetting be considered voluntary or compulsory?	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	16.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	Point (b) of AR9 seems to introduce a new obligation for undertakings, as metrics related to the state of species were previously optional, even if the subtopic was considered material.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	Point b) of AR8 introduces the new notion of a "buffer zone" which is neither defined in this AR, nor in the Glossary. It should be suppressed.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	General comment: EFRAG should develop comprehensive non-mandatory implementation guidance for each topical standard, including ESRS E4. The guidance should comprise instructions and examples how to conduct the materiality assessment for the topic, how to apply the disclosure requirements, and to calculate the metrics. Sectoral examples could be added, where appropriate.	E4	E4 - Objective	1.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Para. 1 states that information on financial effects is expected under [Draft] Amended ESRS E4, which is a valuable acknowledgement given that such information on financial effects is highly decision-relevant, not only for the undertakings themselves, but also for other primary users of their sustainability statements, including those in the financial sector. However, [Draft] Amended ESRS E4 no longer contains specific DRs on financial effects on biodiversity since the former ESRS E4-6 is proposed to be removed. Financial effects are also not included in any other disclosure requirements in ESRS E4, which makes this statement somewhat void. Since nature-related financial effects can be substantial, the standards should ensure that they are considered in reporting on actual and anticipated financial effects under ESRS 2 SBM-3. If it proofs difficult to reinstate them as part of ESRS 2, they should at the least be included in the non-mandatory guidance.	E4	E4 - Objective	1.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I disagree	Comment to IRO-1-related DR in E4: We are concerned that [Draft] Amended ESRS E4 no longer contains explicit topic-specific instructions or guidance on how to conduct the materiality assessment regarding biodiversity and ecosystems (as set out in previous AR 4), and do not consider this information redundant as laid out in the Log of Amendments, since ESRS 2 does not cover topic-specific provisions. The references in [Draft] amended ESRS 2, AR 22 to location-specific considerations and the "LEAP approach" should be strengthened (see comments on ESRS 2). Further, we advise EFRAG to include the essence of ESRS E4, AR 4 to AR 6 into the NMIG for ESRS 2.	E4	E4 - Objective	1.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	[Draft] Amended ESRS E4 para. 3 explicitly states that undertakings shall report only on a sub-topic, when material. While it is reasonable to report only on material sub-topics, the sub-topics of [Draft] Amended ESRS E4 consider different levels and are not mutually exclusive. For example, the sub-topic "drivers of biodiversity and ecosystem change" addresses the reasons for biodiversity and ecosystem change, while other sub-topics address biodiversity loss/change itself (e.g. status of species, extent and condition of terrestrial and marine ecosystems; and ecosystem services). Focussing on one of these topics while neglecting another is not reasonable. We therefore recommend to include a clarification in E4, para. 3, on the interlinkages between sub-topics, and to ensure that both drivers and the loss of biodiversity are addressed.	E4	E4 - Objective	3.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	[Draft] Amended ESRS E4 in para. 4 only acknowledge a sub-set of drivers of change in biodiversity and ecosystems. The expression in brackets "terrestrial and marine habitat change, invasive species" should be deleted.	E4	E4 - Objective	4.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	The standard mainly refers to terrestrial and marine ecosystems, while freshwater ecosystems are not explicitly mentioned / included. Given that freshwater habitats are among the most threatened ecosystems globally and provide critical services such as drinking water supply, irrigation, and biodiversity corridors, we recommend explicitly integrating freshwater ecosystems into the scope of ESRS E4. Extend para. 4: "the extent and condition of terrestrial, freshwater and marine ecosystems;"	E4	E4 - Interaction with other ESRS	4.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Glossary: We highlight that the definition of "biodiversity" in para. 7 differs slightly from the one in the glossary. From a conservation perspective, we strongly recommend aligning both definitions with the Convention on Biological Diversity (CBD), Article 2: „Biological diversity means the variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part; this includes diversity within species, between species and of ecosystems." (https://www.cbd.int/convention/articles?a=cbd-02). Using the CBD definition would ensure consistency with the globally recognised reference framework.	E4	E4 - Interaction with other ESRS	7.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Using "objective" in this sentence is confusing, since the objective of the standard is already introduced in para. 2. Delete "The objective of" and start with "This Standard shall…"	E4	E4 - Objective	8.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Glossary: The GBF has a vision for 2050, a mission for 2030, four goals for 2050, and 23 targets for 2030. The phrase "To take urgent action to halt and reverse biodiversity loss" is part of the mission for 2030. We therefore recommend a slight change in wording for [Draft] Amended ESRS E4-1 para. 8.a.) to better align with the terms and concepts used in the GBF: "the vision and mission of the Kunming-Montreal Global Biodiversity Framework and …";	E4	E4 - Objective	8. (a)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	ESRS E4 para. 10 is rather confusing: it states that climate change and pollution are covered only in E1/E2, but sub-points a–d indicate their impacts are addressed in E4. To avoid confusion, we recommend clarifying that ESRS E1 and E2 cover the drivers of climate change and pollution themselves, while ESRS E4 addresses their specific impacts on biodiversity and ecosystems. We suggest to modify the text of para. 10 in the following: delete "these drivers are covered in this Standard, except for", so that it reads "…alien species. Climate change and pollution are mainly addressed by [Draft] Amended ESRS E1 Climate Change and [Draft] Amended ESRS E2 Pollution. The main points of interaction…"	E4	E4 - Interaction with other ESRS	10.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Glossary: We recommend to adapt the glossary entry for "Drivers of ecosystem and biodiversity change" (prev. "Impact drivers") in the following way: 1.) specify "exploitation" similar to the wording in ESRS E4 para. 10 "direct exploitation of organisms; 2.) Substitute "indirect impact drivers" with "indirect drivers of ecosystem and biodiversity change" to reflect the new title of the entry.	E4	E4-1 - Transition plan for biodiversity and ecosystems	11.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	We recommend to delete "when it has in place a biodiversity and ecosystems transition plan" from para. 11. This condition is already covered in para. 12.	E4	E4-1 - Transition plan for biodiversity and ecosystems	11.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Disclosure under ESRS E4-1 should be mandatory whenever a transition plan exists („if… has in place"). The additional condition of publication ("and has made public") should be deleted. This condition would set incentives for non-disclosure and lead to a duplication of published information, which should both be avoided. If EFRAG were to delete the condition of publication, users would also understand that non-disclosure according to E4-1 indicates the absence of a transition plan, which is considered a relevant information in itself.	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	We noticed that for some NMIG entries related to Biodiversity and Ecosystem the numbering is wrong: NMIG 1 and 2 should both be for para. 12.	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	The GBF has a vision for 2050, a mission for 2030, four goals for 2050, and 23 targets for 2030. The phrase "To take urgent action to halt and reverse biodiversity loss" is part of the mission for 2030. We therefore recommend a slight change in wording for para. 12 to better align with the terms and concepts used in the GBF: "…so it is aligned with the global mission of halting and reversing biodiversity loss".	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	AR 1 and NMIG 1 (note that paragraph numbering is wrong in NMIG): We recommend to use similar wording as in the transition plan for climate change mitigation, i.e. „key features" instead of "elements"	E4	E4-1 - Transition plan for biodiversity and ecosystems	AR 1
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Regarding ESRS E4-1 and its associated AR 1 and NMIG 2, we find misalignments in the references to the GBF and EU Biodiversity Strategy. We suggest: 1.) Embed the possible connection of the transition plan to further goals, concepts, strategies and frameworks in para. 12 with: "… as stated in the Kunming-Montreal Global Biodiversity Framework or other relevant local, national, EU and global public policy goals and targets related to biodiversity and ecosystems, it shall disclose its key features."; and 2.) Include references to relevant GBF goals and targets in a separate NMIG, to shift the focus away from providing guidance solely on the EU Biodiversity Strategy, which is not part of the mandatory para. 12 anymore.	E4	E4-1 - Transition plan for biodiversity and ecosystems	AR 1
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Acronyms: the acronym list should include "GBF" – Global Biodiversity Framework since this abbreviation is used in ESRS E4, but not introduced before	E4	E4-1 - Transition plan for biodiversity and ecosystems	AR 1
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	We note that para. 15 on actions and resources related to avoid, mitigate and remediate biodiversity- and ecosystem-related impacts remains unspecific. This risks placing undue emphasis on biodiversity offsets, (para. 16). We recommend carefully reviewing this disproportionate level of detail. Offsets should not become the primary focus, as they are not necessarily a net gain for nature, and may even divert attention from more effective biodiversity measures.	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	15.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Since publication of the delegated act for the ESRS in 2023, the global community has agreed on a new mechanism for the Fair and Equitable Sharing of Benefits from the use of Digital Sequence Information on Genetic Resources (DSI) – the Cali fund. With updating the ESRS we see it as important to reference this global agreement and to offer undertakings, that make use of digital sequence information, guidance to consider this when disclosing their relevant actions. We therefore suggest to add an additional entry to the Non-Manadatory Implementation Guidance relating to E4-3 (para. 15): „When disclosing their key biodiversity and ecosystem-related actions and significant resources allocated to their implementation, users of digital sequence information on genetic resources in sectors that directly or indirectly benefit from their use in their commercial activities, can disclose their monetary contributions to the Cali Fund for the Fair and Equitable Sharing of Benefits from the use of Digital Sequence Information on Genetic Resources (DSI)."	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	15.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	The term "biodiversity offsets" should be added to the glossary. EFRAG can rely on the work of IUCN: https://iucn.org/resources/issues-brief/biodiversity-offsets	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	16.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Glossary: replace the term "local and indigenous peoples" in AR 5 for para. 17 with the internationally more common wording of "indigenous peoples and local communities".	E4	E4-4 - Targets related to biodiversity and ecosystems	AR 5
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I agree	We support the decision of EFRAG to maintain the concept of biodiversity-sensitive areas, since we also consider this location-specific information as highly decision-useful. It provides essential insights into impacts, risks and opportunities that cannot be captured through aggregated reporting alone. Even though E4-5 has lost in topical granularity, we generally welcome that [Draft] Amended ESRS E4-5 now foresees the mandatory disclosure of metrics related to material impacts on biodiversity and ecosystems.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	21.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	From a conservation perspective, we strongly recommend that AR 8 para. 20(b) specifies that undertakings should also take into account the type of buffer zone of biodiversity-sensitive areas, along with the resulting legal requirements, obligations and prohibitions. For example, the buffer zones of biosphere reserves are an integral part of these large protected areas, functioning as a 'maintenance zone' with a buffer function for the core zone, and are usually subject to strict regulatory requirements (e.g. comparable to a nature reserve regulation). For other types of buffer zones, measures in line with industry best practice standards may be more appropriate. This distinction is essential to ensure meaningful and comparable disclosure.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	AR 9 only acknowledges a sub-set of drivers of change in biodiversity and ecosystems.The expression in brackets "terrestrial and marine habitat change, invasive species" should be deleted.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Include "freshwater ecosystems" in item (c)	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Glossary: We recommend including a definition of „state of species“.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Regarding the structure of ESRS E4-5, it might make sense to swap order of current paras. 20 and 21 to first mention requirements (in this case metrics) related to ESRS 2 GDR-M and then other metrics specific for the topical standard similar to other DRs	E4	E4-5 - Metrics related to biodiversity and ecosystems change	21.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	NMIG 14 is highly welcome. However, it is particularly helpful for the guidance on how to conduct the materiality assessment regarding biodiversity and ecosystems and should belong with this section of the NMIG for ESRS 2 IRO-1 instead of ESRS E4-5.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	21.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I disagree	NMIG: The term "Natural Resources" was deleted from the Glossary, but is still used within the NMIG. Avoid use of the term in NMIG.	E4	E4 - Objective	1.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	We recommend to move the requirement to disclose "the specific environmental conditions and characteristics of the area where the impact is occurring;" from ESRS 2, para. 41 (b) to ESRS E4-5. Providing contextual information on the environmental conditions and characteristics of an area where the impact occurs, is most relevant for biodiversity and ecosystem metrics. The provision could be formulated as follows: "When providing contextual information on the metric, in accordance with ESRS 2 GDR-M, the undertaking shall explain the environmental conditions and characteristics of the area where the impact is occurring;"	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 11
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	The new E4-1 requirement makes biodiversity and ecosystem transition plan disclosure mandatory if such a plan exists and is already public. While recognising the current maturity level for biodiversity transition plans, the AR 1 wording ("are expected to address…") remains vague, and there is no specific definition of a biodiversity transition plan in the ESRS glossary. There is also no clear distinction between a "biodiversity transition plan" and a "biodiversity strategy". Furthermore, the link with the Kunming-Montreal Global Biodiversity Framework (GBF) raises practical issues: there is no agreed methodology for assessing "alignment" with GBF at company scale, biodiversity impacts are often localised (by business line or geography), and sector-specific metrics are still under development. We suggest the following changes: • Provide a clear, short definition of a biodiversity and ecosystems transition plan in the ESRS glossary, distinguishing it from a biodiversity strategy. • Require only a core set of elements (targets, key actions, timelines, governance), similar in structure to ESRS E1-1, to ensure minimum comparability without overburden. • Indicate in the NMIG that companies may disclose plans not yet fully aligned with the GBF, provided they explain the degree of alignment and the steps planned to achieve it.	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	The removal of biodiversity-specific resilience analysis from ESRS E4 risks creating a gap in the disclosure framework, as it may lead undertakings to provide only generic resilience assessments under ESRS 2 SBM-3 without addressing biodiversity-specific risks and dependencies. While the intent to avoid redundancy is understandable, biodiversity resilience has distinct drivers compared to climate and merits dedicated consideration.	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	While E4-3 and E4-4 introduce transparency requirements for biodiversity offsets, they remain significantly less detailed and prescriptive than the new E1-9 provisions on carbon removals and carbon credits. To ensure alignment and coherence across ESRS topical standards, and to avoid the biodiversity offset requirements being perceived as weaker than climate-related offset requirements, we recommend that EFRAG: • Provide a clear definition of "biodiversity offset" and distinguish it from general conservation or restoration actions. • Mirror E1's structure by separating disclosure of internal offsetting projects from offsets purchased or financed externally. • Require minimum integrity criteria similar to those for carbon credits, covering ecological quality factors. • Require reference to recognised quality standards (or state explicitly if none exists). • Mandate disclosure of the proportion of targets met through offsets versus direct biodiversity actions.	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	16.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	The removal of the previous requirement (number of sites and hectares affected) eliminates a more feasible and comparable metric for large groups. We recommend considering reinstating the previous "number of sites and hectares affected" metric as a baseline, complementing it with qualitative description of priority areas and allowing companies to report on prioritised biodiversity-sensitive areas only, with aggregation where appropriate.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20.
Excels	Nature Positive Initiative Secretariat	NGO	United States			I agree	N/A	E4	E4-5 - Metrics related to biodiversity and ecosystems change	19.
Excels	Nature Positive Initiative Secretariat	NGO	United States			I agree	Support this update in the context of needing to remove datapoints.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20. (a)
Excels	Nature Positive Initiative Secretariat	NGO	United States			I agree	Support this update in the context of needing to remove datapoints.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20. (b)
Excels	Nature Positive Initiative Secretariat	NGO	United States			I agree	Support this update in the context of needing to remove datapoints.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20. (c)
Excels	Nature Positive Initiative Secretariat	NGO	United States			I partially agree and partially disagree	We support the alignment with the draft global consensus metrics on state of nature, convened by the Nature Positive Initiative. Removal of the metric specifications from the mandatory requirements is particularly problematic for biodiversity and ecosystems metrics, where standardisation is more limited at present than with other metrics. Specifying metrics (as is now in NMIG 18-20) would give companies the information they need to select and report practical, credible and comparable metrics.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	21.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Nature Positive Initiative Secretariat	NGO	United States			I partially agree and partially disagree	Suggest threatened species or ecosystems. Guidance would be needed for companies on how to identify impacts concerning land degradation, desertification or soil sealing, as these are not commonly reported as categories/sub-topics.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 6
Excels	Nature Positive Initiative Secretariat	NGO	United States			I disagree	Strongly recommend that it should not be an option to only report according to point (b). Companies should apply (a) and/or (c) and may additionally choose to apply (b). As it is currently written, companies may choose to disclose metrics for only sites with limited biodiversity-related impacts or risks but that it has focussed on in its wider sustainability programmes, whilst high risk/impact sites for biodiversity might not need reporting. This undermines the purpose of the standard.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 7
Excels	Nature Positive Initiative Secretariat	NGO	United States			I agree	N/A	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8
Excels	Nature Positive Initiative Secretariat	NGO	United States			I partially agree and partially disagree	Strongly support the alignment with the draft consensus state of nature metrics being convened by the Nature Positive Initiative. If the location has already been assessed as material for biodiversity and ecosystems then all four metrics are needed to indicate the impact of the company. It may be practical to move the qualification on materiality to point (d), i.e. companies shall report metrics for the most material ecosystem services.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	9.
Excels	Nature Positive Initiative Secretariat	NGO	United States			I disagree	Between site level measurement and estimation must be an additional step in the hierarchy: using national or global data layers. With the increasing availability of higher-quality remote sensing data, this is now more feasible and more accurate for measuring state of nature. It provides a much more accessible means of reporting for companies. Estimations should be the third resort.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 10
Excels	Nature Positive Initiative Secretariat	NGO	United States			I agree	N/A	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 11
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	1) The sentence "Transition plans for biodiversity and ecosystems are expected to address similar elements than transition plans for climate change mitigation" shall be removed\cancelled. The reference to similarity with climate transition plans is not appropriate: the two areas are fundamentally different, as are the related requirements. Climate transition plans rely on globally available metrics and quantitative pathways, whereas for biodiversity, such methodologies and comparable targets do not exist at a global level. 2) the compatibility with GBF shall be removed or explained in detail. The text requires that any transition plan be compatible/aligned with the targets of the GBF. A similar formulation exists for climate (referring to compatibility with the 1.5°C target), which is currently under discussion, as it is considered not directly applicable to companies. The same issue arises here with biodiversity. The GBF objectives are designed to guide public policies and national action plans, not to be directly applied to corporate business models. In this context, it is unclear what it means for a company to have a strategy or business model "compatible" with such objectives. The requirement is difficult to interpret and cannot be verified.	E4	E4-1 - Transition plan for biodiversity and ecosystems	AR 1
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	With this new wording it is not clear which site should be reported (please see comment on AR 7 below). The term "location" is not very clear, please clarify if "location" refer to single sites or an aggregation of type of activities or geographies. It is reccomended consistency of wording in all the environmental ESRS.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20. (a)
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	The criteria identified in letter a), b), c) seems to require the disclosure on all the location with IRO + all the sites prioritised internally + the assets (and is not clear why we are not referring anymore to locations) with negative interactions with biodiversity areas. The interaction of the 3 points could lead to a ling ist of location to disclose. It should be clarified that the intention is not to require disclosure for every single site, but rather a limited number of representative sites selected according to prioritisation criteria defined by the company.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 7
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	In an attempt to clarify the concept of "near," the text paradoxically ends up considering as near any site "not inside" a sensitive area. This would effectively imply conducting ad hoc analyses for hundreds of sites (all those not overlapping), in order to identify a science-based buffer based on the ecological specificities of each site. This represents an operational and documentation burden that is entirely disproportionate to the goal of simplification. Moreover, IBAT does not provide a buffer on a scientific basis; it is the user who enters the desired buffer to perform the mapping. Finally, it should be noted that ESRS is a disclosure standard, designed to harmonize reporting across companies, not to prescribe detailed operational management of impacts, which is addressed through other regulatory frameworks. The current wording of AR 8 risks turning the standard into a de facto operational requirement, going beyond the intended purpose of ESG disclosure.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	The section requires reporting metrics on "relevant" concepts (e.g., drivers of biodiversity loss, species status, ecosystems, ecosystem services), but does not specify which metrics to adopt or the level of detail required. On one hand, this allows for flexibility; on the other, in a disclosure context subject to assurance, it is problematic because it leaves wide room for subjective interpretation and does not ensure comparability between companies. Moreover, it does not provide parameters to assess the adequacy of the selected metrics. It is recommended to specify whether we are referring to impact metrics (of the company on these topics) or to ecological status metrics of the area and species.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	Check the consistency of the subtopics (Appendix A: List of topics). "Direct exploitation of organisms" is not included in the list, nor are Climate Change and Pollution. Moreover, here it is stated that the driver Climate Change is covered under E1, while in E1 it is stated that is covered in E4. The same inconsistency applies to Pollution.	E4	E4 - Interaction with other ESRS	10.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	In the other sections, it is not specified that the impacts are attributed to the company. This difference in wording should be clarified in order to avoid misinterpretation with the previous requirements (10. a-d).	E4	E4 - Interaction with other ESRS	10. (e)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	With reference to point a) "supporting traceability of products, components and raw materials with material actual or potential impacts on biodiversity and ecosystems along the upstream and downstream value chain;" we see difficulties for companies in obtaining such information across the entire value chain (as already occurs with CBAM and EUDR). We propose deleting this point.	E4	E4-2 - Policies related to biodiversity and ecosystems	14.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I agree	Equinor supports significant reduction in the number of overall datapoints.	E4	E4 - Objective	1.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I agree	Equinor supports removal of Disclosures related to the resilience of strategy (former para.13) on this topical level and lifting it to the higher aggregated level (in ESRS 2 SBM-3) to avoid redundancy across the sustainability statement.	E4	E4-1 - Transition plan for biodiversity and ecosystems	1.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	The requirement to describe traceability policies along the value chain and for sites "in or near" biodiversity-sensitive areas (ESRS E4, 14a and b) is highly prescriptive. It poses operational, verification, and legal challenges. We recommend moving this DR to voluntary data points allowing proportionate flexibility consistent with materiality and preparer feasibility.	E4	E4-2 - Policies related to biodiversity and ecosystems	2.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	We support the objective of requirement 20 to enhance transparency on biodiversity-related impacts, risks and opportunities. Nevertheless, its current wording could be misinterpreted as requiring large multinational undertakings to enumerate every location with a material impact — an effort that may be disproportionate and obscure the most decision-useful information. We suggest clarifying that this is not the intent and allowing aggregation (e.g., disclosure of the most significant or representative locations, or grouping by geography, ecosystem type or business segment) so reporting remains both meaningful and practicable.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	5.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	AR. 9 for para. 21 - We support enhanced reporting on biodiversity and ecosystem change. However, mandatory metrics on drivers, species state, ecosystem condition, and ecosystem services are highly challenging due to the lack of globally accepted frameworks and robust methodologies. Defer methodology guidance until stable, widely accepted approaches exist; avoid locking-in immature voluntary frameworks. Premature mandatory guidance risks inconsistent disclosures and legal exposure.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	Equinor recommends that all biodiversity metrics remain voluntary. Defer methodology guidance until stable, widely accepted approaches exist; avoid locking-in immature voluntary frameworks. Premature mandatory guidance risks inconsistent disclosures and legal exposure.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	5.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	We believe the requirement in ESRS E4, paragraph 14b, should not be triggered if the site does not pose any specific risks or negative impacts on the area in question. For instance, having a sales office or similar activities like normal housing would normally not require reporting. Hence, we believe that the size or type of activities needs to be considered internally as part of the materiality assessment before requiring any external disclosure requirements, also in terms of policies.	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (b)
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	In our opinion, there is a lack of clarity on what should be done if a company does not have a biodiversity and ecosystems transition plan (there is a similar section for the E1 plan). Should section E4-1 be omitted from the report entirely if an E4 transition plan is not in place?	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	shouldnt it be reported if the transition plan has not made public?	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	does it mean that if the biodiversity transition plan is not aligned to the Kunming-Montreal Global Biodiversity Framework, nothing should be reported?	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	pls, bear in mind this AR could be contradictory to the paragraph above, as here relevant global goals are mentioned while above only the GBF is included.	E4	E4-1 - Transition plan for biodiversity and ecosystems	AR 1
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	to be added " when applicable"	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (a)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	to be added " when applicable"	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (b)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	should be " can" replaced by "may"?	E4	E4-2 - Policies related to biodiversity and ecosystems	AR 4
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	should this AR be included in the strategy related DR (E4-1), as it refers to not only policies, but also actions and targets?	E4	E4-2 - Policies related to biodiversity and ecosystems	AR 4
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Please include " when applicable" , when referred to indigenous people	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	AR 5
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	shouldn't this information be disclosed in the ESRS S3?	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	AR 5
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	minor mistake. par 20. a)	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 6
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	we would suggest to facilitate some examples of tools to be used	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	we would include a reference to some internationally recognized standards to be considered in this regard	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS E4 Biodiversity , when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, and targets (if in place), dependencies when relevant, metrics and financial effects Suggestion: When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS E4 Biodiversity, when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, metrics and targets (if in place), dependencies when relevant, metrics and financial effects.	E4	ESRS E4 - Objective	1.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Unnecessary duplication: The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M. In particular: (a) if the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact; (b) the undertaking may present the description of its material impacts, risks and opportunities, in accordance with [Draft] Amended ESRS 2 IRO-2, alongside information about its policies, actions, targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative Suggestion: The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M. In particular: (a)if the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact; (b)the undertaking may present the description of its material impacts, risks and opportunities, in accordance with [Draft] Amended ESRS 2 IRO-2, alongside information about its policies, actions, targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative .	E4	ESRS E4 - Objective	5.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	Reporting on a biodiversity transition plan, if already in place and made public, should be mandatory as suggested, as it is assumed to provide the most relevant information regarding an undertaking's biodiversity measures. The removal of data points on resilience of the strategy from E4-1 and inclusion of these data points in ESRS 2 SBM-3 increases efficiency on reporting regarding the strategy's overall resilience. The sole focus of E4-1 on transition plan makes sense for both preparers and readers of the sustainability report. However, it should be possible to report on a biodiversity transition plan even if it defers from the Global Biodviversity Framework. This is an addition compared to current ESRS and not a simplification. We recommend to include the Global Biodiversity Framework as an example.	E4	Disclosure Requirement E4-1 - Transition plan for biodiversity and ecosystems	11.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	Reporting on a biodiversity transition plan, if already in place and made public, should be mandatory as suggested, as it is assumed to provide the most relevant information regarding an undertaking's biodiversity measures. The removal of data points on resilience of the strategy from E4-1 and inclusion of these data points in ESRS 2 SBM-3 increases efficiency on reporting regarding the strategy's overall resilience. The sole focus of E4-1 on transition plan makes sense for both preparers and readers of the sustainability report. However, it should be possible to report on a biodiversity transition plan even if it defers from the Global Biodviversity Framework. This is an addition compared to current ESRS and not a simplification. We recommend to include the Global Biodiversity Framework as an example.	E4	Disclosure Requirement E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I agree	The removal of AR 4 and all reference of other E4 datapoints to AR 4 is welcome, as this led to a high level of repetition and unnessecary detail regarding the undertaking's biodiversity measures with little to no value / relevance for users of the sustainability report.	E4	Disclosure Requirement E4-1 - Transition plan for biodiversity and ecosystems	AR 4
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	This requirement was moved from IRO-1, which is welcomed. However (within IRO-1) it should be clarified that for sectors where it is not to be excpected that there are own sites of an undertaking with material IROs reg. biodiversity (e.g., withtin the financial services sector), no detailed analysis of all sites of the undertaking is required as part of the DMA.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I agree	Removal is welcome as other regulation already drives the requirements regarding ESG risk management and there is no need to further address this within ESRS, especially for the financial services sector.	E4	Disclosure Requirement E4-6 - Anticipated financial effects from material biodiversity and ecosystem-related risks and opportunities	n/a
Excels	Allianz SE	Insurance	Germany			I disagree	NEW requierement: Divergence with other E-beyond metrics sections that are only applicable to own operations. Ammended DR 21 expand the application of Metrics for value chain. Request to have back original scope own operations. Biggest probelm is that metrics are not related to own operations anymore, which means that value chain is included from now on. This is a huge increase of burden for financial institutions due to the complexity of the value chain of financial institutions and the dependency of the data availabilty coming from real economy. Many companies do not disclose biodiversity data and, in addition, in the future less companies will be obliged to report under CSRD. This would require us to use estimates and very volatole numbers that depend on data providers methologies. Not one established methodology.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	21.
Excels	Allianz SE	Insurance	Germany			I partially agree and partially disagree	use of "can" shall be avoided and only use "shall" or "may"	E4	E4-2 - Policies related to biodiversity and ecosystems	AR 4
Excels	Allianz SE	Insurance	Germany			I partially agree and partially disagree	Site shall be clearly connected to own or direct operations	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Allianz SE	Insurance	Germany			I disagree	AR suggests the worst case if the site is in a biodiversity sensitive area "is highly likely that ist activities will negatively affect the area" We think this is an inappropriate assumption. AR makes prejudging assumptions for the DMA which contradict the DMA principles.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8
Excels	Allianz SE	Insurance	Germany			I disagree	The guidance to be complied with by undertakings when determining whether a site is near a sensitive are makes more complex than before.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8
Excels	Allianz SE	Insurance	Germany			I disagree	new requierement: disclosure of impact metrics fo value chain IRO is complex as data is not availible and metholdoogies are not mature yet. It shall be voluntary to disclosure metrics for value chain impacts	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	Allianz SE	Insurance	Germany			I disagree	Additional metric requirement. Although "ecosystem services" is mentioned in the delegated act in several instances, it is not a metric requirement in the delegated act.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	Allianz SE	Insurance	Germany			I disagree	Additional metric requirement. Although "drivers of [...] ecosystem change" is mentioned in the delegated act (ESRS E4.AR20f), it is not a metric requirement in the delegated act.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	Allianz SE	Insurance	Germany			I disagree	new requierement: disclosure of impact metrics fo value chain IRO is complex as data is not availible and metholdoogies are not mature yet. It shall be voluntary to disclosure metrics for value chain impacts	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 10
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We disagree with this new (!) data point. As a matter of principle, no new data points should be included in the revised ESRS. We clearly disagree with the requirement for disclosures for IROs on location or asset basis. This data point also places a heavy additional burden on companies, as the reporting level would become highly disaggregated if reporting had to be done at the location or asset level. Furthermore, information on PAT is generally not specific to a location or asset level, but rather at a higher level. Reporting at such a low level of aggregation would therefore not be effective.	E4	E4 - Objective	9.
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	This is also a new data point. We therefore reject it on principle. In addition, this data point is highly complex and uncertain, as it remains unclear what is meant by nature metrics and how these indicators are to be collected. A design such as this will lead to heterogeneous reporting, which cannot contribute to standardized and comparable reporting.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 10
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	There seems to be a wrong assignment in E4-5 AR 6 is rather related to E4-2	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 6
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	At the end of the sentence the following should be added "and indicate all identified material negative impacts and risks that remained unaddressed by actions during the reporting year"	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	15.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	At the end of the sentence the following should be added "against each action disclosed under DR G1-2".	E4	E4-4 - Targets related to biodiversity and ecosystems	17.
Excels	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom			I partially agree and partially disagree	The disclosure of dependencies has been further weakened (to 'when relevant') in the new paragraph 1. The TNFD suggests to remove the specification 'when relevant' in paragraph 1 and reinstate, either at the level of ESRS 2 or at the level of the individual topical standard, a similar text to the Set 1 paragraphs, such as the one asking for disclosure of 'the nature, type and extent of the undertaking's material (...) dependencies (...) related to [biodiversity and ecosystems], and how the undertaking manages them'.	E4	E4 - Objective	1.
Excels	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom			I partially agree and partially disagree	Comment related to former ESRS E4 IRO-1: The TNFD does not support the proposed removal of the following requirement as it reduces alignment with TNFD : Disclosure of whether and how actual and potential impacts on biodiversity and ecosystems at own site locations and in value chain have been identified and assessed (para 17(a) of Set 1) The TNFD also disagrees with the deletion of ESRS E4 paragraph 17(c) on whether and how the undertaking identified and assessed transition and physical risks and opportunities related to biodiversity and ecosystems, including assessment criteria applied based on its impacts and dependencies	E4	E4 - Objective	1.
Excels	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom			I partially agree and partially disagree	The TNFD welcomes the retention of the provisions related to the disclosure of material sites negatively affected biodiversity-sensitive areas and the activities negatively affecting those areas (para. 20, ESRS E4 Exposure Draft). The TNFD notes some divergence with the TNFD recommended disclosure Strategy D, which recommends the disclosure of the locations of assets and/or activities in the organisation's full value chain, including where possible upstream and downstream value chain(s). The TNFD also recommends under Strategy D disclosure of assets and/or activities in sensitive locations beyond those deemed material	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20.
Excels	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom			I partially agree and partially disagree	We do not support the option to report only metrics for locations relevant to existing sustainability objectives (AR7(b)). Such metrics should be reported in addition to (rather than in lieu of) those related to locations where the undertaking has identified material impacts, risks and opportunities arising from its direct operations – or locations that are significant drivers of material impacts, risks and opportunities. Otherwise, there is a risk that companies will significantly narrow the scope of locations disclosed, despite material risks to operations.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 7
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	This is highly relevant, but in the DASB view, the impact is negated because it will only be reported by companies large enough to fall under the ESRS. DASB imagines some might have a significant impact on their surroundings (in the Dutch context, exceeding local, municipal, and even provincial environmental regulations), yet are still too small to fall under the CSRD. As a result, this ultimately provides neither control nor insight.	E4	E4-4 - Targets related to biodiversity and ecosystems	20.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Most of the drivers are difficult to quantify, except when it suddenly becomes clear (e.g., in the case of invasive species). Many species arrive without ever becoming invasive. A species can only be classified as invasive once it has already become invasive — at which point it is too late. This makes steering, reporting, and similar activities in the early stages very difficult. The same applies to terrestrial and marine habitat change: while terrestrial change can, in some cases, be reversed or managed, this is much harder for the other two.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Particulate matter/pollution is a much more important and urgent issue for the Netherlands and Western Europe than microplastics. Pollutants are too often perceived as being gaseous (in the air) or dissolved (in water).	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20. (b)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Can consider the use of scenario analysis when defining...? Wouldn't it be much more practical and clearer to align this across all ESRS? After all, scenario analysis is scenario analysis...	E4	E4-2 - Policies related to biodiversity and ecosystems	AR 4
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I disagree	Sites differ considerably and often (or in most cases) do not share the same measurement indicators. For companies large enough to fall under the ESRS, this often involves multiple sites with mostly different, site-specific measurements, which together produce too much of a data jumble to be truly steerable. I miss clarity and a sense of guidance or direction.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 11
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Suggestion to add the undertakings dependencies (resulting from the identified impacts) because they can cause significant supply chain discruption.	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (a)
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Suggestion to add a description how the organisation assessed / identified the biosensitive area's near sites of its own operations.	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (b)
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	For the quality of the (D)IRO assessment it is very important that the undertakings use the LEAP approach as provided by TNFD. This is mentioned in ESRS 2 AR 22 for para 26, but I can imagine users can oversee this when applying E4. I would recomment to make a reference to amended ESRS 2 paragraph 26 and related AR 22 in the objective of the E4 standard, justs as is included a reference to ESRS 2 in paragraph 5.	E4		
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	The scenario analysis is part of the LEAP approach that is performed, good to make this clear with a link to the LEAP approach, mentioned in ESRS 2 AR 22 for para 26, so that also the TNFD guidance for scenario analysis can/will be used as a basis and as part of the LEAP approach.	E4	E4-2 - Policies related to biodiversity and ecosystems	13.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	This is not specifically for financial institutions, should there also be an additional description for financial institutions? (TNFD also pays attention to this seperately).	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (a)
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Target setting is part of the LEAP approach that is performed, good to make this clear with a link to the LEAP approach, mentioned in ESRS 2 AR 22 for para 26, so that also the TNFD guidance for target can/will be used as a basis and as part of the LEAP approach. Adding this reference will increase quality of target setting.	E4	E4-4 - Targets related to biodiversity and ecosystems	AR 5
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Suggestion to add 'dependencies' (also apply consistently in following paragraphs), since identifying and adressing material dependencies are crucial for the organisations resilience.	E4	E4-4 - Targets related to biodiversity and ecosystems	19.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	paragraph 20 only focusses on own operations, but for a lot of countries the most material (D)IRO's related to biodiversity manifest in the upstream value chain. Also 21 is only scoped to own operations (refers to 20), which also limits the scope to own operations. Furhermore ESRS 2 has more general requirements where you asess the level of aggregation and disaggregation. We suggest to align with ESRS 2.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Please note that this comment relates to objective 8 (can not be inserted / selected in this file): It shows several legislations but there is no data-point referencing to it afterwards. As this only should be discloses when relevant and material, this probably will be adressed if it is relevant. It might be misleading to include the frameworks in the objective as it could lead to reporting immaterial information. In the log of amendments file I read it that it is now included because it was used as a source for the standard, then it can better be included in the standard as a source then as an objective.	E4	E4-1 - Transition plan for biodiversity and ecosystems	11.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Objective 8.) with 5 references to other EU Regulations increase complexity and uncertaintiy for preparer of sustainability statement. Please delete these references.	E4	E4-1 - Transition plan for biodiversity and ecosystems	11.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	The IBAT Alliance licences commercial access to the IBAT platform. I think there shouldn't be a reference to a commercial plattform in a EU regulation.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8
Excels	Little Blue Research	Consultant (including software vendor)	United Kingdom			I partially agree and partially disagree	The paragraph doesn't consider material dependencies. "dependencies when relevant". The paragraph should be rephrased to ensure dependencies are not considered and after thought i.e. "when this topic relates to material impacts, DEPENDENCIES, risks and opportunities." This would align it with the TNFD and ISO 14054 Natural Capital Accounting for Organizations (forthcoming)	E4	E4 - Objective	1.
Excels	Little Blue Research	Consultant (including software vendor)	United Kingdom			I partially agree and partially disagree	Missing dependencies - this is out of alignment with the TNFD and ISO 14054 Natural Capital Accounting for Organizations (forthcoming).Should be "if the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, DEPENDENCIES, risks and opportunities, it shall disclose this fact;"	E4	E4 - Objective	5. (a)
Excels	Little Blue Research	Consultant (including software vendor)	United Kingdom			I partially agree and partially disagree	Missing dependencies - this is out of alignment with the TNFD and ISO 14054 Natural Capital Accounting for Organizations (forthcoming).Should be "the undertaking may present the description of its material impacts, DEPENDENCIES, risks and opportunities, in accordance with"	E4	E4 - Objective	5. (b)
Excels	Little Blue Research	Consultant (including software vendor)	United Kingdom			I partially agree and partially disagree	Missing dependencies - this is out of alignment with the TNFD and ISO 14054 Natural Capital Accounting for Organizations (forthcoming).Should be "When material impacts, DEPENDENCIES, risks or opportunities arise at local level, it is important to consider appropriate disaggregation or aggregation of the reported information,"	E4	E4 - Objective	9.
Excels	Little Blue Research	Consultant (including software vendor)	United Kingdom			I disagree	There is a missing reference to the use of scenario analysis here. Adding this specific reference would align the ESRS with the TNFD guidance and the forthcoming ISO on Natural Capital Accounting for Organizations. Please add the following sentence "Tranisition plans should be based on scenario analysis as referenced in the TNFD and can also use future looking natural capital balance sheets (NCBS) as set out in ISO 14054 natural capital accounting for organizations. The use of underpinning scenarios and future looking NCBS helps to support the organisation's financial planning and target setting"	E4	E4-1 - Transition plan for biodiversity and ecosystems	AR 1
Excels	Little Blue Research	Consultant (including software vendor)	United Kingdom			I disagree	Missing should - "The undertaking can consider the use of scenario analysis when defining its policies, actions and targets." How can an organisation consider its risk and opportunities into the future without scenario based analysis? Change to should - "The undertaking SHOULD consider the use of scenario analysis when defining its policies, actions and targets.	E4	E4-2 - Policies related to biodiversity and ecosystems	AR 4
Excels	Little Blue Research	Consultant (including software vendor)	United Kingdom			I disagree	This is missing a requirement of ensuring that the offsets are considered as part of the application of the mitigation hierarchy. Please add "reference should be made as to the application of the mitigation hierarchy when reporting the use of biodiversity offsets"	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	16.
Excels	Little Blue Research	Consultant (including software vendor)	United Kingdom			I partially agree and partially disagree	Missing dependencies	E4	E4-5 - Metrics related to biodiversity and ecosystems change	19.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	General comment: EFRAG should develop comprehensive non-mandatory implementation guidance for each topical standard, including ESRS E4. The guidance should comprise instructions and examples how to conduct the materiality assessment for the topic, how to apply the disclosure requirements, and to calculate the metrics. Sectoral examples could be added, where appropriate.	E4	E4 - Objective	1.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Para. 1 states that information on financial effects is expected under [Draft] Amended ESRS E4, which is a valuable acknowledgement given that such information on financial effects is highly decision-relevant, not only for the undertakings themselves, but also for other primary users of their sustainability statements, including those in the financial sector. However, [Draft] Amended ESRS E4 no longer contains specific DRs on financial effects on biodiversity since the former ESRS E4-6 is proposed to be removed. Financial effects are also not included in any other disclosure requirements in ESRS E4, which makes this statement somewhat void. Since nature-related financial effects can be substantial, the standards should ensure that they are considered in reporting on actual and anticipated financial effects under ESRS 2 SBM-3. If it proofs difficult to reinstate them as part of ESRS 2, they should at the least be included in the non-mandatory guidance.	E4	E4 - Objective	1.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I disagree	Comment to IRO-1-related DR in E4: We are concerned that [Draft] Amended ESRS E4 no longer contains explicit topic-specific instructions or guidance on how to conduct the materiality assessment regarding biodiversity and ecosystems (as set out in previous AR 4), and do not consider this information redundant as laid out in the Log of Amendments, since ESRS 2 does not cover topic-specific provisions. The references in [Draft] amended ESRS 2, AR 22 to location-specific considerations and the "LEAP approach" should be strengthened (see comments on ESRS 2). Further, we advise EFRAG to include the essence of ESRS E4, AR 4 to AR 6 into the NMIG for ESRS 2.	E4	E4 - Objective	1.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	[Draft] Amended ESRS E4 para. 3 explicitly states that undertakings shall report only on a sub-topic, when material. While it is reasonable to report only on material sub-topics, the sub-topics of [Draft] Amended ESRS E4 consider different levels and are not mutually exclusive. For example, the sub-topic "drivers of biodiversity and ecosystem change" addresses the reasons for biodiversity and ecosystem change, while other sub-topics address biodiversity loss/change itself (e.g. status of species, extent and condition of terrestrial and marine ecosystems; and ecosystem services). Focussing on one of these topics while neglecting another is not reasonable. We therefore recommend to include a clarification in E4, para. 3, on the interlinkages between sub-topics, and to ensure that both drivers and the loss of biodiversity are addressed.	E4	E4 - Objective	3.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	[Draft] Amended ESRS E4 in para. 4 only acknowledge a sub-set of drivers of change in biodiversity and ecosystems. The expression in brackets "terrestrial and marine habitat change, invasive species" should be deleted.	E4	E4 - Objective	4.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	The standard mainly refers to terrestrial and marine ecosystems, while freshwater ecosystems are not explicitly mentioned / included. Given that freshwater habitats are among the most threatened ecosystems globally and provide critical services such as drinking water supply, irrigation, and biodiversity corridors, we recommend explicitly integrating freshwater ecosystems into the scope of ESRS E4. Extend para. 4: "the extent and condition of terrestrial, freshwater and marine ecosystems;"	E4	E4 - Interaction with other ESRS	4.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Glossary: We highlight that the definition of "biodiversity" in para. 7 differs slightly from the one in the glossary. From a conservation perspective, we strongly recommend aligning both definitions with the Convention on Biological Diversity (CBD), Article 2: „Biological diversity means the variability among living organisms from all sources including, inter alia, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part; this includes diversity within species, between species and of ecosystems." (https://www.cbd.int/convention/articles?a=cbd-02). Using the CBD definition would ensure consistency with the globally recognised reference framework.	E4	E4 - Interaction with other ESRS	7.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Using "objective" in this sentence is confusing, since the objective of the standard is already introduced in para. 2. Delete "The objective of" and start with "This Standard shall…"	E4	E4 - Objective	8.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Glossary: The GBF has a vision for 2050, a mission for 2030, four goals for 2050, and 23 targets for 2030. The phrase "To take urgent action to halt and reverse biodiversity loss" is part of the mission for 2030. We therefore recommend a slight change in wording for [Draft] Amended ESRS E4-1 para. 8.a.) to better align with the terms and concepts used in the GBF: "the vision and mission of the Kunming-Montreal Global Biodiversity Framework and …";	E4	E4 - Objective	8. (a)
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	ESRS E4 para. 10 is rather confusing: it states that climate change and pollution are covered only in E1/E2, but sub-points a–d indicate their impacts are addressed in E4. To avoid confusion, we recommend clarifying that ESRS E1 and E2 cover the drivers of climate change and pollution themselves, while ESRS E4 addresses their specific impacts on biodiversity and ecosystems. We suggest to modify the text of para. 10 in the following: delete "these drivers are covered in this Standard, except for", so that it reads "…alien species. Climate change and pollution are mainly addressed by [Draft] Amended ESRS E1 Climate Change and [Draft] Amended ESRS E2 Pollution. The main points of interaction…"	E4	E4 - Interaction with other ESRS	10.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Glossary: We recommend to adapt the glossary entry for "Drivers of ecosystem and biodiversity change" (prev. "Impact drivers") in the following way: 1.) specify "exploitation" similar to the wording in ESRS E4 para. 10 "direct exploitation of organisms; 2.) Substitute "indirect impact drivers" with "indirect drivers of ecosystem and biodiversity change" to reflect the new title of the entry.	E4	E4-1 - Transition plan for biodiversity and ecosystems	11.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	We recommend to delete "when it has in place a biodiversity and ecosystems transition plan" from para. 11. This condition is already covered in para. 12.	E4	E4-1 - Transition plan for biodiversity and ecosystems	11.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Disclosure under ESRS E4-1 should be mandatory whenever a transition plan exists („if… has in place"). The additional condition of publication ("and has made public") should be deleted. This condition would set incentives for non-disclosure and lead to a duplication of published information, which should both be avoided. If EFRAG were to delete the condition of publication, users would also understand that non-disclosure according to E4-1 indicates the absence of a transition plan, which is considered a relevant information in itself.	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	We noticed that for some NMIG entries related to Biodiversity and Ecosystem the numbering is wrong: NMIG 1 and 2 should both be for para. 12.	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	The GBF has a vision for 2050, a mission for 2030, four goals for 2050, and 23 targets for 2030. The phrase "To take urgent action to halt and reverse biodiversity loss" is part of the mission for 2030. We therefore recommend a slight change in wording for para. 12 to better align with the terms and concepts used in the GBF: "...so it is aligned with the global mission of halting and reversing biodiversity loss".	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	AR 1 and NMIG 1 (note that paragraph numbering is wrong in NMIG): We recommend to use similar wording as in the transition plan for climate change mitigation, i.e. „key features" instead of "elements"	E4	E4-1 - Transition plan for biodiversity and ecosystems	AR 1
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Regarding ESRS E4-1 and its associated AR 1 and NMIG 2, we find misalignments in the references to the GBF and EU Biodiversity Strategy. We suggest: 1.) Embed the possible connection of the transition plan to further goals, concepts, strategies and frameworks in para. 12 with: "... as stated in the Kunming-Montreal Global Biodiversity Framework or other relevant local, national, EU and global public policy goals and targets related to biodiversity and ecosystems, it shall disclose its key features."; and 2.) Include references to relevant GBF goals and targets in a separate NMIG, to shift the focus away from providing guidance solely on the EU Biodiversity Strategy, which is not part of the mandatory para. 12 anymore.	E4	E4-1 - Transition plan for biodiversity and ecosystems	AR 1
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Acronyms: the acronym list should include "GBF" – Global Biodiversity Framework since this abbreviation is used in ESRS E4, but not introduced before	E4	E4-1 - Transition plan for biodiversity and ecosystems	AR 1
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	We note that para. 15 on actions and resources related to avoid, mitigate and remediate biodiversity- and ecosystem-related impacts remains unspecific. This risks placing undue emphasis on biodiversity offsets, (para. 16). We recommend carefully reviewing this disproportionate level of detail. Offsets should not become the primary focus, as they are not necessarily a net gain for nature, and may even divert attention from more effective biodiversity measures.	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	15.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Since publication of the delegated act for the ESRS in 2023, the global community has agreed on a new mechanism for the Fair and Equitable Sharing of Benefits from the use of Digital Sequence Information on Genetic Resources (DSI) – the Cali fund. With updating the ESRS we see it as important to reference this global agreement and to offer undertakings, that make use of digital sequence information, guidance to consider this when disclosing their relevant actions. We therefore suggest to add an additional entry to the Non-Manadatory Implementation Guidance relating to E4-3 (para. 15): „When disclosing their key biodiversity and ecosystem-related actions and significant resources allocated to their implementation, users of digital sequence information on genetic resources in sectors that directly or indirectly benefit from their use in their commercial activities, can disclose their monetary contributions to the Cali Fund for the Fair and Equitable Sharing of Benefits from the use of Digital Sequence Information on Genetic Resources (DSI)."	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	15.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	The term "biodiversity offsets" should be added to the glossary. EFRAG can rely on the work of IUCN: https://iucn.org/resources/issues-brief/biodiversity-offsets	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	16.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Glossary: replace the term "local and indigenous peoples" in AR 5 for para. 17 with the internationally more common wording of "indigenous peoples and local communities".	E4	E4-4 - Targets related to biodiversity and ecosystems	AR 5
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I agree	We support the decision of EFRAG to maintain the concept of biodiversity-sensitive areas, since we also consider this location-specific information as highly decision-useful. It provides essential insights into impacts, risks and opportunities that cannot be captured through aggregated reporting alone. Even though E4-5 has lost in topical granularity, we generally welcome that [Draft] Amended ESRS E4-5 now foresees the mandatory disclosure of metrics related to material impacts on biodiversity and ecosystems.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	21.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	From a conservation perspective, we strongly recommend that AR 8 para. 20(b) specifies that undertakings should also take into account the type of buffer zone of biodiversity-sensitive areas, along with the resulting legal requirements, obligations and prohibitions. For example, the buffer zones of biosphere reserves are an integral part of these large protected areas, functioning as a 'maintenance zone' with a buffer function for the core zone, and are usually subject to strict regulatory requirements (e.g. comparable to a nature reserve regulation). For other types of buffer zones, measures in line with industry best practice standards may be more appropriate. This distinction is essential to ensure meaningful and comparable disclosure.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	AR 9 only acknowledges a sub-set of drivers of change in biodiversity and ecosystems.The expression in brackets "terrestrial and marine habitat change, invasive species" should be deleted.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Include "freshwater ecosystems" in item (c)	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Glossary: We recommend including a definition of „state of species".	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Regarding the structure of ESRS E4-5, it might make sense to swap order of current paras. 20 and 21 to first mention requirements (in this case metrics) related to ESRS 2 GDR-M and then other metrics specific for the topical standard similar to other DRs	E4	E4-5 - Metrics related to biodiversity and ecosystems change	21.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	NMIG 14 is highly welcome. However, it is particularly helpful for the guidance on how to conduct the materiality assessment regarding biodiversity and ecosystems and should belong with this section of the NMIG for ESRS 2 IRO-1 instead of ESRS E4-5.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	21.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I disagree	NMIG: The term "Natural Resources" was deleted from the Glossary, but is still used within the NMIG. Avoid use of the term in NMIG.	E4	E4 - Objective	1.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	We recommend to move the requirement to disclose "the specific environmental conditions and characteristics of the area where the impact is occurring;" from ESRS 2, para. 41 (b) to ESRS E4-5. Providing contextual information on the environmental conditions and characteristics of an area where the impact occurs, is most relevant for biodiversity and ecosystem metrics. The provision could be formulated as follows: "When providing contextual information on the metric, in accordance with ESRS 2 GDR-M, the undertaking shall explain the environmental conditions and characteristics of the area where the impact is occurring;"	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 11

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	1) The sentence "Transition plans for biodiversity and ecosystems are expected to address similar elements than transition plans for climate change mitigation" shall be removed. The reference to similarity with climate transition plans is not appropriate: the two areas are fundamentally different, as are the related requirements. Climate transition plans rely on globally available metrics and quantitative pathways, whereas for biodiversity, such methodologies and comparable targets do not exist at a global level. 2) the compatibility with GBF shall be removed or explained in detail. The text requires that any transition plan be compatible/aligned with the targets of the GBF. A similar formulation exists for climate (referring to compatibility with the 1.5°C target), which is currently under discussion, as it is considered not directly applicable to companies. The same issue arises here with biodiversity. The GBF objectives are designed to guide public policies and national action plans, not to be directly applied to corporate business models. In this context, it is unclear what it means for a company to have a strategy or business model "compatible" with such objectives. The requirement is difficult to interpret and cannot be verified.	E4	E4-1 - Transition plan for biodiversity and ecosystems	AR 1
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	With this new wording it is not clear which site should be reported (please see comment on AR 7 below). The term "location" is not very clear, please clarify if "location" refer to single sites or an aggregation of type of activities or geographies. It is reccomended consistency of wording in all the environmental ESRS	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20. (a)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The criteria identified in letter a), b), c) seems to require the disclosure on all the location with IRO + all the sites prioritised internally + the assets (and is not clear why we are not referring anymore to locations) with negative interactions with biodiversity areas. The interaction of the 3 points could lead to a ling ist of location to disclose. It should be clarified that the intention is not to require disclosure for every single site, but rather a limited number of representative sites selected according to prioritisation criteria defined by the company	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 7
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	In an attempt to clarify the concept of "near," the text paradoxically ends up considering as near any site "not inside" a sensitive area. This would effectively imply conducting ad hoc analyses for hundreds of sites (all those not overlapping), in order to identify a science-based buffer based on the ecological specificities of each site. This represents an operational and documentation burden that is entirely disproportionate to the goal of simplification. Moreover, IBAT does not provide a buffer on a scientific basis; it is the user who enters the desired buffer to perform the mapping. Finally, it should be noted that ESRS is a disclosure standard, designed to harmonize reporting across companies, not to prescribe detailed operational management of impacts, which is addressed through other regulatory frameworks. The current wording of AR 8 risks turning the standard into a de facto operational requirement, going beyond the intended purpose of ESG disclosure	E4	E4-5 - Metrics related to biodiversity and ecosystems change	8.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The section requires reporting metrics on "relevant" concepts (e.g., drivers of biodiversity loss, species status, ecosystems, ecosystem services), but does not specify which metrics to adopt or the level of detail required. On one hand, this allows for flexibility; on the other, in a disclosure context subject to assurance, it is problematic because it leaves wide room for subjective interpretation and does not ensure comparability between companies. Moreover, it does not provide parameters to assess the adequacy of the selected metrics. It is recommended to specify whether we are referring to impact metrics (of the company on these topics) or to ecological status metrics of the area and species	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I agree	We support the changes proposed	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	3.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We support the changes proposed, especially the deletion of the resilience analysis required in current paragraph 13. However, we believe the datapoint in [DRAFT] paragraph 12 should remain voluntary. The notion of transition plan for biodiversity and ecosystems remains unclear at this stage, especially on how to assess alignment. While companies are trying to report under the TNFD framework, the CSRD should not include a mandatory DR while the topic is not yet mature.	E4	E4-1 - Transition plan for biodiversity and ecosystems	1.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	In any case, it should be maintained that reporting on the transition plan is only required once the transition plan has been implemented and published. The introduction of such a transition plan should remain voluntary. On the positive side, the disclosure requirement in ESRS E4 only applies if a company voluntarily draws up a transition plan for biodiversity and ecosystems. However, I take a critical view of the transition plan itself: as soon as biodiversity is identified as a material issue, there is indirect pressure to draw up a plan or to justify why no plan is in place. In contrast to the climate transition plan, there is a lack of reliable data, standardised methods and key performance indicators for biodiversity. The complexity of ecological relationships, the high cost of monitoring and the lack of standardisation make the transition plan difficult to implement and potentially ineffective.	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	With the increased scope of SHALL for sub-topics, the reporting scope is increasing. In particular AR 9 for para. 21 (Metrics related to biodiversity and ecosystems change) and point c) and d) might be challenging to report on in a meaningful way without undue costs/systems.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	There are not necessarily common state of nature metrics being monitored across a large portfolio, so difficult to aggregate. Depending on interpretation can result in costly/complex implementation. State of nature is not linked to operational control. For renewable assets which are large and open and integrated with many other activities in the area - state of nature can be particularly challenging to measure on as its results may not be linked to ones own operations. Recommend to remove - or have longer phase-in for companies to identify meaningful and cost efficient ways of measuring.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 10

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	Building on comment for AR 9 - these additionnal requirements/specifications to the metrics are likely to drive complex reporting and data collection/assessments with high costs of implementation. Recommend to remove - or have longer phase-in for companies to identify meaningful and cost efficient ways of measuring.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 11
Excels	SAIM GmbH	Consultant (including software vendor)	Germany			I agree	The further clarification of interactions between E4 and other standards was much needed and we agree with it. This has been a constant topic in our discussions with clients.	E4	E4 - Interaction with other ESRS	10.
Excels	SAIM GmbH	Consultant (including software vendor)	Germany			I partially agree and partially disagree	I understand the scientific rationale behind structuring ESRS E1 (Climate) separately from ESRS E4 (Biodiversity), and at the same time listing climate change as one of the direct drivers of biodiversity loss within E4. This reflects well-established evidence. However, in practice the overlap creates challenges for reporting entities. From a preparer's perspective, it is difficult to explain why climate is treated as both a standalone standard and as a subtopic within biodiversity. Many companies fear they must conduct two separate assessments, which risks duplication of effort. In particular, the assessment of materiality is unclear: most companies, outside of a few highly emission-intensive sectors, cannot reasonably demonstrate that their own emissions directly cause biodiversity loss. This makes it difficult to apply the E4 requirement consistently. I suggest that EFRAG clarify the intended relationship: results from E1 should be cross-referenced in E4, with companies only expected to explain the biodiversity implications of their climate analysis. Additional assessment should only be required if a company's emissions are significant in absolute or sectoral terms. Such clarification would increase user-friendliness, reduce unnecessary reporting burden, and preserve the scientific integrity of highlighting climate as a biodiversity driver.	E4	E4 - Interaction with other ESRS	10. (a)
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	The notion of "transition plan" is not yet clearly defined. Companies are currently exploring the best ways to develop action plans on this highly complex subject, whether through national or international initiatives, but no official certification of such analyses and plans exists to date. Making this datapoint mandatory, even with precautions (i.e. if the company has a transition plan and has published it), would discourage companies from taking initiatives, as it would trigger compulsory verification by auditors without existing auditing standards. Furthermore, "so it is aligned" with the Global Biodiversity Framework (GBF) lacks clarity. It would be more appropriate to refer instead to "consistency" with the objectives of the GBF.	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	The distinction between a "transition plan" and an "action plan" remains unclear and has already led to numerous discussions with auditors during the first reporting exercise, even in the case of climate transition plan. Moreover, as previously suggested, we propose to refer to "consistency" with relevant global goals, rather than "to become compatible with" them.	E4	E4-1 - Transition plan for biodiversity and ecosystems	AR 1
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	We would appreciate further clarification on the following points: what exactly is meants by the "action plans" reffered to? Should offsetting be considered voluntary or compulsory?	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	16.
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	Point (b) of AR9 seems to introduce a new obligation for undertakings, as metrics related to the state of species were previously optional, even if the subtopic was considered material.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	Point b) of AR8 introduces the new notion of a "buffer zone" which is neither defined in this AR, nor in the Glossary. It should be suppressed.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	An explanation what is meant by "biodiversity offsets" would be helpful. Either in the ESRS E4 or in the glossary.	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	18.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Is this applicable for only own operations or the entire value chain? Further explanations could help.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	21.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The objective described in para. 1 of each draft topical ESRS is inconsistent with Draft ESRS 1. The statement about "dependencies when relevant" and "financial effects" should be deleted to make it consistent with ESRS 1. Change the wording to: "When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS E4 Biodiversity and Ecosystems, when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, metrics and targets (if in place)."	E4	E4 - Objective	1.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Remove parts (a) and (b) and keep the introductory paragraph to avoid unnecessary duplication. Paragraph 5 should read as follows: "The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M."	E4	E4 - Objective	5.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	It should be clarified that this is intended to be a reference to a transition plan, regarding biodiversity (i.e., the mention of nature in a climate transition plan should not be sufficient to trigger these disclosure obligations)	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Amended ESRS E4 introduces a requirement for undertakings to disclose biodiversity transition plan features when such plans exist and are public. As users of transition plans, AFME supports the disclosure of transition plans on a voluntary basis if an entity has one (as with E1). AFME does not support the mandatory disclosure of biodiversity transition plans, and EFRAG should clarify that such disclosures are voluntary and subject to an entity's materiality assessment. While framed as conditional ("if the undertaking has in place"), there is a risk that this requirement could create an expectation that organisations must develop biodiversity transition plans aligned with the Kunming-Montreal Global Biodiversity Framework. In addition, climate transition plans disclosed under E1 may reference nature/biodiversity and include biodiversity-related metrics but would not be considered a standalone "transition plan" for biodiversity and ecosystems. It is unclear how organisations who integrate nature and biodiversity into their existing transition planning would meet this new E4 disclosure requirement.	E4	E4-1 - Transition plan for biodiversity and ecosystems	AR 1
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	EFRAG should consider removing ESRS E4 AR 5 (engagement with indigenous peoples) associated with paragraph 17 as this undermines EFRAG's stated simplification goals. If the objective is to reduce prescriptive guidance and rely on ESRS 2 GDR-T frameworks, then AR5 represents an arbitrary exception. Moreover, AR5 introduces problematic scope creep by embedding social governance mechanisms within an environmental disclosure requirement. ESRS S3 (Affected Communities) already addresses indigenous people.	E4	E4-4 - Targets related to biodiversity and ecosystems	AR 5
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	This marks an expansion of scope. While the current ESRS E4 (para 37) limits metrics to the undertaking's own operations, the revised draft removes that clarity. If the downstream value chain is material, a metric may now be expected, though its absence of definition allows for interpretive flexibility.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	21.
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We request to clarify the cliteria of "material impacts, risks and opportunities" for disclosure. There is concern that each companies has defferent interpretation of this criteria. It should be discussed.	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (a)
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We request to clarify the cliteria of "material impacts, risks and opportunities" for disclosure. There is concern that each companies has defferent interpretation of this criteria.It should be discussed.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20. (a)
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We request to clarify the cliteria of "material impacts, risks and opportunities" for disclosure. There is concern that each companies has defferent interpretation of this criteria. It should be discussed.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	21.
Excels	ETSA	Business association (other than association of financial institution)	Belgium			I agree	The new guidance on disaggregating locations and defining sensitive areas is primarily viewed as a useful clarification by ETSA member.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Value chain is mentioned only once in the whole ESRS – now referring to traceability of products/raw materials with actual or potential biodiversity impacts. Given the difficulty to implement EPD across industries we are wondering what the expectations are here.	E4	E4-1 - Transition plan for biodiversity and ecosystems	11.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	The change from may to shall for this requirement can reduce flexibility for companies	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	The requirement to describe policies related to the traceability of products, components of raw materials, with material or potential impacts on biodiversity and ecosystems in the entire value chain is burdensome. The same goes for the requirement to describe policies for own sites in/near sensitive areas	E4	E4-2 - Policies related to biodiversity and ecosystems	14.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	While this requirement can be useful, it might create additional burden	E4	E4-4 - Targets related to biodiversity and ecosystems	AR 6
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Prioritising sites in or near sensitive areas can be beneficial	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 10
Excels	IBAT	NGO	United Kingdom			I partially agree and partially disagree	Paragraph 14a on 'actual or potential impacts' shoud include 'impacts and dependencies' to make it relevant to businesses	E4	E4-2 - Policies related to biodiversity and ecosystems	2.
Excels	IBAT	NGO	United Kingdom			I partially agree and partially disagree	On paragraph 14b, we recommend adding the wording "sites in its own operations and its key sourcing locations that are in or near a biodiversity sensitive area" which would support the paragrpah above focusing on traceability across the upstream and downstream value chains	E4	E4-2 - Policies related to biodiversity and ecosystems	2.
Excels	IBAT	NGO	United Kingdom			I partially agree and partially disagree	IBAT is highly relevant by providing the datapoints in relation to identifying biodiversity sensitive areas. It would be good to mention here what the definition of 'biodiversity sensitive area (s)' are - making specific reference to the NMIG guidance of provide example datapoints as a footnote. We recommend adding the wording 'may be' to 'biodiversity-sensitive area(s) that may be negatively affected (name and type)' given that with biodiversity data, it might not always reflect the current situtation 100% of the time, accounting for the sensitiveness of nature.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20. (b)
Excels	IBAT	NGO	United Kingdom			I partially agree and partially disagree	Similar to the comment above, it would be beneficial to mention the datapoints suggested for biodiversity sensitive areas, incorporating the suggestions published by EFRAG in late 2024 on identification of biodiversity sensitive areas such as Protected Areas from the Protected Planets through IBAT.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 7
Excels	IBAT	NGO	United Kingdom			I disagree	IBAT's Disclosure Preparation Report provides some level of guidance on buffers for certain site types. However, this list is not as comprehensive and would not be appropriate for it to be mentioned as the industry standard. We suggest that IBAT is not mentioned directly here. Further research is being conducted by the IBAT alliance partners. Consider including references to IFC PS6 or the clear, Good Practices in Collection of Biodiversity Baseline Data, and sector-specific standards, such as GRI Sector Standards or TNFD sector-specific guidance where businesses can refer to for a more comprehensive breakdown and understanding of how they can consider their area of influence when conducting this analysis.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	IBAT	NGO	United Kingdom			I partially agree and partially disagree	(b) Clarifying what state of species is - will organisations be able to refer to the IUCN Red List of Threatened Species for this? Consider making reference to the NPI species metric which considers metrics on extinction risk and relative abundance.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	IBAT	NGO	United Kingdom			I partially agree and partially disagree	Recommend providing definition of threatened species. Species assessed as CR, EN or VU in the global/and or national IUCN red lists and/or species assessed as threatened via national/local assessments.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 6
Excels	IBAT	NGO	United Kingdom			I partially agree and partially disagree	On paragraph 12 - the existing text can be misleading for companies not having to consider creating or disclosing a transition plan if they do not already have one publicly available. The goal of reporting is for companies to understand their DIROs but also then take the next step in creating an action plan, a transition plan on how they can look to further avoid or mitigate these impacts in the future. Consider rephrasing the text to remove a notion of businesses only needing to report their transition plans if they have 'made public' their plans.	E4	E4-1 - Transition plan for biodiversity and ecosystems	1.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Making biodiversity planning mandatory is necessary. However, focusing on transition planning seems too far ahead of where most companies currently are in terms of assessing their impacts to biodiversity.	E4	E4-1 - Transition plan for biodiversity and ecosystems	1.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Partially agree-partially disagree	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20.
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	The notion of "transition plan" is not yet clearly defined. Companies are currently exploring the best ways to develop action plans on this highly complex subject, whether through national or international initiatives, but no official certification of such analyses and plans exists to date. Making this datapoint mandatory, even with precautions (i.e. if the company has a transition plan and has published it), would discourage companies from taking initiatives, as it would trigger compulsory verification by auditors without existing auditing standards. Furthermore, "so it is aligned" with the Global Biodiversity Framework (GBF) lacks clarity. It would be more appropriate to refer instead to "consistency" with the objectives of the GBF.	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	The distinction between a "transition plan" and an "action plan" remains unclear and has already led to numerous discussions with auditors during the first reporting exercise, even in the case of climate transition plan. Moreover, as previously suggested, we propose to refer to "consistency" with relevant global goals, rather than "to become compatible with" them.	E4	E4-1 - Transition plan for biodiversity and ecosystems	AR 1
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	We would appreciate further clarification on the following points: what exactly is meants by the "action plans" reffered to? Should offsetting be considered voluntary or compulsory?	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	16.
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	Point (b) of AR9 seems to introduce a new obligation for undertakings, as metrics related to the state of species were previously optional, even if the subtopic was considered material.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	Point b) of AR8 introduces the new notion of a "buffer zone" which is neither defined in this AR, nor in the Glossary. It should be suppressed.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	We believe the requirement in ESRS E4, paragraph 14b, should not be triggered if the site does not pose any specific risks or negative impacts on the area in question. For instance, having a sales office or similar activities like normal housing would normally not require reporting. Hence, we believe that the size or type of activities needs to be considered internally as part of the materiality assessment before requiring any external disclosure requirements, also in terms of policies.	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (b)
Excels	DRSC	(National) standard setter	Germany			I disagree	Disaggregation will lead to too much detail level and will increase reporting workload. Although "appropriate disaggregation" is worded, a definition of "appropiate level" is needed.	E4	E4 - Objective	9.
Excels	DRSC	(National) standard setter	Germany			I disagree	This might be seen as an extension of the Delegated Act, as it is now proposed as a mandatory requirement (DA, E4.15 "The undertaking may disclose its transition plan..."); data point moved from "may" to "shall"	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL: Clarification needed on what is meant with "has made public a transition plan". The sustainability report is publicly available	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG: The DR "sites in its own operations that are in or near a biodiversity sensitive area" is still a huge, work-intensive disclosure. The simplification is highly questionable here.	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (b)
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL: The para contains the term "action plan" (the undertaking shall describe the biodiversity offsets used in its action plans); however, "action plan" is not adressed in ESRS 2 GDR-A which this para refers to. This inconsistency should be adressed.	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	16.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL: A clarification should be added that this DR is related to actual impacts only.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL: (1) The DR contains the term "direct operations" without saying what it is (the term should be explained). (2) The wording: "impacts, risks and opportunities arising from its direct operations" might create confusion as it it not consistent in itself. Impacts typically arise from the undertakings operations. In other words: The undertaking is the cause, and the effect results from this cause. The direction of the effect is: Undertaking -> Impact. For risks and opportunities this direction the opposite. Risks and opportunities - in most cases - have (financial) impacts on the undertaking but do not arise from the undertaking. Therefore, it should not be worded (all across the ESRS) that IROs arise from operations/undertaking etc. since the use of the term "arise" is correct for impacts only. Better word "impacts, risks and opportunities associated with or related to the undertaking/own operations etc."	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 7
Excels	DRSC	(National) standard setter	Germany			I disagree	The AR makes prejudging assumptions for the DMA which contradict the DMA principles. The AR suggests the worst case if the site is in a biodiversity sensitive area "is highly likely that its activities will negatively affect the area" We doubt, this assumption should be taken without the DMA.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	DRSC	(National) standard setter	Germany			I disagree	On AR8(b): The guidance to be complied with by undertakings when determining whether a site is near a sensitive are makes ot more complex than before. The discussion was already taken when developing the Set 1 in 2022; however, EFRAG might reconsider (1) to explicitly leave it to the undertaking to assess "near" or (2) label the AR as non-mandatory, i.e., move it to NMIG.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	The IBAT Alliance licences commercial access to the IBAT platform. There shouldn't be a reference to a commercial plattform in a EU regulation.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG A(9(a)): This seems an extension of the Delegated Act. Although "drivers of [...] ecosystem change" is mentioned in the delegated act (ESRS E4.AR20f), it is not a metric requirement in the delegated act, but in the ED it is.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG (AR9(b)): This seems an extension of the Delegated Act. Although "ecosystem services" is mentioned in the delegated act in several instances, it is not a metric requirement in the delegated act.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL: The meaning of the first sentence is not clear.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 10
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL: The meaning of this para is not clear. Probably it is meant to say that if an undertaking monitors an issue frequently by using a measure/a metric, this might indicate this metric is a material information.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 11
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The amendments are highly welcome. Please make clear that a reference to a transition plan is only necessary if there is a transition plan in place. If the undertaking does not have a transition plan in place it does not consequently have to disclose that this is the fact.	E4	E4-1 - Transition plan for biodiversity and ecosystems	11.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The amendments are highly welcome. Please make clear that a reference to a transition plan is only necessary if there is a transition plan in place. If the undertaking does not have a transition plan in place it does not consequently have to disclose that this is the fact.	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	N.a.	E4	E4-1 - Transition plan for biodiversity and ecosystems	AR 1
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	N.a.	E4	E4-2 - Policies related to biodiversity and ecosystems	13.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	The added para. 14 is not necessary and should be removed as the reference to ESRS 2 GDR-P is sufficient. Otherwise it would differ from the structure of the other ESRS E standards.	E4	E4-2 - Policies related to biodiversity and ecosystems	14.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	The added para. 14 is not necessary and should be removed or be made voluntary as the reference to ESRS 2 GDR-P is sufficient. Otherwise it would differ from the structure of the other ESRS E standards.	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (a)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	The added para. 14 is not necessary and should be removed as the reference to ESRS 2 GDR-P is sufficient. Otherwise it would differ from the structure of the other ESRS E standards.	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	The added para. 14 is not necessary and should be removed as the reference to ESRS 2 GDR-P is sufficient. Otherwise it would differ from the structure of the other ESRS E standards.	E4	E4-2 - Policies related to biodiversity and ecosystems	AR 2
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	AR 3 for para. 13 should be removed as it only adds irrelevant additional information. At least please make clear that AR 3 does not require a "not applicable" disclosure.	E4	E4-2 - Policies related to biodiversity and ecosystems	AR 3
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	AR 4 for para. 13 can be removed as it brings no additional information.	E4	E4-2 - Policies related to biodiversity and ecosystems	AR 4
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	N.a.	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	15.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The added para. 16 is not necessary and should be removed as the reference to ESRS 2 GDR-P is sufficient. Otherwise it would differ from the structure of the other ESRS E standards. At least, please make clear that the undertaking does not have to disclose the fact that it does not have any offsets in place.	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	16.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	N.a.	E4	E4-4 - Targets related to biodiversity and ecosystems	17.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The added para. 18 is not necessary and should be removed as the reference to ESRS 2 GDR-P is sufficient. Otherwise it would differ from the structure of the other ESRS E standards. Additionally An explanation what is meant by "biodiversity offsets" would be helpful. Either in the ESRS E4 or in the glossary.	E4	E4-4 - Targets related to biodiversity and ecosystems	18.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	AR 5 for para. 17 should make clear that this is only an information but no disclosure requirement. FPIC reporting should be risk-based and focus on management systems.	E4	E4-4 - Targets related to biodiversity and ecosystems	AR 5
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	N.a.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	19.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Para. 20 should only refer to impacts.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Para. 20 should only refer to impacts.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20. (a)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Para. 20 should only refer to impacts.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Para. 20 should only refer to impacts.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20. (c)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Please make clear that para. 21 only refers to metrics for the own operations.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	21.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Para. 20 should only refer to impacts.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 6
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Para. 20 should only refer to impacts.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 7
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	AR 8 should make clear that IBAT is only one of many different tools to examine biodiversity sensitive areas.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	AR 9 is redundant as the sub-topics are already listed in ESRS 1	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The term "not feasible" is too subjective, creating significant audit risk. We recommend EFRAG provide further guidance to clarify this threshold.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 10
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Recommend EFRAG provide guidance that allows the use of practical alternatives like high-quality estimates.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 11
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	Overall, the link between the biodiversity standard and other topical standards is clearer than in the previous version.	E4	General disclosures	
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	In the objectives section, paragraph 9 the log of amendments states that the topic of sites is addressed in both ESRS 1 and ESRS 2. This objective paragraph only mentions ESRS 1. It should also reference the relevant paragraph in ESRS 2.	E4	General disclosures	
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	General disclosures has been amended to remove redundancies	E4	General disclosures	
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Disclosure is only required if the company has a transition plan in place and has made it public. EFRAG should require companies to disclose why they do not have a transition plan and/or when they plan to implement one.	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	It's not clear the specific disclosures that are required on the transition plan. E4 paragraph 12 states that the company "shall" disclose key features; however, the list of example features are included in the non-mandatory guidance document. It would improve comparability if EFRAG outlined which features are mandatory and then included "non-mandatory" features in the NMIG.	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The previous disclosure in IRO 17a has been removed and ESRS 2 IRO 1 is referenced instead. It is not clear in ESRS 2 whether we need to address impacts at the site level. This should be made more clear in the E4 standard and/or in the IRO 1 section of ESRS 2.	E4		
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The disclosure update for AR4 in the amendment log is different from the disclosure in the clean version of the updated standard. The disclosure in the log of amendments is more clear and should be used in the final version.	E4	E4-2 - Policies related to biodiversity and ecosystems	AR 4
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	It is not clear if the information on the use of scenario analysis is a mandatory or non-mandatory requirement. If it is non-mandatory, the standard should use the term "may" instead of "can."	E4	E4-2 - Policies related to biodiversity and ecosystems	AR 4
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The disclosure of information on policies requires the companies to disclose sites in it own operations that are in or near biodiversity sensitive areas. This is inconsistent with the update to the disclosure in paragraph 20 to update the wording to "location" instead of "site". This disclosure should be updated to use the term location for consistency.	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (b)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	A definition should be included for biodiversity offsets	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	16.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	More detail is needed on what is meant by "financing effects in monetary terms"	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	16.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	The standard should provide more detail on what is meant by "appropriate" consultation	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	AR 5
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	EFRAG should provide a mapping document between the E4 standard and TNFD disclosure requirements. Similar to what was done for TCFD and the E1 standard.	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	The metric addresses impacts on the undertaking's own operations. However, if the material IRO relates to the (upstream) value chain, its applicability remains unclear (like in the 2023 ESRS), leading to inconsistent interpretations and cost-inefficient discussions with auditors.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	1. Issue with "dependencies" only mentioned in objectives, "ecosystem services" not mentioned until metrics – Remove dependencies and revise objectives related to ecosystem services. 8. Issue with objective to understand the plans and capacity of the undertaking to adapt its strategy and business model in line with various EU Directives and Regulations – Revise to provide additional flexibility when some of a company's subsidiaries are located outside the EU.	E4	Objectives	1, 8
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Issue with language "transition plan to transform its business model…" – Revise text to "transition plans that improve and ultimately achieve alignment of its strategy and business model to contribute to…"	E4	Transition plan	11, 12
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Scenario analysis duplication with ESRS 2 SBM-3 – Remove from E4	E4	Policies	14
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Issue with "site" and "location" seemingly used interchangeably needs clarification/harmonisation. Issue with metrics related to ecosystem services (21, AR7) not used elsewhere in E4, not well defined or understood – Remove from AR7.	E4	Metrics	19-21, AR7
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Issues with lack of clarity of "biodiversity sensitive areas" definition	E4	Annex II	NA
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Mention the connection with AR 22 of ESRS 2 (e.g., local considerations such as threatened species and ecosystems in biodiversity-sensitive areas)	E4	E4 - Objective	9.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Place greater emphasis on the importance of the upstream and downstream value chain for biodiversity, as the value chain often represents the source of the most severe impacts and significant risks. Along with the principle on location-specific considerations in E4 §9, we propose introducing a principle on value chain. Proposed wording: "The most severe impacts and the most significant risks may originate in the undertaking's upstream and downstream value chain rather than in connection with its own operations. When material IRO arise in the value chain, it is important to consider appropriate information related to policies, actions, targets and metrics in accordance with ESRS 2 paragraph 29."	E4	E4 - Objective	9.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Highlight dependencies on biodiversity and ecosystems, as they serve as a proxy for physical risk. Along with the principle on location-specific considerations in E4 §9, we propose introducing a principle on dependencies Proposed wording: "Dependencies on biodiversity and ecosystems should be considered, as they serve as a proxy for physical risks"	E4	E4 - Objective	1.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Several clarifications are needed. - The plan should be made public by the company itself, not by a third party and the term "publicly available" should be clearly define. - A distinction should be made between a biodiversity action plan and transition plan. Companies are developing action plans through initiatives such as SBTN or TNFD. Most of these plans are published without formal certification, as methodologies and auditing standards are evolving. There is a risk that mandatory disclosure under ESRS could discourage companies from joining such initiatives, as they may wrongly fear that participation or commitments to biodiversity actions would automatically trigger the requirement to disclose an audited transition plan. We support adding a definition in the ESRS glossary and enhancing alignment with ESRS E1-1 on the meaning of "transition plan." A transition plan should be defined by its transformative impact on the business model, requiring only key elements: integration of biodiversity into strategy and business model, consistency between targets, actions, and resources, and approval by governance bodies.	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Compatibility with the Kunming-Montreal Global Biodiversity Framework raises practical challenges: no standardised methodology exists at corporate level, impacts are localised, and sector-specific metrics are under development. Companies should be allowed to present a plan even if not fully compatible, provided they disclose the current level of alignment and measures planned to achieve it. The current contradiction between references to "alignment" in the main body and "compatibility" in the application requirements should be resolved by retaining "compatibility," consistent with E1.	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Allow optional inclusion of sites under operational control when disclosing policies related to sites in or near biodiversity-sensitive areas; Add in AR2 : "The description of the policy can cover operations in the value chain that are in or near biodiversity sensitive areas" to open the door to value chain impacts.	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (b)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Address net targets in a separate way as gross targets to clearly separate each step of the mitigation hierarchy, and to mirror the mechanism used in E1; the proposed wording does not imply anymore that a "net" target can be set (i.e., no more mixing of mitigation and offsetting) Simple rewording proposal to reflect this and improve consistency in how offsets are addressed across ESRS: "If the undertaking has set targets relating to offsets, the disclosure required by paragraph 17 shall include how it used them."	E4	E4-4 - Targets related to biodiversity and ecosystems	18.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Consider referencing free alternatives to IBAT tool, as it has high commercial costs (e.g., WWF Biodiversity Risk Filter) or developing public databases on key biodiversity areas	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Consider proposing the disclosure of aggregated metrics where relevant (e.g., share of locations with critical ecological status, covered by specific actions), especially in place of data points at the local level when such data is sensitive	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Allow optional inclusion of sites/locations under operational control	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20. (a)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	- Place materiality assessment results outside the metrics section and the application requirements to avoid confusion. The description of the undertaking's contribution to direct drivers of biodiversity loss is particularly important and should be included in the main body of the standard in relation to IRO-2. - Clarify the direct biodiversity pressures covered by ESRS E4 and their hierarchy Requirement on biodiversity-related impacts to be relocated outside the metrics and in relation to IRO-2 in the main body: "When providing description of material impacts, risks and opportunities in accordance with [Draft] Amended ESRS 2 IRO-2 the undertaking shall indicate which material impacts concern (16(b) amended) land degradation, desertification or soil sealing, and (16(c) amended) operations that affect threatened species." Application requirements : "Changes in land and sea use are the primary biodiversity pressure, followed by direct exploitation of organisms; climate change; pollution; and invasion of alien species, in order of importance according to IPBES. ESRS E4 focuses on land-use change in terrestrial, freshwater, and marine ecosystems, direct exploitation of threatened species, and introduction of invasive alien species or other ecosystem disturbances."	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 6
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Retain the optional LCA-based land use data point to capture value chain impacts, or provide guidance for qualitative assessment as part of the materiality assessment in the absence of metrics Proposed wording: "The undertaking may disclose land-use based on a Life Cycle Assessment to capture value chain impacts."	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Clarify that metrics on biodiversity may be "on own operations and when relevant on the value chain" (to be added at the end of the §21.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	21.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We note that biodiversity transition plans remain an emerging practice. Only the most mature undertakings are likely to have adopted and communicated on their transition plan. If EFRAG retains the current proposal, we recommend tackling the attention points below in AR 1. We recommend EFRAG to keep dedicated disclosures related to resilience analysis for ESRS E4 to enhance transparency around how the undertaking's strategy and business model would withstand biodiversity-related physical, transition, and systemic risks and dependencies across its value chain. Specific requirements in E4 would avoid boilerplate disclosures in ESRS 2.SBM-3 potentially overlooking complex nature-specific risks and dependencies, as biodiversity resilience has distinct drivers compared to other environmental topics. In our view, dedicated disclosures and guidance (in line with the granularity of requirements related to climate resilience) are needed as relevant information for users.	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	As noted above, if EFRAG retains the current proposal, we ask EFRAG to provide a specific definition of transition plans for biodiversity and ecosystems. The definition should be standalone and should not refer to transition plans for climate change mitigation as this will create confusion. It is essential to distinguish a biodiversity transition plan from a biodiversity strategy or action plan. Without a precise definition, preparers and auditors will face strong challenges to determine whether certain public information qualifies as a transition plan and therefore must be disclosed. We also recommend clarifying what is meant by "made public". Should preparers consider all publicly available information, including fragmented disclosures? How should this relate to transition plans published through initiatives such as SBTN? Furthermore, the requirement for plans to be "compatible with global goals" or "in line with the GBF" raises practical questions, in the absence of mature methodologies to assess compatibility with the Kunming-Montreal Global Biodiversity Framework (GBF). This could lead to inconsistent interpretations and disclosures. We recommend further alignment with the structure of DR E1-1 to provide the key features of the biodiversity transition plan. It could be specified in the standard that GBF stands for Kunming Montreal Global Biodiversity Framework	E4	E4-1 - Transition plan for biodiversity and ecosystems	AR 1
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We recommend EFRAG to specify what is meant by "sustainable land / agricultural practices" and "sustainable oceans / seas practices"	E4	E4-2 - Policies related to biodiversity and ecosystems	AR 3
Excels	Ernst & Young	Auditor	United Kingdom			I agree	The requirement to report metrics related to material impacts on biodiversity and ecosystems leaves flexibility to select relevant indicators. We encourage EFRAG to provide some clarifications or examples of metrics (in NMIG) drawing from existing frameworks and practices to support consistent reporting across undertakings, enhancing comparability of the disclosed information.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	21.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The amendments are highly welcome. Please make clear that a reference to a transition plan is only necessary if there is a transition plan in place. If the undertaking does not have a transition plan in place it does not consequently have to disclose that this is the fact.	E4	E4-1 - Transition plan for biodiversity and ecosystems	11.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The amendments are highly welcome. Please make clear that a reference to a transition plan is only necessary if there is a transition plan in place. If the undertaking does not have a transition plan in place it does not consequently have to disclose that this is the fact.	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E4	E4-1 - Transition plan for biodiversity and ecosystems	AR 1
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E4	E4-2 - Policies related to biodiversity and ecosystems	13.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The added para. 14 is not necessary and should be removed as the reference to ESRS 2 GDR-P is sufficient. Otherwise it would differ from the structure of the other ESRS E standards.	E4	E4-2 - Policies related to biodiversity and ecosystems	14.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The added para. 14 is not necessary and should be removed as the reference to ESRS 2 GDR-P is sufficient. Otherwise it would differ from the structure of the other ESRS E standards.	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (a)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The added para. 14 is not necessary and should be removed as the reference to ESRS 2 GDR-P is sufficient. Otherwise it would differ from the structure of the other ESRS E standards.	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The added para. 14 is not necessary and should be removed as the reference to ESRS 2 GDR-P is sufficient. Otherwise it would differ from the structure of the other ESRS E standards.	E4	E4-2 - Policies related to biodiversity and ecosystems	AR 2
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	AR 3 for para. 13 should be removed as it only adds irrelevant additional information. At least please make clear that AR 3 does not require a "not applicable" disclosure.	E4	E4-2 - Policies related to biodiversity and ecosystems	AR 3
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	AR 4 for para. 13 can be removed as it brings no additional information.	E4	E4-2 - Policies related to biodiversity and ecosystems	AR 4
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	15.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The added para. 16 is not necessary and should be removed as the reference to ESRS 2 GDR-P is sufficient. Otherwise it would differ from the structure of the other ESRS E standards. At least, please make clear that the undertaking does not have to disclose the fact that it does not have any offsets in place.	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	16.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E4	E4-4 - Targets related to biodiversity and ecosystems	17.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The added para. 18 is not necessary and should be removed as the reference to ESRS 2 GDR-P is sufficient. Otherwise it would differ from the structure of the other ESRS E standards.	E4	E4-4 - Targets related to biodiversity and ecosystems	18.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	AR 5 for para. 17 should make clear that this is only an information but no disclosure requirement.	E4	E4-4 - Targets related to biodiversity and ecosystems	AR 5
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	19.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Para. 20 should only refer to impacts. The locations shall only be reported if there are significant and verifiable negative impacts affecting biodiversity sensitive areas. A general reporting of locations should be avoided as there is no added value.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Para. 20 should only refer to impacts. The locations shall only be reported if there are significant and verifiable negative impacts affecting biodiversity sensitive areas. A general reporting of locations should be avoided as there is no added value.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20. (a)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Para. 20 should only refer to impacts. The locations shall only be reported if there are significant and verifiable negative impacts affecting biodiversity sensitive areas. A general reporting of locations should be avoided as there is no added value.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Para. 20 should only refer to impacts. The locations shall only be reported if there are significant and verifiable negative impacts affecting biodiversity sensitive areas. A general reporting of locations should be avoided as there is no added value.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	20. (c)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Please make clear that para. 21 only refers to metrics for the own operations and that these metrics could also be qualitative.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	21.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Para. 20 should only refer to impacts.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 6
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Para. 20 should only refer to impacts. The locations shall only be reported if there are significant and verifiable negative impacts affecting biodiversity sensitive areas. A general reporting of locations should be avoided as there is no added value.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 7
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	AR 8 should make clear that IBAT is only one of many different tools to examine biodiversity sensitive areas (otherwise ESRS lead to a monopoly-market). Para. 20 should only refer to impacts. The locations shall only be reported if there are significant and verifiable negative impacts affecting biodiversity sensitive areas. A general reporting of locations should be avoided as there is no added value.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 8
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	AR 9 is redundant as the sub-topics are already listed in ESRS 1	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 9
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 10
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	N.a.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 11
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I agree	There is no major change to the shall disclosure of site level biodiversity impacts.	E4	E4-1 - Transition plan for biodiversity and ecosystems	11.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	FPIC reporting should be risk-based and focus on management systems.	E4	E4-4 - Targets related to biodiversity and ecosystems	AR 5
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	It is recommended this disclosure be made voluntary as it adds compliance burden without providing more decision-useful information.	E4	E4-2 - Policies related to biodiversity and ecosystems	14. (a)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	The term "not feasible" is too subjective, creating significant audit risk. We recommend EFRAG provide further guidance to clarify this threshold.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 10
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Recommend EFRAG provide guidance that allows the use of practical alternatives like high-quality estimates.	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 11
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Value chain is mentioned only once in the whole ESRS – now referring to traceability of products/raw materials with actual or potential biodiversity impacts. Given the difficulty to implement EPD across industries we are wondering what the expectations are here.	E4	E4-1 - Transition plan for biodiversity and ecosystems	11.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	The change from may to shall for this requirement can reduce flexibility for companies	E4	E4-1 - Transition plan for biodiversity and ecosystems	12.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	The requirement to describe policies related to the traceability of products, components of raw materials, with material or potential impacts on biodiversity and ecosystems in the entire value chain is burdensome. The same goes for the requirement to describe policies for own sites in/near sensitive areas	E4	E4-2 - Policies related to biodiversity and ecosystems	14.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	While this requirement can be useful, it might create additional burden	E4	E4-4 - Targets related to biodiversity and ecosystems	AR 6
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Prioritising sites in or near sensitive areas can be beneficial	E4	E4-5 - Metrics related to biodiversity and ecosystems change	AR 10
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	We would appreciate further clarification on the following points: what exactly is meants by the "action plans" reffered to? Should offsetting be considered voluntary or compulsory?	E4	E4-3 - Actions and resources related to biodiversity and ecosystems	16.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Reclaim Finance	NGO	France			I partially agree and partially disagree	The AR lacks references to methodologies and frameworks that could guide companies (including SBTN, TNFD, Forest500…).	E4	E4-1 - Transition plan for biodiversity and ecosystems	AR 1
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Data not currently available; Lack of a common methodology. Analogous to E5-4, it should be made clearer that the metrics for resource outflows are only to be reported if the sub-topic has been assessed as material. The requirements are formulated more clearly and concisely. There is no definition of 'key products'. With a wide variety of products in countless areas of application, a pragmatic answer must be possible.	E5	E5-5 - Resource outflows	17. (c)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Data is not always available, the level of granularity is disproportionate, and there are concerns about the overall usefulness of many different types of waste disclosures. Analogous to E5-4, it should be made clearer that the metrics for waste are only to be reported if the sub-topic has been assessed as material	E5	E5-5 - Resource outflows	18. (b)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Disproportionate cost. To be simplified.	E5	E5-5 - Resource outflows	18. (c)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Disproportionate cost. To be simplified. This issue is very strictly regulated in the Member States and is also collected via public digital tools and must also be reported to the environmental authorities. Therefore, this point should also be simplified in order to make things easier for companies and avoid double reporting.	E5	E5-5 - Resource outflows	18. (d)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Disproportionate cost. To be simplified.	E5	E5-5 - Resource outflows	19.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Resource inflows is mentioned as a sub-topic in the topics list in ESRS Appendix A, so the sentence should be adapted to "When 'Resource Inflows' is assessed as a material sub-topic […]". In this context, the topic list in Appendix A should already indicate that resource inflows only refer to key materials and not e.g. to components, so that the sub-topic is not considered material due to components.	E5	E5-4 - Resource Inflows	15.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	In the definition of key materials, the phrase "(can be sourced 'as is' or be assembled in goods and substances purchased)" should be deleted to clarify that it refers only to materials and not to prefabricated components/assemblies	E5	E5-4 - Resource Inflows	15.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	This is difficult to answer without burdening the supply chain with information about preliminary products. It should be possible to use standard values/average values here.	E5	E5-4 - Resource Inflows	15. (d)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	'total weight of critical and strategic raw materials' not meaningful; very high data collection efforts necessary, especially for critical/strategic raw materials that are/might be included in other products	E5	E5-4 - Resource Inflows	15. (c)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	why are 'critical and strategic raw materials' mentioned? - strategic might be deleted, as all strategic raw materials listed in Critical Raw Materials Act are listed as critical raw materials too	E5	E5-4 - Resource Inflows	15. (c)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	'critical and strategic raw materials' is not material for all companies and should therefore be marked as optional datapoint	E5	E5-4 - Resource Inflows	15. (c)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	'biological materials' is not material for all companies and should therefore be marked as optional datapoint	E5	E5-4 - Resource Inflows	15. (e)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	This seems an extension of the DA. The content was moved from E5-5 Resource inflows and now includes the term "eco-design principles" which is not mentioned in the DA-	E5	E5-1 - Policies related to resource use and circular economy	11.
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	E5-3 (§13), NMIG 4 Issue: ESRS E5-3 (§13) does not explicitly allow undertakings to use EU Taxonomy (Substantial Contribution/DNSH) criteria for circular economy as a reference for their targets and actions. Proposed simplification: Add a clear option to reference EU Taxonomy criteria for circular economy in ESRS E5 disclosures. Proposed text: "Undertakings may use EU Taxonomy criteria for circular economy (Substantial Contribution or Do No Significant Harm) as the reference for their targets and actions under ESRS E5-3 (§13). Where this option is used, undertakings should indicate alignment and provide a cross-reference to the relevant Taxonomy criteria." Why it helps: This ensures regulatory coherence, reduces double reporting, and increases comparability for stakeholders.	E5	E5-3 - Targets related to resource use and circular economy	13.
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I disagree	E5-4 (§15(b)) – Total Weight of Key Materials Issue: The requirement to report the total weight of key materials per material is not feasible or meaningful for the real estate sector. In practice, real estate companies do not track material flows at this level; sector practice is to report the overall carbon and material footprint of the building. Proposed simplification: Allow sector-specific metrics, such as whole-building carbon and material footprint, instead of a breakdown by material weight. Proposed text: "For sectors such as real estate, undertakings may use sector-specific metrics (e.g., building carbon and material footprint) in place of total weight per key material, to ensure disclosures are relevant and decision-useful." Why it helps: This aligns reporting with sector practices and provides more meaningful information for stakeholders.	E5	E5-4 - Resource Inflows	15. (b)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	E5-5 (§16–19) Resource outflows Issue: The requirement to disclose durability, reparability, and recycled content is not directly applicable to real estate assets, which are not "products" in the conventional sense. Proposed simplification: Allow real estate undertakings to report on building adaptability, design for disassembly, and compliance with EU Taxonomy waste and circularity criteria instead. Proposed text: "For real estate, undertakings may report on building adaptability, design for disassembly, and compliance with EU Taxonomy waste and circularity criteria, in place of product-level durability and reparability metrics." Why it helps: This ensures disclosures are relevant, feasible, and aligned with sector and regulatory expectations.	E5	E5-5 - Resource outflows	16.
Excels	Atenor	Preparer (non-financial preparing a sustainability report)	Belgium			I partially agree and partially disagree	ESRS E5-5 Resource Outflows – Waste (§18) Issue: The requirement to disclose detailed waste streams and breakdowns (by hazardous/non-hazardous, recovery operations, etc.) is challenging for real estate, where waste data is typically aggregated at the project or site level and managed by external contractors. Sector practice and EU Taxonomy focus on overall rates of reuse, recycling, and recovery, not granular breakdowns. Proposed simplification: Allow real estate undertakings to report waste data in line with EU Taxonomy criteria (e.g., percentage of construction and demolition waste prepared for reuse, recycling, and recovery), and to aggregate data at the project/site level. Proposed text: "For the real estate sector, undertakings may report waste data in line with EU Taxonomy requirements (e.g., percentage of construction and demolition waste prepared for reuse, recycling, and recovery), and may aggregate data at the project or site level rather than by detailed waste stream." Why it helps: This aligns ESRS E5-5 with sector practice, leverages existing regulatory frameworks, and ensures disclosures are feasible and decision-useful.	E5	E5-5 - Resource outflows	18. (c)
Excels	CEWEP	Business association (other than association of financial institution)	Germany			I disagree	The recovery definition proposed in Annex II p. 27 and its application to ESRS E5, paragraph 18 on waste, do not align with existing EU legislation. The Waste Framework Directive (2008/98/EC, Article 3(15) and Annex II), which is the cornerstone of EU waste management legislation, defines recovery as including energy recovery. As currently drafted, 18.c and 18.d would lead to inaccurate reporting, as it would be unclear where to report incineration with energy recovery (WFD Annex II "R1"): it is explicitly excluded from the ESRS definition of "recovery", but is not a disposal operation and therefore should not be reported under "waste directed to disposal". This would misrepresent actual waste treatment performance, create inconsistencies in EU statistics and compliance reporting, and result in incorrect financial disclosures by companies, since waste treatment pathways directly affect cost allocations, liabilities, and sustainability performance indicators. The stated goal of the Amended ESRS consultation is simplification and greater usability without compromising EU objectives. Introducing a definition that conflicts with existing law instead increases reporting complexity, as companies would face two contradictory classifications. Suggestion: "iii. other recovery operation, including incineration with energy recovery (R1)". It ensures alignment with existing EU legislation and avoids unnecessary burdens.	E5	E5-5 - Resource outflows	18. (c)
Excels	CEWEP	Business association (other than association of financial institution)	Germany			I disagree	The recovery definition proposed in Annex II p. 27 and its application to ESRS E5, paragraph 18 on waste, do not align with existing EU legislation. The Waste Framework Directive (2008/98/EC, Article 3(15) and Annex II), which is the cornerstone of EU waste management legislation, defines recovery as including energy recovery. As currently drafted, 18.c and 18.d would lead to inaccurate reporting, as it would be unclear where to report incineration with energy recovery (WFD Annex II "R1"): it is explicitly excluded from the ESRS definition of "recovery", but is not a disposal operation and therefore should not be reported under "waste directed to disposal". This would misrepresent actual waste treatment performance, create inconsistencies in EU statistics and compliance reporting, and result in incorrect financial disclosures by companies, since waste treatment pathways directly affect cost allocations, liabilities, and sustainability performance indicators. The stated goal of the Amended ESRS consultation is simplification and greater usability without compromising EU objectives. Introducing a definition that conflicts with existing law instead increases reporting complexity, as companies would face two contradictory classifications. Suggestion: "i. incineration without energy recovery (D10)". It ensures alignment with existing EU legislation and avoids unnecessary burdens.	E5	E5-5 - Resource outflows	18. (d)
Excels	BDEW	Other - please specify (required)	Germany			I disagree	In our view, the extension of the standard to cover "services" is highly problematic. This obligation was not previously envisaged, yet EFRAG does not clearly identify it as a new requirement. As a result, additional effort is created, since the standard has so far been evidently tailored to manufacturing companies. We find it particularly concerning that EFRAG argues that the "services" sector has been included in the scope from the outset, whereas expert opinion—such as from EY or BET—has not supported this view.	E5	E5 - Objective	2.
Excels	BDEW	Other - please specify (required)	Germany			I disagree	Content was moved from E5-5 Resource inflows and now contains the term "eco-design principles" which is not mentioned in the delegated act. BfC (388): The only addition on policies is how circularity and eco-design principles are integrated into key products and services, aligning with the "Eco-design for Sustainable Products Regulation" (EU) 2023/1230.	E5	E5-1 - Policies related to resource use and circular economy	11

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	BDEW	Other - please specify (required)	Germany			I disagree	Reference seems wrong, the Eco-design for Sustainable Products Regulation has got the identifier (EU) 2024/1781 (Ökodesign-Verordnung für nachhaltige Produkte)	ES	ES-1 - Policies related to resource use and circular economy	BFC 388
Excels	BDEW	Other - please specify (required)	Germany			I disagree	Additional requirement BfC (130): Added for better alignment with recent EU regulatory developments, particularly the Eco-design for Sustainable Product Regulation and Critical Raw Materials Act (Verordnung kritische Rohstoffe: Verordnung (EU) 2024/1252 vom 11. April 2024 „zur Schaffung eines Rahmens zur Gewährleistung einer sicheren und nachhaltigen Versorgung mit kritischen Rohstoffen“)	ES	ES-4 - Resource Inflows	15 (c)
Excels	BDEW	Other - please specify (required)	Germany			I agree	Par 15 (e) reintroduces the limitation of biological materials to “sustainably sourced”. The market wants a total figure for biobased materials, this metric is highly disputable and not relevant if limited.	ES	ES-4 - Resource Inflows	15 (e)
Excels	BDEW	Other - please specify (required)	Germany			I disagree	Additional requirement: Additional labelling requirement increases the granularity.	ES	ES-4 - Resource Inflows	AR 2
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	needs clarification whether "thermal-based disposal" is something different to "thermal recovery"	ES	ES-5 - Resource outflows	18 (d) (i)
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	Additional requirement BfC (130): Als Erleichterung gedacht, "not forcing undertakings to make unreasonable estimations but instead allowing them to disclose on the figures they have and can reasonably document."	ES	ES-5 - Resource outflows	18 (e)
Excels	BDEW	Other - please specify (required)	Germany			I disagree	Additional requirement, although the wording might indicate a relief: "When describing its waste streams, it is sufficient to provide a name and an indication of the key materials that are included in the waste stream"	ES	ES-5 - Resource outflows	AR 5
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Useful amendment and clear guidance (in NMIG)	ES	ES-1 - Policies related to resource use and circular economy	11.
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Clarification needed in context to definition of resource inflow: Product packaging is not mentioned explicitely anymore. Is it still in scope by "were part of the delivery of the undertaking's products" or completely out?	ES	ES-4 - Resource Inflows	15.
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Higher disaggregation level for material inflow very positive, as opposed to biological vs technical. Though clarification is needed at which level the "key" material should be defined and reported - at the mateiral group level e.g. fibers, plastics and metals OR at the individual material level within the material group like polyester, alyminium etc., as this is important for defining a threshold for "key" materials	ES	ES-4 - Resource Inflows	15. (b)
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Dependent on overarching understanding of definition of Resource inflows: Agree with the overall objective to include, but unclear whether there is a sufficient differentiation for companies/products, where the CRMs are truly material (e.g. solar panel producers) versus companies, that do retail products with CRMs, but where they overall account for a very small fraction of material inflow. These companies should be allowed to omit this DR. For example, if we derive that a material group "metals" is relevant for our Inflow (= key material), it should be allowed for us to focus on the most relevant metals within this group (like steel/iron) and exclude CRM metals from reporting as metals with only a tiny share of volume. Additional clarification: is it just one aggregated number for all CRMs together or disaggregated by concrete individual material?	ES	ES-4 - Resource Inflows	15. (c)
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Amendment request: remove the limitation that only biological materials can be "sustainably sourced", since technical materials can be more sustainable not only when they are recycled. Examples - green steel (steel produced with green electricity) and biobased materials. Clearer wording needed that "secondary resourced" is not a subset of „sustainably sourced“, since recycled material are also "sustainable"	ES	ES-4 - Resource Inflows	15. (e)
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	ANNEX definition of "resource inflow" - clarification needed how retailers are to interprete the new definition - if by the new definition only private-label products (that are produced in factories not owned by the company) remain in scope, and 3rd party brands are out (to avoid double acconting) - very positive. However if it means that even private label products are not considered as "inflow" for retail companies, since they dont produce in own facilities, but receive already the final product from their tier 1 suppliers (as opposed to semi-finished products or components), than we strongly disagree, as we dont considered it a balance to meet core sustainability objectives. Private labels should be considered as Inflow. Retail companies, even if not physically produce in own facilities, are strongly dependant on the natural resources and are in control of (and thus responsible for) which materials are used in their (private label) products and are put on the market for consumption	ES	ES-4 - Resource Inflows	15.
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Clarification needed: Wording should be harmonized across different EU standards/methods, e.g. PEFCR. This DR should aim for the "recyclability" of the whole product (e.g. as defined by PEFCR with recyclability disruptors") as opposed to recyclability of individual materials within the product. It is decisive how the final product is assembled, which requires a consideration of more aspects rather than just materials. Currently the wording is misleading. Additional clarification needed: is "rate of" the same as "share of"?	ES	ES-5 - Resource outflows	17. (c)
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Clarification needed: We need a clarification of the new definitions of resource outflow and key products in the annex, particularly with regard to their application in the retail sector. At present, it is not clear to us from the available definitions whether and to what extent a marketplace or platform business falls within the scope of the new definitions or is excluded from them.	ES	ES-5 - Resource outflows	17.
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Good simplification and removal of redundancies	ES	ES-5 - Resource outflows	18.
Excels	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	For the marine sector,final destination of waste is very dependent on port reception facilities and third parties and is very often outside of the control of the vessel operators. As such it can be very difficult given the nature of multiple third parties in the waste management chain to accurately identify final destination of waste	ES	ES - Objective	18.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Materiality	Consultant (including software vendor)	Poland			I disagree	Par. 15 is inconsistent regarding role of packaging materials in undertaking's resource inflows. The definition (Annex II) states that packaging are: "products made of any materials of any nature to be used for the containment, protection, handling, delivery, storage, transport and presentation of goods, from raw materials to processed goods, from the producer to the user or consumer". Therefore, packaging materials are not only those that are "part of the delivery", but they are used in all processes of product creation from resources extraction to products presentation. Also, materials used for packaging purposes may significantly differ from the materials used in products. Often, materials used for packaging have higher potential for recycling than materials used for products themselves. In conclusion, our suggestion is to include packaging as a important group of materials considered in DR 15 by replacing phrase "product and services" with phrase "products and it's packaging and services".	ES	ES-4 - Resource Inflows	15.
Excels	Materiality	Consultant (including software vendor)	Poland			I disagree	Par. 15 d) is inconsistent regarding requirement of disclosing "recycled materials used". Annex II neither defines "recycled materials" nor "recycling". Annex II defines only "secondary resources" as "materials previously used (secondary) and that are recovered from waste streams and reintroduced into production cycles, reducing reliance on primary resources and minimizing environmental impact." For clarity, "recycled materials" should be defind and included in "secondary resources" definition.	ES	ES-4 - Resource Inflows	15. (d)
Excels	Materiality	Consultant (including software vendor)	Poland			I disagree	Par. 17 d) is inconsistent regarding definition of "secondary resourced materials". "Secondary resources" are defined (Annex II) as "Materials previously used (secondary) and that are recovered from waste streams and reintroduced into production cycles, reducing reliance on primary resources and minimizing environmental impact." However, DR 17 d) requires disclosing of the rate of "recycled materials used", whereas Annex II neither defines "recycled materials" nor "recycling". For clarity, "recycled materials" should be defind and included in secondary resources definition.	ES	ES-5 - Resource outflows	17. (d)
Excels	Materiality	Consultant (including software vendor)	Poland			I disagree	Par. 15 a) should be consistently amended to address packaging of the products. We propose the following wording: "the key materials used to manufacture products and their packaging, deliver them and/or provide services;"	ES	ES-4 - Resource Inflows	15. (a)
Excels	Materiality	Consultant (including software vendor)	Poland			I disagree	Par. 17 d) should be consistently amended to address packaging of the products. We propose the following wording: "the rate of recycled materials in its key products and their packaging."	ES	ES-5 - Resource outflows	17. (d)
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I agree	The new version of ES-1 simplifies the requirement by focusing on the disclosure of policies in line with ESRS 2 GDR-P and explaining how circularity and eco-design principles are integrated into core products and services. The removal of information on the transition to recycled resources and sustainable sourcing may reduce visibility into the company's strategic ambition regarding the circular economy. On the other hand, the practical focus on applying these principles can strengthen the link between policy and innovation especially in resource-intensive sectors.	ES	ES-1 - Policies related to resource use and circular economy	11.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The new version of ES-2 simplifies the requirement by only requiring disclosure of actions in line with ESRS 2 GDR-A, removing the possibility to detail practices such as resource efficiency, use of recycled materials, circular design, and circular business models. This simplification reduces visibility into the company's level of innovation and operational transformation, particularly in sectors reliant on critical raw materials. However, by maintaining focus on core actions, it may facilitate reporting and reinforce the link between policy and execution, provided companies voluntarily include these transformative elements.	ES	ES-2 - Actions and resources related to resource use and circular economy	12.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The new version of ES-3 simplifies the requirement by only requiring disclosure of targets in line with ESRS 2 GDR-T, removing the need to detail resource flows, circular design principles, waste hierarchy, and ecological thresholds. This simplification limits the ability to assess the ambition and strategic alignment of targets with advanced circular practices. However, by focusing on a common target structure, it may promote consistency across companies, as long as they choose to voluntarily include more transformative elements.	ES	ES-3 - Targets related to resource use and circular economy	13.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The new version of ES-4 retains the main indicators but adopts a more simplified and standardised structure, with less demand for technical contextualisation. The exclusion of elements such as material intensity and methodological details may reduce comparability and understanding of material efficiency. On the other hand, the explicit inclusion of categories like critical raw materials and secondary materials strengthens the strategic view on circularity and resource security, which is particularly relevant for sectors with high dependency on specific inputs.	ES	ES-4 - Resource Inflows	14.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The new version of ES-5 retains the main indicators but adopts a more simplified and outcome-oriented structure, with less demand for technical and methodological contextualisation. The exclusion of details on circular design and classification criteria may limit understanding of product ambition and innovation. However, the strengthened focus on waste measurement and traceability of its destination contributes to a more operational view of circularity, especially relevant for sectors with high waste generation.	ES	ES-5 - Resource outflows	16.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I agree	The change of 'products and materials' to 'products and services' is aligned with the GRI Standards.	ES	ES - Objective	4. (b)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	In the Log of Amendments, it is stated "Definitions added to the Annex II: circularity and eco-design". While the definition of eco-design exists in Annex II, the definition of 'circularity' is missing. We suggest clarifying whether 'circularity' refers to the definition of 'circular economy'.	ES	ES-1 - Policies related to resource use and circular economy	11.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	Note that the new definition of 'key products' added to Annex II does not include a reference to services. We suggest this be clarified.	ES	ES-1 - Policies related to resource use and circular economy	11.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	Introduction of term 'key materials': Note that the introduction of this term would be misaligned with GRI 301-1-a which requires to report the total weight or volume of materials used to produce and package the organization's primary products and services. GRI focuses on the primary products and services but does not focus on or use the term 'key materials'. This change results in a difference in the scope of the ES and GRI 301-1 requirements. In addition, the definition of 'key materials' is marked as 'amended' in Annex II whereas it is a 'new' definition.	ES	ES-4 - Resource Inflows	15.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	Focus on key materials: GRI 301-1-a requires to report the total weight or volume of materials used to produce and package the organization's primary products and services. GRI does not focus only on key materials. In addition, the reference to products and services is not focusing on key products and services as done in paragraph 11. As such it is unclear whether the key materials of all products and services or only of key products and services shall be reported. We recommend aligning with GRI to require the total weight or volume of materials of primary products and services.	ES	ES-4 - Resource Inflows	15. (b)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	The Log of Amendments states that definitions for technical and biological material have been added to Annex II, but Annex II does not include a definition for technical material.	ES	ES-4 - Resource Inflows	15. (b)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	Note that the new Glossary definition states 'secondary resources' and not 'secondary resourced materials' as used in paragraph 15 (d). We also suggest clarifying the relationship between the definitions of 'raw materials' ("Primary or secondary material that is used to produce a product.") and 'secondary resources' ("Materials previously used (secondary) and that are recovered from waste streams and reintroduced into production cycles, reducing reliance on primary resources and minimizing environmental impact."). We propose that similar terminology be streamlined to facilitate the understanding of different concepts.	ES	ES-4 - Resource Inflows	15. (d)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We suggest clarifying the difference between 15 (d) ("the percentage of total weight of secondary resourced materials") and 17 (d) (" the rate of recycled materials used in its key products") and the reasons why they are included in different DRs, as both seem to be based on former paragraph 31 (c).	ES	ES-5 - Resource outflows	17. (d)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We propose aligning the Annex II definition of 'recovery' with GRI 306's definition: "operation wherein products, components of products, or materials that have become waste are prepared to fulfill a purpose in place of new products, components, or materials that would otherwise have been used for that purpose. Source: United Nations Environment Programme (UNEP), Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal, 1989; modified. Examples: preparation for reuse, recycling. Note: In the context of waste reporting, recovery operations do not include energy recovery."	ES	ES-5 - Resource outflows	18. (c)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I disagree	We propose changing the unit of measurement from tons or kilograms to metric tons, for alignment with GRI 306: Waste.	ES	ES-5 - Resource outflows	AR 4
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Disclosure should be limited not only to key materials (already in the current Draft) but also key products (new suggestion for reducing the reporting burden while maintaining a comprehensible level of disclosure; also in line with ES-5 Resource Outflows where this focus is implemented in the current Draft). Further proposed simplification: omission of e.g. clippings/scrap (for manufacturing companies). Moreover, Good definition and focus of "key materials" for manufacturing. No mention anymore of process materials, packaging, water and property, plant and equipment.	ES	ES-4 - Resource Inflows	15.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Disclosure should be limited not only to key materials (already in the current Draft) but also key products (new suggestion for reducing the reporting burden while maintaining a comprehensible level of disclosure; also in line with ES-5 Resource Outflws where this focus is implemented in the current Draft). Further proposed simplification: omission of e.g. clippings/scrap (for manufacturing companies). EFRAG should revise again whether a breakdown per key material is needed and useful information for stakeholders. Further „breakdown per key material" involves increased and additional effort. Currently there is just an overall total weight of technical and biological materials necessary.	ES	ES-4 - Resource Inflows	15. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The introduction of a new KPI counteracts the aim of reduing the reporting requirements and burden. Based on the new KPI, resource inflow needs to be reported on a more granular level, which increases the data requirement again. Not only is the information extremly challenging to obtain (as it requires information from the value chain and migh need IT adjustments) but transparency on the purchased material structure is sensitive information and might lead to competitive disadvantages. This new requirement on critical and strategical raw material should be removed.	ES	ES-4 - Resource Inflows	15. (c)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Disclosure should be limited not only to key materials (already in the current Draft) but also key products (new suggestion for reducing the reporting burden while maintaining a comprehensible level of disclosure; also in line with ES-5 Resource Outflws where this focus is implemented in the current Draft). Further proposed simplification: omission of e.g. clippings/scrap (for manufacturing companies). Nevertheless, Good focus on „secondary resourced materials". No mention anymore of reused and recycled materials/ components and packaging.	ES	ES-4 - Resource Inflows	15. (d)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Disclosure should be limited not only to key materials (already in the current Draft) but also key products (new suggestion for reducing the reporting burden while maintaining a comprehensible level of disclosure; also in line with ES-5 Resource Outflws where this focus is implemented in the current Draft). Further proposed simplification: omission of e.g. clippings/scrap (for manufacturing companies). The definition on sustainable sourcing in the glossary should be revised again with a focus on more clarity and auditability of the required information; currently it seems a bit vague and open for interpretation. The concept of 'sustainably sourced' is should be clarified. Furthermore, limiting the scope of reporting exclusively to biological materials (which is well defined) is not justified, as technical materials may also meet sustainability criteria and should therefore be considered within the reporting framework.	ES	ES-4 - Resource Inflows	15. (e)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	Focus on key products helps to disclose relevant information for stakeholders while reducing the burden for disclosing companies	ES	ES-5 - Resource outflows	17. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	Focus on key products helps to disclose relevant information for stakeholders while reducing the burden for disclosing companies	ES	ES-5 - Resource outflows	17. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The requirement to report on the recyclable content of packaging should be removed. Packaging reporting requirements should be excluded and not considered as part of the product. Additionally, there is not a common definition for recyclable product, therefore, the requirement of reporting the rate of recyclable materials in products should be clarified.	ES	ES-5 - Resource outflows	17. (c)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Focus on key products helps to disclose relevant information for stakeholders while reducing the burden for disclosing companies. However, Further “rate of recycled materials used in its “key products”” involves increased and additional effort. Added value questionable because 15. (d) “percentage of total weight of secondary resourced materials” also in the key products indirectly included	ES	ES-5 - Resource outflows	17. (d)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Please see comment for ESRS E5 para. 17 (c)	ES	ES-5 - Resource outflows	AR 3
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	This new requirement would entail additional work if this case were to arise.	ES	ES-5 - Resource outflows	18. (e)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	Significant improvement, as the example makes it clearer what level of detail is required here.	ES	ES-5 - Resource outflows	AR 5
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	No objection	ES	ES-5 - Resource outflows	AR 4
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	E5-4 §30 has been removed which specified quite clearly, that only those resource inflows are to be looked at, that are used to manufacture the undertakings products and services. Now this paragraph was removed and the ESRS amended in a way, that it is less clear for retailers, whether products that are not manufactured, but just placed on the market, need to be taken into the scope of E5-4 §15 a-e or not. This should be more clearly defined, products placed on market will be a huge work intensive disclosure that does not stand in the light of burden reduction.	ES	ES-4 - Resource Inflows	15.
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	17 a) and b): Burden reduction is limited. Newly added definitions leave a lot of room for interpretation. How is "information" defined? Is this considered a metric or a qualitative disclosure? Definitions don't seem to be aligned with PPWR. Why are the definitions not aligned with PPWR, at least broadly? Due to the focus on key products? Besides that the metric is pretty similar. No specification, that the DR applies to manufacturing undertakings. Collecting information on durability and reparability as a retailer is overly burdensome and will likely double with disclosures of manufacturing undertakings. Undertakings should be obliged to report on their own products. Generally, there are currently no robust methodologies or proxy information to calculate this data. It is not feasible to calculate these metrics for the moment. Remove DP or move to NMIG.	ES	ES-5 - Resource outflows	17. (a)
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	see above	ES	ES-5 - Resource outflows	17. (b)
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	In the current standard, it is clear that E5 related activities also interact with workers of the value chain (ESRS S2) : ""E5 related activities often involve intensive resource extraction, manufacturing, or waste processing, which can expose workers to hazardous conditions and low-wage labour, especially in lower tiers of the value chain". We recommend maintaining such interaction in the revised E5. This could be done in the NMIG.	ES	E5 - Interaction with other ESRS	9. (e)
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We recommend complementing this § as follows, in consistency with the wording used in other topical standards in relation to actions and resources: "The undertaking shall disclose its resource use and circular economy actions and significant resources allocated to their implementation, in accordance with…".	ES	ES-2 - Actions and resources related to resource use and circular economy	12.
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	"Sustainably sourced" shall be put in bold italic as a new definition (referring to "sustainable sourcing/sustainable sourced" that could be complemented with "sustainably sourced") has been added in the ESRS glossary. We nonetheless recommend to enrich such definition which is quite broad/generic.	ES	ES-4 - Resource Inflows	15. (e)
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We regret that EFRAG has not clarified in this DR whether and how value chain data can be used for reporting on own operations.	ES	ES-4 - Resource Inflows	15.
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	"Can refer to" should be replaced by "shall refer to" in the last sentence of this AR as it illustrates a mandatory requirement: "… the undertaking shall designate the material in such a way as to identify this characteristic, e.g. the undertaking shall refer to ‘synthetic fibres’ and ‘natural fibres’ instead of just ‘fibres’."	ES	ES-5 - Resource outflows	AR 2
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We recommend rewording this DP as "the rate of recycled materials included in its key products…" to ensure consistency in wording (cf. § 17(c)), instead of using "recyclable".	ES	ES-5 - Resource outflows	17. (c)
Excels	Triodos Bank N.V.	Bank	Netherlands			I disagree	We propose to keep the target related to waste management in.	ES	ES-3 - Targets related to resource use and circular economy	3.
Excels	BDO	Auditor	Belgium			I partially agree and partially disagree	While reporting on key resources used to produce, put on the market or deliver, the material streams may vary significantly from one reporting entity to another. Accordingly, allowing for flexibility with regard to paragraph 15 a-e might encourage more tailored reporting solutions for the respective reporting entities.	ES	ES-5 - Resource outflows	15.
Excels	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	We are not 100% sure that it is not anymore required to disclose the amounts of each pollutant above the threshold from Annex II of the Industrial Emissions Portal Regulation. This is due to possible different interpretation of "The pollutants TO BE CONSIDERED for reporting …" in AR 2. Please clarify or re-formulate "to be considered" in the application requirement.	E2	E2-4 - Pollution of air, water and soil	AR 2
Excels	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	AR 4 leaves room for interpretation in our opinion. Does it mean that the emissions to water are excluded from the reporting scope of E2-4 (which is defined as own operations in § 16 a) when the wastewater is not treated internally but send to an external treatment plant? Or should they nevertheless be reported even if they "qualify" as downstream pollution? Please clarify.	E2	E2-4 - Pollution of air, water and soil	AR 4
Excels	UPM-Kymmene Corporation	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	So far, there are no reliable methods to measure emissions of primary microplastics. There must be agreed methods to be able to comply with this disclosure requirement. Information from relevant suppliers about microplastics in there products is currently lacking and their mandatory reporting is starting only. Information on secondary microplastic in the downstream value chain is very challenging and will be very unprecise, especially for companies with a multi-tier downstream value chain. In general, the ESRS requirements for microplastics reporting should be in line, also timewise, with the REACH restriction for intentionally and unintentionally added microplastics and other microplastic-related reporting regulations. Please consider to add this DR to the NMIG list for now.	E2	E2-4 - Pollution of air, water and soil	16. (b)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Delete. With the disclosure in GDR-P this will be sufficiently transparent	ES	ES-1 - Policies related to resource use and circular economy	11.
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	We recommended to align to the definition of CTI Methodology from WBCSD which is used from our peers and consultancies as standard for the methodological approach and tracking, depending on the respective sector; option to create a default list of standards to be used by sector	ES	ES-4 - Resource Inflows	15. (b)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	We recommended to align to the definition of CTI Methodology from WBCSD which is used from our peers and consultancies as standard for the methodological approach and tracking, depending on the respective sector; option to create a default list of standards to be used by sector	ES	ES-4 - Resource Inflows	15. (e)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	We recommended to align to the definition of CTI Methodology from WBCSD which is used from our peers and consultancies as standard for the methodological approach and tracking, depending on the respective sector; option to create a default list of standards to be used by sector	ES	ES-4 - Resource Inflows	15. (d)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	We see the change from full scope to "key materials" critical as it will impact the comparability of the reporting. The definition of of "key products" leaves a lot of room for interpretation. We foresee that the definition of what is "key" will create additional work in assessment, definition and reporting.	ES	ES-4 - Resource Inflows	15.
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Clearer guidance from EFRAG on the level of granularity of the key material clusters needed (especially for comparability). E.g. Packaging material vs. Glas/metal/paper/plastics split of packaging material.	ES	ES-4 - Resource Inflows	15. (a)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	While externally there is no additional reporting requirement (no completely new KPI, still sustainably sourced biological materials), we internally have to also calculate the total amount of key biological materials to calculate this figure. This means additional reporting burden. Furthermore we see critical that this might lead to a high reported percentage even if the volume is minimal.	ES	ES-4 - Resource Inflows	15. (e)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Rate of recycled material used in key products should be only considered in inflow OR outflow. With this proposal it would be in both, meaning an additional data point, which should be avoided.	ES	ES-5 - Resource outflows	17. (d)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	We see the change from full scope to "key products" critical as it will impact the comparability of the reporting. The definition of of "key products" leaves a lot of room for interpretation. We foresee that the definition of what is "key" will create additional work in assessment, definition and reporting.	ES	ES-5 - Resource outflows	17.
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	This AR provides better guidance on how to report waste materials,however the detail of all waste materials considering all other reporting requirements would significantly increase the complexity of the reporting. The AR does not detail if all materials are to be reported.	ES	ES-5 - Resource outflows	AR 5
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	At present, the notion of critical and strategic raw materials may evolve over time with the development of the Critical Raw Materials Act, and as the delegated acts deriving from the Eco-design for Sustainable Products Regulation are not yet approved. Companies consider this information hard to access and publish, particularly since these materials are often mixed with others. In this evolving context, this datapoint shall be inserted in the NMIG	ES	ES-4 - Resource Inflows	15. (c)
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	"Preparation for reuse" does not correspond to any of the R/D codes of the Waste framework directive. This information should be retained only in the narrative part. In the future French translation of this standard, the title should be corrected to refer to "réutilisation" rather than "réemploi".	ES	ES-5 - Resource outflows	18. (c)
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	What is the added value of this information? It should also be noted that some wastes are diverted from disposal, but their final destination remains unknown.	ES	ES-5 - Resource outflows	18. (e)
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	General comment: EFRAG should develop comprehensive non-mandatory implementation guidance for each topical standard, including ESRS E5. The guidance should comprise instructions and examples how to conduct the materiality assessment for the topic, how to apply the disclosure requirements, and to calculate the metrics. Sectoral examples could be added, where appropriate.	ES	ES - Objective	1.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Para. 7 should in addition to the Green Deal also mention the Clean Industrial Act.	ES	ES - Objective	7.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	We welcome the introduction of "key materials" in the standard, which increases the proportionality of DR E5-4. However, the introduction of "key materials" comes with the challenge of defining the term appropriately. The current definition is not fit for purpose, leaving too much room for inconsistent interpretations. In line with EFRAG's mandate to increase consistency with other pieces of EU legislation, we recommend to define key materials as follows: 1.materials included in the "list of relevant raw materials" under Art. 6 of Regulation (EU) 2024/1244 (Industrial Emission Portal-Regulation), if used by the undertaking, complemented by 2.additional materials that are essential for the undertaking's manufacturing and delivery of products and services or that are a driver of its material impacts, risks and opportunities. This approach would ensure a uniform and clear basis of what is considered a key material and would leave flexibility for companies to include additional materials that are relevant to their specific circumstances. The delegated act under Art. 6 IEP-Regulation is to be adopted by 31 December 2025 and would therefore be in time for the ESRS revision.	ES	ES-4 - Resource Inflows	15.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	While we consider the metrics proposed by EFRAG a step forward, we question the relevance of metrics that are based on the total weight of materials, since the use of different materials can vary by many orders of magnitude and the overall amount does not provide a good indication of environmental or social impacts, nor (financial) risks and opportunities. We, therefore, suggest to focus on the following datapoints in [Draft] amended ESRS E5-4: 1.the key materials used to manufacture products, deliver them and/or provide services 2.for each key material, whether it contains critical raw materials or strategic raw materials 3.the overall number of critical and strategic raw materials that are contained in its key materials 4.the percentage of key materials in dry weight that are from secondary sources. (text proposal see next line)	E5	E5-4 - Resource Inflows	15.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Text proposal for new set of metrics: "15. When 'Resource Inflows' is assessed as a material topic, the undertaking shall disclose: a) the key materials used to manufacture products, deliver them and/or provide services; and for each key material: (i) whether it contains critical raw materials or strategic raw materials; (ii) the percentage in dry weight that is from secondary sources; (b) the overall number of critical and strategic raw materials that are contained in its key materials	E5	E5-4 - Resource Inflows	15.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Text proposal for new application requirements: "Para. 15 (a)(i): Key materials can be raw materials, components or products procured. In case of key materials that are components and products, the undertaking shall report whether these contain critical raw materials or strategic raw materials. Para. 15 (a)(ii): The percentage ratio shall be calculated by dividing the dry weight of the key material that is from secondary sources by the total dry weight of the key material procured in the reporting period. The requirement also applies to key materials that are components or products. Para. 15 (b): If critical or strategic raw materials are contained in more than one key material, their number shall not be double counted." NMIG: include an examplary reporting template (table), with columns "Key material", "Is or contain a critical raw material?", "Is or contains a strategic raw material", "% of key material that is from secondary sources". Lines are the respective key materials.	E5	E5-4 - Resource Inflows	15.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Please consider the following proposals for ESRS E5-related terms and definitions: - Generally, we recommend to cross-check all definitions with the terminology from ISO 59004:2024 "Circular economy — Vocabulary, principles and guidance for implementation" and relevant legislation. - "resources" is used frequently in the, but not defined. It should be clarified in a separate definition that "resources" means "material resources" in the ESRS, not natural resources more broadly, nor financial nor human resources. This would help to clarify and be in line with how The International Resource Panel at UNEP is using the term. - "Circular economy principles" is used inconsistently and should be aligned with common frameworks such as 10R or Narrow/Slow/Close/Substitute. - "circular material use rate" is defined but not used in the standard. The definition is also unclear because it does not define "circular material use" and does not link to the definition of "secondary resources". It should be deleted.	E5	E5 - Objective	1.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Further on definitions: - The new definition for "resource efficiency" introduces the term "material consumption" which is not explained. Instead, the definition should refer to the already defined term "resource inflow". We also not that resource efficiency is not used in E5. - The new definition for "secondary resources" misses the fact that those resources can also come from non-waste streams, e.g. by-products such as metallurgical slags. Hence, it should be amended to "waste and non-waste streams" - "sustainably sourced" is referring only to the assessment of direct suppliers. It is not in line with the OECD Guidelines for Multinational Enterprises for Responsible Business Conduct. Moreover, the term is not correctly used in the standard. The definition should either be removed or fundamentally revised. If our proposal to amend the set of metrics is adopted, the definition would not be needed anymore.	E5	E5 - Objective	1.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Further on definitions: - the defintiion of „Critical raw materials" should be extended by "low end-of-life recycling input rates", so that it reads: „Critical raw materials are materials that have high economic importance and are subject to supply risk, due to factors such as geographic concentration, economic or geopolitical limitations, low end-of-life recycling input rates, or difficulties in substitution. Critical raw materials are those listed in Annex II, Section 1 in the Critical Raw Materials Acts (2023)."	E5	E5 - Objective	15. (c)
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	Further on definitions: - in the definition of "strategic raw materials", the phrase "subset of critical raw materials" should be deleted. It should better align with the CRMA, which states in recital 6: "raw materials that are of high strategic importance for the functioning of the internal market, taking into account their use in strategic technologies underpinning the green and digital transitions or for defence or aerospace applications, that are characterised by a potentially significant gap between global supply and projected demand, and for which an increase in production is relatively difficult, for instance due to long lead-times for new projects increasing supply capacity." and in Art. 3 (2): "the raw materials that score among the highest in terms of strategic importance, forecasted demand growth and difficulty of increasing production."	E5	E5 - Objective	15. (c)
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	"Circularity" is highlighted as a defined term but not included in Annex II (Glossary). It should be defined in the finalization of the standard.	E5	E5-1 - Policies related to resource use and circular economy	11.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	"Circularity" is highlighted as a defined term but not included in Annex II (Glossary). It should be defined in the finalization of the standard.	E5	E5-4 - Resource Inflows	14.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	It should be be specified whether the reported weight of waste is in dry- or wet weight (which is especially relevant for organic waste).	ES	ES-5 - Resource outflows	AR 4
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	The definition of "durability" should be aligned with the definition in the ESPR: " 'durability' means the ability of a product to maintain over time its function and performance under specified conditions of use, maintenance and repair;"	ES	ES-5 - Resource outflows	17. (a)
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	The definition of "ecodesign" should be aligned with the definition in the the ESPR: "'ecodesign' means the integration of environmental sustainability considerations into the characteristics of a product and the processes taking place throughout the product's value chain;"	ES	ES-1 - Policies related to resource use and circular economy	11.
Excels	German Environment Agency	National supervisory authority & regulator	Germany			I partially agree and partially disagree	The definition of "scope of repairability" should not relate to "placing on the market" since this is not a product characteristc and, in line with the ESPR definition for "repair", also cover waste: "Extent to which a product or waste is designed in a manner that enables it to be restored to proper functioning through repair activities, taking into account factors such as product design, ease of disassembly, availability of spare parts and tools, accessibility of repair and maintenance information, and the legal and practical conditions under which end- users, professional repairers, or independent operators can carry out such repairs..."	ES	ES-5 - Resource outflows	17. (b)
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	There is still no clarification on whether and how value chain data can be used for reporting on own operations under ES-4, which leaves preparers with practical uncertainties and risks of inconsistent interpretation. Challenges in sourcing reliable data – especially in complex, multi-tier supply chains such as retail – remain unaddressed.	ES	ES-4 - Resource Inflows	15.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	The disclosure requirement in 15(e) on "sustainably sourced" biological materials is not defined in the ESRS. We recommend that EFRAG provide a clear definition of "sustainably sourced" in Annex II, aligned with recognised schemes and addressing minimum due diligence requirements. Additionally, moving the recycled material disclosure from inflows to outflows may overlook recycled content that does not remain in final products.	ES	ES-4 - Resource Inflows	15. (e)
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	We note a risk of double counting in waste reporting: incineration with energy recovery (Directive 2008/98/EC Annex II, category R1) appears to be covered under both "other recovery operations" [para. 18.c)iii] and "thermal-based disposal" [para. 18.d)i)], depending on interpretation. This could cause inconsistency in categorising incineration with energy recovery sometimes as recovery, sometimes as disposal depending on interpretation. This should be clarified to ensure consistent classification.	ES	ES-5 - Resource outflows	18. (d)
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	It is suggested to clarify that this DR applies only to companies that are subject to the CRM Act: "the percentage of total weight of critical and strategic raw materials, whenever the undertaking is required to assess those material flows according to the CRM Act regulations".	ES	ES-4 - Resource Inflows	15. (c)
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	Disclosure should be limited not only to key materials (already in the current Draft) but also "key products and services" (new suggestion for reducing the reporting burden while maintaining a comprehensible level of disclosure).	ES	ES-4 - Resource Inflows	15.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	With reference to point e) "the percentage and/or total weight for which the final destination is unknown," we believe that this new item does not add any value to the reporting (as it can be derived simply as the difference between the previous points). Furthermore, it is unclear from the explanation of the last column what is meant by this requirement and how the data should be obtained. Clarification is considered necessary.	ES	ES-5 - Resource outflows	18. (e)
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	E5-4 para 15c When resource inflows is assessed as a material topic, the undertaking shall disclose the following information about. (...) "c) the percentage of total weight of critical and strategic raw materials;" We believe this may introduce a heavy reporting burden and undue effort for companies. Tracking the "percentage of total weight" of those materials is problematic because it relies on complex supply chains (could require deep tier-2 and tier-3 supplier transparency) where traceability is low, and the metric may not meaningfully reflect the company's real sustainability risks or impacts. Suggest to delete this requirement.	ES	ES-4 - Resource Inflows	15. (c)
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	Para. 15 (d) The undertaking shall disclose, for key materials: (d) the % ... of secondary resourced materials; Ambiguity in definitions: "secondary resourced materials" versus recycled material – possible overlap or confusion. Most recycled materials become secondary sources once they're processed and reused. There is a clear overlap. Without well-defined criteria, comparability value will be impacted. Suggestion to clarify definitions to distinguish recycled materials, secondary resourced materials, and other categories to ensure consistent reporting.	ES	ES-4 - Resource Inflows	15. (d)
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	AR 1 for apra 15 c&d - We consider this denominator not to be a useful metric. The term "key materials" is vague and allows companies wide discretion in what to include, leading to inconsistent reporting, reduced comparability, and potential misrepresentation. Variations in material selection or year-over-year shifts in material mix can distort the indicator, making it unreliable. We recommend removing this metric.	ES	ES-4 - Resource Inflows	AR 1
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	Para 18 e requires to disclose " the percentage and/or total weight for which the final destination is unknown." We believe there is limited usefulness of a "final destination unknown" metric. Disclosing the percentage or total weight of materials with unknown final destinations could generate significant reporting effort with limited value for stakeholders, particularly if large portions are unknown. Suggestion to move this paragraph to voluntary and focusing on qualitative information, or allowing aggregation of "unknown" categories with explanation of materiality and mitigation efforts (if material).	ES	ES-5 - Resource outflows	18. (e)
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	We find that this requirement has been added/changed from a "may" to a "shall" but is not counted as such and is not highlighted in Q23. Furthermore, we note that the requirement essentially drives detailed reporting on how other EU-legislation is met. We believe the relevant elements would be covered by the general reporting requirement in ESRSE5, paragraph 10, at an appropriate level.	ES	ES-1 - Policies related to resource use and circular economy	11.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	We disagree to the amended standard as it increases the reporting requirement on resource inflows to include a breakdown on weight by key material and percentages of certain categories. This is an increase in the disclosure requirement which will impose a significant increase in the reporting burden. This should in particular be seen in relation to the definition of "key" products which includes a large range of products, which may be purchased in bulks as well as be included in raw material or assembled in semi-finished goods. It should, furthermore, be noted that such information would be confidential and business critical if disclosed for certain businesses. We disagree to this extension and suggest maintaining the requirements from current ESRS 5.	ES	ES-4 - Resource Inflows	15.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	We disagree to the requirement to report on the recycled materials used in key products and their packaging. This is a significant reporting burden as many outflow-products depend on inflows that are mixed on reused/recycled and new/virgin materials. Therefore, the information would be impractical or add significant administrative or reporting burden both for entity and across the value chains. There are currently quite some debates as to what can be defined as recycled, so if these DRs are to stay, EFRAG need to offer very clear guidance or support with good, illustrative examples as to what can be regarded as recycled materials and what can't.	ES	ES-5 - Resource outflows	17.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree The description of other recovery operations, item (c) iii, and of thermal-based disposal, item (d) i, are inconsistent with the EU waste regulation which leads to difference in the sustainability report compared to reporting under the waste regulation and possible to difference in application. This is, in particular, the case for "incineration", which can be interpreted to be included In both item (c) iii and (d) i. We suggest amending the definitions to match those of the waste regulation and waste hierarchy: -Prevention -Preparing for Re-use -Recycling -Other Recovery (incl. energy recovery) -Disposal At an Outreach event we, furthermore, understood, that there should by a link between the requirements in ESRS E5 and ESRS E1, and that energy recovery should be disclosed according to ESRS E1. If that is the case such link should be clearly stated and linked to the definition in the waste regulation.	ES	ES-5 - Resource outflows	18.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	One of the fundamental changes to the E5 standard regarding inflows is the expansion or addition of definitions for terms used within the standard. This is certainly a welcome development; however, in our opinion, there are still some inconsistencies in terminology that could cause interpretation problems in the future, both for reporting entities and audit firms. The proposed expanded definition of "Resource inflows" first defines inflows as "all materials, substances, and products entering an organization's operations or value chain for the purpose," but later in the definition clarifies that this includes "virgin and secondary raw materials (including energy carriers used for material purposes), semi-finished goods, and components, regardless of whether they are purchased, reused, or internally recovered." The remainder of the definition therefore refers to raw materials, semi-finished products, and components, but does not specify products (as indicated at the beginning of the definition). This may lead to confusion as to whether the issue of input resources is implicitly intended to apply only to producers who "process" raw materials, semi-finished products, and components to some extent. How does this apply to companies that purchase products (e.g., finished IT products, ready-made clothing) and sell them under their own brand (market them)?	ES	ES-4 - Resource Inflows	14.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I disagree	The proposal for a simplified ESRS E5 includes paragraph 4(a): "resource inflows (including mineral and biotic marine resources)." The emphasis on marine resources stems from changes to the ESRS E3 scope, but it is unclear whether water (both fresh and marine) should be treated as an input resource and disclosed in metric E5-4 (e.g., for companies using large amounts of water to produce goods)?	ES	ES-4 - Resource Inflows	4. (a)
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	The proposed simplified ESRS E5 states (new paragraph 15) that if input resources are considered material, the company must disclose the following information regarding key materials used in the production, placed on the market, or formed part of the supply of the company's products and services during the reporting period. This section of the ESRS therefore emphasizes that this issue also applies to key materials placed on the market (but also products). Referring to the revised definition of key materials, we notice that it specifies, among other things, that key materials can be sourced 'as is' or assembled in purchased goods and substances. Again, it seems unclear whether key materials should also be understood as finished products that the company does not process but merely sells on.	ES	ES-4 - Resource Inflows	15.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	The new paragraph 15(a) specifies that the entity discloses "the key materials used to manufacture products, deliver them, and/or provide services." In our opinion, it is unclear what information the entity is expected to provide here. Is this intended to describe all materials, substances, and products entering the organization's operations or value chain for production, consumption, maintenance, or service provision that the entity considers significant (with respect to the definition of inputs)? Or was the intention to present key materials broken down into categories identified in the definition of key materials, such as: plastic, plastic-metal composite, colored fabrics, solvents, wood, fabrics or fibers, glass, foam, adhesives, and finishes.	ES	ES-4 - Resource Inflows	15. (a)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	The new paragraph 15(b) specifies that an entity discloses "the total weight of key materials with a breakdown per key material (in weight or percentage of total weight)." Analyzing this point raises the question of how to approach multi-component materials (e.g., purchased IT equipment)? From a business perspective, the purpose of conducting and publishing these calculations is also puzzling. For example, one year, a company used 100 kg of plastics, and the next year, it reduced production and used 80 kg (the product's ecological footprint remained unchanged; the company only recorded a loss of revenue). Another company also used 100 kg of plastics, and the following year, it implemented resource-efficient solutions, reducing the amount of plastics in the product while simultaneously increasing the amount, and used 150 kg of plastics. What is the purpose of presenting this data from a stakeholder perspective?	ES	ES-4 - Resource Inflows	15. (b)
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I disagree	The new paragraph 15(c) specifies that the entity discloses "the percentage of total weight of critical and strategic raw materials." Considering the experience from the first year of reporting (problems with determining the weight of input resources) and the fact that the aim of the ESRS review is to reduce companies' sustainability reporting obligations, this requirement seems difficult to meet. How can companies purchasing semi-finished products or components collect data on the percentage and weight of individual critical and strategic raw materials? How can audit firms verify these calculations later?	ES	ES-4 - Resource Inflows	15. (c)
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	The new paragraph 15(d) specifies that an entity discloses "the percentage of the total weight of secondary resourced materials." Similar to the comment above, this point appears to require companies to collect detailed data from suppliers, and determining the weight of recycled materials in purchased raw materials, semi-finished products, or components may be difficult. How could auditors verify the value presented in this metric? Is a supplier's declaration that the material is recycled sufficient?	ES	ES-4 - Resource Inflows	15. (d)
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	The new paragraph 15(e) specifies that the entity discloses "the percentage of the total weight of key biological materials sustainably sourced." While the missing definition of biological materials is certainly valuable, the term is defined rather broadly and, in our opinion, may raise interpretation issues in the future. For example, trees are listed in the definition as the source of biological materials. Is impregnated/varnished wood still considered biological materials? Should all paper be considered biological materials? It seems advisable to refine the definition to clarify for entities what should be considered biological materials. The second issue related to this paragraph concerns what should be considered sustainably sourced biological materials. How can an auditor verify whether an entity has correctly determined the weight of key biological materials sustainably sourced? Should certificates, for example, be the only criterion (or are all of them sufficiently reliable)? In our opinion, this metric leaves much room for interpretation for reporting entities, and very little verification for auditors.	ES	ES-4 - Resource Inflows	15. (e)
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I disagree	In the new AR 2 (up to paragraph 15 a) the term "technical material" is written in bold, but the definition is not included in Annex II to [Draft] Amended ESRS Exposure Draft July 2025 – Aggregated acronyms and glossary of terms.	ES	ES-4 - Resource Inflows	AR 2
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	As explained in the Basis for Conclusions for the [Draft] Amended ESRS Exposure Drafts – July 2025, the terminology for resource outflows has been updated from the former term 'products and materials' to the revised 'products and services'. Analyzing the disclosures indicated in the new paragraph 17, it can be seen that they apply only to products. What information should a company disclose if it considers its services relevant to implementing a circular economy model?	ES	ES-5 - Resource outflows	17.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	while a reference to GDR is included in the standard to support undertakings on how to report about policies, actions, metrics and targets, no reference to financial effects related requirement is included. This could cause confusion.	ES	ES - Objective	1.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Please note that Annex II specifically mention to all materials, substances, and products; however, apparently, it does not encompass services.	ES	ES - Objective	4. (b)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	should then this be included in the the S2?	ES	ES - Objective	9. (e)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	what about the implications in affected communities? for instance, incineration activities may impact on neighborhood	ES	ES - Objective	9. (f)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Since this is referred to policies, should better the related commitments explain here, instead of the "how"?	ES	ES-1 - Policies related to resource use and circular economy	11.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	We would suggest to align this requirement with the ones included in GRI 306-5: disposal operations: i. Incineration (with energy recovery); ii. Incineration (without energy recovery); iii. Landfilling; iv. Other disposal operations.	ES	ES-5 - Resource outflows	18.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS E5 Resource Use & Circular Economy, when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, and targets (if in place), dependencies when relevant, metrics and financial effects Suggestion: When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS E5 Resource Use & Circular Economy, when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, metrics and targets (if in place), dependencies when relevant, metrics and financial effects.	ES	ESRS E5 - Objective	1.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Unnecessary duplication: The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M. In particular: (a) if the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact; (b) the undertaking may present the description of its material impacts, risks and opportunities, in accordance with [Draft] Amended ESRS 2 IRO-2, alongside information about its policies, actions, targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative Suggestion: The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M. In particular: (a)if the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact; (b)the undertaking may present the description of its material impacts, risks and opportunities, in accordance with [Draft] Amended ESRS 2 IRO-2, alongside information about its policies, actions, targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative .	ES	ESRS ES - Objective	5.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I agree	Removal is welcome as other regulation already drives the requirements regarding ESG risk management and there is no need to further address this within ESRS, especially for the financial services sector.	ES	Disclosure Requirement E5-6 - An-cipated financial effects from material resource use and circular economy-related risks and opportunies	n/a
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We reject this new data point on the disclosure of critical and strategic materials, as this is sensitive information that we will not publish.	ES	ES-4 - Resource Inflows	15. (c)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	At the end of the sentence the following should be added "and indicate all identified material negative impacts and risks that remained unaddressed by actions during the reporting year"	ES	ES-2 - Actions and resources related to resource use and circular economy	12.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	At the end of the sentence the following should be added "against each action disclosed under DR G1-2".	ES	ES-3 - Targets related to resource use and circular economy	13.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	The information disclosed should only relate to "key materials" used by the entity. Although a definition of key material is provided, the selection criteria are very general and may be omitted.	ES	ES-4 - Resource Inflows	15.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	Par. 15 is inconsistent regarding role of packaging materials in undertaking's resource inflows. The definition (Annex II) states that packaging are: "products made of any materials of any nature to be used for the containment, protection, handling, delivery, storage, transport and presentation of goods, from raw materials to processed goods, from the producer to the user or consumer". Therefore, packaging materials are not only those that are "part of the delivery", but they are used in all processes of product creation from resources extraction to products presentation. Also, materials used for packaging purposes may significantly differ from the materials used in products. Often, materials used for packaging have higher potential for recycling than materials used for products themselves. In conclusion, our suggestion is to include packaging as a important group of materials considered in DR 15 by replacing phrase "product and services" with phrase "products and it's packaging and services".	ES	ES-4 - Resource Inflows	15.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	Par. 15 d) is inconsistent regarding requirement of disclosing "recycled materials used". Annex II neither defines "recycled materials" nor "recycling". Annex II defines only "secondary resources" as "materials previously used (secondary) and that are recovered from waste streams and reintroduced into production cycles, reducing reliance on primary resources and minimizing environmental impact." For clarity, "recycled materials" should be defind and included in "secondary resources" definition.	ES	ES-4 - Resource Inflows	15. (d)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	Par. 17 d) is inconsistent regarding definition of "secondary resourced materials". "Secondary resources" are defined (Annex II) as "Materials previously used (secondary) and that are recovered from waste streams and reintroduced into production cycles, reducing reliance on primary resources and minimizing environmental impact." However, DR 17 d) requires disclosing of the rate of "recycled materials used", whereas Annex II neither defines "recycled materials" nor "recycling". For clarity, "recycled materials" should be defind and included in secondary resources definition.	ES	ES-5 - Resource outflows	17. (d)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	Par. 15 a) should be consistently amended to address packaging of the products. We propose the following wording: "the key materials used to manufacture products and their packaging, deliver them and/or provide services;"	ES	ES-4 - Resource Inflows	15. (a)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	Par. 17 d) should be consistently amended to address packaging of the products. We propose the following wording: "the rate of recycled materials in its key products and their packaging."	ES	ES-5 - Resource outflows	17. (d)
Excels	Taskforce on Nature-related Financial Disclosures	Standard setting initiative	United Kingdom			I partially agree and partially disagree	The disclosure of dependencies has been further weakened (to 'when relevant') in the new paragraph 1. The TNFD suggests to remove the specification 'when relevant' in paragraph 1 and reinstate, either at the level of ESRS 2 or at the level of the individual topical standard, a similar text to the Set 1 paragraphs, such as the one asking for disclosure of 'the nature, type and extent of the undertaking's material (...) dependencies (...) related to [Resource use and circular economy], and how the undertaking manages them'.	ES	E5 - Objective	1.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I agree	agree that these exceptions to the general rule are appropriate and justified.	ES	ES-4 - Resource Inflows	15.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	regarding the Critical Raw Materials Act, but if there is already a reporting obligation based on that Act, this new datapoint does not create an additional reporting burden and it does provide useful information to users of an Annual Report.	ES	ES-4 - Resource Inflows	15.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I agree	Agree with the rationale that is given.	ES	ES-5 - Resource outflows	16.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	The DASB suggests that the standard also explains how a preparer should handle if materials that are initially waste reach the 'End-of-waste criteria'. These specify when certain waste ceases to be waste and becomes a product, or a secondary raw material. Waste Framework Directive - European Commission Should these amounts be deducted from the waste numbers? And if so, how to handle if there is a time lag? [This question is not specific to the amendments, but already present from the first Set of ESRS]	ES	ES-5 - Resource outflows	18.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I disagree	The basis for much of the information in the Circular Economy ESRS is the availability and reliability of metadata (e.g., if this piece of wood comes from a sustainably managed forest, does that also mean that this table—composed of multiple pieces of wood—is made from sustainable wood?). How this should be arranged or managed by companies is unclear. In other ESRS topics, guidance is provided on what to use (e.g., scenario analysis), but here it is missing.	ES	ES-4 - Resource Inflows	15.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I disagree	An important foundation is having insight into the chain of custody/production chain of the raw materials used. At present, this is absolutely not transparent, even though this is requested under points c. and d. The proposal is to mention the Chain of Custody ISO standard here as a possible option.	ES	ES-4 - Resource Inflows	15. (b)
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Please note that this comment relates to the objective - paragraph 5 does not seem consistent with the other standards (for example E4).	ES	ES-1 - Policies related to resource use and circular economy	10.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Please note that this comment relates to the objective - paragraph 6 references to a disclosure objective of each DR, but I think this should be removed (also saw this in other E-standards)	ES	ES-1 - Policies related to resource use and circular economy	10.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Please note that this comment relates to the objective - paragraph is not visualised in a consistent way with E2/3/4 (there bullets are used). Also the dcomment in line with the comments on E2/3/4: it shows several legislations but there is no data-point referencing to it afterwards. As this only should be discloses when relevant and material, this probably will be adressed if it is relevant. It might be misleading to include the frameworks in the objective as it could lead to reporting immaterial information. In the log of amendments file I read it that it is now included because it was used as a source for the standard, then it can better be included in the standard as a source then as an objective.	ES	ES-1 - Policies related to resource use and circular economy	10.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Objective 8.) with 4 references to other EU Regulations increase complexity and uncertaintiy for preparer of sustainability statement. Please delete these references.	ES	ES-1 - Policies related to resource use and circular economy	10.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	- Due to a missing comparable definition of key materials this DR is not aligned with the Qualitative characteristics of information in ESRS 1 - Appendix B) and it won't be comparable to other companies. Thus, DR 15 a. & b. should be deleted. - The draft refers to various categories of raw materials, including "critical raw materials," "strategic raw materials," "key materials," and "secondary raw materials." However, only "critical raw materials" and "secondary raw materials" are defined in Annex II. The terms "strategic raw materials" and "key materials" are not included in the glossary, creating ambiguity and potential inconsistency in interpretation. This may hinder consistent application of the disclosure requirement across reporting undertakings. - Reporting on "strategic raw materials" is not about ESG/sustainability reporting. Reporting must not be used as vehicle for data-collection for geostrategical questions of the European Union.	ES	ES-4 - Resource Inflows	15.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	For waste management companies it would be suitable to report on waste generated by their own operation, but also total waste managed due to the following breakdowns c., d. ,e.	ES	ES-5 - Resource outflows	18. (b)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	The change of the denominator in the Exposure Drafts is unclear. Previously, both the share of secondary reused/recycled materials and the share of bio-based (sustainably sourced) raw materials were determined in relation to the total amount of raw materials. Now, for bio-based (sustainably sourced) raw materials, the denominator has been changed to the amount of bio-based raw materials only. The previous approach was more intuitive keeping the same denominator and the new one may result in confusion due to a company reporting a very high percentage, while in absolute terms the share of bio-based raw materials in the total remains rather small.	ES	ES-5 - Resource outflows	AR 1
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Standardised global reporting is difficult (e.g. definition of "hazardous waste" in the ESRS glossary: "Waste which displays one or more of the hazardous properties listed in Annex III of Directive 2008/98/EC"). Reporting according to local definitions and legal provisions should be made possible. This ESRS is not clearly defined and causes legal uncertainties. We recommend specifying these data points more closely or deleting them.	ES	ES-5 - Resource outflows	
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Combination of Data points with glossary: Definition of "Hazardous Waste" should be amended to "or local law" since no double-accounting shoule be necessary to fulfil only reporting requirements (e.g. measuring according to local law in non-EU-countries and addtional to Annex III of waste framework directive)	ES	ES-5 - Resource outflows	
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	'- Recyclable content: This is a new metric (rate of recycled materials) which will lead to a significant increase in burden. The data is currently not available, lack of common methodolgy and standards, disproportionate costs (especially for companies using a large number of raw materials, ingredients, etc.).. - It is suggested to qualify this requirement as qualitative. - It is suggested to apply/limit this requirement only to "key materials" as defined in Annex II to the Amended ESRS Exposure Draft July 2025.	ES	ES-5 - Resource outflows	17. (c)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	- Too granular, data currently not available and disproportionate costs. Data retrieval is very difficult since operators involved in disposal-related activities often are not direct partners of the company generating waste. - Reporting information on the value chain activities will be difficult for the first years and we suggest to qualify this information as qualitative or to consider adopting a phase in approach.	ES	ES-5 - Resource outflows	18. (d)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Companies that do not use radioactive substances in their production processes should not be required to report them. Exceptions should be introduced for laboratory applications, measuring instruments, markers, naturally occurring radioactive materials, and activities below the exemption threshold of radiation protection legislation, in order to avoid the effort of reporting insignificant quantities and negligible exposures.	ES	ES-5 - Resource outflows	19.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	General comment: EFRAG should develop comprehensive non-mandatory implementation guidance for each topical standard, including ESRS E5. The guidance should comprise instructions and examples how to conduct the materiality assessment for the topic, how to apply the disclosure requirements, and to calculate the metrics. Sectoral examples could be added, where appropriate.	E5	E5 - Objective	1.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Para. 7 should in addition to the Green Deal also mention the Clean Industrial Act.	E5	E5 - Objective	7.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	We welcome the introduction of "key materials" in the standard, which increases the proportionality of DR E5-4. However, the introduction of "key materials" comes with the challenge of defining the term appropriately. The current definition is not fit for purpose, leaving too much room for inconsistent interpretations. In line with EFRAG's mandate to increase consistency with other pieces of EU legislation, we recommend to define key materials as follows: 1.materials included in the "list of relevant raw materials" under Art. 6 of Regulation (EU) 2024/1244 (Industrial Emission Portal-Regulation), if used by the undertaking, complemented by 2.additional materials that are essential for the undertaking's manufacturing and delivery of products and services or that are a driver of its material impacts, risks and opportunities. This approach would ensure a uniform and clear basis of what is considered a key material and would leave flexibility for companies to include additional materials that are relevant to their specific circumstances. The delegated act under Art. 6 IEP-Regulation is to be adopted by 31 December 2025 and would therefore be in time for the ESRS revision.	E5	E5-4 - Resource Inflows	15.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	While we consider the metrics proposed by EFRAG a step forward, we question the relevance of metrics that are based on the total weight of materials, since the use of different materials can vary by many orders of magnitude and the overall amount does not provide a good indication of environmental or social impacts, nor (financial) risks and opportunities. We, therefore, suggest to focus on the following datapoints in [Draft] amended ESRS E5-4: 1.the key materials used to manufacture products, deliver them and/or provide services 2.for each key material, whether it contains critical raw materials or strategic raw materials 3.the overall number of critical and strategic raw materials that are contained in its key materials 4.the percentage of key materials in dry weight that are from secondary sources. (text proposal see next line)	E5	E5-4 - Resource Inflows	15.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Text proposal for new set of metrics: "15. When 'Resource Inflows' is assessed as a material topic, the undertaking shall disclose: a) the key materials used to manufacture products, deliver them and/or provide services; and for each key material: (i) whether it contains critical raw materials or strategic raw materials; (ii) the percentage in dry weight that is from secondary sources; (b) the overall number of critical and strategic raw materials that are contained in its key materials	E5	E5-4 - Resource Inflows	15.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Text proposal for new application requirements: "Para. 15 (a)(i): Key materials can be raw materials, components or products procured. In case of key materials that are components and products, the undertaking shall report whether these contain critical raw materials or strategic raw materials. Para. 15 (a)(ii): The percentage ratio shall be calculated by dividing the dry weight of the key material that is from secondary sources by the total dry weight of the key material procured in the reporting period. The requirement also applies to key materials that are components or products. Para. 15 (b): If critical or strategic raw materials are contained in more than one key material, their number shall not be double counted." NMIG: include an examplary reporting template (table), with columns "Key material", "Is or contain a critical raw material?", "Is or contains a strategic raw material", "% of key material that is from secondary sources". Lines are the respective key materials.	E5	E5-4 - Resource Inflows	15.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Please consider the following proposals for ESRS E5-related terms and definitions: - Generally, we recommend to cross-check all definitions with the terminology from ISO 59004:2024 "Circular economy — Vocabulary, principles and guidance for implementation" and relevant legislation. - "resources" is used frequently in the, but not defined. It should be clarified in a separate definition that "resources" means "material resources" in the ESRS, not natural resources more broadly, nor financial nor human resources. This would help to clarify and be in line with how The International Resource Panel at UNEP is using the term. - "Circular economy principles" is used inconsistently and should be aligned with common frameworks such as 10R or Narrow/Slow/Close/Substitute. - "circular material use rate" is defined but not used in the standard. The definition is also unclear because it does not define "circular material use" and does not link to the definition of "secondary resources". It should be deleted.	E5	E5 - Objective	1.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Further on definitions: - The new definition for "resource efficiency" introduces the term "material consumption" which is not explained. Instead, the definition should refer to the already defined term "resource inflow". We also not that resource efficiency is not used in ES. - The new definition for "secondary resources" misses the fact that those resources can also come from non-waste streams, e.g. by-products such as metallurgical slags. Hence, it should be amended to "waste and non-waste streams" - "sustainably sourced" is referring only to the assessment of direct suppliers. It is not in line with the OECD Guidelines for Multinational Enterprises for Responsible Business Conduct. Moreover, the term is not correctly used in the standard. The definition should either be removed or fundamentally revised. If our proposal to amend the set of metrics is adopted, the definition would not be needed anymore.	ES	ES - Objective	1.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Further on definitions: - the defintiion of „Critical raw materials" should be extended by "low end-of-life recycling input rates", so that it reads: „Critical raw materials are materials that have high economic importance and are subject to supply risk, due to factors such as geographic concentration, economic or geopolitical limitations, low end-of-life recycling input rates, or difficulties in substitution. Critical raw materials are those listed in Annex II, Section 1 in the Critical Raw Materials Acts (2023)."	ES	ES - Objective	15. (c)
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	Further on definitions: - in the definition of "strategic raw materials", the phrase "subset of critical raw materials" should be deleted. It should better align with the CRMA, which states in recital 6: "raw materials that are of high strategic importance for the functioning of the internal market, taking into account their use in strategic technologies underpinning the green and digital transitions or for defence or aerospace applications, that are characterised by a potentially significant gap between global supply and projected demand, and for which an increase in production is relatively difficult, for instance due to long lead-times for new projects increasing supply capacity." and in Art. 3 (2): "the raw materials that score among the highest in terms of strategic importance, forecasted demand growth and difficulty of increasing production."	ES	ES - Objective	15. (c)
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	"Circularity" is highlighted as a defined term but not included in Annex II (Glossary). It should be defined in the finalization of the standard.	ES	ES-1 - Policies related to resource use and circular economy	11.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	"Circularity" is highlighted as a defined term but not included in Annex II (Glossary). It should be defined in the finalization of the standard.	ES	ES-4 - Resource Inflows	14.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	It should be be specified whether the reported weight of waste is in dry- or wet weight (which is especially relevant for organic waste).	ES	ES-5 - Resource outflows	AR 4
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	The definition of "durability" should be aligned with the definition in the ESPR: " 'durability' means the ability of a product to maintain over time its function and performance under specified conditions of use, maintenance and repair;"	ES	ES-5 - Resource outflows	17. (a)
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	The definition of "ecodesign" should be aligned with the definition in the the ESPR: "'ecodesign' means the integration of environmental sustainability considerations into the characteristics of a product and the processes taking place throughout the product's value chain;"	ES	ES-1 - Policies related to resource use and circular economy	11.
Excels	German Federal Agency for Nature Conservation (BfN)	Public authority	Germany			I partially agree and partially disagree	The definition of "scope of repairability" should not relate to "placing on the market" since this is not a product characteristc and, in line with the ESPR definition for "repair", also cover waste: "Extent to which a product or waste is designed in a manner that enables it to be restored to proper functioning through repair activities, taking into account factors such as product design, ease of disassembly, availability of spare parts and tools, accessibility of repair and maintenance information, and the legal and practical conditions under which end- users, professional repairers, or independent operators can carry out such repairs..."	ES	ES-5 - Resource outflows	17. (b)
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	For issuers that are not producers, but still find resource inflows material (eg. Electronics resellers), there should be a relief allowing for qualitative disclosure based on industry analysis and averages, as extracting data from electronics producers is often difficult and would require significant administrative effort.	ES	ES-4 - Resource Inflows	15.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	For issuers that are not producers (eg. Electronics resellers), there should be a relief allowing for qualitative disclosure based on industry analysis and averages, as extracting data from electronics producers is often difficult and would require significant administrative effort, not proportional to the value for end user.	ES	ES-5 - Resource outflows	17.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	Issuers that are not producers should be exempted from this requirement.	ES	ES-5 - Resource outflows	17. (c)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Disclosure should be limited not only to key materials (already in the current Draft) but also "key products and services" (new suggestion for reducing the reporting burden while maintaining a comprehensible level of disclosure)	ES	ES-4 - Resource Inflows	15.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is suggested to clarify that this DR applies only to companies that are subject to the CRM Act: "the percentage of total weight of critical and strategic raw materials, whenever the undertaking is required to assess those material flows according to the CRM Act regulations".	ES	ES-4 - Resource Inflows	15. (c)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The description of the interaction with other ESRS in this standard differs from that in other environmental ESRS. Rather than clearly delineating the boundaries for disclosures between the standards, it presents more of an interpretation or opinion. Recommend revising Disclosure Requirement E5-9 (items a to f) to enhance clarity and consistency. The updated text should eliminate subjective language and instead establish clear, factual boundaries for reporting across the relevant ESRS standards.	ES	E5 - Interaction with other ESRS	9.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I agree	We support the changes proposed.	ES	ES-2 - Actions and resources related to resource use and circular economy	2.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	The concept of recyclable content in the chemical industry is not as straightforward as in other industries for several reasons: i) many chemical products are being transformed in their first life cycle step and cannot therefore be considered recyclable, ii) the concentration of a chemical substance in a product will have an impact on the recyclability of the product, and iii) recyclable content of chemicals in products depends on the existence of collection/separation and re-marketing facilities.	ES	ES-5 - Resource outflows	17. (c)
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	While we agree with the changes proposed, additional definitions (e.g. sustainable-sourced products, secondary intermediary product) and clarifications (need for specific certifications for sustainably-sourced products, minimum content of biological material for considering a product as sustainable-sourced, minimum content of reused or recycled components in products/packaging for considering a raw material/packaging as covered by this datapoint) are required in [DRAFT] paragraphs 15 (d) and (e).	ES	ES-4 - Resource Inflows	15.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The definition of hazardous waste is based on an EU regulation. For a multinational organization, it is not practible nor in accordance with local laws, to account waste based on EU frameworks. Waste categorization is highly location-specific, and thus - should allow for some flexibility in terms of definition. In such cases, the ESRS may propose a "preferred" definition - however, should higlight that different definitions of hazardous may be applicable depending on global footprint.	ES	ES-5 - Resource outflows	18.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I agree	Switch from quantitative metric to narrative-based is appreciated.	ES	ES-5 - Resource outflows	17.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I agree	Switch from quantitative metric to narrative-based is appreciated.	ES	ES-5 - Resource outflows	17.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Concept of “Remanufacturing” – is defined but not mentioned in the E5 standard. It is therefore not clear where it should be considered.	ES	ES-5 - Resource outflows	18.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is unclear how does the E5 Standard consider By-Products. By-Products are defined in the EU Waste Directive, but not explicitly allocated to either metric element for Resource inflows or outflows.	ES	ES-5 - Resource outflows	18.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	“Recyclable” and “Recycled” materials are not specifically defined; it is unclear whether the definitions of “Recycling” are to be considered in this context.	ES	ES-5 - Resource outflows	18.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is unclear whether "recycling" covers by-products or only materials that were recovered from waste streams, excluding by-products; and whether materials such as supplementary cementitious materials are covered (i.e. materials that were not necessarily used previously, but produced as by-product in production processes without direct use, and then used as input material, thereby diverting the volume from waste). Overall, the concept of "recyclability" in the chemical industry is not as straightforward as in other industries since i) the concentration of a chemical substance in a product will have an impact on the recyclability of that product (both technical and financial), and ii) recyclable content of chemicals in products depends on the existence of collection/separation and re-marketing facilities.	ES	ES-5 - Resource outflows	18.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	It is unclear if the definition of “secondary reused materials” covers by-products or materials such as supplementary cementitious materials (i.e. materials that were not necessarily used previously, but produced as by-product in production processes without direct use, and then used as input material, thereby diverting the volume from waste).	ES	ES-4 - Resource Inflows	15.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Circular material use rate is defined but not mentioned elsewhere in the E5 standard draft. It is unclear if this metrid is supposed to be linked to Resource Inflows or Resource Outflows. Need more clarification for what is meant by "circular use" (i.e. recovered, reused, recylced).	ES	ES-4 - Resource Inflows	15.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	The change of the denominator in the Exposure Drafts is unclear. Previously, both the share of secondary reused/recycled materials and the share of bio-based (sustainably sourced) raw materials were determined in relation to the total amount of raw materials. Now, for bio-based (sustainably sourced) raw materials, the denominator has been changed to the amount of bio-based raw materials only. The previous approach was more intuitive keeping the same denominator and the new one may result in confusion due to a company reporting a very high percentage, while in absolute terms the share of bio-based raw materials in the total remains rather small.	ES	ES-5 - Resource outflows	1.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We would like to flag a potential timing issues with the ESPR, since the publication of the relevant Delegated Acts for all the sectors will take several years. A relief measure/postponement could be included.	ES	ES-4 - Resource Inflows	15. (c)
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	The ESRS requirements for reporting waste should be aligned or mapped with the Recovery and Disposal Operations codes outlined in Annex I and Annex II of the Waste Framework Directive (WFD) (Directive 2008/98/EC). Currently it is unclear and open to too much interpretation on whether waste that is thermally treated, either at waste-to-energy plants or high-temperature incineration plants which recover energy and generate electricity and district heating, should be reported as “other recovery operations” or “thermal-based disposal/incineration”).	ES	ES-5 - Resource outflows	1.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	We suggest the following changes in the Disclosure Requirement ESS-5 – Resource outflows paragraph 18(c): c) the percentage and/or total weight diverted from disposal, with a breakdown between hazardous waste and non-hazardous waste, and a breakdown by the following recovery operation types: i. preparations for reuse; ii. recycling; and iii. other recovery operations; (This type should be split into material recovery and energy recovery. The option energy recovery should include recovery code R1 (Use principally as a fuel or other means to generate energy) as outlined in the Annex II of the Waste Framework Directive (Directive 2008/98/EC).) (d) the percentage and/or total weight directed to disposal with a breakdown between hazardous waste and non-hazardous waste, and a breakdown by the following disposal operation types: i. thermal-based disposal; (We believe that this type should be reverted back to incineration, and it should only include disposal codes D10 (Incineration on land) and D11 (Incineration at sea) as outlined in Annex I of the Waste Framework Directive (Directive 2008/98/EC)). ii. landfill; and iii. other disposal operations)	ES	ES-5 - Resource outflows	18. (c)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Analogous to ES-4, it should be made clearer that the metrics for resource outflows are only to be reported if the sub-topic has been assessed as material. The requirements are formulated more clearly and concisely. There is no definition of 'key products'. With a wide variety of products in countless areas of application, a pragmatic answer must be possible.	ES	ES-5 - Resource outflows	17.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Analogous to ES-4, it should be made clearer that the metrics for waste are only to be reported if the sub-topic has been assessed as material	ES	ES-5 - Resource outflows	18.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Resource inflows is mentioned as a sub-topic in the topics list in ESRS Appendix A, so the sentence should be adapted to "When 'Resource Inflows' is assessed as a material sub-topic [...]". In this context, the topic list in Appendix A should already indicate that resource inflows only refer to key materials and not e.g. to components, so that the sub-topic is not considered material due to components.	ES	ES-4 - Resource Inflows	15.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	In the definition of key materials, the phrase "(can be sourced 'as is' or be assembled in goods and substances purchased)" should be deleted to clarify that it refers only to materials and not to prefabricated components/assemblies	ES	ES-4 - Resource Inflows	15.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	This is difficult to answer without burdening the supply chain with information about preliminary products. It should be possible to use standard values/average values here.	ES	ES-4 - Resource Inflows	15. (d)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	'total weight of critical and strategic raw materials' not meaningful; very high data collection efforts necessary, especially for critical/strategic raw materials that are/might be included in other products	ES	ES-4 - Resource Inflows	15. (c)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	why are 'critical and strategic raw materials' mentioned? - strategic might be deleted, as all strategic raw materials listed in Critical Raw Materials Act are listed as critical raw materials too	ES	ES-4 - Resource Inflows	15. (c)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	'critical and strategic raw materials' is not material for all companies and should therefore be marked as optional datapoint	ES	ES-4 - Resource Inflows	15. (c)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	'biological materials' is not material for all companies and should therefore be marked as optional datapoint	ES	ES-4 - Resource Inflows	15. (e)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	This seems an extension of the DA. The content was moved from ES-5 Resource inflows and now includes the term "eco-design principles" which is not mentioned in the DA-	ES	ES-1 - Policies related to resource use and circular economy	11.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	The introduction of a new KPI counteracts the aim of reduing the reporting requirements and burden. Based on the new KPI, resource inflow needs to be reported on a more granular level, which increases the data requirement again. Not only is the information extremly challenging to obtain (as it requires information from the value chain and migh need IT adjustments) but transparency on the purchased material structure is sensitive information and might lead to competitive disadvantages.	ES	ES-4 - Resource Inflows	15. (c)
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	It is unclear what constitute "materials used to manufacture the undertaking's products and services". Is the generation and sale of electricity in scope? Is the construction and sale of power plants in scope? Should we only include the key materials that goes into the production of products/services, and exclude key materials that goes into the construction of new manufacturing facilities or power plants?	ES	ES-4 - Resource Inflows	15.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	Is energy (e.g., electricity, district heating) considered a product? If an undertaking is building and selling power plants, are the power plants considered products?	ES	ES-5 - Resource outflows	17. (a)
Excels	SAIM GmbH	Consultant (including software vendor)	Germany			I partially agree and partially disagree	In case of a high consuming and producing company, some types of waste my be immaterial when comparing total volumes. For resource inflows for instance it is clearly stated that you should only indicate numbers and figures for material resources, this clarification is lacking for especially waste and may help to avoid discussions with auditors.	ES	ES-5 - Resource outflows	18.
Excels	SAIM GmbH	Consultant (including software vendor)	Germany			I agree	ESRS 5 Resource outflows is the only standard where "product groups" are mentioned. However there is no further explanation what is meant by product groups. Also the NMIG doesnt mention examples. Please add a clarification or examples what is meant by product groups.	ES	ES-5 - Resource outflows	17.
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	At present, the notion of critical and strategic raw materials may evolve over time with the development of the Critical Raw Materials Act, and as the delegated acts deriving from the Eco-design for Sustainable Products Regulation are not yet approved. Companies consider this information hard to access and publish, particularly since these materials are often mixed with others. In this evolving context, this datapoint shall be inserted in the NMIG. For issuers that are not producers, but still find resource inflows material, a phase-in approach should be adopted targeting at the begining product that are designed by those issuers.	ES	ES-4 - Resource Inflows	15. (c)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	"Preparation for reuse" does not correspond to any of the R/D codes of the Waste framework directive. This information should be retained only in the narrative part. In the future French translation of this standard, the title should be corrected to refer to "réutilisation" rather than "réemploi". Issuers that are not producers should be exempted from this requirement if no public database are available.	ES	ES-5 - Resource outflows	18. (c)
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	What is the added value of this information? It should also be noted that some wastes are diverted from disposal, but their final destination remains unknown.	ES	ES-5 - Resource outflows	18. (e)
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We propose re-integrating the breakdown between key technical and biological materials. The integration of this information would be useful for readers and for the organizations to better categorize the large family of "materials".	ES	ES-4 - Resource Inflows	15. (b)
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We propose providing a more precise description of what "sustainably sourced" means, so that the organization can better understand what should be reported. We also suggest revising the definition in the glossary.	ES	ES-4 - Resource Inflows	15. (e)
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We noted an inconsistency in the denominators. We propose also defining a comprehensive denominator for paragraphs 15 (c), (d), (e), in order to semplify and harmonize the reporting requirements for companies.	ES	ES-4 - Resource Inflows	AR 1
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Good definition and focus of "key materials" for manufacturing. No mention anymore of process materials, packaging, water and property, plant and equipment.	ES	ES-4 - Resource Inflows	15. (a)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Further „breakdown per key material" involves increased and additional effort. Currently there is just an overall total weight of technical and biological materials necessary	ES	ES-4 - Resource Inflows	15. (b)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Not evaluable with current IT-Tool landscape	ES	ES-4 - Resource Inflows	15. (c)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Good focus on „secondary resourced materials". No mention anymore of reused and recycled materials/ components and packaging.	ES	ES-4 - Resource Inflows	15. (d)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Good definition of biological materials and focus of percentage with sustainably sourced materials on total weight of key biological materials.	ES	ES-4 - Resource Inflows	15. (e)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Rate of recyclable materials and their packaging ? Is here the focus just on the "recyclability of materials in product" and should packaging (like product protection) disclosed separately	ES	ES-5 - Resource outflows	17. (c)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Further "rate of recycled materials used in its "key products"" involves increased and additional effort. Added value questionable because 15. (d) "percentage of total weight of secondary resourced materials" also in the key products indirectly included	ES	ES-5 - Resource outflows	17. (d)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	This new requirement would entail additional work if this case were to arise.	ES	ES-5 - Resource outflows	18. (e)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Significant improvement, as the example makes it clearer what level of detail is required here.	ES	ES-5 - Resource outflows	AR 5
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	No objection	ES	ES-5 - Resource outflows	AR 4
Excels	PwC International Limited	Auditor	United Kingdom			I agree	The scope of the requirement to disclose metrics on key materials (used to manufacture, put on the market, or part of the delivery of the undertaking's products and services) is still ambiguous. The term 'undertaking's products and services' is not defined, raising questions about whether this obligation applies to retail chains, distributors, or importers (i.e. entities that buy and resell products)—or whether it applies solely to entities that manufacture using their own factories or outsourced production. Additionally, it is unclear if the reference to materials that are "part of the delivery" includes packaging, which is no longer explicitly mentioned in the current provisions. For service providers, such as real estate developers, it is also uncertain whether materials used in the execution of services—like building materials—must be reported under this requirement.	ES	ESRS E5 - Objective	15.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The objective described in para. 1 of each draft topical ESRS is inconsistent with Draft ESRS 1. The statement about "dependencies when relevant" and "financial effects" should be deleted to make it consistent with ESRS 1. Change the wording to: "When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS E5 Resource Use & Circular Economy, when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, metrics and targets (if in place)."	ES	E5 - Objective	1.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Remove parts (a) and (b) and keep the introductory paragraph to avoid unnecessary duplication. Paragraph 5 should read as follows: "The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M."	ES	E5 - Objective	5.
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I disagree	Comment on Disclosure Requirement 18 (a–c) – Waste: When applying the ESRS at the consolidated level—particularly where the ultimate parent company is located outside the EU—significant challenges arise due to differing definitions and classifications of "waste" across countries and regions. These inconsistencies make straightforward aggregation of waste data impractical and may lead to misleading disclosures. Recommendation: Consider removing this requirement.	ES	ES-5 - Resource outflows	5.
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Since Outflow now focuses on key products, more efficient disclosure is possible. Similarly, Inflow now focuses on key materials, but since it does not focus on key products, the scope of disclosure differs from Outflow. Therefore, Inflow should also focus on key materials of key products.	ES	ES-4 - Resource Inflows	14.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Regarding the percentage of total weight of critical and strategic raw materials, in order to be consistent with the CRM act, the target should be limited to raw materials that are extracted, processed, and recycled within Europe, rather than all products sold in Europe.	ES	ES-4 - Resource Inflows	15. (c)
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	(We basically recommend deleting DR 18(a–c) on waste for the reasons stated in ES-5.) Previously, there was a condition that "The undertakings for which outflows are material shall disclose." However, this condition was deleted in this amendment and all undertakings are required to disclose. On the other hand, In ES-4, the condition is set as "When 'Resource Inflows' is assessed as a material topic,". We request to align the condition of outflows and inflow to disclose.	ES	ES-5 - Resource outflows	17.
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	(We basically recommend deleting DR 18(a–c) on waste for the reasons stated in ES-5.) There is a requirement to disclose recyclability, but the definition is unclear.	ES	ES-5 - Resource outflows	17. (c)
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	(We basically recommend deleting DR 18(a–c) on waste for the reasons stated in ES-5.) Disclosure of the recycling material usage rate has been added, but this is almost the same as the disclosure of secondary resourced materials in Inflow 15(d), resulting in duplication. Therefore, only one of the two should be disclosed.	ES	ES-5 - Resource outflows	17. (d)
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	(We basically recommend deleting DR 18(a–c) on waste for the reasons stated in ES-5.) Waste has become one of the items in ES-5 resource outflow, but while Products and services target key products, Waste does not have a specific target. As with Products and services, Waste should target operations related to key products.	ES	ES-5 - Resource outflows	18.
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	(We basically recommend deleting DR 18(a–c) on waste for the reasons stated in ES-5.) We request clarification of the scope of "waste" in "total weight of waste for which the final destination is unknown." It should be clarified whether "waste" covers all waste or only specific categories of waste.	ES	ES-5 - Resource outflows	18. (e)
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The introduction of a new KPI counteracts the aim of reduing the reporting requirements and burden. Based on the new KPI, resource inflow needs to be reported on a more granular level, which increases the data requirement again. Not only is the information extremly challenging to obtain (as it requires information from the value chain and migh need IT adjustments) but transparency on the purchased material structure is sensitive information and might lead to competitive disadvantages.	ES	ES-4 - Resource Inflows	15. (c)
Excels	ETSA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	ETSA members question the feasibility of establishing environmental targets linked to science and ecological thresholds, as suggested in GDR-T, especially for resource-related targets. In order for preparers to do so, target setting methodologies should be elaborated.	ES	ES-3 - Targets related to resource use and circular economy	13.
Excels	ETSA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	When reporting on "the rate of recycled materials" ETSA members stress the fact that if no or only limited proportions of recycled materials can be used due to technical standards – that this should be taken into account when comparing companies, industries and applications in terms of sustainability performance. In the field of personal protective equipment in particular, the use of recycled fibres can only be possible to a limited extent without compromising the necessary safety standards. ETSA members that report on the rate of recycled content in textiles will provide the necessary context on why certain levels of recycled content can(not) be integrated.	ES	ES-5 - Resource outflows	17. (d)
Excels	ETSA	Business association (other than association of financial institution)	Belgium			I agree	ESRS ES is largely seen as consistent with its previous iteration. ETSA welcomes the clearer link that is being made with other flagship legislative packages like the Circular Economy Act, the CRM act and the ESPR.	ES	ES - Objective	8.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	This streamlines the process by no longer considering the value chain. However, this now requires more disclosures. More clarification is needed for "key materials".	ES	ES-4 - Resource Inflows	15.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The process is now streamlined as only "key" products are required. However, more clarity is needed for the wording "key"	ES	ES-5 - Resource outflows	17.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	While the aim of this amendment is to bring more flexibility because it allows companies to report percentages instead of amounts, this DR is still burdensome because: - The amended waste requirements introduce a new metric that increases reporting burden by adding categories not aligned with the EU Waste Framework Directive, specifically for waste with an "unknown final destination". Creating a separate category forces companies to maintain parallel reporting systems, leading to overlap and reduced comparability. - There is no prescription on how to consider the upstream value chain if waste is identified as a material topic only in the company's value chain (i.e. in case it is not material in its own operations).	ES	ES-5 - Resource outflows	18.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Suppliers currently do not have a legal obligation to provide information on recyclability. As a result, disclosure provided by undertakings will be purely based on available information in the value chain and cannot be verified. On the other hand, it is required by companies to list the material composition and EoL instructions (including recycling potential) in the digital product passport required by the ESPR. The information provided in the digital product passport is specific to each product and will allow users to take more informed decisions. In view of this, CSRD should either: a. Mandate the accurate provision of material composition and/or recyclability information supplied to downstream users by suppliers, or b. Make this DR non-mandatory since the pertinent information is already available in the digital product passport. Current ESRS definitions do not clearly define key products and materials leading to potential discrepancy across companies to report KPIs related to the same. Clear guidance is needed on definition of key products or materials.	ES	ES-5 - Resource outflows	5.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	A standard metrics / a general classification scheme is required for industry wide usage across the KPIs required for resource inflows to enable standardization across companies for reporting.	ES	ES-4 - Resource Inflows	4.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	At present, the notion of critical and strategic raw materials may evolve over time with the development of the Critical Raw Materials Act, and as the delegated acts deriving from the Eco-design for Sustainable Products Regulation are not yet approved. Companies consider this information hard to access and publish, particularly since these materials are often mixed with others. In this evolving context, this datapoint shall be inserted in the NMIG. For issuers that are not producers, but still find resource inflows material, a phase-in approach should be adopted targeting at the begining product that are designed by those issuers.	ES	ES-4 - Resource Inflows	15. (c)
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	"Preparation for reuse" does not correspond to any of the R/D codes of the Waste framework directive. This information should be retained only in the narrative part. In the future French translation of this standard, the title should be corrected to refer to "réutilisation" rather than "réemploi". Issuers that are not producers should be exempted from this requirement if no public database are available.	ES	ES-5 - Resource outflows	18. (c)
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	What is the added value of this information? It should also be noted that some wastes are diverted from disposal, but their final destination remains unknown.	ES	ES-5 - Resource outflows	18. (e)
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I disagree	This paragraph introduces a new more granular requirement, namely a breakdown by key materials by weight, which will add extra complexity and effort without adding value. This will particularly penalise Wave 1 companies that have already invested substantial time, efforts and money to comply with the existing standard and meet the current requirements. Also this new requirements still does not clarify if this should include secondary products as inflows during their second life. The initial requirements to be kept and proposed amendments deleted.	ES	ES-4 - Resource Inflows	15. (b)
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I disagree	This paragraph introduces a new more granular requirement, namely a breakdown of strategic and critical raw materials by weight, which will add extra complexity and effort without adding value. This will particularly penalise Wave 1 companies that have already invested substantial time, efforts and money to comply with the existing standard and meet the current requirements. Also this new requirements still does not clarify if this should include secondary products as inflows during their second life. The initial requirements to be kept and proposed amendments deleted.	ES	ES-4 - Resource Inflows	15. (c)
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I disagree	The difference between this disclosure requirement and the one under paragraph 17. d) is unclear. DR 17. d) should be maintained in the standard while the DR 15. d) should be deleted.	ES	ES-4 - Resource Inflows	15. (d)
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I agree	This is clearer now.	ES	ES-5 - Resource outflows	17. (b)
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I agree	This is now clearer.	ES	ES-5 - Resource outflows	17. (d)
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I disagree	Clarity is needed on whether estimations are allowed or not when classifying the waste, in cases where no primary data is available. Should it be the case, such an approach would be inconsistent with ESRS 1 and ESRS 2 standards. This requirement should be removed or reformulated to be made optional.	ES	ES-5 - Resource outflows	18. (e)
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	Former paragraph 40 has been deleted (would have followed 19, but no new number). This deletion makes it unclear if and to what extent estimations and assumptions are acceptable.	ES	ES-5 - Resource outflows	18.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	We find that this requirement has been added/changed from a "may" to a "shall" but is not counted as such and is not highlighted in Q23. Furthermore, we note that the requirement essentially drives detailed reporting on how other EU-legislation is met. We believe the relevant elements would be covered by the general reporting requirement in ESRSE5, paragraph 10, at an appropriate level.	ES	ES-1 - Policies related to resource use and circular economy	11.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	We disagree to the amended standard as it increases the reporting requirement on resource inflows to include a breakdown on weight by key material and percentages of certain categories. This is an increase in the disclosure requirement which will impose a significant increase in the reporting burden. This should in particular be seen in relation to the definition of "key" products which includes a large range of products, which may be purchased in bulks as well as be included in raw material or assembled in semi-finished goods. It should, furthermore, be noted that such information would be confidential and business critical if disclosed for certain businesses. We disagree to this extension and suggest maintaining the requirements from current ESRS 5.	ES	ES-4 - Resource Inflows	15.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	We disagree to the requirement to report on the recycled materials used in key products and their packaging. This is a significant reporting burden as many outflow-products depend on inflows that are mixed on reused/recycled and new/virgin materials. Therefore, the information would be impractical or add significant administrative or reporting burden both for entity and across the value chains. There are currently quite some debates as to what can be defined as recycled, so if these DRs are to stay, EFRAG need to offer very clear guidance or support with good, illustrative examples as to what can be regarded as recycled materials and what can't.	ES	ES-5 - Resource outflows	17.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree The description of other recovery operations, item (c) iii, and of thermal-based disposal, item (d) i, are inconsistent with the EU waste regulation which leads to difference in the sustainability report compared to reporting under the waste regulation and possible to difference in application. This is, in particular, the case for "incineration", which can be interpreted to be included In both item (c) iii and (d) i. We suggest amending the definitions to match those of the waste regulation and waste hierarchy: -Prevention -Preparing for Re-use -Recycling -Other Recovery (incl. energy recovery) -Disposal At an Outreach event we, furthermore, understood, that there should by a link between the requirements in ESRS E5 and ESRS E1, and that energy recovery should be disclosed according to ESRS E1. If that is the case such link should be clearly stated and linked to the definition in the waste regulation.	ES	ES-5 - Resource outflows	18.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Sustainably sourced' is a not defined and is a vague term. There should be a requirement for an undertaking to define in its disclosures how it has been applied if it is using this term.	ES	ES-4 - Resource Inflows	15. (e)
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	It should be clarified if retail companies are intended to be included in the scope of this requirement.	ES	ES-4 - Resource Inflows	15.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	There is a risk of double counting in waste reporting: incineration with energy recovery (Directive 2008/98/EC Annex II, category R1) appears to be covered under both 'Other recovery operations' [para. 18.c)iii] and 'Thermal-based disposal' [para. 18.d)i)], depending on interpretation. This could cause inconsistency in categorisation: sometimes as recovery, sometimes as disposal, depending on interpretation. The approach should be clarified to ensure consistent classification and disclosure.	ES	ES-5 - Resource outflows	18. (d)
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG: This seems an extension of the Delegated Act. The content was moved from E5-5 Resource inflows; and now it contains the term "eco-design principles" which is not mentioned in the delegated act.	ES	ES-1 - Policies related to resource use and circular economy	11.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL regaring BfC, para 388: The reference seems wrong; the Eco-design for Sustainable Products Regulation has got the identifier "(EU) 2024/1781".	ES	ES-1 - Policies related to resource use and circular economy	11.
Excels	DRSC	(National) standard setter	Germany			I disagree	Para 15 (e) reintroduces the limitation of biological materials to "sustainably sourced". The market wants a total figure for biobased materials, this metric is highly disputable and not relevant if limited.	ES	ES-4 - Resource Inflows	15. (e)
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL: The delegated act requires disclosure of the "percentage of biological materials … sustainably sourced" in relation to "materials used to manufacture the undertaking's products and services" (para 31, 31(b)). The ED proposes to require "biological materials sustainably sourced" in relation to "key biological materials" (para 15(e), para AR1, second sentence). We note, this constitutes a change in the disclosure. At least, the figure (percentage) will significantly increase as the denominator in the ED ("key biological materials") is just a subset of the denominator of the delegated act ("materials used to manufacture the undertaking's products and services").	ES	ES-4 - Resource Inflows	15. (e)
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG: This seems an extension of the Delegated Act: Additional labelling requirement increases the granularity.	ES	ES-4 - Resource Inflows	AR 2
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG: According to BfC 379 this is meant to be a clarification. However, we note two stages of the value chain are mixed together. Para 17(d) of the ED addresses "rate of recycled material used in key products ", and it relates to resource outflows. This datapoint is not in the delegated act, so it is a new datapoint (a disclosure on the recycled content in products is not required in the delegated act). At the same time, it is proposed to amend 31(c) in resource inflows ("the weight … of secondary reused or recycled components …) to require disclosing "secondary resourced materials" in ED E5.15(d), which leaves it to the undertaking to understand the difference – if any – to current 31(c). Furthermore, the new datapoint in ED E5.17d will result in additional burden.	ES	ES-5 - Resource outflows	17. (d)
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL: Clarification is needed whether "thermal-based disposal" is something different to "thermal recovery".	ES	ES-5 - Resource outflows	18. (d)
Excels	DRSC	(National) standard setter	Germany			I disagree	On 18(d)(i): Standardised global reporting is difficult (e.g. definition of "hazardous waste" in the ESRS glossary: "Waste which displays one or more of the hazardous properties listed in Annex III of Directive 2008/98/EC"). Reporting according to local definitions and legal provisions should be made possible. This ESRS causes legal uncertainties. We recommend specifying these data points more closely or deleting them.	ES	ES-5 - Resource outflows	18. (c)
Excels	DRSC	(National) standard setter	Germany			I agree	As this new para seems to help undertakings in preparing the reports, the addition is regarded helpful.	ES	ES-5 - Resource outflows	18. (e)
Excels	DRSC	(National) standard setter	Germany			I disagree	(1) Companies that do not use radioactive substances in their production processes should not be required to report them. (2) Exceptions should be introduced for laboratory applications, measuring instruments, markers, naturally occurring radioactive materials, and activities below the exemption threshold of radiation protection legislation, in order to avoid the effort of reporting insignificant quantities and negligible exposures.	ES	ES-5 - Resource outflows	19.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Disclosure should be limited not only to key materials (already in the current Draft) but also key products (new suggestion for reducing the reporting burden while maintaining a comprehensible level of disclosure; also in line with ES-5 Resource Outflows where this focus is implemented in the current Draft). Further proposed simplification: omission of e.g. clippings/scrap (for manufacturing companies). Additionally: Unclear whether "materials used to manufacture" are only materials or also finished product components. Please clarify, suggestion: only materials, not components.	ES	ES-4 - Resource Inflows	15.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Disclosure should be limited not only to key materials (already in the current Draft) but also key products (new suggestion for reducing the reporting burden while maintaining a comprehensible level of disclosure; also in line with ES-5 Resource Outflws where this focus is implemented in the current Draft). Further proposed simplification: omission of e.g. clippings/scrap (for manufacturing companies).	ES	ES-4 - Resource Inflows	15. (a)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	This is a resource intensive exercise to calculate and it is not clear what the benefit is of reporting the total weight of key materials used. Disclosure should be limited not only to key materials (already in the current Draft) but also key products (new suggestion for reducing the reporting burden while maintaining a comprehensible level of disclosure; also in line with E5-5 Resource Outflws where this focus is implemented in the current Draft). Further proposed simplification: omission of e.g. clippings/scrap (for manufacturing companies). EFRAG should revise again whether a breakdown per key material is needed and useful information for stakeholders.	ES	ES-4 - Resource Inflows	15. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We understand the rationale for the proposed datapoint 15(c) is to align with the EU Critical Raw Materials Act (CRMA). However, we have significant concerns about the practicality (tracking all raw materials in complex value chains) and decision-usefulness of this metric. Disclosure should be limited not only to key materials (already in the current Draft) but also key products (new suggestion for reducing the reporting burden while maintaining a comprehensible level of disclosure; also in line with ES-5 Resource Outflws where this focus is implemented in the current Draft). Further proposed simplification: omission of the datapoint for critical and strategic raw material (for manufacturing companies). This new datapoint requires companies to disclose sensitive information which may lead to competitive disadvantages; should hence be a "may"-disclosure; further it increases burden on the disclosing companies in gathering these information.	ES	ES-4 - Resource Inflows	15. (c)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Disclosure should be limited not only to key materials (already in the current Draft) but also key products (new suggestion for reducing the reporting burden while maintaining a comprehensible level of disclosure; also in line with ESS-5 Resource Outflws where this focus is implemented in the current Draft). Further proposed simplification: omission of e.g. clippings/scrap (for manufacturing companies).	ES	ES-4 - Resource Inflows	15. (d)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Disclosure should be limited not only to key materials (already in the current Draft) but also key products (new suggestion for reducing the reporting burden while maintaining a comprehensible level of disclosure; also in line with ESS-5 Resource Outflws where this focus is implemented in the current Draft). Further proposed simplification: omission of e.g. clippings/scrap (for manufacturing companies). The definition on sustainable sourcing in the glossary should be revised again with a focus on more clarity and auditability of the required information; currently it seems a bit vague and open for interpretation.	ES	ES-4 - Resource Inflows	15. (e)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	Focus on key products helps to disclose relevant information for stakeholders while reducing the burden for disclosing companies	ES	ES-5 - Resource outflows	17. (a)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	Focus on key products helps to disclose relevant information for stakeholders while reducing the burden for disclosing companies	ES	ES-5 - Resource outflows	17. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	Focus on key products helps to disclose relevant information for stakeholders while reducing the burden for disclosing companies.	ES	ES-5 - Resource outflows	17. (c)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	Focus on key products helps to disclose relevant information for stakeholders while reducing the burden for disclosing companies.	ES	ES-5 - Resource outflows	17. (d)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Rate of recyclable materials and their packaging Is here the focus just on the "recyclability of materials in product" and should packaging (like product protection) disclosed separately	ES	ES-5 - Resource outflows	17.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	This new requirement would entail additional work if this case were to arise.	ES	ES-5 - Resource outflows	18. (e)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	Significant improvement, as the example makes it clearer what level of detail is required here.	ES	ES-5 - Resource outflows	AR 5
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	No objections	ES	ES-5 - Resource outflows	AR 4
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands				Overall, ES lacks sufficient clear guidance on methodologies for disclosing metrics. Circularity is still a relatively new reporting topic for companies; therefore, additional guidance will help clarify the correct approach and improve comparability. It is evident from the first wave of CSRD reporting, that companies are interpreting the ES metrics differently and the amendments to ES do not sufficiently address this risk.	ES		
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands				The amended definition of circular economy is not detailed enough. In addition, the reference to 2030 will become outdated. EFRAG should update the definition to be similar to the original, but slightly more condensed.	ES		
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	The newly introduced definition of key materials leaves room for differences in interpretation which could hinder comparability. To mitigate this, EFRAG should provide guidance in the NMIG for determining materials that meet the criteria for "key materials."	ES	ES-4 - Resource Inflows	15. (a)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	This disclosure allows absolute or percentage disclosure. The standard should choose one or both of these to be mandatory for comparability	ES	ES-4 - Resource Inflows	15. (b)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	Adding the disclosure option for waste where the final destination is unknown is positive as there are instances where a third-party may control the final destination of waste.	ES	ES-5 - Resource outflows	18. (e)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	For many companies, post-consumer packaging is a relevant topic. Post-consumer packaging is not addressed in the ES standard because it is not waste from own-operations. The standard or value chain implementation guidance should provide clarity on the scope of the value chain, specifically addressing post-consumer packaging.	ES	ES-5 - Resource outflows	18. (c)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The original definition of resource inflows was much clearer and focused on inflows. The new definition has shifted its focus towards outflows.	ES	ES-4 - Resource Inflows	15.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	The total weight of key materials has been amended to include a breakdown. This breakdown is an improvement as it will allow companies to compare materials that are similar in nature. On the other hand, this update will create additional work for companies that already report as they will now need to tag each type of key material for the breakdown.	ES	ES-4 - Resource Inflows	15. (b)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The AR should specify what the denominator is for the critical and strategic materials %.	ES	ES-4 - Resource Inflows	15. (c)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The AR should clarify whether critical and strategic materials should always be included as a "key material."	ES	ES-4 - Resource Inflows	15. (c)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	The reused and recycled input materials KPI has been replaced with the term secondary resourced materials. Neither the disclosure nor definition of secondary resources mentions the terms reused or recycled. It is unclear if both reused and recycled materials continue to be in scope for this disclosure. EFRAG should add clarity to the definition of secondary resources and specify whether it includes reused and/or recycled materials. For example, does this KPI only require disclosure on reused materials and not recycled content?	ES	ES-4 - Resource Inflows	15. (d)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	Non-recycled waste disclosure removed. This KPI did not make sense as the formula included waste prepared for reuse. Therefore, it is positive that it was removed.	ES	ES-5 - Resource outflows	18.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The AR should specify what the denominator is for the secondary resourced materials KPI. It would make the most sense if the denominator only includes key materials that are capable of being reused or recycled. For example, certain food products may not be capable of being reused or recycled. Including them in the denominator creates confusion for stakeholders.	ES	ES-4 - Resource Inflows	15. (d)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	The removal of refernce to the cascading principle helps condense this disclosure requirement	ES	ES-4 - Resource Inflows	15. (e)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	The proposed amendment states that the denomintator for the % is key biological materials. This makes more sense than the current version which states that the denominator must be total inflow materials.	ES	ES-4 - Resource Inflows	15. (e)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Reference to a certification scheme was removed in the disclosure requirement. Without reference to certification schemes, this disclosure loses credibility.Reference to certification schemes should be added back to this disclosure requirement.	ES	ES-4 - Resource Inflows	15. (e)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The glossary should include a definition for sustainably sourced	ES	ES-4 - Resource Inflows	15. (e)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	The ED separates out this KPI from the current version DR ES-4 31c, does this mean that the ESRS ED ES -15d does not require recycled content?	ES	ES-5 - Resource outflows	17. (d)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	It does not make sense for recycled content to be included in the resource outflows section, it should remain in the resource inflows section as it is in the current version.	ES	ES-5 - Resource outflows	17. (d)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	The specific matters that needed to be included in relation to policies in the current draft ES-1 15 have been removed. This allows companies to address the specific matters which address their material IROs.	ES	ES-1 - Policies related to resource use and circular economy	10.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	It is not clear what the denominator is that needs to be applied for ES-17d. For example, could the denominator only include packaging or does it need to be the total weight of key materials (KPI ES-15b?)	ES	ES-5 - Resource outflows	17. (d)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	It is not clear if recycled materials refers to recycled content or also reused materials? This clarification is especially important given the other disclosure requirement for ES-15d.	ES	ES-5 - Resource outflows	17. (d)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	This AR states that packaging is not included in disclosures ES-5 17 c and d. This implies that companies would not be required to disclose information on their packaging that is recyclable by design or includes recycled content. For many companies packaging is one of the main waste streams; therefore, it does not make sense to remove packaging from these disclosures.	ES	ES-5 - Resource outflows	AR 3
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Addition on making the reference to key material introduced: Disclosing key raw materials and their exact weights per key material - involves sensitive information and may be misinterpreted as shrinkflation, despite resulting from more efficient material use.	ES	ES-4 - Resource Inflows	15. (a)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Addition on making the reference to key material introduced: Disclosing key raw materials and their exact weights per key material - involves sensitive information and may be misinterpreted as shrinkflation, despite resulting from more efficient material use.	ES	ES-4 - Resource Inflows	15. (b)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Statements made which are not universally true (e.g., related activities are "by nature energy intensive" and "require large volumes of water") should be removed, or need clarification (e.g., "collecting energy efficiency in own operations").	ES	Interactions with other ESRS	9
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Total and breakdown weights of key materials is excessively granular and challenging to gather data from activities around the world, potentially cluttering and not useful. In addition, the definition of resource inflows includes "internally recovered" resources, which should not be included as they are not inflows and are often the result of internal optimisations and efficiency improvements.	ES	Metrics - Resource inflows	15
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Product durability and rate of recycled materials used per product are excessively granular and very challenging to determine and gather data for each key product. "Incineration" changed to "thermal-based disposal" may lead to challenges - recommend to revert.	ES	Metrics - Resource outflows	17-18
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	It is not clear how it relates to a service provider. How does it relate to assets (finished goods) needed to provide services (i.e. telecom services)? How does it relate to the reselling of products (finished goods) that have been manufactured by another company?	ES	ES-4 - Resource Inflows	15.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	This is an additional datapoint which runs counter to the simplification objective of the ESRS. It is difficult to quantify in practice and would create additional administrative burden for preparers without significantly enhancing decision-usefulness.	ES	ES-4 - Resource Inflows	15. (c)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Where previously it related to "the undertaking's production process", this now seems to relate to resale of primary goods as well. If so, these datapoints are hard to report for a reseller. A producer should report on the product design related datapoints (e.g. durability, reparability, recyclable/recycled material). A service provider/reseller by adding circular economy principles to services (e.g. offering repair services). Suggest to split products and services here to make it more clear.	ES	ES-5 - Resource outflows	17.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	Although this is an additional datapoint for producers, it helps reporting on datapoints for inflow w.r.t. products bought by service providers.	ES	ES-5 - Resource outflows	17. (d)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	It adds value to have weight diverted to disposal as a sub-metric in percentage and weight. Yet, it is not clear if it refers to waste 'send-to' e.g. recycling or to 'mass-balance' approach e.g. materials recovered through recycling. Additional guidance would support uniformity.	ES	ES-5 - Resource outflows	18. (c)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Although this is an additional datapoint, it adds flexibility as a 'residual bucket'. It is not (yet) clear how it relates to potential assumptions made under 18b, c, d. For example, if we don't know how a tier-2 waste processor treats a certain waste flow, should we make an assumption with a rationale where possible or report it as 'unknown'?	ES	ES-5 - Resource outflows	18. (e)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Could you please provide more information as why thermal-based disposal is reported separately?	ES	ES-5 - Resource outflows	18. (d)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The revised requirement related to "total inflow" weight changed from inflow in total weight to weight with breakdown to key materials. A breakdown in weight for key materials increases the number of datapoints needed for this DR, thereby increasing the reporting burden without clear justification how this helps to achieve objectives under the EU Grean Deal.	ES	ES-5 - Resource outflows	15. (b)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	This item is related to ES- 15 c): the percentage of total weight of critical and strategic raw materials. We refer to the item listed above, with the addition that by requiring disclosures on all critical and strategic raw materials (beyond impacts on people and the environment), the scope of reporting expands beyond sustainability information and the objectives of the CSRD.	ES	ES-5 - Resource outflows	15. (c)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Introduce the reference to marine resources, ensuring that material IROs related to them can be addressed through entity-specific disclosures under ESRS E5. In line with the principle on location-specific considerations in ESRS E4 §9, we propose introducing a corresponding principle on marine resources. Proposed wording: "Marine resources should be considered when they are relevant to the undertaking's strategy and business model. Where material IROs arise in relation to marine resources, it is important to consider appropriate entity-specific information in accordance with ESRS 1, paragraph 11."	E5	E5 - Objective	1.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Require only a qualitative description of resource inflows Firstly, there is no clear or stable definition of "key," "strategic," "critical" materials", and "key biological sustainably sourced". The scope of critical materials may change over time with the evolution of the CRMA, and the Delegated Acts deriving from the ESPR are not yet approved. Companies therefore expect this information to be difficult to access and disclose. However, EFRAG could reference these regulations (e.g., CRMA annexes) and provide pedagogical resources and data (e.g., JRC) in the NMIG to support qualitative disclosures on resource inflows. Secondly, the data would be technically complex to obtain. These materials are often mixed, transformed, or embedded in products, making it very difficult to determine their exact weight without reverse engineering. Companies stress that they may not know the precise quantities of raw materials used, which could result in unreliable or even zero reporting. Proposed wording: "When 'Resource Inflows' is assessed as a material topic, the undertaking shall disclose: a) which materials used to manufacture, were put on the market or were part of the delivery of the undertaking's products and services can be considered as key for its business model, including, where appropriate, critical materials, and the major reasons behind;"	E5	E5-4 - Resource Inflows	15. (a)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	See above	E5	E5-4 - Resource Inflows	15. (b)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	See above	E5	E5-4 - Resource Inflows	15. (c)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Proposed wording: "When 'Resource Inflows' is assessed as a material topic, the undertaking shall disclose: (...) b) which of these materials are biological and sustainably sourced;	E5	E5-4 - Resource Inflows	15. (e)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Specify the circular economy principles in the objective to facilitate entity-specific disclosures, as the data points only cover durability and reparability Proposed wording: "... in accordance with circular economy principles (i.e., durability, reusability, repairability, disassembly, remanufacturing, refurbishment, recycling, recirculation by the biological cycle, or optimisation of the use of the product or material through other circular business models) ...")	E5	E5-5 - Resource outflows	16.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Specify in the NMIG that the information on the expected durability of key products should be "in relation to the industry average for each product group"	E5	E5-5 - Resource outflows	17. (a)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Specify in the NMIG that the scope of reparability should be assessed "where possible, using an established rating system"	E5	E5-5 - Resource outflows	17. (b)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Delete the datapoint on "recycled materials used in key products" and retain only the one on "recyclable materials included in key products and their packaging". This ensures consistency with the focus on outflow metrics (product characteristics) rather than inflow metrics (use of recycled inputs)	E5	E5-5 - Resource outflows	17. (d)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	ANC disagrees with the new datapoint on the percentage or total weight with unknown final destination. The key question is whether this should be entity-specific or managed jointly by companies and auditors, given the political objective of avoiding new datapoints and focusing on absolute reduction. This issue is not critical, as it could be addressed in other ways.	E5	E5-5 - Resource outflows	18. (e)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	The policy and metrics regarding unsold products appear to be a missing point in ESRS E5. In line with the objective of the ESRS revision to ensure better connectivity with other European regulations, an AR related to ESPR (Ecodesign for Sustainable Products Regulation which entered into force on 18 July 2024) could be added. In reference to the ESPR Art 24.1(a) - number and weight of unsold consumer products discarded per year, differentiated per type or category of products, the undertaking could provide this information in ESRS E5-5.	E5	E5-5 - Resource outflows	5.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We suggest to remove wording in brackets ("including mineral and biotic marine resources") and incorporate it either in the Application Requirements or in the term "resources inflows" defined in the glossary in Annex II. The specific focus on "marine resources" could create confusion and imply a stronger focus on one resource/ecosystem whereas the definition is larger.	E5	E5 - Objective	4. (a)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We suggest to remove wording 'products and services' and incorporate it either in the Application Requirements or in the term "resource outflows" defined in the glossary Annex II. This would ensure clarity and consistency throughout the standard.	E5	E5 - Objective	4. (b)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	Resource use', while in bold, is not included in the glossary Annex II.	E5	E5-2 - Actions and resources related to resource use and circular economy	12.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	Resource use', while in bold, is not included in the glossary Annex II.	E5	E5-3 - Targets related to resource use and circular economy	13.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	'Circularity', while in bold, is not included in the glossary Annex II. We suggest providing specific guidance on how to consider value chain data (e.g. product composition) when reporting on inflows in reporting resources inflows for own operations. This is challenging, namely in sectors involving different layers of suppliers for a product, with thousands of products concerned (such as distribution sector).	ES	ES-4 - Resource Inflows	14.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	The "resource inflows" should be in bold, instead of in brackets We encourage EFRAG to modify the definition of 'Key materials" as this definition only relates to financial materiality and does not consider impact materiality.	ES	ES-4 - Resource Inflows	15.
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	We disagree from an auditability perspective. Based on our experience, few companies actively monitor the list of critical and/or strategic materials outlined in the Critical Raw Materials Act (2023). Those that do are likely to do so because some of these materials are considered high-risk (e.g. conflict minerals such as tungsten and tantalum). The requirement to disclose these materials is not consistent with the simplification objective. The data is complex to determine since these materials are rarely isolated but are rather mixed with other materials or assembled in products. We are concerned that companies not operating in key sectors that use these raw materials will be forced to make complex estimates, increasing the reporting burden. The definition of critical and strategic raw materials is unclear as strategic material is defined in the glossary by reference to an external definition of critical material. The conceptual perimeter of the disclosure is unclear. Importantly, we acknowledge that EU Member States are currently focused on identifying strategic raw material projects, aligning national permitting processes with the Act's timelines, and participating in the EU's Critical Raw Materials Board.	ES	ES-4 - Resource Inflows	15. (c)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We ask EFRAG to provide a definition of 'sustainably sourced', including any relevant framework/due diligence needed to ascertain the sustainable source of the biological materials. In addition, better alignment should be sought for the new definition of "biological materials" for example, aligning it to the definition based on biological and technical cycles defined by Ellen MacArthur Foundation.	ES	ES-5 - Resource outflows	15. (e)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	Further guidance in Application requirements is sought on what disclosures are expected on "expected durability' and how this aligns to EU regulations (i.e., EU Digital Passport)	ES	ES-5 - Resource outflows	17. (a)
Excels	Ernst & Young	Auditor	United Kingdom			I agree	We consider this a good approach in terms of transparency and assurance / auditability as this enables to reconcile the total waste generated (as disclosed in point b) with the detailed breakdowns provided in points (c - waste diverted from disposal) and (d - directed to disposal). It ensures that any gaps between the total and the sum of known operations are transparently accounted for, thereby improving the completeness and reliability of the waste reporting.	ES	ES-5 - Resource outflows	18. (e)
Excels	Dragerwerk AG &Co.KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	recyclable' is not defined and therefore 'the rate of recyclable materials' is neither meaningful nor comparable. Delete or replace with qualitative 'information on recyclable materials included in its key products and in their packaging'.	ES	ES-5 - Resource outflows	17. (c)
Excels	Dragerwerk AG &Co.KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	This information is almost impossible to determine with certainty. Metals, for example, usually contain an unknown recycled content. As a single figure, the information is also useless.	ES	ES-5 - Resource outflows	17. (d)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Disclosure should be limited not only to key materials (already in the current Draft) but also key products (new suggestion for reducing the reporting burden while maintaining a comprehensible level of disclosure; also in line with ES-5 Resource Outflws where this focus is implemented in the current Draft). Further proposed simplification: omission of e.g. clippings/scrap (for manufacturing companies). Additionally: Unclear whether "materials used to manufacture" are only materials or also finished product components. Please clarify, suggestion: only materials, not components.	ES	ES-4 - Resource Inflows	15.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Disclosure should be limited not only to key materials (already in the current Draft) but also key products (new suggestion for reducing the reporting burden while maintaining a comprehensible level of disclosure; also in line with ES-5 Resource Outflws where this focus is implemented in the current Draft). Further proposed simplification: omission of e.g. clippings/scrap (for manufacturing companies).	ES	ES-4 - Resource Inflows	15. (a)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Disclosure should be limited not only to key materials (already in the current Draft) but also key products (new suggestion for reducing the reporting burden while maintaining a comprehensible level of disclosure; also in line with ES-5 Resource Outflws where this focus is implemented in the current Draft). Further proposed simplification: omission of e.g. clippings/scrap (for manufacturing companies). EFRAG should revise again whether a breakdown per key material is needed and useful information for stakeholders.	ES	ES-4 - Resource Inflows	15. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Disclosure should be limited not only to key materials (already in the current Draft) but also key products (new suggestion for reducing the reporting burden while maintaining a comprehensible level of disclosure; also in line with ES-5 Resource Outflws where this focus is implemented in the current Draft). Further proposed simplification: omission of the datapoint for critical and strategic raw material (for manufacturing companies). This new datapoint requires companies to disclose sensitive information which may lead to competitive disadvantages (regarding competitors and partners in the value chain; also many supplier contracts include duty of confidentiality); should hence be a "may"-disclosure, if any; further it increases burden on the disclosing companies in gathering these information.	ES	ES-4 - Resource Inflows	15. (c)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Disclosure should be limited not only to key materials (already in the current Draft) but also key products (new suggestion for reducing the reporting burden while maintaining a comprehensible level of disclosure; also in line with ES-5 Resource Outflws where this focus is implemented in the current Draft). Further proposed simplification: omission of e.g. clippings/scrap (for manufacturing companies).	ES	ES-4 - Resource Inflows	15. (d)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Disclosure should be limited not only to key materials (already in the current Draft) but also key products (new suggestion for reducing the reporting burden while maintaining a comprehensible level of disclosure; also in line with ES-5 Resource Outflws where this focus is implemented in the current Draft). Further proposed simplification: omission of e.g. clippings/scrap (for manufacturing companies). The definition on sustainable sourcing in the glossary should be revised again with a focus on more clarity and auditability of the required information; currently it seems a bit vague and open for interpretation.	ES	ES-4 - Resource Inflows	15. (e)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Focus on key products helps to disclose relevant information for stakeholders while reducing the burden for disclosing companies	ES	ES-5 - Resource outflows	17. (a)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Focus on key products helps to disclose relevant information for stakeholders while reducing the burden for disclosing companies	ES	ES-5 - Resource outflows	17. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Focus on key products helps to disclose relevant information for stakeholders while reducing the burden for disclosing companies.	ES	ES-5 - Resource outflows	17. (c)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Focus on key products helps to disclose relevant information for stakeholders while reducing the burden for disclosing companies.	ES	ES-5 - Resource outflows	17. (d)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Add deleted paragraph 28 back in, as it clarifies that the disclosure requirements are only for those resource inflows related to the material IRO, not all resource inflows.	ES	ES-4 - Resource Inflows	14.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				The mass-balance approach should be explicitly permitted.	ES	ES-4 - Resource Inflows	15.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	This is a resource intensive exercise to calculate and it is not clear what the benefit is of reporting the total weight of key materials used.	ES	ES-4 - Resource Inflows	15. (b)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We understand the rationale for the proposed datapoint 15(c) is to align with the EU Critical Raw Materials Act (CRMA). However, we have significant concerns about the practicality (tracking all raw materials in complex value chains) and decision-usefulness of this metric.	ES	ES-4 - Resource Inflows	15. (c)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				15. (e) - "sustainably sourced" is not defined, but is a contentious topic. Recommend adding a requirement that the undertaking provide a description of how the undertaking defines or categorizes "sustainably sourced". If the authors would like to have a discussion on how best to define this officially, we'd be very open to a call to share our approach.	ES	ES-4 - Resource Inflows	15. (e)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				These disclosure requirements should be closely aligned with existing ecodesign regulations (ESPR) and underlying standards (EN 4555X) which define durability, reparability, recyclability and recycled content.	ES	ES-4 - Resource Inflows	16.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				These disclosure requirements should be closely aligned with existing ecodesign regulations (ESPR) and underlying standards (EN 4555X) which define durability, reparability, recyclability and recycled content.	ES	ES-4 - Resource Inflows	17.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Add "as relevant to any material IRO" to "The undertaking shall disclose its resource use and circular economy actions"	ES	ES-5 - Resource outflows	12.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				Add point (e): rate of biological material used in its key products	ES	ES-5 - Resource outflows	17.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				Current: "(b) information on the scope of reparability of its key products;" Change to "information on the reparability of its key products per EN45554"	ES	ES-5 - Resource outflows	17. (b)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				The disclosure requirements should be aligned with the Waste Framework Directive, the Packaging and Packaging Waste Regulation (PPWR) and the WEEE Directive, which is currently under revision. Change to: The undertaking shall disclose the following information on waste streams that are linked to a material impact, risk or opportunity from its own operations:) a description of the material waste streams relevant to its sector or own activities (identified through the DMA process)"	ES	ES-5 - Resource outflows	18.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	This streamlines the process by no longer considering the value chain. However, this now requires more disclosures. More clarification is needed for "key materials".	ES	ES-4 - Resource Inflows	15.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The process is now streamlined as only "key" products are required. However, more clarity is needed for the wording "key"	ES	ES-5 - Resource outflows	17.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	While the aim of this amendment is to bring more flexibility because it allows companies to report percentages instead of amounts, this DR is still burdensome because: - The amended waste requirements introduce a new metric that increases reporting burden by adding categories not aligned with the EU Waste Framework Directive, specifically for waste with an "unknown final destination". Creating a separate category forces companies to maintain parallel reporting systems, leading to overlap and reduced comparability. - There is no prescription on how to consider the upstream value chain if waste is identified as a material topic only in the company's value chain (i.e. in case it is not material in its own operations).	ES	ES-5 - Resource outflows	18.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				The disclosure requirements should be aligned with the Waste Framework Directive, the Packaging and Packaging Waste Regulation (PPWR) and the WEEE Directive, which is currently under revision.	ES	ES-5 - Resource outflows	18.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				Add point (e): rate of biological material used in its key products	ES	ES-5 - Resource outflows	17.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				Current: "(b) information on the scope of reparability of its key products;" Change to "information on the reparability of its key products per EN45554"	ES	ES-5 - Resource outflows	17. (b)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				15. (e) - "sustainably sourced" is not defined, but is a contentious topic. Recommend adding a requirement that the undertaking provide a description of how the undertaking defines or categorizes "sustainably sourced". If the authors would like to have a discussion on how best to define this officially, we'd be very open to a call to share our approach.	ES	ES-4 - Resource Inflows	15. (e)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				The mass-balance approach should be explicitly permitted.	ES	ES-4 - Resource Inflows	15.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				These disclosure requirements should be closely aligned with existing ecodesign regulations (ESPR) and underlying standards (EN 4555X) which define durability, reparability, recyclability and recycled content.	ES	ES-4 - Resource Inflows	16.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				These disclosure requirements should be closely aligned with existing ecodesign regulations (ESPR) and underlying standards (EN 4555X) which define durability, reparability, recyclability and recycled content.	ES	ES-4 - Resource Inflows	17.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Since Outflow now focuses on key products, more efficient disclosure is possible. Similarly, Inflow now focuses on key materials, but since it does not focus on key products, the scope of disclosure differs from Outflow. Therefore, Inflow should also focus on key materials of key products.	ES	ES-4 - Resource Inflows	14.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Waste has become one of the items in ES-5 resource outflow, but while Products and services target key products, Waste does not have a specific target. As with Products and services, Waste should target operations related to key products.	ES	ES-5 - Resource outflows	18.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	There is a requirement to disclose recyclability, but the definition is unclear.	ES	ES-5 - Resource outflows	17. (c)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Disclosure of the recycling material usage rate has been added, but this is almost the same as the disclosure of secondary resourced materials in Inflow 15(d), resulting in duplication. Therefore, only one of the two should be disclosed.	ES	ES-5 - Resource outflows	17. (d)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Regarding the percentage of total weight of critical and strategic raw materials, in order to be consistent with the CRM act, the target should be limited to raw materials that are extracted, processed, and recycled within Europe, rather than all products sold in Europe.	ES	ES-4 - Resource Inflows	15. (c)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	The introduction of a new KPI counteracts the aim of reduing the reporting requirements and burden. Based on the new KPI, resource inflow needs to be reported on a more granular level, which increases the data requirement again. Not only is the information extremly challenging to obtain (as it requires information from the value chain and migh need IT adjustments) but transparency on the purchased material structure is sensitive information and might lead to competitive disadvantages.	ES	ES-4 - Resource Inflows	15. (c)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				Re. Row 4 The disclosure of the rate of biological materials is already required in the inflow. Therefore, this additional point is considered unnecessary.	ES	ES-5 - Resource outflows	17.
Excels	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	Clarification is needed on how to interpret the requirement to disclose the share and/or total mass of waste for which the final destination is unknown. What should companies do when they do not have information that clearly determines the type of process applied? In some cases, it can be assumed that the waste will be reused (e.g. scrap metal), but the problem is the lack of sufficient qualitative data confirming that waste recipients will actually perform the declared process (e.g. a statement on waste treatment). Guidance is needed on whether, in such cases, companies should estimate the amount of waste likely to undergo recovery processes in order to avoid disposal, even though no definitive proof is available, and disclose this under point (e).	ES	ES-5 - Resource outflows	18. (e)
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I disagree	At present, the notion of critical and strategic raw materials may evolve over time with the development of the Critical Raw Materials Act, and as the delegated acts deriving from the Eco-design for Sustainable Products Regulation are not yet approved. Companies consider this information hard to access and publish, particularly since these materials are often mixed with others. In this evolving context, this datapoint shall be inserted in the NMIG	ES	ES-4 - Resource Inflows	15. (c)
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	What is the added value of this information? It should also be noted that some wastes are diverted from disposal, but their final destination remains unknown.	ES	ES-5 - Resource outflows	18. (e)
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I disagree	Preparation for reuse does not correspond to any of the R/D codes of the Waste framework directive. This information should be retained only in the narrative part. In the future French translation of this standard, the title should be corrected to refer to "réutilisation" rather than "réemploi".	ES	ES-5 - Resource outflows	18.
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	This indicator shall not be compulsory as it can induce to add waste which have no coherence and as such may false the interpration of the reality. This paragraph could be deleted.	ES	ES-5 - Resource outflows	18. (b)
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	This needs to be clarified because, at first glance, it seems to imply that incineration with energy recovery falls under the "disposal" category, whereas it is actually treatment code R1, which is indeed part of material recovery. The definition of R1 further on in the standard needs to be read in order to clearly differentiate between the two.	ES	ES-5 - Resource outflows	18. (d)
Excels	ASD					I disagree	The introduction of this request - "employee head count in the ten largest countries in terms of number of employees" - increases reporting burden, compared to the previous requirement (countries with at least 10% of employees). We ask to reintroduce the previous requirement, or to keep the 2 options.	S1	S1-5 - Characteristics of the undertaking's employees	AR 11
Excels	ASD					I disagree	The elimination of the concept of "severe" related to human rights incident increases the reporting burden. We ask to reintroduce that concept.	S1	S1-16 - Incidents of discrimination and other human rights incidents	16.
Excels	ASD					I agree	Under the current ESRS, undertakings are required to disclose whether all employees are covered by social protection. Under the Exposure Draft, the disclosure is mandatory only when employees lack this protection. We welcome EFRAG proposed change.	S1	S1-10 - Social protection	34.
Excels	ASD					I disagree	All reporting obligations regarding people with disability can produce an inherent conflict with national laws. Whether or not a person has a disability, it is an information provided by employees on a voluntary basis. Therefore, reporting on this category is very difficult since it requires data that is often not known by the employer. The proposed change does not appear to bring significant simplification	S1	S1-11 - Persons with disabilities	AR 23
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	A boolean DP (whether) will complicate the structure of a generic GDR-P. Suggestion: create a separate datapoint in S1-1 to disclose whether policies cover specific groups or all: "It shall state whether policies cover specific groups within its own workforce (for example, employees working in a particular factory or geography or self-employed) or all of its own workforce." Or, create an AR to specify content (without a boolean).	S1	S1-1 - Policies related to Own workforce	11.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	This DP would likely be overlapping with the generic GDR-A content. Transforming it to a AR would allow to include the content in the GDR-A: "The undertaking shall describe key actions taken, planned or underway to prevent, mitigate and remediate material negative impacts on its own workforce, including its approach in situations where tensions arise between such actions and other business pressures are related to"	S1	S1-3 - Actions and Resources related to Own workforce	19. (a)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Chamber of Labour, Austria	Trade union	Austria			I partially agree and partially disagree	In principle, the BAK welcomes the restructuring into topics and companies (no more sub-subtopics) for better alignment with management processes as well as a more comprehensible presentation of the materiality analysis and the IROs (Impact Risks Opportunities). However, in the objectives for S 1 (page 3 of the "Log of Amendments S 1"), it was clarified that a company only has to report on the sub-topics "own workforce" (S1-5), "non-employees S1-6) and "remuneration parameters" (S1-16) if the company comes to the conclusion that its own workforce is material. We are of the opinion that the interests of the company's own workforce are generally to be regarded as material in every company and that this information should therefore not be subject to the materiality reservation. The CSRD has also specified in detail the social concerns to be reported in Article 29b – which forms the basis for the ESRS.	S1	S1 - Objective	3.
Excels	Chamber of Labour, Austria	Trade union	Austria				The consolidation of human rights and their alignment with different frameworks in a single place for "human rights policy" (ED, ESRS 2, GDR-P) is advocated. This underlines the importance of the topic and increases transparency.	S1	S1 - Objective	
Excels	Chamber of Labour, Austria	Trade union	Austria			I agree	The envisaged definitions for the different employment groups increases the clarity and comparability of reporting.	S1	S1 - Objective	8.
Excels	Chamber of Labour, Austria	Trade union	Austria			I agree	The envisaged definitions for the different employment groups increases the clarity and comparability of reporting.	S1	S1 - Objective	8. (a)
Excels	Chamber of Labour, Austria	Trade union	Austria			I agree	The envisaged definitions for the different employment groups increases the clarity and comparability of reporting.	S1	S1 - Objective	8. (b)
Excels	Chamber of Labour, Austria	Trade union	Austria			I agree	The envisaged definitions for the different employment groups increases the clarity and comparability of reporting.	S1	S1 - Objective	9.
Excels	Chamber of Labour, Austria	Trade union	Austria			I agree	The envisaged definitions for the different employment groups increases the clarity and comparability of reporting.	S1	S1 - Objective	9. (a)
Excels	Chamber of Labour, Austria	Trade union	Austria			I agree	The envisaged definitions for the different employment groups increases the clarity and comparability of reporting.	S1	S1 - Objective	9. (b)
Excels	Chamber of Labour, Austria	Trade union	Austria			I partially agree and partially disagree	Compared to the current ESRS, the information according to ESRS SBM-2 is no longer provided for in this ED S1. From the BAK's point of view, the interests and perspectives of the stakeholders are important information and should therefore be disclosed again on a mandatory basis.	S1	S1 - Interaction with other ESRS	
Excels	Chamber of Labour, Austria	Trade union	Austria			I partially agree and partially disagree	The change in the thresholds for reporting the number of persons employed is welcomed, as it provides more information on the number of employees, especially from companies operating in several countries, and this data is also necessary for other social indicators.	S1	S1-5 - Characteristics of the undertaking's employees	23. (a)
Excels	Chamber of Labour, Austria	Trade union	Austria			I disagree	The breakdown for "Non-guaranteed hours employees" should continue to be mandatory by gender.	S1	S1-5 - Characteristics of the undertaking's employees	23. (b)
Excels	Chamber of Labour, Austria	Trade union	Austria			I disagree	The number of employees who left the company in the year under review is no longer planned. From the BAK's point of view, this is an important social indicator and therefore requests resumption.	S1	S1-5 - Characteristics of the undertaking's employees	23. (c)
Excels	Chamber of Labour, Austria	Trade union	Austria			I partially agree and partially disagree	The BAK criticises the lack of definition of RTD in the present ED. In the interests of comparability, transparency and simplification for reporting, the BAK calls for a uniform definition of the term FTE to be included in the ESRS. Compared to the current ESRS, there is no longer any provision of explanations to understand the fluctuation rate. From the BAK's point of view, fluctuation is a central social indicator and therefore a statement on the development of fluctuation rates should be disclosed.	S1	S1-5 - Characteristics of the undertaking's employees	23. (d)
Excels	Chamber of Labour, Austria	Trade union	Austria			I disagree	For this group of employees, only their total number must be given – and only in the event that they (e.g. temporary workers or work contractors) are a key element in the company's business model (see S1-AR 14). The BAK criticises this, as companies also have a social responsibility towards non-salaried employees on the one hand and important information is also lost for works councils on the other.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.
Excels	Chamber of Labour, Austria	Trade union	Austria			I partially agree and partially disagree	The BAK is extremely critical of the provision for determining adequate wages outside the EU: reference is also made to national statutory minimum wages for the determination of adequate wages outside the EU. These are often far from adequate in third countries. Reference must be made here to the relevant provisions on living wages of the International Labour Organization.	S1	S1-9 - Adequate wages	
Excels	Chamber of Labour, Austria	Trade union	Austria			I partially agree and partially disagree	The breakdowns (especially by gender) for performance assessments and training hours have been deleted. Since training and further education are often the basis for higher pay in practice, gender-specific differentiation in access to further training can lead to pay discrimination. Therefore, a reporting obligation is necessary here. The "granularity" in the draft cited as a justification, i.e. to reduce the depth of information in the information, is incomprehensible, since in practice such information can usually be retrieved from the corresponding personnel programs at the "push of a button".	S1	S1-12 - Training and skills development metrics	38.
Excels	Chamber of Labour, Austria	Trade union	Austria			I partially agree and partially disagree	Changed working conditions and increasing work pressure lead to more work-related mental illnesses among employees. For BAK, it is therefore incomprehensible why these important indicators are deleted from reporting. It is precisely this information that is an indispensable component for assessing corporate social responsibility. The BAK therefore requests that this data be disclosed accordingly.	S1	S1-13 - Health and Safety metrics	
Excels	Chamber of Labour, Austria	Trade union	Austria			I disagree	The entire sum of penalties and penalties that companies had to pay in cases of discrimination must be disclosed. The wording is problematic because in practice settlements (which, usually at the express request of the companies, are not explicitly dedicated to a "discrimination case") are often concluded in order to settle discrimination cases. However, according to the present wording ("fines, penalties and compensation"), such a settlement payment would not be covered by the reporting obligation, which would greatly distort the cases of discrimination to be reported and would not be able to shed light on the already large number of unreported cases.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (c)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Chamber of Labour, Austria	Trade union	Austria			I disagree	The reporting obligation regarding preventive measures against discrimination (incl. harassment) in the workplace has been deleted without replacement, according to the comment with the following reason: "deleted from mandatory content and moved to NMIG (...) to enhance clarity and simplify content". This does not create clarity or simplification, but rather a unilateral reduction of reporting obligations in favour of companies, at the expense of transparency.	S1	S1-1 - Policies related to Own workforce	24.
Excels	Chamber of Labour, Austria	Trade union	Austria			I agree	The BAK welcomes the transfer from the CSRD to the involvement of the employee representatives and forwarding their opinion to the supervisory bodies. This is a significant step forward transparency and stakeholder involvement and represents a significant improvement for clear reporting.	S1	S1-3 - Actions and Resources related to Own workforce	AR 11
Excels	Chamber of Labour, Austria	Trade union	Austria				Basic remarks on ESRS S 1: The CSRD specifies the social aspects (Article 29b, paragraph 2 b): • Equal treatment and opportunities for all, including gender equality and equal pay for work of equal value, training and skills development, employment and inclusion of persons with disabilities, action against violence and harassment in the workplace, and diversity; • Working conditions, including secure employment, working hours, decent wages, social dialogue, freedom of association, existence of works councils, collective bargaining, including the proportion of workers covered by collective agreements, workers' rights to information, consultation and participation, work-life balance, and health and safety; • Respect for human rights, fundamental freedoms, democratic principles and international standards.	S1		
Excels	Chamber of Labour, Austria	Trade union	Austria				This explicit mention of the social aspects in the CSRD underlines the importance of this information for the BAK. For this reason, it is incomprehensible to the BAK why the disclosure requirements have been reduced so massively. Deleted data points, such as the age distribution in diversity metrics (S1-8), parental leave is replaced by maternity leave (S1-10), workers without social protection (S1-10), leave from work for family reasons (S1-14), recording of fines and sanctions for incidents of discrimination and harassment (S1-16), should be re-disclosed. It is precisely these topics that provide important information for the co-determination actors (works councils, employee representatives) on the sustainability indicators relevant to them (e.g. health and safety, remuneration) and on their qualitative development, especially in the supervisory board. In addition, reporting requirements have already been significantly reduced twice since the first ESRS Exposure Draft (April 2022). From the BAK's point of view, all social concerns are essential for the successful implementation of the socio-ecological transformation of economic activities in addition to environmental issues. Accordingly, the deleted social data points should be re-examined. There must be no further reduction or dilution of the social aspects.	S1		
Excels	Chamber of Labour, Austria	Trade union	Austria				A lot of information can be collected in the companies without much effort or is basically available. The data points on non-employees are only to be reported if the external workers contribute significantly to the IROs. In particular, information about the working conditions of temporary workers and self-employed contract workers is an indispensable component for assessing the social responsibility of companies. A structure should be expanded to include the categories of gender and countries from the BAK's point of view. The BAK also emphasises that the ESRS must be in line with the future CSRD or the Corporate Sustainability Due Diligence Directive.	S1		
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	The terms pay, remuneration and wages (ESRS S1-9) should be better differentiated from one another. It would be desirable if the requirements of ESRS S1-9 and S-15 were combined, as all reporting requirements relate to pay and other remuneration.	S1	S1-15 - Remuneration metrics	44.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Information on the grievance mechnism should be removed from S1-2, as this is addressed in the G-standard. Alternatively, it should be noted in the DR that a reference to the Governance information is sufficient, if there is no separate channel for employees..	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	16.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	The publication of remuneration ratios is problematic because it can reveal sensitive information about individuals (data protection). In addition, the ratio is often distorted and not very meaningful, especially in small or specialised companies. Finally, there is a lack of clear methodological standards for calculation (gross/net, bonuses, full-time equivalents, etc.), which further limits comparability and meaningfulness -> deletion	S1	S1-15 - Remuneration metrics	44. (b)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	The workload is extremely high, as appropriate wages must be researched for each country. The EU should publish an annual overview of all appropriate wages for each country. How should performance-related salary components be included? Need for clarification.	S1	S1-9 - Adequate wages	13.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	simplification edit, thanks for the examples in brackets - better move to ESRS 2	S1	S1-1 - Policies related to Own workforce	11.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	duplication of ESRS S1-18	S1	S1-3 - Actions and Resources related to Own workforce	19. (a)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	duplication of ESRS S1-18	S1	S1-3 - Actions and Resources related to Own workforce	19. (b)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	new disclosure requirement description without helpful examples	S1	S1-3 - Actions and Resources related to Own workforce	AR 6

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	previous description more clear	S1	S1-3 - Actions and Resources related to Own workforce	AR 7
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	For social standards the removal of the term "severe" from the disclosure requirements for human rights incidents across all social standards is particularly concerning. Without a clear limitation to the most serious cases, companies may be required to report even minor or less relevant incidents. This broad scope risks undermining the materiality of disclosures and contradicts the objective of simplification. Maintaining a focus on severe human rights incidents is essential to ensure that reporting remains meaningful, proportionate, and aligned with the principles of relevance and efficiency.	S1	S1-16 - Incidents of discrimination and other human rights incidents	45.
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	The removal of the workforce age distribution is not necessarily possitive to us since age distribution is monitored and disclosed as a key dimension of our strategy.	S1	S1-8 - Diversity metrics	29.
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	It may be excessively complex to identify isolated cases of employees who lack social protection, and even more so to determine in which countries they are located, since as a general rule, all our employees live in countries where minimum social protection is guaranteed by the government, and the company fully complies with local laws.	S1	S1-10 - Social protection	34.
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	We offer paternity leave in every operation. Both maternity leave and paternity leave are key to our work-life balance commitment.	S1	S1-10 - Social protection	34. (d)
Excels	BDEW	Other - please specify (required)	Germany			I disagree	The requirements concerning non-employees should be removed. They create significant additional effort without providing a clear added value in terms of comparability or decision-usefulness.	S1	S1 - Objective	4.
Excels	BDEW	Other - please specify (required)	Germany			I disagree	change from "pay gap" to "global pay gap"	S1	S1-15 - Remuneration metrics	44(a)
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	- is calculated on the basis of the average wage: however, a median wage would be better	S1	S1-15 - Remuneration metrics	44(a) AR21, AR22
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	- Feedback to EFRAG for V 1.5: so far (ESRS S1.104) only addressed"severe human rights incidents" - also Indicator #14 in Table III of Annex I Delegegated Regulation (EU) 2022/12888 refers to "severe human rights incidents"	S1	S1-16 - Incidents of discrimination and other human rights incidents	45, 46(b)
Excels	BDEW	Other - please specify (required)	Germany			I agree	- Feedback to EFRAG for V 1.5: "In the ESRS Set 1 depending on the standard "incidents" meant different things."; if it is about the complaints filed through channels it should state that/ if it is about actual confirmed incidents, it should also state that - nevertheless "Incident" is a defined term, which should be specified.	S1	S1-16 - Incidents of discrimination and other human rights incidents	
Excels	BDEW	Other - please specify (required)	Germany			I agree	- "confirmed incidents" maybe better.	S1	S1-16 - Incidents of discrimination and other human rights incidents	
Excels	BDEW	Other - please specify (required)	Germany			I agree	- duplication of ESRS GDR-A	S1	S1-3 - Actions and resources related to own workforce	19(a)
Excels	BDEW	Other - please specify (required)	Germany			I agree	- duplication of ESRS GDR-AT	S1	S1-3 - Actions and resources related to own workforce	19(b)
Excels	BDEW	Other - please specify (required)	Germany			I agree	- Feedback to EFRAG for V 1.5: ESRS S1.19a is a duplication to 18 - Question: Is this really a duplication or a clarification with regard to key actions with regard to material negative impacts	S1	S1-3 - Actions and resources related to own workforce	19(a)
Excels	BDEW	Other - please specify (required)	Germany			I disagree	- Proposal: replace this metric by a number of confirmed incidents of "non-respect of adequate wages"	S1	S1-9 - Adequate wages	
Excels	Randstad	Preparer (non-financial preparing a sustainability report)	Netherlands			I disagree	Proposal: Allow companies to choose between reporting the unadjusted gap or the adjusted gap, with an explanation for their choice. Rationale: This provides flexibility while ensuring a high level of transparency and relevancy. Arguments: We believe that there is no added value for disclosing the unadjusted pay gap, here are our arguments: - Misleading Indicator: The unadjusted pay gap fails to measure equal pay for equal work. It can falsely imply pay discrimination and misrepresent a company's commitment to pay equity. It is an oversimplification of an equal pay analysis and ignores structural factors. - Contradicts "Fair Presentation": For a global company like Randstad, a single, consolidated figure is not a fair or faithful representation of our remuneration practices across diverse labor markets. - Not Actionable: The raw number doesn't identify the root cause of the gap (e.g., representation in leadership, geographic pay scales), making it a poor tool for driving meaningful, targeted action. - Flawed for Multinationals: A global, unadjusted figure is statistically unsound as it averages vastly different economic realities, currencies, and costs of living.	S1	S1-15 - Remuneration metrics	AR 33
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Regarding the indication of whether employees are covered by collective agreements: does this refer to collective agreements that cover all working conditions (including salary, in German "Manteltarifvertrag"), or should collective agreements (in German "Tarifverträge") that regulate only parts of the working conditions also be included? We assume that work agreements (in German "Betriebsvereinbarungen") are not included in the scope of collective agreements, but are considered policies. Please validate.	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (b)
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	There may be countries outside the EU that apply a minimum wage which, however, does not fully cover the ILO wage-setting principles (particularly the aspect of tripartite social dialogue). Does the incomplete consideration of all ILO wage-setting principles lead to a mandatory exclusion of the data point wage applied in these countries from the reporting?	S1	S1-9 - Adequate wages	32.
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Is the understanding correct that S1-12, alongside S1-5 and S1-7, also refers only to the ten countries with the highest number of employees? The calculation logic refers in the denominator to the new definition according to S1-5. If we voluntarily report on more countries in S1-5, are we still allowed to apply the limit of ten countries in S1-12?	S1	S1-12 - Training and skills development metrics	AR 24
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	What is meant by b i) "as well as other workers that work on its sites". Does this include only non-employees or value chain workers as well? According to ESRS1, AR 28 metrics does not include value chain workers within S1	S1	S1-13 - Health and Safety metrics	40. (b)
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	On the one hand it refers to employees (first paragraph) but on the other hand it refers to own workforce (with includes employees and non-employees), so should work-related accidents only be reported for employees or also for non-employees?	S1	S1-13 - Health and Safety metrics	AR 27

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Fatalities from work-related ill health may have existed before the employee started working at the undertaking. This metric does not allow any conclusions to be drawn about whether work at the undertaking leads to corresponding fatalities and should therefore not be reported	S1	S1-13 - Health and Safety metrics	40. (b)
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	AR 27 states that the company should use definitions for work-related injuries according to the national laws of the countries. However, AR 29 on work-related illnesses does not mention this. Shouldn't the company use the definitions according to the national laws of the countries to determine the type of work-related illness too?	S1	S1-13 - Health and Safety metrics	AR 29
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	In 44a), the average is requested (whereas the Pay Transparency Directive (EU) 2023/970 refers to the median), but in 44b) the median is asked for. Do you want the median or the average in the ESRS reporting or does the undertaking have a choice regarding 44a)?	S1	S1-15 - Remuneration metrics	44. (a)
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	As the deletion of the reporting obligation regarding "severe" human rights incidents does not lead to a simplification but to an increase of reportable incidents and to a decrease of specificity of incidents, the term "severe" in relation to human rights incidents should be reinstated to simplify the reporting process. However, a definition of "severity" in this context is required.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (b)
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	From our perspective, the change does not make much difference for international undertakings with many subsidiaries in different countries, because the number of employees must be queried anyway in order to consolidate the figures and then decide which are the ten countries with the most employees. Unless this threshold applies to all reporting obligations, it represents hardly any noticeable relief. Moreover all information about the new DR S1-5 concerning employees have to be in line with IFRS. With regard to new DR S1-7, it could be a relief.	S1	S1-5 - Characteristics of the undertaking's employees	5.
Excels	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States			I disagree	The definition of recordable accidents needs clarifying, as this can vary depending on jurisdiction. This is particularly relevant for companies working internationally. The ESRS requires a TRIF report (per 1,000,000 hours), but definition of what the ESRS considers as recordable is not given – It is also the case that multiple different regulations both at EU and national level require reporting of this information, for example in the marine sector, the EU offshore reporting directive already asks this. It is not necessary to report this same data multiple times via multiple regulations	S1	S1-13 - Health and Safety metrics	40. (c)
Excels	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States			I partially agree and partially disagree	Annual remuneration of the highest paid individual is reported under financial reporting regulations and does not need to be double-reported under ESRS S1	S1	S1-15 - Remuneration metrics	44. (b)
Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	Similar to comment for ESRS 1 Appendix A: the social susubtopics in parenthesis are not exhaustive of the sub-topic title/ human rights instruments mentioned in CSRD. Hence all parentheses should start with 'including'.	S1	S1 - Objective	4.
Excels	Danish Institute for Human Rights	NGO	Denmark			I agree	Support the top 10 country suggestion	S1	S1-5 - Characteristics of the undertaking's employees	23. (a)
Excels	Danish Institute for Human Rights	NGO	Denmark			I disagree	Non-EU hierarchy should be amended to prevent use of minimum wage without relevant 'adequacy' check. ILO wage setting principles check is not a correct adequate wage check. ILO principles for Estimating a Living Wage is the right benchmark, not the wage setting principles for i. See also answer to q 28 in the survey.	S1	S1-9 - Adequate wages	AR 22
Excels	Danish Institute for Human Rights	NGO	Denmark			I disagree	Disagree with the arbitrary removal of age. Age a known discrimination factor in workplaces and managing risks and impacts related to demographic developments requires access to data. Suggest to reinstate former requirement S1 66 (b) on the distribution of employees by age group.	S1	S1-8 - Diversity metrics	30.
Excels	Danish Institute for Human Rights	NGO	Denmark			I disagree	Parental leave rather than maternity leave should be retained. As should retirement. Arbitrary deletions of decision useful datapoints.	S1	S1-10 - Social protection	34.
Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	Suggest reinstating the requirement to report the percentage of entitled employees that took family related leave not just how many is entitled.	S1	S1-14 - Work-life balance metrics	42.
Excels	European Transport Workers' Federation (ETF)	Trade union	Belgium			I partially agree and partially disagree	Gender breakdown for zero-hours employees should be brought back in	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	European Transport Workers' Federation (ETF)	Trade union	Belgium			I partially agree and partially disagree	Age distribution should not be deleted, as it provides crucial information on the characteristics of workforce, which is relevant for a whole host of IROs, e.g. aging of the workforce	S1	S1-8 - Diversity metrics	29.
Excels	European Transport Workers' Federation (ETF)	Trade union	Belgium			I partially agree and partially disagree	Retirement should be brought back in as a mandatory datapoint	S1	S1-10 - Social protection	34.
Excels	European Transport Workers' Federation (ETF)	Trade union	Belgium			I partially agree and partially disagree	Gender breakdown for training hours should be reinstated	S1	S1-12 - Training and skills development metrics	38.
Excels	European Transport Workers' Federation (ETF)	Trade union	Belgium			I partially agree and partially disagree	Fatalities from ill health for non-employees and workers on site should be reinstated	S1	S1-13 - Health and Safety metrics	40.
Excels	European Transport Workers' Federation (ETF)	Trade union	Belgium			I partially agree and partially disagree	Datapoint on workers actually taking family-related leave should be reinstated	S1	S1-14 - Work-life balance metrics	42.
Excels	European Transport Workers' Federation (ETF)	Trade union	Belgium			I partially agree and partially disagree	Country-level information should be provided on the ratio of the higest paid individual in that country to the country median should be reported	S1	S1-15 - Remuneration metrics	44. (b)
Excels	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy			I partially agree and partially disagree	The information requested could be more meaningful to the reader of the sustainability statement if, in addition to the number of training hours per employee, a breakdown by job category (manual worker, office worker, middle manager, or executive) were also requested. This would provide a more comprehensive and general overview.	S1	S1-12 - Training and skills development metrics	38. (b)
Excels	Punto 3 S.r.l. S.B.	Consultant (including software vendor)	Italy			I partially agree and partially disagree	To make the comparative analysis more effective, it would be useful to specify which components of total remuneration should be included and which should not. Furthermore, total remuneration does not take into account part-time contracts (except through a normalization carried out by the report preparer, which could also distort the data). The total annual remuneration of these employees is obviously lower than that of their full-time colleagues performing the same role. The ratio is significantly altered and distorted upwards, as the median value of the remuneration of all employees (except the highest paid), the denominator, is reduced.	S1	S1-15 - Remuneration metrics	44. (b)
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The changes to S1-1 make the rules clearer, cut duplication, and reduce the reporting effort, which is helpful. This simplification makes the standards easier to follow. However, moving DEI to a voluntary level reduces transparency and may lead to uneven reporting between companies. At a time when diversity and inclusion are increasingly important for investors, workers and society, this information should stay mandatory.	S1	S1-1 - Policies related to Own workforce	11.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	GKK Partners	Consultant (including software vendor)	Germany			I disagree	Unclear why "existing" definition "10% threshold" is changed to "ten largest countries". This constitutes a more complex way. Furthermore, it can be expected that the "10% threshold" is available within undertaking's data.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	23. (a)
Excels	GKK Partners	Consultant (including software vendor)	Germany			I agree	Simplification. However, data can be expected to be there for the calculation of the ratio.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	23. (c)
Excels	GKK Partners	Consultant (including software vendor)	Germany			I agree	Simplification	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	24.
Excels	GKK Partners	Consultant (including software vendor)	Germany			I agree	Simplification	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	29.
Excels	GKK Partners	Consultant (including software vendor)	Germany			I agree	Simplification	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	30.
Excels	GKK Partners	Consultant (including software vendor)	Germany			I partially agree and partially disagree	Simplification. However, with deletion of "parental" only partical information for female gender. Might be seen in contrast to an overall equality perspective aligning gender. Since it is exceptable, that current HR-systems have information of leave (for both genders, when applying for leave), it is suggested to add this again.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	34. (d)
Excels	GKK Partners	Consultant (including software vendor)	Germany			I agree	Simplification	S1	S1-12 - Training and skills development metrics	38. (a)
Excels	GKK Partners	Consultant (including software vendor)	Germany			I agree	Simplification	S1	S1-12 - Training and skills development metrics	38. (b)
Excels	GKK Partners	Consultant (including software vendor)	Germany			I disagree	Table 2: is the connection to corresponding adjustment of "10 % threshold" (see line 1) clear enough? As outlined above, "10% threshold" preferred and suggested.	S1	S1-5 - Characteristics of the undertaking's employees	AR 11
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Original ESRS, ESRS 2 paragrapg 65 f states: if relevant, whether and how the undertaking makes the policy available to potentially affected stakeholders, and stakeholders who need to help implement it. Revised ESRS S2 AR 1 is making this disicosure as "example of policy apects to disclose", which might create differnent interpretation even within one report. Suggested to either remove this DP or move back to ESRS 2 with amended wording.	S1	S1-1 - Policies related to Own workforce	AR 1
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I agree	(15) Requirements are simplified with regards to engagement, reduces the volume of reporting, especially for global companies	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	15.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	(19 a) "including the approach in situations where tensions arise between such actions and other business pressures" - voluntary DP in original ESRS. Making voluntary DP mandatory goes against aim of simplification. Initial disclosure requirement S1-4 paragraph 41 is sufficient " whether and how it ensures that its own practices do not cause or contribute to material negative impacts on own workforce".	S1	S1-3 - Actions and Resources related to Own workforce	19. (a)
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I agree	(21) and (AR 8) allows not to disclose whether and how entity is engaged with workforce in "tracking performance against targets" and "identification of lessons learnt or improvements". original ESRS (S1-5 47b, c) required to do so.	S1	S1-4 - Targets related to Own Workforce	21.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I agree	(23) requirement of top 10 countries enhances the presentation	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I agree	(AR 13) turnover rate calculation now refers to "average employee headcount" which provides clarity. Original (old S1-6 AR 59) allowed company to determine the denominator and describe the methodology.	S1	S1-5 - Characteristics of the undertaking's employees	AR 13
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	(AR 11, AR 12) inconsistency in templates for Table 1 and Table 3 remain between "not reported" and "not disclosed". Suggested to align to remove the inconsistency for streamlined reporting.	S1	S1-5 - Characteristics of the undertaking's employees	AR 11
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	(23 b e) requirement to disclose non-guaranteed hours employees. Definition provided by ESRS does not match with categories of non-headcount relevant employees in some companies. Suggested to allow flexibility in this requirement, including to remove this line from template in case it is not applicable.	S1	S1-5 - Characteristics of the undertaking's employees	23. (b)
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	(old S1-7 55 b) removed the requirement on disclosure whether its FTE/HC; whether its average, as of year end > limits comparability, suggested to add back requirement to disclose methodology.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I agree	(27 b and 28 a) refer to top 10 countries instead of countries presenting over 10% of total number of employees > provides more insights, since original requirement gives very limited overview	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (b)
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I agree	(27 b and 28 a) added references which total number of employees to consider > removes any uncertainty	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (b)
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I agree	(AR 17) allows now present information in narrative or table, earlier only table was allowed > gives more flexibility	S1	S1-7 - Collective bargaining coverage and social dialogue	17.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	(33) the topic is kept, while is highly regulated by local laws in each country, so the benefit of this information is limited; we suggest revisiting the related disclosure requirements	S1	S1-10 - Social protection	33.

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Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	(33) no further guidance is provided on scope and how to disclose in case of local specifics (for example: in different countries eligibility for such protection might depend on type of employees, i.e temporary or and hourly paid employees). For global companies reporting burden remains > further guidance is needed	S1	S1-10 - Social protection	33.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I agree	(34) retirement is removed from list of events; parental leave is replaced with maternity leave > if the topic reimains in the ESRS, less reporting and data collection burden.	S1	S1-10 - Social protection	34.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	(35) the topic is kept, while it is subject to legal restrictions on data collection, so the benefit of this information is limited. Suggested revisiting the topic/ required metrics.	S1	S1-11 - Persons with disabilities	35.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I agree	(AR 23) allows companies use the same definition of persons with disabilities across various countries	S1	S1-11 - Persons with disabilities	AR 23
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I agree	(38 a) methodology to calculate % of employees participated in performance review simplified	S1	S1-12 - Training and skills development metrics	38. (a)
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	(44) Adjusted gender pay gap is more representative metric compared to unadjusted, it would be great to allow companies at least to choose which gender pay gap to report on.	S1	S1-15 - Remuneration metrics	44.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Word "Severe" has been removed from the disclosure of "human rights incidents", while reference to SFDR PAI indicator remained, where disclosure of "severe human rights incidents" remained, this creates inconsistency. Suggested to add "severe" back to the DR. In addition, definition of "severe" should be provided in alignment with internationally recognized standards.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (b)
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I agree	(AR 38) clarity provided that only substantiated incidents are to be reported > suggested to move this to main body of the requirement from AR (i.e. to 46)	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 38
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I agree	S1-16 (AR 41) good clarification no cross-reference or reconciliation to financial statements is required.	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 41
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Paragraph 45: 'Previously only "severe human rights issues" were mentioned. The SFDR also refers to "severe human rights issues and incidents". We suggest to add the word "severe" again to ensure consistency between both frameworks. Furthermore, we would welcome to refer to the definition of the United Nations Guiding Principles on Business and Human Rights regarding "severe human rights issues".	S1	S1-16 - Incidents of discrimination and other human rights incidents	44.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	The definition of non-employees in the undertaking's own workforce is too narrow and does not provide a fair presentation of an organization's own workforce. We recommend using 'control of work' as the criteria for determining an organization's own workforce. This is consistent with GRI Standards (Disclosure 2-8) and has also been included in the recent Proposed Amendments to the SASB Standards. For the topic of occupational health and safety, the scope of workers should be further extended to cover other workers that work on the undertaking's site (i.e., control of workplace).	S1	S1 - Objective	7.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We propose retaining former 14 (e) regarding impacts on the undertaking's own workforce that may arise from the transition plan. This is important information for understanding the social dimension of climate change. In addition, S1 could refer to the just transition-related metrics in GRI 102: Climate Change, to further support undertakings in reporting on the impacts on their own workforce resulting from the transition plan. At the least, this content should be retained within the NMIG.	S1	S1-1 - Policies related to Own workforce	10.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We propose retaining former S1 32 (e) on how the undertaking involves stakeholders in ensuring the effectiveness of their grievance mechanisms, in line with GRI 2-25-e.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	16.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	For the purpose of simplification, data points on the availability of channels such as grievance mechanisms from S1, S2, S3 and S4 could be consolidated into one data point covering all categories of stakeholders and moved to ESRS 2. This would be equivalent to the consolidation done for the data point on the human rights policy commitment. This would also increase alignment with GRI 2-25. In addition, the data point could be further aligned verbatim with GRI 2-25-b and e, for greater clarity and interoperability.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	16.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	For the purpose of simplification, data points on the general approach to and processes for providing or contributing to remedy from S1, S2, S3 and S4 could be consolidated into one data point covering all categories of stakeholders and moved to ESRS 2. This would be equivalent to the consolidation done for the data point on the human rights policy commitment. This would also increase alignment with GRI 2-25. In addition, the data point could be further aligned verbatim with GRI 2-25-c, for greater clarity and interoperability.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	17.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We recommend retaining remedy actions (former S1 38 (b)) as a stand-alone data point, in line with GRI 3-3-d-ii. Having a standalone data point ensures that this information is not overlooked and it is easily identifiable by users and stakeholders.	S1	S1-3 - Actions and Resources related to Own workforce	19.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	The breakdown by gender for 'non-guaranteed hours employees' in 23 (b) iii has been removed. This removal seems arbitrary and seems to establish a hierarchy between permanent and temporary contracts on one hand, and non-guarantee hours contracts on the other. We thus recommend reinstating the breakdown by gender in line with GRI 2-7-b-iii.	S1	S1-5 - Characteristics of the undertaking's employees	23. (b)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	This comment pertains to paragraph 23 (f) - which is not listed in the drop-down list in column B. We recommend retaining the total number of employees who have left the undertaking during the reporting period. Since the average employee headcount used for the denominator could be calculated in different ways, it is important to keep the absolute data to provide transparency on the actual total number of employees that have left the undertaking.	S1	S1-5 - Characteristics of the undertaking's employees	23. (d)

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Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We recommend that former paragraph 50(e) on fluctuations in number of employees during the reporting period be retained within new AR10, as important contextual information depending on which methodology has been selected for calculating the number of employees (e.g., at the end of the reporting period vs as an average).	S1	S1-5 - Characteristics of the undertaking's employees	AR 10
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	This paragraph should specify whether the data is reported as headcount or FTE, in line with paragraph 23 on employees. Similarly, AR10 should be included for this DR as well, to provide transparency on the methodology used and other important contextual information (such as on fluctuations during the reporting period). See comment to suggest retaining former paragraph 50(e) on fluctuations within AR10.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	DR S1-8 on diversity has been reduced to just reporting gender diversity at the top management level. We deem it important to reinstate former requirement S1 66 (b) on the distribution of employees by age group to provide additional information about the diversity among employees and as important contextual information on potential impacts. This also supports alignment with GRI 405-1-b-ii. However, to support simplification, each organization could define its own specific age groups, as suggested in the latest GRI Diversity and Inclusion exposure draft (available for public consultation until 15 September), since different age groups may be relevant depending on the organization's specific characteristics, such as its sector of operation.	S1	S1-8 - Diversity metrics	30.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We recommend retaining parental leave and retirement (former S1 74 (d) and (e)), as two important areas of social protection. GRI's Remuneration and Working Time exposure draft, which was available for public consultation in 2024, includes both maternity and paternity leave in the context of social protection: "Maternity and paternity benefits in case of pregnancy or childbirth – covers income security, maternal healthcare, maternity leave, paternity leave, parental leave, adoption leave, breastfeeding arrangements, employment protection, and childcare solutions after return to work."	S1	S1-10 - Social protection	34.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	This data point does not provide meaningful information as it only provides a list of countries where employees do not have social protection for certain life events. It does not indicate how many or which types of employees are not covered by which social protection. Since DR S1-5 23(a) is limited to the top ten countries, it adds further difficulty in interpreting the data for S1-10, in terms of the coverage of employees.	S1	S1-10 - Social protection	34.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We recommend retaining the breakdown by gender when reporting the percentage of employees that participated in regular performance and career development reviews. This breakdown demonstrates the extent to which the system is applied throughout the organization, and whether there is inequity of access to these opportunities. This also supports alignment with GRI 404-3-a. At the least, we suggest to retain this content within the NMIG.	S1	S1-12 - Training and skills development metrics	38. (a)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We recommend retaining the breakdown by gender when reporting the average number of training hours per employee. This breakdown demonstrates the extent to which the system is applied throughout the organization, and whether there is inequity of access to these opportunities. This also supports alignment with GRI 404-1-a-i. At the least, we suggest to retain this content within the NMIG.	S1	S1-12 - Training and skills development metrics	38. (b)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	GRI deems it important to require separate reporting of fatalities from work-related injuries on one hand, and fatalities from work-related ill health on the other. Disaggregating this information is important for understanding the types of occupational health and safety impacts. This also supports alignment with GRI 403-9 and GRI 403-10. At the very least, we suggest that former AR 82 be retained within the NMIG.	S1	S1-13 - Health and Safety metrics	40. (b)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	Paragraph 40 (b) seems to suggest that sub-points i and ii should be aggregated into a total figure on fatalities. Aggregating figures with different scopes (point i includes non-employees and other workers that work on its sites, while point ii excludes these) can obscure material information. We thus recommend that fatalities be reported separately for employees on one hand, and for non-employees and other workers that work on its sites on the other hand. This also supports alignment with GRI 403-9 and GRI 403-10.	S1	S1-13 - Health and Safety metrics	40. (b)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We recommend reinstating the requirement to report fatalities as a result of work-related ill-health for non-employees and workers in the value chain (former 88 (b) and supporting provision "The information for (b) shall also be reported for other workers working on the undertaking's sites, such as value chain workers if they are working on the undertaking's sites."). Non-employees are often at a higher risk of negative impacts related to occupational health and safety. Reinstating this requirement also supports better alignment with GRI 403-9-b-i and GRI 403-10-b-i. At a minimum, it should be retained within the NMIG.	S1	S1-13 - Health and Safety metrics	40. (b)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	The data point to report the number and rate of recordable work-related accidents is not consistent with GRI 403-9. GRI requires reporting the number and rate of recordable work-related injuries, excluding cases of ill health in GRI 403-9. In GRI 403-10, cases of work-related ill health are reported separately and as an absolute number, rather than as a rate. Many illnesses develop slowly over time after exposure, thus making the reporting of a rate more challenging and less meaningful. This can also support further simplification of this metric.	S1	S1-13 - Health and Safety metrics	40. (c)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We recommend retaining former AR 83-86, 88 and 92 within the ARs or at least within the NMIG, as important guidance for compiling the required information on health and safety and to enable comparability.	S1	S1-13 - Health and Safety metrics	AR 27
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We recommend retaining the following former guidance from AR 94 within new AR29: "the disclosure may include cases of work-related ill health that were detected during the reporting period among people who were formerly in the undertaking's workforce."	S1	S1-13 - Health and Safety metrics	AR 29
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We recommend reinstating the requirement to report the percentage of entitled employees that took family-related leave, and a breakdown by gender (former S1 93 (b)). Many employees are discouraged from taking leave and returning to work by employer practices that affect their employment security, remuneration and career path. Therefore, reporting entitlement alone does not provide sufficient information with regards to the ability of employees to take such leave. Reinstating this requirement also supports alignment with GRI 401-3-b.	S1	S1-14 - Work-life balance metrics	42.
Excels	NomoGaia	NGO	United States			I partially agree and partially disagree	Insert "and how it makes it known to its own workforce." at the end of the second sentence. REASON: For companies' grievance mechanism, outreach (the process of informing potential claimants of the existence of grievance mechanisms and how to access them) is key. See https://warwick.ac.uk/fac/soc/law/research/centres/chrp/governance/hrandbusiness/empiricalresearch/msigrievancemechanisms/ and references cited.	S1	S1-1 - Policies related to Own workforce	16.

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Excels	NomoGaia	NGO	United States			I partially agree and partially disagree	Insert, "including a description of all actual remedies provided for negative human rights impacts." to end the sentence. REASON: Specific remedy disclosures are essential to the usefulness of disclosures on human rights actions. See our Report at https://nomogaia.org/wp-content/uploads/2025/09/Disclosure-Report-1.pdf and draft paper https://warwick.ac.uk/fac/soc/law/research/centres/chrp/publications/corporate_disclosure_and_mhrdd_june_2026_ext.pdf.	S1	S1-1 - Policies related to Own workforce	18.
Excels	NomoGaia	NGO	United States			I partially agree and partially disagree	Add: "In accordance with ESRS 2 GDR-A key actions describe all actual remedies provided for negative human rights impacts." REASON: Specific remedy disclosures are essential to the usefulness of disclosures on human rights actions. see our Report at https://nomogaia.org/wp-content/uploads/2025/09/Disclosure-Report-1.pdf CITE DISCLOSRUE PAPER.	S1	S1-1 - Policies related to Own workforce	AR 6
Excels	NomoGaia	NGO	United States			I partially agree and partially disagree	Delete the final word "region" and insert "country". REASON: To disclose this information by region risks aggregating workforces in countries with widely divergent rates of securing collective bargaining agreements and so rendering the information misleading and uninformative.	S1	S1-1 - Policies related to Own workforce	27. (c)
Excels	NomoGaia	NGO	United States			I partially agree and partially disagree	Insert at the beginning of (b) "For each country in which the undertaking operates: " REASON: This is a valuable addition with little added reporting cost. Often the most important information on workplace fatalities is where they occurred and so can highlight particularly dangerous and insufficiently controlled operations.	S1	S1-1 - Policies related to Own workforce	40. (b)
Excels	NomoGaia	NGO	United States			I partially agree and partially disagree	Add to AR 37: "In addition to the total number of incidents reported under DR 46(b) disaggregate by human right negatively impacted and the country in which they occurred." REASON: These are essential metrics needed to make these disclosures useful for relevant audiences. see: https://wrap.warwick.ac.uk/id/eprint/185392/ and https://warwick.ac.uk/fac/soc/law/research/centres/chrp/governance/hrandbusiness/empiricalresearch/msigrievancemechanisms/ and references cited	S1	S1-1 - Policies related to Own workforce	AR 37
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Paragraph 3 makes reporting on S1-5 and S1-16 as well as S1-6 (if non-employees are considered material) mandatory for every company that identified any material impact, risk or opportunity that is allocated to S1. Whereas we can follow the argument for S1-5 and S1-6, we cannot follow the argument for S1-16. Disclosure Requirement S1-16 is clearly targeted at the topic discrimination and human rights incidents. Thus, it is indirectly assumed these sub-topics are always considered to be material for a company that may hovever only have identified S1 as partially material. If the DMA result shows that for example only the sub-topic health and safety is material for a company, the DR S1-16 does not include any related additional information for descriping the management approach for health and safety as e.g. health and safety incidents will already be reported under DR S1-13. The same may apply for training and skills development. Thus, we conclude a mandatory reporting of DR S1-16 as disproportionate if no related material subtopic is identified. We therefore recommend to either fully remove DR S1-16 as mandatory datapoint or to add addtional requirements just as for S1-6.	S1	S1 - Objective	3.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We would appreciate to have a common Database on adequate wages provided by the EU to ensure comparability between Companies. Moreover, the current methodology imposes the burden of judge whether a statutory minimum wage or a collective bargaining wage takes into account the ILO wage setting principles on the reporting undertaking, which could lead to an excessive burden which surpasses both the companies knowledge and responsibility as well as to different conclusions about the same wage being an adequate wage or not. Furthermore, in AR 22 b) i) it is established that in order to be considered as an adequate wage, it should be reviewed/adjusted every two years. The ILO wage setting principles do not establish this particular period of time, therefore, the ESRS should not create a requirement in this sense. Even more, taking into account that the reality on the field demonstrates that a great part of statutory minimum wages/collective bargaining agreements wages are not adjusted on this period.	S1	S1-9 - Adequate wages	22.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The current remuneration metrics fail to incorporate key stakeholder feedback, such as from the ANC working group, which called for greater flexibility to reduce the reporting burden. We strongly recommend allowing companies to provide disclosures at a country or category level, as this provides more meaningful and context-relevant information. As such, we including as a "may" option to disclose another gender pay gap metric to comply with other laws and regulations. Companies do have to bear in mind that they are subject to assurance requirements if they decide to disclose the adjusted gender pay gap.	S1	S1-15 - Remuneration metrics	44. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	the removal of the term "severe" from the disclosure requirements for human rights incidents across all social standards is particularly concerning. Without a clear limitation to the most serious cases, companies may be required to report even minor or less relevant incidents. This broad scope risks undermining the materiality of disclosures and contradicts the objective of simplification. Maintaining a focus on severe human rights incidents is essential to ensure that reporting remains meaningful, proportionate, and aligned with the principles of relevance and efficiency	S1	S1-16 - Incidents of discrimination and other human rights incidents	45.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The paragaph does not support the aim of simplifying the ESRS. This paragraph generates considerable additional work in reporting and additional coordination requirements (e.g. determining and adjusting the reporting scope yearly, establishing new data collection processes). Due to the varying and company-specific reporting scope we do not see any added value, as it prevents meaningful comparisons across years and between companies. We do not agree with the definition "50 or more employees by head count and that are the 10 largest countries in terms of employee numbers for the undertaking" for significant employment. The definition misleadingly implies a substantial employee presence in these countries, when in reality, the number of employees may be very small. In our case, these 10 countries also include countries that cover only 0.2 % of the total number of employees. The total number of employees should be shown by region, as the undertakings are easier to compare than by country breakdown. For this, a standardised definition of region should be used (e.g. UN classification). The regional breakdown enables to take a position on regional priorities,	S1	S1-5 - Characteristics of the undertaking's employees	23. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	In general, the reporting requirements are now more clearly defined. We welcome that the disclosure requirements have been narrowed down and that the word "complaint" has been removed. However, we suggest including as an application requirement that we can refer to G1 if our grievance mechanism also includes HR discrimination and/or human rights incidents.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The inconsistent scope for health and safety metrics, which alternates between 'employees', 'non employees' and 'workers on site', creates confusion and hinders comparability. We propose streamlining these datapoints to mandate reporting only for a company's own workforce. Including non-employees is problematic as companies lack the direct operational control and access required to collect reliable and verifiable data from third-party entities, making disclosure on them optional and based on materiality is a more practical approach.	S1	S1-13 - Health and Safety metrics	40.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Referenc to S1 §4a-f: Very confusing why previous sub-sub-topics are sometimes moved to extra points and sometimes in brackets. This will lead to huge discussions on which level materiality is going to be defined, whether to use topics in front or in the brackets. Materiality analysis needs to be fully and new implemented due to this change. Only resonable approach: Leave out sub-topics in general and just list the previous sub-sub-topics one after each other. Furthermore, a proper mapping won't be possible like this!! We recommend deleting them to avoid the risk of auditors requiring individual assessments for each one.	S1	S1 - Own workforce	4.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Move this to ESRS 2, this is related to the general statement with regards to the human rights policy.	S1	S1-1 - Policies related to Own workforce	12.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Either move this to ESRS 2, as it is a general disclosure no matter if the sub-topic "Health&Safety" is material, or delete it and only state a health & safety policy if health&safety is material for this company. This again does not follow the overall systematic.	S1	S1-1 - Policies related to Own workforce	13.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	I understand why this is being required, but again it would make sense to move this disclosure requirement to ESRS 2 as it related to the human rights policy and how the company works with it and how the HR policy is being trated within the company with regards to stakeholders.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	15. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	What is meant with resources (personnel, money, time...)? Definition not clear enough. Maybe keep focus only on key actions related to material topics. Furthermore, how can "KEY" actions be identified? Delete the word "key".	S1	S1-3 - Actions and Resources related to Own workforce	18.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Please note that the possibility to report in FTE is only stated under 23(b), not 23(a). This could lead to confusion. Maybe put the remark whether to report in head count or FTE under 23. in general. Moreover, the presentation of the required information should be reviewed to ensure greater clarity regarding the specific disclosure obligations. This need is particularly evident in paragraph 23(a), where the expectations are insufficiently defined. The same applies to the subsequent layers of paragraph 23(b), which would benefit from a more structured and precise formulation. In contrast, paragraph 27 serves as a good example of a well-articulated and actionable disclosure requirement. Reporting on "non-guaranteed hours employees" should be deleted overall. No information materiality (see benchmaking of already existing ESRS reports).	S1	S1-5 - Characteristics of the undertaking's employees	23. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	Great that you deleted the number which is less meaningful than the rate.	S1	S1-5 - Characteristics of the undertaking's employees	23. (c)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Disclosure of countries in EEA and their collective bargaining coverage is fine, but stating how many different bargaining contract there are is not a valuable information. Left alone that due to different countries, there are always more than one. And knowing how much does not really represent anything. Percentage per country should be sufficient!! Moreover, shifting from a "50 employees and 10% of total headcount" threshold to reporting for the "top 10 largest countries by employee headcount (if >50 employees)" will expand the number of countries for which many multinational companies must disaggregate data. Each additional country introduces distinct challenges in data collection. We suggest the inclusion of an additional option to avoid additional increase to only mandate disclosure until the first of either threshold is hit. So either 10% or the top 10 –whichever causes least burden. Lastly, The number of EEA countries to be reported in S1-7 is unclear. Should the list be derived from 23a (minus non-EEA), potentially resulting in fewer than 10 EEA countries, OR should a separate list of 10 EEA countries be compiled, potentially including more EEA countries than listed in 23a.	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The definition of Collective Bargaining can be interpreted in several ways. We advocate for a broader interpretation: In countries where trade unions exist but their agreements do not apply to a company, internal agreements covering working conditions should be considered "Collective Bargaining". ESRS S1 aims to protect employees, and this protection can be provided through agreements with both trade unions and Works Councils. We recommend to clarify the definition accordingly. A clear definition will lead to better cross-company comparability. Since AR 54 was deleted, the definition of region no longer exists. For S1-7, 27c, Collective Bargaining, a definition of region is needed (e.g. Classification UN) for cross-company comparability. Moreover, consistency and efficiency, a 'significant employment' threshold should also be applied to non-EEA countries, aligning the reporting requirements of 27c with 27b.	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (c)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Definition required what "loss of income" means: Is a one-off payment sufficient or does social protection only mean that there is a monthly payment covering an adequate amount?	S1	S1-10 - Social protection	33.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	More clear to only refer to maternity leave. Open question: the basis to calculate the coverage is then only all female employees? Which would be different basis than calculating the coverage for the other life events.	S1	S1-10 - Social protection	34. (d)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	Reduction is perceived very well.	S1	S1-12 - Training and skills development metrics	38. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	Reduction is perceived very well.	S1	S1-12 - Training and skills development metrics	38. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	Fine.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (a)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We do not support the removal of the "severity" concept from ESRS S1-16 § 46b). The previous focus on severe human rights incidents provided a clear and operational threshold for reporting, which enabled consistent and justifiable disclosures—such as the exclusion of non-severe cases from our 2024 reporting. Eliminating this threshold introduces ambiguity and would require us to define our own criteria for inclusion, particularly in areas like occupational safety or freedom of association. This increases complexity and audit effort while undermining comparability. For example, we are not classifying occupational safety issues as human rights violations under the LkSG framework, given our robust governance and preventive measures. We believe that fair and decision-useful reporting requires clear boundaries, and the removal of the severity filter undermines this principle. We support the narrowing of the former 103b scope (labor-related complaints) to incidents specifically concerning respect for internationally recognized human rights.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Table 2: Make sure to combine the requirement of former ESRS 2, paragraph 40(a)iii in the table. Both geographical areas as well as countries can be combined in this table. In general, mix-up of FTE and headcount again that is not made clear in S1-5.	S1	S1-5 - Characteristics of the undertaking's employees	AR 11
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Table 1,2,: The undertaking should not be allowed to choose how it presents the information. For benchmarking, it is better if only the tables are used. Table 3: The table in this way does not allow multi-year reporting. In general, mix-up of headcount and FTE that is not made clear throughout S1-5! Moreover, Gender as specified by the employees themselves..." in Table 3 should also be integrated into the explanlation of "others" in AR 11.	S1	S1-5 - Characteristics of the undertaking's employees	AR 12
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Table is fine, just the mix-up of region and country is difficult. No clear definition on what a region is. Continents as per UN definition could be used instead of region to make it more comparable. Or for non-EEA, also use country and the threshold. Could be more of use for the reader.	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 17
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The inherent diversity in national definitions for "work-related accidents" means that data collected from different countries within the same undertaking will not be directly comparable. This significantly complicates the ability to aggregate global health and safety data consistently, limiting an undertaking's capacity to gain a holistic and accurate view of its performance across all operations, and provide precise and reliable information essential for robust management of health and safety aspects, as expected by financial markets.. Therefore, suggestion of deletion of "work-related accidents, the undertaking shall use the definitions as per the national laws of the countries where the employees are based." Please add: "However, the undertaking can use its own definition for accident. In this case it shall disclose that fact."	S1	S1-13 - Health and Safety metrics	AR 27
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Since a work-related accident inherently involves an injury, distinguishing fatalities by injury and accident in this context is redundant. All accidents are already injuries, so the differentiation does not make sense. Please exclude "number". Rate is sufficient for transparency and more valuable to reader and it is relatable. Moreover, please exclude "number". Rate is sufficient for transparency and more valuable to reader and it is relatable.	S1	S1-13 - Health and Safety metrics	AR 28
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Please add to the first part: "and where an official investigation has show that the case of work-related ill health is causally linked to the company's working conditions and requirements."	S1	S1-13 - Health and Safety metrics	AR 29
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	This AR is not required if it is already stated in MDR-M and guidance is already provided in a general manner under GDR-M, applicable for all metrics.	S1	S1-15 - Remuneration metrics	AR 34
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	This is a non-understandable AR. Why is S1-15 the only metric where you indicate how many previous years need to be reported? This is usually standardized within the integrated reports (usually 5 years, depending on when the reporting on this metric started). This AR should be deleted and the company should decide on how many years are reported and harmonize this themselves.	S1	S1-15 - Remuneration metrics	AR 35
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	This should also be the definition of gross pay as stated in amended ESRS S1 paragraph 44(b) for the gender pay gap. And it should also be the reference on how to calculate the CEO remuneration. Still not enough clarification between remuneration and pay. Too many different definitions and non-alignment with EU Pay Transaprency Act, where salary components are not clarified.	S1	S1-15 - Remuneration metrics	AR 36. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The life areas of social security are not clear after discussion with several experts worldwide: Most of the time, the topic acquired disability is secured via the health insurance. So the five areas are not separate, rather then intertwined, at least for reason 1 and 3.	S1	S1-10 - Social protection	34. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Although the information on non-employees is subject to a phase-in period, the mandatory disclosure requirement should be reconsidered and made voluntary. Requiring quantitative data on non-employees would represent a disproportionate effort for companies.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	24.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Likewise, the use of estimates outside the workforce lacks conceptual coherence and may result in disclosures that are neither meaningful nor reliable.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	AR 15
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Please see comment for ESRS S2 para. 21	S1	S1-4 - Targets related to Own Workforce	21.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Please see comment for ESRS S2 para. 18 (b)	S1	S1-3 - Actions and Resources related to Own workforce	19. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The scope of this disclosure has been expanded. The requirement to disclose the methodology used to compile incidents data should be eliminated. Such expanded requirement may lead to disproportionate reporting efforts, without necessarily enhancing the relevance or comparability of the information disclosed.	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 39

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Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Regarding " The actions taken by the undertaking differ depending on its connection to the impact (causation, contribution, direct linkage), and how it has identified the actions as appropriate for addressing material impacts" it is not clear what the undertaking is expected to report on. Shall the distinction between causation, contribution and direct linkage be reported separately? In the previous version of ESRS the request was "whether the undertaking causes or contributes to a material impact" with "or" that was reflecting an alternative approach rather than the simplified requirement which seems to require three kind of impact to be disclosed separately. This is not a simplification therefore we suggest to eliminate the brackets or insert "or".	S1	S1-3 - Actions and Resources related to Own workforce	AR 6
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The current absence of a clear, standardized definition for "work-related ill health" presents a critical vulnerability within the disclosure requirements. Suggestion: Add the comprehensive definition of "work-related ill health" to the annex or guidance notes, as per the previous version: "Work-related ill health can include acute, recurring, and chronic health problems caused or aggravated by work conditions or practices. These include musculoskeletal disorders, skin and respiratory diseases, malignant cancers, diseases caused by physical agents (for example, noise-induced hearing loss, vibration-caused diseases), and mental illnesses (for example, anxiety, post-traumatic stress disorder). For the purpose of the required disclosures, the undertaking shall, at a minimum, include in its disclosure those cases outlined in the ILO List of Occupational Diseases" Moreover, fatalities of external employees should never be summed up with internal employees. Since there are usually more fatal accidents among external than internal employees. Additional external accidents do not result in necessary actions for a company's internal processes as they don't have full responsibility for the measures. Especially for the reputation, it is essential to differentiate between fatal incidents which we are not responsible for but has happened on our premises and incidents we are fully responsible for.	S1	S1-13 - Health and Safety metrics	40. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We welcome the use of the average, because in case of averaging, consideration of additions and disposals pro rata, this reduces the calculation effort. This leads to better comparability for benchmarking by using a standardised average. However, we do not agree that the denominator "by average number of employees" includes 23 a (total number by number of employees). We would welcome it, if the involvement of employees by contract can be defined and described. If, for example, a large number of holiday workers are employed during the summer holidays, this drives up the fluctuation rate and distorts the informative value.	S1	S1-5 - Characteristics of the undertaking's employees	AR 13
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We welcome the fact that companies can use their own definitions, but only in addition. The first step must be mandatory reporting according to the definition of "top management". If the own definition will be used, we agree with the obligation to disclose.	S1	S1-8 - Diversity metrics	AR 19
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	While the proposal to further specify the definition of social dialogue was rejected to take account of national differences, the decision has a significant drawback. Without a more standardized definition, the breakdown by 10 countries creates a misleading impression of comparability between these countries that does not exist. If the 10-country rule is introduced, the Collective Bargaining and Social Dialogue KPIs would be disproportionately weighted compared to other KPIs. Moreover, the number of EEA countries to be reported in S1-7 is unclear.	S1	S1-7 - Collective bargaining coverage and social dialogue	28. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	Better comparibility for benchmarking by using only rate of employee turnover.	S1	S1-5 - Characteristics of the undertaking's employees	23 (f)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	The legal text now specifies exactly how the distribution must be reported; distribution in number (head count) and percentage. Moreover, for "age group", deleting as mandatory content and moving to NMIG is not useful for comparability in benchmarking. Information on age should continue to be integrated into S1-8. Statements on age have an interesting informative value in the context of HR strategy and other reporting topics/key figures (e.g. diversity, promotion of young talent, trainings, health and safety). As an alternative, the company-wide average age should be integrated into the report.	S1	S1-8 - Diversity metrics	30.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We welcome, S1-5 as the basis for calculating certain quantitative metrics required by other DRs in this Standard. This helps to create transparency and comparability. It should be no deviation in the KPIs from this (exception S1-9). However, the designation "not reported/not disclosed" should be defined clearly. Does this refer to values that cannot be determined due to the current personnel systems (e.g., the system does not evaluate gender), or does it refer to an additional gender specification by the employee (i.e., the employee did not provide a gender)?	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We support the introduction of a threshold for incidents. However, we strongly recommend defining the term "substantiated" or changing it to "confirmed" to ensure cross-company comparability. The interpretation of the term "substantiated" varies significantly across countries and legal fields, and without a clear definition, we anticipate challenges in establishing a reporting approach.	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 38
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	The elimination of the distinction of performance reviews according to number/proportion of performance reviews per employee (a) and number of reviews in proportion to the agreed number of reviews by the management (b) simplifies data collection and thus involves less effort in the data collection process. Morover, there are diverging requirements from ESRS S1-12 § 38a (regular performance and career development reviews) and AR 24 (here only performance review). It is therefore unclear whether the disclosure requirement only includes performance meetings and/or development discussions. This can lead to a lack of comparability in the disclosure.	S1	S1-12 - Training and skills development metrics	AR 24
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	The elimination of the gender distinction in the training hours simplifies data collection and is therefore associated with less effort in the data collection process.	S1	S1-12 - Training and skills development metrics	38.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	We agree that EFRAG also declined to give guidance about whether interns, trainees or inactive employees must be included as this depends on the national legislation. But to increases the transparency and comprehensibility of the data the undertakings must explain the sope "total number of employe" in a qualitative way and had to give feedback which employees are included or not. In our opinion, the explanation of this applied scope is particularly also necessary due to pragraph 23g "in case of inconsistency between financial statement".	S1	S1-5 - Characteristics of the undertaking's employees	23 (g)

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Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	In order to data quality and comparability, the definition of "non-guaranteed" rather should be concretised clearly and not consistently removed. It is clear that this category includes "own workforce" employees, not "non-employees" or "value chain workers," and these employees do not have guaranteed minimum working hours. However, it is not explicitly stated if "non-guaranteed hours employees" only include on-call workers considered vulnerable workers. It should be clarified whether non-guaranteed hours employees only include on-call workers or also include employees without guaranteed hours but with mutual agreements on work availability.	S1	S1-5 - Characteristics of the undertaking's employees	AR 9
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	We welcome the standardised use of scope between the KPIs. In S1-7 we use the scope of EEA- and non-EEA countries. We think it is better to use the EU/Non-EU Scope for this (as for S1-9).	S1	S1-7 - Collective bargaining coverage and social dialogue	27.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We agree that total number of non-employee only have to be reported, when they are significant driver of IROs. But it is not clear when this situation arises. The definition "key part of the undertaking's business model, for example when they are used to provide flexible labour or when they are used in key processes" is missing. Possible interpretation: If we would not use the non-employees model, the business could not be continued. We recommend to clarify the definition accordingly.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	AR 14
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We agree, the undertaking shall disclose the calculation methodology, data types and sources used as input. However, we recommend that a combination of "collected voluntary employee surveys and the information from mandatory disability quotas reported by the undertaking" be used for this. This also covers the nation legal definiton. We welcome it only to report data that can be lawfully collected and the recognition that disability status depends on national legal definition Moreover, The reference to GDR-T within this specific AR appears to lack relevance and should be removed	S1	S1-11 - Persons with disabilities	AR 23
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	We welcome the eliminating of the requirement to disclose the types of employees that do not enjoy social protection and eleminating of retirement from the list of life events and changing 'parental leave' to 'maternity leave.	S1	S1-10 - Social protection	34.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	We welcome the move to NMIG in relation to the percentage of employees who have taken leave for family reason.	S1	S1-14 - Work-life balance metrics	42.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	We welcome the reduction of non-employee reporting (all disclosures about non-employees were deleted except for the total number) due to data limitations.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We welcome the changes. It would be helpful to clarify whether fines, penalties and compensation for damages that are recognised during the current reporting year but relate to incidents disclosed under 46(a)(b) in the previous reporting year(s) also fall under 46c.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (c)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	We disagree as now the "tension" description becomes a "shall" criteria (initally, it was a "may" datapoint). The wording "where potentially / significant tension arise" should be added as otherwise it would counteract the intention to simplify the reporting requirements.	S1	S1-3 - Actions and Resources related to Own workforce	19. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The proposal introduces a new term, 'work-related accident,' which is not defined anywhere in the standard. This fundamental omission immediately introduces significant misleading ambiguity and confusion, leaving its precise meaning open to subjective interpretation by different undertakings and jurisdictions. Suggestion: Amend to: The objective of this DR is to allow an understanding of the coverage, quality and performance of the health and safety management system established to prevent work-related injuries, ill-health and fatalities.	S1	S1-13 - Health and Safety metrics	39.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The definition of "recordable work-related accidents" within the EFRAG proposal explicitly encompasses both work-related injury and ill-health. 1)Duplication and Misalignment with Simplification: If "recordable work-related accidents" includes ill-health, and there is also a separate requirement for "recordable work-related ill health" (40. (d)), this creates a direct duplication of reporting requirements. This redundancy contradicts the fundamental objective of simplification and streamlining data collection, leading to unnecessary complexity and potential inconsistencies in reported figures.	S1	S1-13 - Health and Safety metrics	40. (c)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	ANNEX II to the [Draft] Amended ESRS Exposure Draft July 2025: This definition, rooted in OSHA criteria, introduces ambiguity through two critical flaws: 1)Loss of Consciousness as a Standalone Criterion The current framework treats all loss of consciousness incidents as recordable, regardless of causation (e.g., workplace hazards like chemical exposure vs. pre-existing conditions like epilepsy). This overinclusiveness distorts workplace safety metrics by conflating occupational and non-occupational factors. Further, severity variations (e.g. brief first-aid cases vs. multi-day absences) are unaddressed, preventing nuanced risk assessment. 2)Undefined "Significant Injury" The term "significant injury" lacks objective parameters, leading to inconsistent interpretation across medical professionals and jurisdictions. For example, a laceration requiring stitches might be deemed "significant" in one context but not another. This subjectivity undermines data harmonization and comparative analysis. Suggestion to delete: Deletion of "loss of consciousness" and "significant injury", remaining "Work-related injury or ill health that results in any of the following: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid or ill health diagnosed by a physician or other licensed healthcare professional, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid"	S1	S1-13 - Health and Safety metrics	40. (c)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The definition of "recordable work-related accidents" within the EFRAG proposal explicitly encompasses both work-related injury and ill-health, and critically, it also includes fatalities. To emphasize and uphold the clear EFRAG decision regarding the deletion of 'days lost to fatalities' – a decision made due to the inherent lack of a robust and comparable methodology for such calculations – it is fundamental to sharpen the interpretation of this requirement. Therefore, while the term "recordable work-related accident" encompasses fatalities, the calculation of "days away from work" must be understood to apply solely to non-fatal incidents. Suggestion: Amend to: with regard to the undertaking's employees, the number of days away from work related to work-related injuries or work-related ill health. Moreover, please note that from a definition perspective, every injury includes an accident. Especially work-related. It does not make sense at all to separate work-rleated accidents and work-related injuries. An accident always includes an injury and vice-versa. Please only write "work-related accident" and ill-health! This will also be more relatable to S1 - 40. (b) and (c).	S1	S1-13 - Health and Safety metrics	40. (e)
Excels	Aquaculture Stewardship Council	NGO	Netherlands			I disagree	The objective should include an aim to understand if companies are taking steps towards closing gaps to an adequate wage. In many countries, especially lower-income countries, there is a substantial gap between current wages and adequate wages (defined as the wage required for a worker and his or her family to have a decent standard of living). This means that this clause should specify that closing the gap needs to be a gradual process to ensure sustainable employment. In almost all of these countries, it is unrealistic and potentially counterproductive to expect companies to pay an adequate wage to all employees immediately, as this could encourage outsourcing of the workforce to contractors outside the scope of ESRS and other harmful strategies. It is important to convey this message as part of the overall objective.	S1	S1-9 - Adequate wages	31.
Excels	Aquaculture Stewardship Council	NGO	Netherlands			I disagree	The previous version, "The undertaking shall disclose whether all its employees are paid an adequate wage, in line with applicable benchmarks" provides much clearer guidance at this first mention for how companies should assess whether or not all employees are paid an adequate wage. Without this clarification, companies may take a subjective view on whether wages are adequate. Indeed, not only should this clause be retained, but it should be strengthened to say that companies should be required to indicate progress they are making in closing adequate wage gaps. The removal of the voluntary clause #71 to disclose information on non-employees is an unwelcome dilution of the requirement given that non-employees, particularly workers indirectly employed through contractors, are often at greatest risk of excessively low wages and wage-related violations such as non-payment of wages. Without a requirement to ensure adequate wages for non-employees, the ESRS risks incentivising companies to replace directly employed workers with indirectly employed workers who are paid below adequate wages.	S1	S1-9 - Adequate wages	32.
Excels	Aquaculture Stewardship Council	NGO	Netherlands			I disagree	Companies should be required to provide evidence as to the wages of lowest paid workers in each country of operation to support their assertion that adequate wages are paid.	S1	S1-9 - Adequate wages	20.
Excels	Aquaculture Stewardship Council	NGO	Netherlands			I disagree	The basis of this calculation must indeed be the lowest wage but related to all individuals working in the company's operations, directly and indirectly employed, and so also including self-employed or sub-contracted workers (termed "non-employees" in the ESRS) working alongside directly employed workers but at risk of wage exploitation if not included in scope. Further, since human rights are universal, making a distinction between EU and non-EU countries as to how adequate wages are defined is not appropriate.	S1	S1-9 - Adequate wages	21.
Excels	Aquaculture Stewardship Council	NGO	Netherlands			I disagree	The benchmark for an adequate wage should be the amount that is needed by workers to support a decent standard of living, i.e., a Living Wage. There should be no distinction between defining adequate wages in EU and non-EU countries as this would represent a discriminatory policy. The proposed hierarchy of benchmarks and in particular, the acceptance of statutory minimum wages as a benchmark for adequate wages is highly problematic and goes against the principle of adequate wage which is an objective and evidence-based measure. Minimum wage setting processes, even when in accordance with ILO wage setting principles, necessarily involve consideration of not only the needs of workers and their families but also economic factors and this almost always results in a minimum wage that is in no way adequate to afford a decent standard of living. Further, the practicality and feasibility of implementation is questionable given the resources required to determine whether wage setting has occurred in line with ILO principles. The EU should instead support the creation of a global Living Wage database with the help of technical experts and companies should regularly report progress towards Living Wages for all workers in their operations.	S1	S1-9 - Adequate wages	22.
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We suggest aligning the ESRS S1 gender pay gap disclosure with the EU Pay Transparency Directive. Most companies will need to calculate the PTD metrics anyway - thereby lowering the burden on calculating the same metric twice in different ways. Furthermore, alignment would improve comparability, and future-proof reporting. We propose keeping the current ESRS ratio as a minimum, but allowing or encouraging companies to report using the PTD methodology where available, and revising ESRS S1 once the Directive is fully transposed."	S1	S1-15 - Remuneration metrics	44. (a)
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Harmonize the calculation methodology with that applied in the context of the gender pay gap in order to promote methodological consistency and ensure comparability across reporting frameworks. Explicitly exclude board members (not only the highest paid individual) from the scope of remuneration metrics to ensure more meaningful and consistent disclosures.	S1	S1-15 - Remuneration metrics	44. (b)
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We suggest that non-employees whose numbers cannot be reliably quantified — such as freelancers — may be excluded from the disclosure, with a note explaining the limitation.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Adjustment of the data point: According to (amended) S1-14, para. 88 b, ""work-related ill-health"" should be reported. Due to GDPR and national data protection laws, it is currently not possible to report this metric as a connection between an employee's illness and professional activity cannot be established. According to the GDPR, a sick note is considered health data and thus personal data that is particularly worthy of protection. For instance, in Germany, according to the Social Security Code (Sozialgesetzbuch, SGB X), the transmission of information about the diagnosis to the employer is not permitted. Undertaking must fall back on estimates to report this data point using publicly available data sources (e.g., statistic published by DGUV in Germany). As all companies in a country with strong data protection laws will face the same issue, all would have to use estimations with non-company-specific (or even industry-specific) data bases. Therefore, it would not be a meaningful comparison.	S1	S1-13 - Health and Safety metrics	40. (b)
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	We note that the amended ESRS now refers only to maternity leave, whereas the previous version included parental leave. We suggest restoring the broader scope to parental leave, as this better reflects companies' social protection practices, ensures gender-neutral coverage, and aligns with international standards. Limiting the disclosure to maternity leave reduces comparability and excludes relevant data on paternity or shared parental leave policies.	S1	S1-10 - Social protection	34. (d)
Excels	UNICEF	NGO	United States			I disagree	UNICEF believes that all parents have a right to be involved in their child's upbringing and that parental rights should not be constrained by traditional gender roles and outdated assumptions about who provides care for a new child. Parental leave is a gender-neutral policy that is available to all parents, including fathers, same-sex partners, and non-birthing parents. This encourages fathers to take time off and be more involved in early childcare, which has been shown to improve family dynamics and the child's development. For these reasons, we disagree with the narrowing of "parental leave" to "maternity leave".	S1	S1-10 - Social protection	34. (d)
Excels	UNICEF	NGO	United States			I partially agree and partially disagree	UNICEF welcomes that the metric to disclose the percentage of employees entitled to take family-related leave during the period has been retained in the exposure draft. However, UNICEF disagrees wih the removal of the metric relating to the percentage of entitled employees that actually took family-related leave. The latter data point is essential to understanding the effectiveness of a company's family leave policies and the extent to which the company supports working parents in practice. UNICEF does not agree that the removal of the second metric is a meaningful reduction in the reporting burden since the effort required to disclose the percentage of employees taking family-related leave is only a marginal increase in the effort required to disclose the percentage of employees entitled to take family-related leave. Indeed, they can be combined into a single metric with two parts: (1) the percentage of employees entitled to take family-related leave during the period, and (2) the percentage of these entitled employees taking family leave.	S1	S1-14 - Work-life balance metrics	42.
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	The term "people" should be added at the end of the following sentence :"(employees working in a particular factory or geography or self-employed people)".	S1	S1-1 - Policies related to Own workforce	11.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	The log of amendments does not contain the reference to "actual negative impacts" in the 2nd paragraph of this AR. We recommend retaining the broader wording from the log of amendments, as key actions may also address material potential negative impacts. This approach would also ensure consistency with para 19(a) of the ESRS S1 ED, which refers broadly to "negative impacts".	S1	S1-3 - Actions and Resources related to Own workforce	AR 6
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	The term "(employees" should be removed in the following sentence: "(AR 56 amended) The definitions of permanent, temporary, non-guaranteed hours (employees differ among countries."	S1	S1-5 - Characteristics of the undertaking's employees	AR 9
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	The following content shall be added at the end of the title of the table 1: ""in the ten largest countries in terms of number of employees, where the undertaking has at least 50 employees".	S1	S1-5 - Characteristics of the undertaking's employees	AR 11
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We recommend clarifying whether the end of temporary contracts shall be considered in the rate of employee turnover calculation (different practices observed for the first year of reporting under the ESRS).	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We invite EFRAG to modify the numbering of current § 23(c), (d) and (e) as they should be presented as a detailed list under § 23(b) (therefore presented under separate points (i), (ii) and (iii)).	S1	S1-5 - Characteristics of the undertaking's employees	23. (b)
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We suggest specifying that the total number of non-employees shall be disclosed by head count to ensure alignment with the reporting of the total number of employees.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We recommend either clarifying the new concept of "significant driver" of material IROs that has been introduced or removing the word "significant" (i.e. stick to "drivers") to avoid confusion with the materiality assessment approach or the materiality of information principle.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	AR 14
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	The content "with >50 employees" in the table should be added in the following sentence: "(for the EEA countries with >50 employees included in the ten largest countries)".	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 17
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	The way former § 74 and § 75 have been simplified and consolidated may raise questions on how to assess a "lack of social protection" (previously, ESRS 1 required to disclose whether all the undertaking's employees were covered by social protection and, if not all employees were covered, the list of countries concerned). We therefore believe the new wording should be clarified to avoid potential different interpretations. Finally, should this proposal be maintained, we highly recommend providing a framework that defines thresholds for social protection (and lack of).	S1	S1-10 - Social protection	34.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We recommend clarifying how to calculate the number of "days lost" as this topic has raised questions in practice. Besides, it would be useful to clarify in the AR that this number does not take into account days lost to fatalities (contrary to Set 1).	S1	S1-13 - Health and Safety metrics	40. (e)
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	The fact that the remuneration to be taken into account for the gender pay gap and for the annual total remuneration ratio is different raises difficulties in practice (the definition of "pay" in the ESRS Glossary shows discrepancies compared with the elements for the annual total remuneration calculation provided under AR 36). We encourage EFRAG to further investigate the matter and to clearly explain which difference exist (where relevant) and to justify why there should be any difference.	S1	S1-15 - Remuneration metrics	44.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We recommend clarifying that the « highest paid individual » may be a member of the administrative, management and supervisory bodies that is not an employee. We also recommend clearly indicating that the highest paid individual may not always be the CEO (consistently with the indicator to be presented under the SFDR and despite the wording of such indicator).	S1	S1-15 - Remuneration metrics	AR 36
Excels	University of Warwick, Coventry, United Kingdom	Academia	United Kingdom			I partially agree and partially disagree	Insert "and how it makes it known to its own workforce." at the end of the second sentence. REASON: For companies' grievance mechanism, outreach (the process of informing potential claimants of the existence of grievance mechanisms and how to access them) is key. See https://warwick.ac.uk/fac/soc/law/research/centres/chrp/governance/hrandbusiness/empiricalresearch/msigrievancemechanisms/ and references cited.	S1	S1-1 - Policies related to Own workforce	16.
Excels	University of Warwick, Coventry, United Kingdom	Academia	United Kingdom			I partially agree and partially disagree	Insert, "including a description of all actual remedies provided for negative human rights impacts." to end the sentence. REASON: Specific remedy disclosures are essential to the usefulness of disclosures on human rights actions. See our Report at https://nomogaia.org/wp-content/uploads/2025/09/Disclosure-Report-1.pdf CITE DISCLOSRUE PAPER.	S1	S1-1 - Policies related to Own workforce	18.
Excels	University of Warwick, Coventry, United Kingdom	Academia	United Kingdom			I partially agree and partially disagree	Add: "In accordance with ESRS 2 GDR-A key actions describe all actual remedies provided for negative human rights impacts." REASON: Specific remedy disclosures are essential to the usefulness of disclosures on human rights actions. see our Report at https://nomogaia.org/wp-content/uploads/2025/09/Disclosure-Report-1.pdf CITE DISCLOSRUE PAPER.	S1	S1-1 - Policies related to Own workforce	AR 6
Excels	University of Warwick, Coventry, United Kingdom	Academia	United Kingdom			I partially agree and partially disagree	Delete the final word "region" and insert "country". REASON: To disclose this information by region risks aggregating workforces in countries with widely divergent rates of securing collective bargaining agreements and so rendering the information misleading and uninformative.	S1	S1-1 - Policies related to Own workforce	27. (c)
Excels	University of Warwick, Coventry, United Kingdom	Academia	United Kingdom			I partially agree and partially disagree	Insert at the beginning of (b) "For each country in which the undertaking operates: " REASON: This is a valuable addition with little added reporting cost. Often the most important information on workplace fatalities is where they occurred and so can highlight particularly dangerous and insufficiently controlled operations.	S1	S1-1 - Policies related to Own workforce	40. (b)
Excels	University of Warwick, Coventry, United Kingdom	Academia	United Kingdom			I partially agree and partially disagree	Add to AR 37: "In addition to the total number of incidents reported under DR 46(b) disaggregate by human right negatively impacted and the country in which they occurred." REASON: These are essential metrics needed to make these disclosures useful for relevant audiences. see: https://wrap.warwick.ac.uk/id/eprint/185392/ and https://warwick.ac.uk/fac/soc/law/research/centres/chrp/governance/hrandbusiness/empiricalresearch/msigrievancemechanisms/ and references cited	S1	S1-1 - Policies related to Own workforce	AR 37
Excels	Triodos Bank N.V.	Bank	Netherlands			I agree	We agree with the new thresholds of 50 employees or more and reporting on ten largest countries.	S1	S1-5 - Characteristics of the undertaking's employees	5.
Excels	Triodos Bank N.V.	Bank	Netherlands			I partially agree and partially disagree	While the simplification of reporting requirements is a legitimate objective, excluding wage information for non-employee workers risks undermining the standard's alignment with core human rights principles. Non-employees such as temporary agency workers, contractors, and platform workers, often operate under precarious conditions and are disproportionately exposed to wage-related vulnerabilities. Their exclusion from wage transparency metrics may obscure material risks and impacts, particularly in sectors with high reliance on outsourced labor. The original inclusion of wage disclosures for non-employees reflected a commitment to the International Labour Organization's standards and the broader social dimension of sustainability. Removing these disclosures may inadvertently signal that adequate remuneration is only relevant for direct employees, which contradicts the ESRS's stated ambition to cover the full scope of the undertaking's own workforce. We recommend that EFRAG reconsider this amendment and explore proportionality-based approaches that allow undertakings to report wage information for non-employees where material.	S1	S1-9 - Adequate wages	9.
Excels	Triodos Bank N.V.	Bank	Netherlands			I partially agree and partially disagree	We strongly disagree with the removal of fatality disclosures for non-employees in ESRS S1-13. This change risks concealing serious safety incidents involving subcontractors and other third-party workers who often operate in high-risk environments. Fatalities among non-employees are not only tragic but also indicative of systemic issues in health and safety management. Their exclusion from mandatory reporting undermines the ESRS's commitment to capturing material impacts across the full scope of the undertaking's workforce. Subcontractors working on-site are frequently subject to the same operational risks as direct employees. Omitting their fatalities from disclosures creates a misleading picture of workplace safety and may reduce accountability for companies that rely heavily on outsourced labor. It also weakens alignment with international standards on occupational health and safety, which emphasize the importance of protecting all workers under an undertaking's control. We recommend reinstating the requirement to report fatalities among non-employees, particularly those working on-site or under direct supervision. Where full data is not available, a proportionality-based approach could be adopted to ensure meaningful reporting. Transparency in this area is essential to drive improvements in safety practices and uphold the ESRS's social objectives.	S1	S1-13 - Health and Safety metrics	13.
Excels	Triodos Bank N.V.	Bank	Netherlands			I partially agree and partially disagree	Not sure how targets set to manage material impacts, risks and opportunities related to own workforce have changed. But I propose to keep it included.	S1	S1-4 - Targets related to Own Workforce	5.
Excels	Triodos Bank N.V.	Bank	Netherlands			I partially agree and partially disagree	We agree that many indicators related to discrimination can be deleted. But considering the relevance of the topic and the fact that it is a core ILO convention we recommend to leave a policy aimed at elimination of discrimination in place.	S1	S1-1 - Policies related to Own workforce	1.
Excels	Triodos Bank N.V.	Bank	Netherlands			I disagree	Core ILO conventions covers right to organise and collective bargaining and equal remuneration. We recommend that a labour policy includes these topics.	S1	S1-1 - Policies related to Own workforce	1.
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	We recommend changing the term "maternal leave" to "parental leave", as this would be more gender inclusive and avoids any misunderstandings.	S1	S1-10 - Social protection	34. (d)
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	We would like to refer you to Directive (EU) 2023/970, which provides exactly this information, and suggest therefore a deletion of the disclosure requirement. If this is not possible, we would at least propose a simplification of the data point (and subsequently the associated ARs) since calculating the median is disproportionately burdensome.	S1	S1-15 - Remuneration metrics	44. (b)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Adapt. Consider to publish this in the annex or a seperate publication	S1	S1-5 - Characteristics of the undertaking's employees	AR 10
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	ESRS S1 - 32 The simplification of the disclosure requirement is appreciated. However, the current wording does not sufficiently clarify how companies should proceed when national benchmarks differ significantly from EU adequate wage definitions. This is particularly relevant in countries like Germany, where the statutory minimum wage may not meet EU adequacy standards. Suggest adding a clarification that companies should disclose when national benchmarks are used and explain how they diverge from EU or ILO principles.	S1	S1-9 - Adequate wages	32
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	ESRS S1 - AR 22 The simplification of the disclosure requirement is appreciated. However, the current wording does not sufficiently clarify how companies should proceed when national benchmarks differ significantly from EU adequate wage definitions. This is particularly relevant in countries like Germany, where the statutory minimum wage may not meet EU adequacy standards. We suggest adding a clarification that companies should disclose when national benchmarks are used and explain how they diverge from EU or ILO principles.	S1	S1-9 - Adequate wages	AR 22
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	40 (b) (i) - adapt: "other workers" please define other workers	S1	S1-13 - Health and Safety metrics	40.(b)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	40 (b) (ii) - delete for non-employees: Fatalities from work-related ill health only recordable for own employees not for non-employees	S1	S1-13 - Health and Safety metrics	40.(b)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	we recommend to delete the number of lost days due to work-related ill health: 1) 'Clear definitions of reportable number of days lost are needed (e.g. reporting period for days lost in chronic disease for multiple years? reporting after end of employment?). 2) It is very difficult up to impossible to record, since on sick leave certificates the reason is not noted due to privacy reasons	S1	S1-13 - Health and Safety metrics	40.(e)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Using national definitions makes aggregation and comparability across countries nearly impossible, especially due to privacy laws (e.g., GDPR). This undermines ESRS objectives of transparency and consistency. Focus should be on "recordable work-related injuries" for feasible, comparable reporting.	S1	S1-13 - Health and Safety metrics	40.(c)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Recordable work-related accidents" already include fatalities, but "days away from work" should apply only to non-fatal cases. Including fatalities would reintroduce methodological flaws and compromise data integrity.	S1	S1-13 - Health and Safety metrics	40.(e)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Including ill-health in "recordable work-related accidents" duplicates reporting with para. 40(d), contradicting simplification goals and creating complexity. Ill-health data for non-employees is also hard to collect due to privacy constraints.	S1	S1-13 - Health and Safety metrics	40.(c)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Work-related ill health" lacks a clear definition, leading to inconsistent interpretation and unreliable data. Reintroducing a definition (aligned with ILO Occupational Diseases) is essential for comparability and credible reporting. Recommended amendments: Add the detailed definition of "work-related ill health" (same as previous version): "Work-related ill health can include acute, recurring, and chronic health problems caused or aggravated by work conditions or practices. These include musculoskeletal disorders, skin and respiratory diseases, malignant cancers, diseases caused by physical agents (for example, noise-induced hearing loss, vibration-caused diseases), and mental illnesses (for example, anxiety, post-traumatic stress disorder). For the purpose of the required disclosures, the undertaking shall, at a minimum, include in its disclosure those cases outlined in the ILO List of Occupational Diseases"	S1	S1-13 - Health and Safety metrics	40.(b)
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Current definition includes vague terms like "loss of consciousness" and "significant injury," causing overinclusion and subjectivity. These should be removed for clarity and consistency. Recommended new text: "Work-related injury or ill health that results in any of the following: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid or ill health diagnosed by a physician or other licensed healthcare professional, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid."	S1	S1-13 - Health and Safety metrics	ANNEX II
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Adapt. We support disclosures on the gender pay gap. However the way this number is calculated (i.e. unadjusted) is not informative. This is because the formula does not take into account the tasks and responsibilities of the employees at all and therefore cannot make any statement on equal pay for work of equal value. In order to be able to make a meaningful statement, the cost of living in the different countries and the comparability of responsibilities should at least be taken into account. This should be aligned with planned directives on pay transparency.	S1	S1-15 - Remuneration metrics	44. (a)
Excels	German Social Insurance European Representation (DSV)	Association of financial institutions	Germany			I disagree	When implementing disclosure requirements on health and safety metrics (S1-13), it is important to recognise that reporting on occupational diseases – referred to as "work-related ill health" – offers little to no informative value for assessing a company's sustainability performance. Many occupational diseases emerge only after long latency periods and are assessed across a worker's entire career exposure history rather than a single employer's current practices. Including such cases in sustainability reporting risks creating a misleading picture that does not reflect the actual causes of the illness. For this reason, S1-13 - 40(b)(ii) should exclude the reporting of figures on work-related ill health.	S1	S1-13 - Health and Safety metrics	40. (b)
Excels	German Social Insurance European Representation (DSV)	Association of financial institutions	Germany			I disagree	When implementing disclosure requirements on health and safety metrics (S1-13), it is important to recognise that reporting on occupational diseases – referred to as "work-related ill health" – offers little to no informative value for assessing a company's sustainability performance. Many occupational diseases emerge only after long latency periods and are assessed across a worker's entire career exposure history rather than a single employer's current practices. Including such cases in sustainability reporting risks creating a misleading picture that does not reflect the actual causes of the illness. For this reason, S1-13 - 40(d) should exclude the reporting of figures on work-related ill health.	S1	S1-13 - Health and Safety metrics	40. (d)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Social Insurance European Representation (DSV)	Association of financial institutions	Germany			I disagree	When implementing disclosure requirements on health and safety metrics (S1-13), it is important to recognise that reporting on occupational diseases – referred to as "work-related ill health" – offers little to no informative value for assessing a company's sustainability performance. Many occupational diseases emerge only after long latency periods and are assessed across a worker's entire career exposure history rather than a single employer's current practices. Including such cases in sustainability reporting risks creating a misleading picture that does not reflect the actual causes of the illness. For this reason, S1-13 - 40(e) should exclude the reporting of figures on work-related ill health.	S1	S1-13 - Health and Safety metrics	40. (e)
Excels	German Social Insurance European Representation (DSV)	Association of financial institutions	Germany			I disagree	AR 29 lists several potential sources of information on work-related ill health, yet many of these sources have significant limitations. Employee reports are often too subjective to serve as a reliable basis. Company doctors examine only current employees and, unlike Germany's accident insurance institutions, are not bound by the official list of occupational diseases set out in the Ordinance on Occupational Diseases. Compensation agencies, such as the accident insurance institutions in Germany, include all recognised occupational diseases where the last harmful exposure occurred within the company, which also regularly covers former employees. Because the scope of individuals considered based on AR 29 differs widely depending on the source, the resulting figures lack consistency and comparability. These methodological shortcomings undermine the reliability of such data, making mandatory disclosure problematic. For this reason, the reporting of figures on work-related ill health should be excluded.	S1	S1-13 - Health and Safety metrics	AR 29
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	See our response to the questionnaire : Companies do not agree with the new definition of the treshold for reporting metrics disaggregated at Country Level	S1	S1-5 - Characteristics of the undertaking's employees	AR 9
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	Non-employees are not part of the company's own workforce by principle ; by consequence they are not recorded in the social data information systems of companies : that makes it impossible to disclose information on this category of workers. The notion of "non employees being a key part of the undertaking's business model" will open the door to interpratation and endless discussions with auditors. We continue to ask for deletion of this DR	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	14.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	Companies prefer to return to the previously proposed definition of the threshold for all DR. Outside the EEA, companies do not understand what a region is (which countries are included in a region ?) and prefer to report on countries where they have significant employment only.	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 16
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I agree	The term 'diversity' does not correspond to the indicator, which only measures gender distribution	S1	S1-8 - Diversity metrics	AR 19
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	We still consider it irrelevant and very complicated to publish information outside the EU ; however in the AR 22 we believe outside the EU, it is entirely appropriate to compare the lowest wages in the company with the statutory minimum wage established by legislation or collective bargaining; and where these do not exist, to use the benchmarks developed by the ILO – a tripartite international organisation – on living wage estimates rather than resorting to consultants or private organisations.	S1	S1-9 - Adequate wages	AR 20
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	The two-year review frequency does not depend on companies and should be abolished.	S1	S1-9 - Adequate wages	AR 22
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	The number of life events covered remains very broad and should focus only on (i)sickness (ii) employment injury. Other items depend heavily on jurisdictional factors with limited company involvement (e.g., unemployment) or are already covered elsewhere in the standard (e.g., maternity leave overlaps with S1-14). The DR requires disclosure by country, with cumulative consideration of the risks listed: are countries listed rather than risks? If a single risk is not covered, the country is 'disqualified'? This DR shall limit disclosure to significant employment countries, applying the old threshold, and allow for refinement based on the risks covered	S1	S1-10 - Social protection	14.
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	This data is very difficult to aggregate at group level. Definitions vary from one country to another. The company cannot collect individual data. The data is aggregated at country level, so it cannot be verified, which will complicate the audit.	S1	S1-11 - Persons with disabilities	AR 23
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	To be relevant this disclosure should be based on the number of employees eligible for training and appraisal interviews, rather than the total number of employees.	S1	S1-12 - Training and skills development metrics	AR 24
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	The amount of information to be disclosed is too detailed and redundant; the number of cases of recordable work related ill health and the number of days lost to work related injuries shall be removed. The publication of all these indicators shall be limited to employees and to countries where the undertaking has a significant workforce.	S1	S1-13 - Health and Safety metrics	AR 26
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I partially agree and partially disagree	This disclosure will require a lot of work and is of little interest: it merely lists the existence of leave for family reasons, whether provided for by law or by a collective agreement.	S1	S1-14 - Work-life balance metrics	AR 31
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	With regard to remuneration, whether it be the pay gap or the ratio (S1-15), companies question the value of unadjusted indicators that do not provide any useful information and which, if reproduced without contextual explanation, may contribute to damaging their reputation. The adjusted pay gap is the only metric that directly measures compliance with the principle of "equal pay for equal work or work of equal value."	S1	S1-15 - Remuneration metrics	AR 33
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	The same remuneration elements should be provided for both indicators – why is only the ratio (AR36) detailed and not AR 35?	S1	S1-15 - Remuneration metrics	AR 35
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	Interns and work-study students shall be excluded, and only the company's own workforce should be targeted. Benefits in kind will be very difficult to isolate and aggregate.	S1	S1-15 - Remuneration metrics	AR 36
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	Our requests for amendments have not been taken into account; the definition of incident of discrimination is still too broad. It shall be limited to proven and dealt with incidents, i.e. those that have resulted in a final court decision.	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 37
Excels	GIFAS (Groupement des Industries Françaises Aéronautiques et Spatiales)	Business association (other than association of financial institution)	France			I disagree	Regarding penalties: what period should be taken into account? There is inevitably a time lag between the incident and any penalty. A financial materiality threshold should be introduced	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 41

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ETUC	Trade union	Belgium			I partially agree and partially disagree	Gender breakdown for zero-hours employees should be brought back in	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	ETUC	Trade union	Belgium			I partially agree and partially disagree	Age distribution should not be deleted, as it provides crucial information on the characteristics of workforce, which is relevant for a whole host of IROs, e.g. aging of the workforce	S1	S1-8 - Diversity metrics	29.
Excels	ETUC	Trade union	Belgium			I partially agree and partially disagree	Retirement should be brought back in as a mandatory datapoint	S1	S1-10 - Social protection	34.
Excels	ETUC	Trade union	Belgium			I partially agree and partially disagree	Gender breakdown for training hours should be reinstated	S1	S1-12 - Training and skills development metrics	38.
Excels	ETUC	Trade union	Belgium			I partially agree and partially disagree	Fatalities from ill health for non-employees and workers on site should be reinstated	S1	S1-13 - Health and Safety metrics	40.
Excels	ETUC	Trade union	Belgium			I partially agree and partially disagree	Datapoint on workers actually taking family-related leave should be reinstated	S1	S1-14 - Work-life balance metrics	42.
Excels	ETUC	Trade union	Belgium			I partially agree and partially disagree	Country-level information should be provided on the ratio of the higest paid individual in that country to the country median should be reported	S1	S1-15 - Remuneration metrics	44. (b)
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	Disclosure of "lack of social protection" Regarding the change from : (Former paragraph 74) "The undertaking shall disclose whether all its employees are covered by social protection[...] against loss of income" to (New paragraph 34) "In situations where an undertaking's employees lack social protection, the undertaking shall disclose the countries where employees lack those protections" As drafted this paragraph requires the use of a highly significant judgment for both the entity and the auditor as to determine whether there is a "lack" of social protection. What is the threshold for each social protection listed? However, the previous wording refering to loss of income was also not clear. We recommend that either 1) EFRAG provide an auditable framework that defines thresholds for social protection - and lack of - (reference to a standard framework, i.e. ILO) or 2) revert to previous wording but provide clarification on what is meant by "loss" of income - is it any dollar amount ? Or is there a threshold?	S1	S1-10 - Social protection	34.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	Definition of total number of employees to be used S1-5 - Characteristics of the undertaking's employees requires the total number of employees by head count or FTE broken down by permanent employees, temporary employees, and non guaranteed hours employees. Multiple metrics throughout S-1 are calculated using a denominator "number of employees" (AR 13, AR 16, AR 18, AR 24, AR 25). Multiple datapoints(AR 13, AR 24, and AR 25) specify to use the headcount from S1-5. However, in AR 16, it is not specified if it is head count or FTE. We recommend specifying this in AR 16, and applying the same methodology used for each datapoint requiring number of employees as denominator.	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 16
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I disagree	Mis-numbered sub bullet points: Paragraph 23 (c), (d), and (e) appear to be sub-bullets of (b) (should be (b)i,(b)ii, (b)iii). This also seems to cause an issue with the AR 13 for para 23 (c) which is permanent employees and not the rate of employee turnover.	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	Introduction of the term "Management Systems" for which further clarification is needed	S1	S1-1 - Policies related to Own workforce	13.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	For the turnover ratio : further clarification needed regarding how to treat the natural end to a defined term term contract	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	Total number of non employees : further clarification needed on whether to use head count or FTE.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	The AR refers to "Significant" drivers: clarification is needed on what constitutes "significant" or we recommend to delete the word "significant".	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	AR 14
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	Introduction of term "establishments" and "significant" employment - for which clarification needed	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 17
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	Further clarification needed for reporting on "Days Lost" : - Clarify on whether it includes fatalities - Clarify whether it includes only those occuring in the period, or those from a previous period but days lost in the current period, the cumulative amount of days included ?	S1	S1-13 - Health and Safety metrics	40. (e)

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Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	Clarification needed regarding the highest paid individual for the total remuneration metric 1) We recommend that EFRAG clarify the definition of the highest paid individual to specify if they must be an employee or not. 2) We also recommend that EFRAG clearly indicate that the highest paid individual may not always be the CEO (consistently with the indicator to be presented under the SFDR and despite the wording of such indicator). 3) Besides, we recommend that EFRAG clarify how to determine the annual total remuneration to identify the "highest paid individual": are we positioning ourselves at the level of the position held or at the level of the individual, bearing in mind that the individual may be remunerated for several different functions performed within the company?	S1	S1-15 - Remuneration metrics	44. (b)
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	For the gender pay gap and remuneration ratio, difficulty arises in determining what is to be included in the calculation of these metrics as the guidance differs between the two. For the gender pay gap, AR 33 states that the metric shall include "all employees gross hourly pay level". For the total remuneration ratio – AR 36b requires the undertaking to consider base salary, benefits in cash, benefits in kind, and fair value of long-term incentives. It is unclear why there are differences between the two definitions and if it is intended that different forms of compensation are included within each. We recommend that EFRAG clarify this point. If the amount is intended to be different between these two metrics, state this and clarify what is to be included for each metric.	S1	S1-15 - Remuneration metrics	44.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	Clarification is needed regarding incidents of discrimination and other human rights incidents. We recommend that EFRAG clarify if it is only the number initiated in the period, or does it also cover procedures that were initiated in a previous year but are still ongoing during the current reporting year?	S1	S1-16 - Incidents of discrimination and other human rights incidents	46.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	We note that there are still redundancies and overlaps which could be further streamlined: - 15a and 16 on insights and perspectives - 17 & 19a on remediation - 13 & 40a on management system related to H&S We recommend that EFRAG review to see if these could be further streamlined.	S1	S1 - Objective	1.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	The first paragraph mentions dependencies and financial effects related to own workforce material IROs. However, there is no datapoint in the standard requiring to describe those dependencies and financial effects. In the absense of a datapoint, we recommend to make a connection with the requirements in the cross cutting standards.	S1	S1 - Objective	1.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	Since sub-sub topics were eliminated, it is not clear why they are still indicated in brackets of sub-topics and what is expected to be disclosed. We recommend deleting them to avoid the risk of auditors requiring individual assessments for each one	S1	S1 - Objective	4.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	Regarding " The actions taken by the undertaking differ depending on its connection to the impact (causation, contribution, direct linkage), and how it has identified the actions as appropriate for addressing material impacts" it is not clear what the undertaking is expected to report on. Shall the distinction between causation, contribution and direct linkage be reported separately? In the previous version of ESRS the request was "whether the undertaking causes or contributes to a material impact" with "or" that was reflecting an alternative approach rather than the simplified requirement which seems to require three kind of impact to be disclosed separately. This is not a simplification therefore we suggest to eliminate the brackets or insert "or".	S1	S1-3 - Actions and Resources related to Own workforce	AR 6
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	Please refer to question 27 of the General section	S1	S1-5 - Characteristics of the undertaking's employees	23. (a)
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	The disaggregation required by this disclosure is not relevant. Especially for a multinational company, it is more meaningful to ask for the disclosure of workforce in every macro-geographical area or continent rather than per country with more than 50 employees (that for example may be all in Europe without adding any value to the information disclosed). We recommend to restore to the previous version of the disclosure, asking for the disclosure in countries where there are more than 50 employees representing 10% of the total workforce.	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (b)
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	Please refer to question 28 of the General section	S1	S1-9 - Adequate wages	22.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	With reference to the number of days lost due to work-related ill health, it is important to highlight that, once an employee submits a medical certificate to justify their absence, the nature of the illness—whether work-related or not—is typically not specified. In many countries, employees are not allowed to self-declare a work-related illness. Instead, they must submit a formal request to the National Institute for Social Security, which is the only authority entitled to assess and officially recognize the illness as work-related. As a result, companies are generally unable to determine how many of the lost workdays are attributable to occupational diseases, since this information depends on external validation and is not systematically reported to employers.	S1	S1-13 - Health and Safety metrics	40. (e)
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	it is required "the number of fatalities from work-related injuries among everybody in the undertaking's own workforce as well as other workers that work on its sites; [...]". Please clarify or delete "among everybody". It does not sound appropriate.	S1	S1-13 - Health and Safety metrics	40. (b)
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	Please refer to question 31 of the General section	S1	S1-15 - Remuneration metrics	44. (a)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	The removal of the term "severe" from the disclosure requirements for human rights incidents across all social standards is particularly concerning. Without a clear limitation to the most serious cases, companies may be required to report even minor or less relevant incidents. This broad scope risks undermining the materiality of disclosures and contradicts the objective of simplification. Maintaining a focus on severe human rights incidents is essential to ensure that reporting remains meaningful, proportionate, and aligned with the principles of relevance and efficiency. It is of utmost importance to clarify if incidents are referred basically to social aspects (child labor, restrictions, overtime not recognized or not compensated) or if they are referred also to security aspects and healty environment.	S1	S1-16 - Incidents of discrimination and other human rights incidents	45.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	We do not have a reporting regime spesifically for "non-employees" as we have an extended reporting practice that includes all personnell (own employees, non-employees and contractors) at our operated facilities. Suggest to make reporting spesifically for non-employees not mandatory if the company can provide evidence of a broader reporting practice where non-employees are included.	S1	S1-13 - Health and Safety metrics	40.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	Suggest to replace term "work related accidents" with "work related accidents resulting in either fatality, lost-time injuries, injuries involving substitute work, or medical treatment injury." in order to be in line with international industry standards for injury frequency (ref. for example IOGP Safety Data reporting User Guide - scope and Definitions, chapter App2: "Total recordable injury rate (TRIR) The number of recordable injuries (fatalities + lost work day cases + restricted work day cases + medical treatment cases) per million hours worked. ")	S1	S1-13 - Health and Safety metrics	40. (c)
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	This metric is currently not reported by Equinor due to personnel privacy concerns. Given sensitivities suggest to at least set this as "may report", not "shall".	S1	S1-13 - Health and Safety metrics	40. (e)
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	Inconsistency of "severe": the classifier "severe" has been removed when asking for the number of human rights incidents connected to own workforce. This signficiantly broadens the scope of what a company may be expected to disclose as an own-workforce human rights impact, as now it reads " number of human rights incidents connected to its own workforce that it has idenified in the reporing period, but excluding those that relate to discriminaion which are reported according to paragraph 46 a)". Potentially in the pursuit of simplification, this has signficantly increased the reporting scope by removing an imporant classifier. This would thus become a very different datapoint than what wave 1 companies reported on for FY2024 (according to only severe human rights incidents in OW). In accordance with the concept of risk-based due diligence, Equinor believes in including the risk-classifier word ("severe") regarding disclosures on human rights incidents. Otherwise, the scope is too large. There should, additionally, be consistency in including the "severe" classifier across S1, S2 and S3 (this is not the case in the current draft standard).	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (b)
Excels	UGT-ESPAÑA	Trade union	Spain			I partially agree and partially disagree	Gender breakdown for zero-hours employees should be brought back in	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	UGT-ESPAÑA	Trade union	Spain			I partially agree and partially disagree	Age distribution should not be deleted, as it provides crucial information on the characteristics of workforce, which is relevant for a whole host of IROs, e.g. aging of the workforce	S1	S1-8 - Diversity metrics	29.
Excels	UGT-ESPAÑA	Trade union	Spain			I partially agree and partially disagree	Retirement should be brought back in as a mandatory datapoint	S1	S1-10 - Social protection	34.
Excels	UGT-ESPAÑA	Trade union	Spain			I partially agree and partially disagree	Gender breakdown for training hours should be reinstated	S1	S1-12 - Training and skills development metrics	38.
Excels	UGT-ESPAÑA	Trade union	Spain			I partially agree and partially disagree	Fatalities from ill health for non-employees and workers on site should be reinstated	S1	S1-13 - Health and Safety metrics	40.
Excels	UGT-ESPAÑA	Trade union	Spain			I partially agree and partially disagree	Datapoint on workers actually taking family-related leave should be reinstated	S1	S1-14 - Work-life balance metrics	42.
Excels	UGT-ESPAÑA	Trade union	Spain			I partially agree and partially disagree	Country-level information should be provided on the ratio of the higest paid individual in that country to the country median should be reported	S1	S1-15 - Remuneration metrics	44. (b)
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	(Part 1): The definition and handling of "non-employees" is a significant challenge and not precise enough. The definitions are not workable and does not capture the development in the labour market (including discussion on whether it's labour or a service that is being delivered) The reliance on the suppliers NACE-code is not practical as this is not something that is logged in the ERP-systems and often quite arbitrary and linked to the historic establishment of the business. Two identical suppliers can belong to different NACE-codes, and hence their services would be accounted for differently. Most ERP-systems does not capture the numbers, partly because defining and gathering the data is very difficult. There may exist "proxies", like "# of deliveries" or similar accounting trails, but they are not standardised or uniform. We believe the definition should exclude all individuals already counted as "employees", even though some of these are technically "non-employees" but are handled as employees for practical reasons. This will ensure consistency to the financial statements.	S1	S1 - Objective	7.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	(Part 2): We believe that "Non-employees" can never be regarded as part of an entity's own workforce from a financial or strategic perspective. From an operational and workforce planning perspective, it makes sense to include the non-employees. The premise for reporting is a clear distinction between the two and ensure consistency in the Annuel Report i.e. financial FTE is based on "people" who are in an employment relationship with the undertaking only and does not include non-employees. We believe the only solution is to delete ESRS S1, paragraph 25, (disclose the number of non-employees) and instead put more emphasis on the narratives as we suggest in the comments to ESRS S1, paragraph 24. This also makes sense as to consistency to the other elements in S1, where employee statistics are only required for employees.	S1	S1 - Objective	7.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	The definition of "self-employed" is extremely difficult to navigate in practise. There are so many borderline definitions between being "self-employed" or "employed" and whether the work performed is in reality a delivery of service. We also believe that the current change in the dynamics of the labour market - for instance the shift in marketing from formal agencies to broader use of influencers – is making the traditional definitions very difficult to navigate. If removing the requirement in ESRS S1, paragraph -25, and place more emphasis on the narrative part as well as clearly outlining the materiality element, then we may be able to work with the current definition. If ESRS S1, paragraph 25, is retained, then a much more narrow and precise definition of ESRS S1, paragraph -8, needs to be developed.	S1	S1 - Objective	8.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially agree The amendment made is not just clarifying timeframe. An important word 'whether' is proposed deleted. As some entities might not engage directly with its own workforce or worker's representatives, whether can't be deleted as it is difficult to disclose on a SHALL, if the DR does not apply. In ESRS-S1-15a, the amendment made is not just editorial. Applicable needs to stay in the sentence. Similar in ESRS-S1-15b "applicable" is proposed deleted. Applicable needs to stay in the sentence.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	15.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree We believe additional reporting obligations have been added with the following addition: "In particular, it shall state whether it has grievance mechanism3. It shall also explain how it assesses the effectiveness of these channels." We believe this is added as it was not previously a "shall" requirement and should consequentially be removed as a "shall" requirement.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	16.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	We suggest deleting ESRS-S1-19 We believe the content of this DR is already covered by ESRS-S1-18 The content in 19a could be part of the NMIG-document, but we suggest to delete 19 as it from our perspective only add complexity thereby increasing the reporting obligations and compliance without adding essential reporting requirements not already covered by ESRS-S1-18 – if material.	S1	S1-3 - Actions and Resources related to Own workforce	19.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	We suggest deleting ESRS-S1-21 We believe the content of this DR is already covered by ESRS-S1-20 as well as the other requirements around stakeholder engagement. The content in 21 could be part of the NMBIGNBMIGNMIGNMIGNMIG-document, but we suggest deleting this as an DR as it from our perspective only add complexity.	S1	S1-4 - Targets related to Own Workforce	21.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	Please refer to our answer for Q27 in part 2. In addition to this we note that the requirement in ESRS-S1-27c refers to regions when being outside the EEA, which for annual reporting context makes more sense than individual countries. We believe this needs to be harmonised – referring to regions – or similar relevant aggregation for the reporting entity.	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree We do not agree with the first sentence in the AR "The undertaking shall present the requested disclosures either in a narrative format or in the following tabular formats…" We agree that the information can be provided both in a narrative way as well as in a tabular format, but we do not agree with mandating the specific tabular format no limiting the use of other presentation formats, like graphs. We believe the tabular format should be only an example, located in the NMIG.	S1	S1-5 - Characteristics of the undertaking's employees	AR 11
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree We do not agree with the first sentence in the AR "The undertaking shall present the requested disclosures either in a narrative format or in the following tabular formats…" We agree that the information can be provided both in a narrative way as well as in a tabular format, but we do not agree with mandating the specific tabular format no limiting the use of other presentation formats, like graphs. We believe the tabular format should be only an example, located in the NMIG.	S1	S1-5 - Characteristics of the undertaking's employees	AR 12
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree We believe the first sentence of AR 14 needs to be included directly in the DR to avoid misunderstanding as it is a very important materiality filer. More emphasis should be placed on the narrative element, including the description about the critical/key parts of the business model/business functions that are performed by non-employees. This description will naturally depend on the facts and circumstances of the individual reporting entity, but would naturally touch on the types of services/functions performed. The description could also cover for instance coverage of H&S-policies etc..	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	24.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	We believe the requirement to disclose the total number of non-employees should be deleted. As stated in our comments to ESRS S1, paragraph 7, we believe the requirement to disclose a number should be removed. We believe that the narrative elements in ESES-S1-24 should provide the relevant information needed, but we could encourage the inclusion of relevant proxies to support/quantify the explanations (for instance # of deliveries or percentage of deliveries). If retained, the materiality threshold in AR 14 needs to included. Furthermore, "non-employees" reported as part of "employees" in the financial statements (see our comment on ESRS-S1-7) should be excluded.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree We believe the reference should be to ESRS-S1-24, not 25. We further believe that the AR should be more neutral in the language as it focusses primarily on the potential, negative impacts while disregarding for instance flexibility. The AR should cover our comments on ESRS S1, paragraph 24.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	AR 14

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Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree Please refer to our answer for Q27 in part 2 – opposing the change in 27b as it refers to "top ten". In addition to this we note that the requirement in ESRS-S1-27c refers to regions when being outside the EEA, which for annual reporting context makes more sense than individual countries. We believe this needs to be harmonised – referring to regions – or similar relevant aggregation for the reporting entity	S1	S1-7 - Collective bargaining coverage and social dialogue	27.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree We do not agree with the first sentence in the AR "The undertaking shall present the requested disclosures either in a narrative format or following the table below …" We agree that the information can be provided both in a narrative way as well as in a tabular format, but we do not agree with mandating the specific tabular format no limiting the use of other presentation formats, like graphs. We believe the tabular format should be only an example, located in the NMIG.	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 17
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I disagree	Regarding ESRS S1, paragraph 38b, we suggest that EFRAG carefully reconsiders the need for this, and if so, then how this can be measured in practice and become "decision useful" The average number of training hours per employee is very difficult to calculate in practice for a modern workplace. We are concerned about whether this could be anything other than an estimate, as training in a modern workplace consist of 1) formal training, 2) informal training, 3) on the job training, 4) coaching & mentoring, 5) microlearning and 6) social & collaborative learning. Of which 5 out of 6 is not necessarily recorded, and the last (formal training), the hours are most often not recorded. Strong definitions as to expectations to what is included and how entities are expected to do complete reporting is needed in order to make the DR decision useful.	S1	S1-12 - Training and skills development metrics	38. (b)
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree We note that the inconsistency between 44 (a) and 44 (b) is not proposed amended. We also understand that the current definitions originate from other EU-regulation as they are PAI-indicators. We propose that EFRAG secures consistency between the calculation of gender pay gap (average pay level) and total remuneration ratio (median annual). Our preference is to use average for both calculations, following how financial reporting would normally deal with assessing aggregated impact and budgeting. In achieving the consistency, we believe this also needs to be accompanied by a suggestion to the EU-Commission on how to ensure consistency with the other EU-legislation, based on the EFRAG proposal achieving this consistency. It is important that the inconsistency is amended both in the EFRAG disclosures as well as the corresponding legislations in order to ensure the infrastructure of information remains in place.	S1	S1-15 - Remuneration metrics	44.
Excels	Danish National Funding Mechanism	(National) standard setter	Denmark			I partially agree and partially disagree	Partially disagree ESRS S1, paragraph 46a, refers to "own workforce", which includes "non-employees". In most instances, It does not make sense, that an entity is made responsible for disclosing non-employee incidents of discrimination, as these would be registered with the legal structure for that non-employee and not with the entity. This also impacts 46b+c, as the entity would not be the receiver of such fines. In most of these situations, "non-employees" are more aligned with the generics of "workers in the value chain" and not aligned with own employees.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46.
Excels	Anker Research Institute	NGO	United States			I partially agree and partially disagree	The objective should include an aim to understand if companies are taking steps towards closing gaps to an adequate wage. In many countries, especially low-income countries, there is a substantial gap between current wages and adequate wages (defined as the wage required for a worker and his or her family to have a decent standard of living) and closing the gap is a gradual process to ensure sustainable employment. In these countries, it is unrealistic and potentially counterproductive to expect companies to pay an adequate wage to all employees immediately, as this could encourage outsourcing of the workforce to contractors outside the scope of ESRS and other harmful strategies. It is important to convey this message as part of the overall objective.	S1	S1-9 - Adequate wages	31.
Excels	Anker Research Institute	NGO	United States			I disagree	The previous version, "The undertaking shall disclose whether all its employees are paid an adequate wage, in line with applicable benchmarks" provides much clearer guidance at this first mention for how companies should assess whether or not all employees are paid an adequate wage. Without this clarification, companies may take a subjective view on whether wages are adequate. The removal of the voluntary clause #71 to disclose information on non-employees is an unwelcome dilution of the requirement given that non-employees, particularly workers indirectly employed through contractors, are often at greatest risk of excessively low wages and wage-related violations such as non-payment of wages. Without a requirement to ensure adequate wages for non-employees, the ESRS risks incentivising companies to replace directly employed workers with indirectly employed workers who are paid below adequate wages.	S1	S1-9 - Adequate wages	32.
Excels	Anker Research Institute	NGO	United States			I partially agree and partially disagree	Companies should be required to provide evidence as to the wages of lowest paid workers in each country of operation to support their assertion that adequate wages are paid.	S1	S1-9 - Adequate wages	AR 20
Excels	Anker Research Institute	NGO	United States			I disagree	The basis of this calculation must indeed be the lowest wage but related to all individuals working in the company's operations, directly and indirectly employed, and so also including self-employed or sub-contracted workers (termed "non-employees" in the ESRS) working alongside directly employed workers but at risk of wage exploitation if not included in scope. Further, since human rights are universal, making a distinction between EU and non-EU countries as to how adequate wages are defined is not appropriate.	S1	S1-9 - Adequate wages	AR 21

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Anker Research Institute	NGO	United States			I disagree	The benchmark for an adequate wage should be the amount that is needed by workers to support a decent standard of living, i.e., a Living Wage. There should be no distinction between defining adequate wages in EU and non-EU countries. The proposed hierachy of benchmarks and in particular, the acceptance of statutory minimum wages as a benchmark for adequate wages is highly problematic. Minimum wage setting processes, even when in accordance with ILO wage setting principles or the EU Adequate Minimum Wages Directive, involve consideration of not only the needs of workers and their families but also economic factors and this often results in a minimum wage that is in no way adequate to afford a decent standard of living. This is especially common in countries that seek comparative advantage by keeping wage costs low for national producers and investors. Further, the practicality and feasiblity of implementation is an issue given the resources required to determine whether wage setting has occurred in line with ILO principles. The EU should instead support the creation of a global Living Wage database with the help of technical experts and companies should regularly report progress towards Living Wages for all workers in their operations.	S1	S1-9 - Adequate wages	AR 22
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	The currently applicable version (ESRS S1 paragraph 26) specifies that disclosures on engagement with the workforce refer to material impacts on them. In the proposed draft ESRS S1 paragraph 14, this clarification has been removed. In addition, the proposed draft ESRS S1 paragraph 15 refers to actual and potential impacts on the undertaking's own workforce, without specifying that this only concerns material impacts. This raises the question of whether section S1-2 is intended to address workforce engagement more generally, without reference to material impacts. If the intention is to preserve the current meaning, in our view this should be explicitly clarified, confirming that workforce engagement relates specifically to material impacts.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	15.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	Draft AR 2 states that the engagement with the own workforce can take different forms, such as information. Whereas, Annex II Acronyms and Glossary of Terms defines stakeholder engagement as an ongoing process of interaction and dialogue between the undertaking and its stakeholders that enables the undertaking to hear, understand and respond to their interests and concerns. It is recommended to harmonise these formulations so that the concept of engagement is applied consistently across the standard.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	AR 2
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	In our view, companies should disclose the processes through which they support the availability of the channels available to its own workforce to bring their concerns or needs. This would show whether such mechanisms are effectively implemented in practice rather than existing only formally, and would give stakeholders a clearer picture of the real effectiveness of due diligence and ethical standards.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	16.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I disagree	We note that the draft lacks a reference to methodical context information, as is included in draft ESRS S1-5 AR 10 for paragraph 23 ("The undertaking's method for compiling employee data (for example, at the end of the reporting year or average) may provide contextual information"). In our view, to ensure consistency, an equivalent point should be added to the Application Requirements fot S1-6, or a cross-reference to S1-5 AR 10 should be made.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	The change in AR 73 represents a shift in focus: in the currently applicable version, the starting point for remuneration outside the EU was a living wage based on recognised benchmarks, whereas in the new proposal, the starting point is the minimum wage. However, the methodology assumes that companies will have to assess for themselves whether the minimum wages in individual countries comply with ILO principles on wage setting and whether the available living wage indicators comply with ILO principles on its estimation. Companies may not have the resources or expertise to make such assessments in multiple jurisdictions, which inevitably leads to divergent conclusions and a lack of comparability in disclosures.	S1	S1-9 - Adequate wages	AR 22
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	why par b) is not included under working conditions?	S1	S1 - Objective	4. (b)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	should a reference to sub-topic be included?	S1	S1 - Objective	5. (a)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	pls bear in mind that for companies which develop their operations in multiple countries, this could result complex to implement.	S1	S1 - Objective	8.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	To avoid redundancy and foster simplification, we would suggest to clarify this in ESRS 2 GDR P, par 34 b), when scope related requirements are described. for instance "description of the scope of the policy, or of its exclusions, in terms of the undertaking's own operations, upstream and/or downstream value chain and geographies and, if relevant, affected stakeholder groups. whether referred to ESRS S1 related IROs, the undertaking shall state if these policies cover specific groups within its…."	S1	S1-1 - Policies related to Own workforce	11.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	For clarification purposes, we would suggest to add "Even if certain labour-related human rights sub-topics—in particular, child labour and forced labour- and human trafficking are considered non-material in the double materiality assessment, the company should still state whether its workforce policies specifically address these issues"	S1	S1-1 - Policies related to Own workforce	12.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	For clarification purposes, we would suggest to add "Even if health and safety has not resulted material…"	S1	S1-1 - Policies related to Own workforce	13.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Please note that for companies with legal entities operating across multiple countries, this may cause confusion. For example, it should be made clear whether the term "workers' representative" refers to representatives of the parent company or another specific entity. If the term is to be understood in a broad sense, collecting and disclosing the relevant information could prove challenging.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	15.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Please note that for companies with legal entities operating across multiple countries, this may cause confusion. For example, it should be made clear whether the term "workers' representative" refers to representatives of the parent company or another specific entity. If the term is to be understood in a broad sense, collecting and disclosing the relevant information could prove challenging.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	15. (b)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	par 19 a and b are referred to negative impacts. should not be actions for positive impacts reported? I suggest to add something like, "beside the reported requirements, as described in ESRS 2 GDR-A, in particular for material negative impacts, the undertaking shall also....	S1	S1-3 - Actions and Resources related to Own workforce	19.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	I suggest that these disclosure requirements undergo a more comprehensive review, so they fully capture all impacts—positive as well as negative—instead of placing particular emphasis on adverse effects.	S1	S1-3 - Actions and Resources related to Own workforce	AR 6
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Why is this particularly focused on negative impacts? for instance, new employment could be created and this is not particularly mentioned.	S1	S1-3 - Actions and Resources related to Own workforce	AR 7
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Please note that for companies with legal entities operating across multiple countries, this may cause confusion. For example, it should be made clear whether the term "workers' representative" refers to representatives of the parent company or another specific entity. If the term is to be understood in a broad sense, collecting and disclosing the relevant information could prove challenging.	S1	S1-4 - Targets related to Own Workforce	21.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	I suggest that these disclosure requirements undergo a more comprehensive review, so they fully capture all related targets—positive as well as negative—instead of placing particular emphasis on adverse effects.	S1	S1-4 - Targets related to Own Workforce	AR 8
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	what about full-time and part-time?	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	we would suggest to add here "whether at the end of the year, in average or both"	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Should this be? b) the total number by headcount or full time equivalent (FTE): i. permanent employees and breakdown by gender; ii. temporary employees and breakdown by gender; and iii. non-guaranteed hours employees;	S1	S1-5 - Characteristics of the undertaking's employees	23. (b)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	to facilitate alignment with GRI 2-7, "by region" could be add as optional	S1	S1-5 - Characteristics of the undertaking's employees	23. (c)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	to facilitate alignment with GRI 2-7, "by region" could be add as optional	S1	S1-5 - Characteristics of the undertaking's employees	23. (d)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	COMMENT TO 23. e) should this be broken down by gender?. to facilitate alignment with GRI 2-7, "by region" could be add as optional as well	S1	S1-5 - Characteristics of the undertaking's employees	23. (d)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	COMMENT TO 23. f) To foster alignment with GRI, I would add as voluntary "Total number and rate of employee turnover during the reporting period, by age group, gender and region"	S1	S1-5 - Characteristics of the undertaking's employees	23. (d)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	there is not a particular requirement requesting for number of employees by gender. As stated in paragraph 49, it appears that the number of employees should be reported with a breakdown by both country and gender simultaneously, rather than separately in two different tables. Additionally, in: 50 a) number of employees by gender and countries 50 b) total number of employees 50 c) permanent breakdown by gender 50 d) temporary breakdown by gender i would suggest to remove this table or provide related clarifications	S1	S1-5 - Characteristics of the undertaking's employees	AR 11
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	to facilitate a better understanding of the context, a qualitative description about the most common types of worker and their contractual relationship with the organization; and the type of work they perform could be helpful. This would be also aligned with GRI 2-7 related requirements.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	24.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	We would suggest to align this disclosure requirement with GRI 2-30: a. Report the total number and percentage of employees covered by collective bargaining agreements;	S1	S1-7 - Collective bargaining coverage and social dialogue	7.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Please clarify whether at the end of the year or in average?	S1	S1-7 - Collective bargaining coverage and social dialogue	27.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	pls clarify the meaning of significant employment	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 18
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Please clarify whether at the end of the year or in average?	S1	S1-8 - Diversity metrics	30.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	should this be moved to AR 20 for para 32?	S1	S1-9 - Adequate wages	32.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	pls clarify if both are permitted or any of them should prevail?	S1	S1-9 - Adequate wages	AR 22

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Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	pls bear in mind that depending of the country, the statutory minimum wage may be set in by year, month or even day. This could add complexity to this requirement, particularly for companies which operate in multiple countries aroun the globe.	S1	S1-9 - Adequate wages	AR 22
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	at the end of the period? in average? headcount, FTEs, both permitted?	S1	S1-11 - Persons with disabilities	36.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	To be aligned with GRI, I would suggest to add as optional by gender and employee category	S1	S1-12 - Training and skills development metrics	38. (b)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	For consistency, I would suggest to add a clarification on whether it should apply to non-employees, in line with the established in DR S1-6	S1	S1-13 - Health and Safety metrics	40.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	An AR could be added: This DR is applicable when non-employees within the undertaking's own workforce are a significant driver of impacts, risks and opportunities related to health and safety	S1	S1-13 - Health and Safety metrics	40.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	to be clarify " employees and/or non-employees, depending on the DMA results"	S1	S1-13 - Health and Safety metrics	40.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	I recommend aligning these requirements with GRI 403-9 and GRI 403-10. Accordingly, reporting on the number of work-related injuries and illnesses is necessary, as "accidents" are no longer referenced. This distinction can lead to confusion and misunderstanding among organizations.	S1	S1-13 - Health and Safety metrics	40. (c)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Please review if there is any mistake with this AR	S1	S1-13 - Health and Safety metrics	AR 28
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	We would suggest to align this disclosure requirement with GRI 401-3, to ensure consistency. In this regard, GRI is asking by parental leave (parental leave - leave granted to men and women employees on the grounds of the birth of a child).	S1	S1-14 - Work-life balance metrics	42.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	We would suggest to add the possibility to disclose both the adjusted and the unadjusted pay gap	S1	S1-15 - Remuneration metrics	44. (a)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Please clarify the remuneration concepts that should be considered while calculating the pay gap, as indicated in the AR 34.	S1	S1-15 - Remuneration metrics	AR 33
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	As well as for human rights and corruption related incidents, it should be clarified that this DR pertains specifically to substantiated cases of discrimination.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (a)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	we would suggest to include "talent management", as it has been a key topic for many undertakings	S1	S1 - Objective	4. (d)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	please clarify whether figures should be reported: - In head count, full-time equivalent (FTE), or both? - At the end of the reporting period, as an average across the reporting period, or both?	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Benefits are really difficult to compare and when in kind, to convert it to cash, for global companies operating in many countries where benefits could be very different. Information is not comparable. Would it be possible to exclude benefits when doing the comparison for all employees vs highest paid employee?	S1	S1-15 - Remuneration metrics	36.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS S2 Workers in the Value Chain, when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, and targets (if in place), DEPENDENCIES WHEN RELEVANT, metrics and financial effects Suggestion: When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS S2 Workers in the Value Chain, when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, METRICS and targets (if in place)[DELETION: , dependencies when relevant, metrics and financial effects].	S1	S1 - Objective	1.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: The statement does not belong here and is inconsistent to all other topical standards. Suggestion: The paragraph should be deleted.	S1	S1 - Interaction with other ESRS	10.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: In relation to material impacts related to its own workforce, the undertaking shall describe: (b) how it tracks and assesses the effectiveness of these actions and initiatives in delivering outcomes for its own workforce. This disclosure can be OMITTED if the undertaking discloses how it tracks the effectiveness of its actions in accordance with [Draft] Amended ESRS 2 GDR-T or GDR-M. IN THAT CASE, A REFERENCE TO THAT DISCLOSURE IS SUFFICIENT. Suggestion: In relation to material impacts related to its own workforce, the undertaking shall describe: (b) how it tracks and assesses the effectiveness of these actions and initiatives in delivering outcomes for its own workforce. This disclosure can be REFERENCED if the undertaking discloses how it tracks the effectiveness of its actions in accordance with [Draft] Amended ESRS 2 GDR-T or GDR-M. [ELETION: In that case, a reference to that disclosure is sufficient.]	S1	S1-3 - Actions and Resources related to Own workforce	19. (b)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	The new DP is meaningful not for every company. The change from 10 % to top 10 can lead to excessive and confusing disclosure just because a country with small number of employees lands in the top 10. There are companies with presence in less than 10 countries. It should be clarified that the list can be shorter than 10 countries. It depends on the company, whether the list of countries with more than 50 employees or of countries with more than 10 % of employees is longer. It should be explicitly clarified that only countries with both more than 50 employees and more than 10 % are to be listed. AR 11 seems to not provide this clarity. In general we propose not to prescribe the kind / granularity of breakdown as metrics on the group level are more common and meaningful.	S1	S1-5 - Characteristics of the undertaking's employees	23. (a)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	We do not support the newly proposed threshold for reporting metrics disaggregated at country level in draft ESRS S1-5 and S1-7 (S1-23(a), S1-27(b), and S1-28(a)). Defining the threshold as the ten largest countries in terms of employee numbers contradicts and undermines the principle of reporting only material information. We recommend maintaining the current threshold of 10% of the total workforce. The proposed definition would significantly increase data collection requirements while adding minimal value, as it would necessitate disclosures for countries with only a very small share of employees and limited relevance to the undertaking. Establishing "ten largest countries" instead of "at least 10%" creates a disproportionately low materiality threshold: with only 50 employees, even small subsidiaries would fall within scope. Such an approach would introduce additional complexity while providing little benefit. For groups with multiple subsidiaries, the requirement would also result in inconsistent reporting across the group, thereby adding unnecessary complexity. Compared with the existing 10% threshold, the new approach produces not more meaningful information but rather more noise.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	24.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	The requirement is not clear (top 10 of EEA-countries or EEA-Countries from the top 10 list; what is about companies with the presence or material presence in less than 10 (EEA-)countries?). In general we propose not to prescribe the kind / granularity of breakdown, but - if disclosed - the method of breakdown calculation should be aligned with S1-5.	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (b)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	We do not support the new threshold proposed for reporting metrics disaggregated at country level in draft ESRS S1-5 and S1-7 (S1 -23(a), S1- 27(b) and S1–28(a)). The new threshold (10 largest countries in terms of employee numbers) contradicts/dilutes the principle of only reporting material information. We recommend maintaining the current threshold of 10% of total number of employees. The updated/new definition in draft ESRS S1-5 and S1-7 would expand the data gathering efforts for the disclosure, with minimal value added because the new threshold would entail that countries with a relative low percentage of total workforce would need to be disclosed despite their relatively little effect on the undertaking.	S1	S1-7 - Collective bargaining coverage and social dialogue	28. (a)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	The approach is oversimplified. In light of the objective set out in §29, disclosure should have been required for the entire pyramid, not only for the top. The deletion of the age distribution requirement is inappropriate, as age discrimination is clearly observable in the market. More quantitative data would therefore have been warranted, not less.	S1	S1-8 - Diversity metrics	30.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	For the sake of confidentiality of sensitive personal information employees employed by small sized sites (e.g. <10) of an undertaking , we kindly ask to apply a threshold for the size (e.g. >20) of eligible sites of an undertaking. A possibility of an individual threshold decision would be appreciated.	S1	S1-11 - Persons with disabilities	36.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I agree	Please clarify in S1 or glossary whether the term "training" includes mandatory / legally required corporate trainings such as compliance, IT security or data protection training and onboarding training, such as training on corporate values and policies.	S1	S1-12 - Training and skills development metrics	37.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Adding own workforce and other workers on the premises is confusing, especially since point (i) uses "workforce," which also includes non-employees, while point (ii) is limited to employees. As a result, this KPI mixes two types of events across three different categories of workers.	S1	S1-13 - Health and Safety metrics	40. (b)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Proper instructions for the gender category "other" are missing. Out of respect and inclusion, it should be addressed with adequate reporting guidance on how to handle it. The current S1-15 is very negative in this respect.	S1	S1-15 - Remuneration metrics	44. (a)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	§46.b: The reference to privacy regulations is unnecessary. Naturally, when a regulation prohibits disclosure, this cannot be overridden by a reporting standard. Adding a dedicated reference could even encourage companies to "abuse" it as a justification to hide relevant cases. §46.c: For the sake of clarity, it should be specified whether provisions for risks are also in scope, or only asserted amounts.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (b)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Unnecessary duplication: The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M. In particular: (a) if the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact; (b) the undertaking may present the description of its material impacts, risks and opportunities, in accordance with [Draft] Amended ESRS 2 IRO-2, alongside information about its policies, actions, targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative Suggestion: The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M. In particular: (a)if the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact; (b)the undertaking may present the description of its material impacts, risks and opportunities, in accordance with [Draft] Amended ESRS 2 IRO-2, alongside information about its policies, actions, targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative .	S1	S1 - Objective	5.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: The statement about value chain workers does not belong to S1. Suggestion: The paragraph should be moved to S2.	S1	ESRS S1 - Objective	9.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	Es ist unklar, wie der Begriff „significant driver" zu verstehen ist. Es wird impliziert, dass einzelne DR bei Unwesentlichkeit weggelassen werden können. Es ist des Weiteren unklar, welche Anforderungen zutreffen müssen, damit non-employees keine Auswirkungen auf IROs haben, anstelle der bisherigen Sichtweise, damit IROs in Bezug auf non-employees nicht wesentlich werden können. Beides widerspricht der bisherigen Lesart aus ESRS 1.0 zur Wesentlichkeit von Nachhaltigkeitsaspekten (u.a. Explanation – ID 177 – Mapping sustainability matters with disclosure requirements).	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	AR 14
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	With the requirement to report the metric for all employees of all Non-EEA countries, undertakings with numerous small sized (e.g. <20) Non-EEA sites need to collect regulatory data for all sites which would cause an immense workload contradicting the purpose of the Omnibus simplification package. We kindly ask to make it possible to limit not only the number of the EEA sites, but the number of the Non-EEA sites too, where the employee metrics have to be disclosed.	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 17
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Redundant to GDR-A Suggestion: Delete	S1	S1-9 - Adequate wages	AR 22
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I agree	According to German law and applicable bargaining agreements, there are multiple forms of carer's leave (Sonderurlaub für Pflege) which can be taken also for serious medical reasons but encompass all medical reasons that are not classified as serious. The reason for taking the carers' leave cannot be specified to the extent that the undertaking cannot verify whether a serious medical reason was existent or not considering the applicable data protection regulations. Please specify whether the carers' leave encompasses leaves which can include leave to provide personal care in general without the possibility of verification of extent of the required degree of medical seriousness or care.	S1	S1-14 - Work-life balance metrics	AR 32
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I agree	The term "annual remuneration" may refer both to full-time as well as part-time employees. Practice shows that undertakings apply different approaches, both extrapolation as well as non-extrapolation which reduces the comparability of the results. We understand that the purpose of this metric is to encapsulate the reason for the difference in annual remuneration, which includes the difference arising out of the distinguishment between part-time and full-time remuneration. Please kindly specify whether it refers either to the extrapolated annual remuneration or the non-extrapolated annual remuneration of part-time employees.	S1	S1-15 - Remuneration metrics	AR 36
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Redundant to GDR-A Suggestion: Delete	S1	S1-3 - Actions and Resources related to Own workforce	AR 6
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Redundant to GDR-A Suggestion: Delete	S1	S1-3 - Actions and Resources related to Own workforce	AR 7
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany				• From the point of view of the qualitative data points (all non-metrics requirements), the revised version only slightly simplifies reporting effort. • We recognize that an effort has been made to express things more simply. For example, content that was written down in two paragraphs (e.g. both in ESRS S1 and ESRS 2) was deleted. This accounts for a large part of the change, but it only helps companies that are newly subject to the regulation. • The adapted layout with the application requirements presented directly after the disclosure requirements is to be welcomed. This way, all relevant information are in one place. • It is unfortunate that the previous grid of paragraphs is not simply reused. This also applies to the quantitative data points. Especially here, the previous numbering represents a lived and well-known practice. All renaming of data points entails an unnecessary administrative effort. • More common than renouncing content is moving the content to other standards. This also means text work. • By no means only deletions take place, there are formerly voluntary data points that are now mandatory and new mandatory data points (e.g. engagement with vulnerable groups or "approach in situations where tensions arise between such actions and other business pressures") • Only the requirements regarding the targets have been simplified, MDR-As and MDR-Ps have remained almost the same. In the implementation, this means that individual sentences have to be "dissected" from the text. Renaming the MDR's to GDR's is confusing. • Clarification that policies do not have to apply to the entire Own Workforce opens up more leeway, but internal guidelines is now needed.	ESRS2	ESRS 2 & ESRS S1 - General - qualitative requirements	
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany				The general deletion or simplification and merging of introductory texts with concrete legal requirements for the metrics is to be welcomed. • The planned establishment of a separate glossary for definitions is, in our view, easier to maintain in the implementing provisions. • In our view, the introduction of a non-mandatory illustrative guidance document for remaining voluntary data points is not necessary and would entail effort. It is better to leave these voluntary data points in the law as before. • Criticism: It is incomprehensible why international rating-relevant information is voluntary or should be removed (e.g. full-time and part-time, age distribution, qualification hours by gender).	ESRS2	ESRS S1 - General - Metrics	
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany				If we read it correctly, materiality analysis should no longer be described as a separate chapter in S1. This also means that the entire text structure has to be changed.	S1	S1-1 - Policies related to Own workforce	
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany				We appriciate the simplifications in the phase-in data points S1-10, S1-11, S1-12 Performance and S1-15. Here, the effort for our entities to assess social protection, etc., is reduced.	S1	S1-10, S1-11, S1-12 Performance & S1-14 (former S1-11, S1-12, S1-13 Performance and S1-15)	
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany				Adding own workforce and other workers on the premises is confusing. Point (i) uses "workforce," thereby also including non-employees, while point (ii) is limited to employees. This means the KPI combines two types of events across three different categories of workers.	S1	S1-13 - Health and Safety metrics	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany				• Criticism regarding S1.13.39/40 (b), (d) and (e) (formerly S1.14.87 + 88) which refers to the term recordable work- related ill health: To be able to provide high-quality definitions to our respective entities in an international context, it is crucial to have a basic guide on reportable work-related health problems. In the ESRS S1 Set according to the 2023 Delegated Act, AR 92 has provided this guideline. In particular, the minimum disclosure requirement, as set out in the ILO list of occupational diseases, was a valuable clarification for efficient reporting. With the draft amendment, this clarity of definition and uniformity would be lost and additional work would be incurred in terms of new definition work. • Criticism of the general focus on the topic of "work-related ill-health"; Key figures for this purpose provide only very poor information about the company's health performance in the reporting period. Work-related illnesses occur with a significant time lag after exposure to the dangerous conditions. • Moreover, in contrast to TRIR, LTIFR enables more robust and internationally comparable reporting of accident rates. To enhance the consistency and transparency of safety performance metrics, LTIFR could be adopted as an additional mandatory indicator—on the condition that it is applied in accordance with an internationally harmonized definition by ESRS. • Criticism of the planned implementing regulation AR 27: This amendment obliges companies to use the definitions of reportable accidents at work in accordance with the national laws of the respective countries in which the employees are resident. For multinational companies such as the Volkswagen Financial Services, accident figures are an instrument for managing and benchmarking their international activities in the field of occupational health and safety. In the international context of reportable accidents at work, national definitions differ significantly, as they are often based on national insurance criteria. When consolidating the accident figures of companies across different countries using the definition under the national law of the respective countries, the importance of the consolidated and the reported data point is not specified. This leads to non-comparable disclosures from companies in CSRD reporting, without the possibility of benchmarking either internally or externally. Therefore, we	S1	S1-13 - Health and Safety metrics	
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany				Proper instructions for the gender category "other" are missing. For reasons of respect and inclusion, it should be addressed with clear reporting guidance on how to handle it. The current S1-15 is very negative in this regard.	S1	S1-15 - Remuneration metrics	
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany				• A new text structure would have to be built, the previous 3 sub-topics (plus sub-sub-topics) become 6 sub-topics (plus sub-sub-topics). Former sub-sub-topics become sub-topics. • Materiality analysis would have to be adjusted, as work was done at the sub-topic level and the new structure did not evaluate topics.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany				The adjustment in S1-6 (former S1-7) is welcomed as the most common types of external workers do not have to be reported per type, but as a whole	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany				Criticism: In the data point adequate wages, it is due to the changes now unclear, whether the lowest wage category of the entity can be used as the basis for comparing and evaluating the adequate wage or whether now the lowest salary paid in the reporting period must to be used for comparing. Adaptation to the latter would entail an adaptation of the previous procedure and would significantly increase the effort of coordination within the entities, as the payroll departments need to be involved. Therefore, we would suggest the following expression in the (new) AR21: "The basis of this calculation is the lowest active wage category among the undertaking´s employees…" • We would welcome if standardized reference values would be provided for all companies in scope of the CSRD requirements • We would suggest a fourth and final analysis step to check whether the employee concerned was really inappropriately remunerated in the reporting year (below the reference value). This leads us to the wish of the harmonization of this data point with the CSDDD objective of adequate wage/remuneration in order to avoid workload in relation to the same objective.	S1	S1-9 - Adequate wages	
Excels	IMA-Europe	Business association (other than association of financial institution)	Belgium			I disagree	There is an inconsistency with the exposure draft language on this paragraph and the log of amendments which states that S1-5,S1-6 and S1-16 are all mandatory but this paragraph states S1-6 is subject to materiality.	S1	S1 - Objective	3.
Excels	IMA-Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	There is an inconsistency with the disclosure requirement. Work-related accidents is a new term that is defined in the glossary as including ill-health and fatalaties. The disclosure requirements makes reference to all three things (work-related accidents, ill-health and fatalities). The latter two should be deleted from the sentence.	S1	S1-13 - Health and Safety metrics	13.
Excels	Allianz SE	Insurance	Germany			I partially agree and partially disagree	We disagree with the addition in AR 22 (b) i) for the adequate benchmark outside the EU "which is periodically reviewed/adjusted every two years". We contend that it is not the responsibility of individual undertakings to regularly check/ ensure this (see also survey) and therefore recommend to delete this addition.	S1	S1-9 - Adequate wages	AR 22
Excels	Allianz SE	Insurance	Germany			I partially agree and partially disagree	We disagree with the newly introduced last sentence of AR 22 (b) that the adequate wage benchmarks outside the EU "should take into account both needs of workers and their families, as well as economic factors, as stated in the ILO Minimum Wage Fixing Convention No.131". Again, we contend that it is not the responsibility of individual undertakings to ensure this.	S1	S1-9 - Adequate wages	AR 22

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Allianz SE	Insurance	Germany			I disagree	We disagree with ESRS S1 - 23 (a), the new threshold for country-by-country disclosure, as it significantly increases 1) the burden of global data collection and 2) the number of data points to be disclosed or S1-5 and S1-7 (Collective bargaining coverage and Social dialogue). Reg 1) The burden of global data collection is significantly increased when metrics on employees are collected primarily by operating entity rather than by country, which is the case in many companies for internal steering purposes. Reg 2) An increased number of data points to be disclosed reduces the readability and conciseness of the final Sustainability Statement. Both arguments contradict the aim of the Omnibus initiative to simplify it (see also survey) and therefore, we recommend keeping the hitherto country-by-country disclosure threshold.	S1	S1-5 - Characteristics of the undertaking's employees	
Excels	Allianz SE	Insurance	Germany			I partially agree and partially disagree	For ESRS S1 AR 30, we recommend using working days instead of calendar days for the calculation of the number of days lost.	S1	S1-13 - Health and Safety metrics	
Excels	Allianz SE	Insurance	Germany			I partially agree and partially disagree	For ESRS S1 DR 44 (b) on total remuneration ratio we recommend aligning the wording with SFDR and using CEO instead of highest-paid individual.	S1	S1-15 - Remuneration metrics	
Excels	Allianz SE	Insurance	Germany			I partially agree and partially disagree	For ESRS S1 DR 34 we recommend further simplification as social protection for listed life events is (at least partially) outside of the company's control and knowledge. We recommend full deletion of metrics and country disclosure. PATs still need to be reported if topic is material.	S1	S1-10 - Social protection	
Excels	Allianz SE	Insurance	Germany			I partially agree and partially disagree	We partially disagree with ESRS S1 DR 12 as the undertaking should only be required to disclose information about policies if the topics listed here have been identified as material. Suggestion: Add "if assessed as material".	S1	S1-1 - Policies related to Own workforce	
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Adjusted gender pay gap should remain a voluntary option as this figure is much more meaningful	S1	S1-15 - Remuneration metrics	44. (a)
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	deletion of days lost due to fatalities leads to deviation of SFDR regulation, should be aligned	S1	S1-13 - Health and Safety metrics	40.
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	deletion of "severe" leads to difference to SFDR requirement and should therefore be changed again and "severe" should be added, otherwise, extended reporting burden	S1	S1-16 - Incidents of discrimination and other human rights incidents	45.
Excels	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland			I partially agree and partially disagree	Table 1 in AR 11 for para 23(a) contains the same information as Table 3 in AR 12 for para 23B	S1	S1-5 - Characteristics of the undertaking's employees	AR 11
Excels	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland			I partially agree and partially disagree	The percentage of employees entitled to take family related leave. We have a policy that covers 100% but it has an earling period of 2 years until you are entitled. Unclear whether it is sufficient to report the policy coverage or if we must do an analysis of seniority of all employees and get the number of employees entitled, according to the policy, in the reporting year.	S1	S1-14 - Work-life balance metrics	42.
Excels	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland			I disagree	Average number of training hours is a metric very difficult to track. When done on an online learning management system, it doesnt track duration - it tracks completion of trainings. Also, people do workshops, in person trainings courses, MBAs etc that are not registered anywhere. So this will not be accounted for either. It will therefore be very difficult to achieve completeness for this metric.	S1	S1-12 - Training and skills development metrics	38. (b)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	At the end of the sentence the following should be added "and indicate all identified material negative impacts and risks that remained unaddressed by actions during the reporting year"	S1	S1-3 - Actions and Resources related to Own workforce	18.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	At the end of the sentence the following should be added "against each action disclosed under DR G1-2".	S1	S1-4 - Targets related to Own Workforce	20.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	To ensure confirmity among standards this sentence should also refer to ESRS S3 and ESRS S4.	S1	S1 - Objective	10.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	"directly their attention" should be replaced with "directly its attention"	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	16.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	With respect to non-guaranteed hours employees breakdown by gender should be added - this would also be in line with AR 12. The total head cout of employees should also be provided as other metrics (e.g. non-employees, health & safety management system coverage) are also provided in head counts and they require contextual information of total head count. The numbering should be amended.	S1	S1-5 - Characteristics of the undertaking's employees	23. (b)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	"non-guaranteed hours (employees" should be amended to remove a bracket.	S1	S1-5 - Characteristics of the undertaking's employees	AR 9
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	"average employee head count" should be amended into "average employee head count during the reporting year".	S1	S1-5 - Characteristics of the undertaking's employees	13.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	The AR makes the ESRS S1-6 sub-topic disclosure subject to materiality assessment. Materiality assessment of non-employee importance may be location specific/country etc. And this raises doubts whether in such a case the undertaking should provide numbers for the whole undertaking or only for location where non-employees are important. However, providing numbers only for a location where non-employees are important without further details will be usesless for users. Moreover, difficulties in interpretatino of this metric will mostly result in nonreporting. Furtheremore, data on non-empoloyees are required under other DRs(e.g. S1-13), and if S1-6 is not mandatory, then such DRs lack contextual data. Conseqently, this metric should be mandatory if own-workforce topic is material.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	AR 14
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	S1-6 should also be material if own-workforce topic is material.	S1	S1 - Objective	3.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	In order to ensure consistency, it should be indicated that the undertaking should use the same manner of presentation (head count vs. FTE) as in S1-5 par 23(b).	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 16

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	In order to ensure consistency, it should be indicated that the undertaking should use the same manner of presentation (head count vs. FTE) as in S1-5 par 23(b).	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	AR 18
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	The AR should clarify that in case of reporting at a grup level, the definition applies to all subsidiaries included in the group and that the undertaking may in addition provide the numbers for the reporting entity only.	S1	S1-8 - Diversity metrics	AR 19
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	In order to ensure consistency, it should be indicated that the undertaking should use the same manner of presentation (head count vs. FTE) as in S1-5 par 23(b).	S1	S1-9 - Adequate wages	32.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	"unemployment starting from when the own worker is working for the undertaking" should be rephrased as follows "unemployment, starting from when the employee is working for the undertaking"	S1	S1-10 - Social protection	34. (b)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	This DR should refer to five events and should include retirement. Such a change will also ensure consistency with a definiton of "social protection" which refers to the whole life cycle.	S1	S1-10 - Social protection	34.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	In order to ensure consistency, it should be indicated that the undertaking should use the same manner of presentation (head count vs. FTE) as in S1-5 par 23(b).	S1	S1-11 - Persons with disabilities	36.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	In order to ensure consistency, it should be indicated that the undertaking should use the same manner of presentation (head count vs. FTE) as in S1-5 par 23(b).	S1	S1-12 - Training and skills development metrics	AR 24
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	In order to ensure consistency, it should be indicated that the undertaking should use the same manner of presentation (head count vs. FTE) as in S1-5 par 23(b).	S1	S1-12 - Training and skills development metrics	AR 25
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I disagree	The average number of training hours per employee should also be disclosed broken by gender as lack of trainings is the most common form of indirect discrimination.	S1	S1-12 - Training and skills development metrics	38. (b)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	In order to ensure consistency, it should be indicated that the undertaking should use the same manner of presentation (head count vs. FTE) as in S1-5 par 23(b).	S1	S1-14 - Work-life balance metrics	42.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	Whole phrase "human rights incidents" should be in bold as it is a separate defined term.	S1	S1-16 - Incidents of discrimination and other human rights incidents	45.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	Whole phrase "human rights incidents" should be in bold as it is a separate defined term.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (b)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	Whole phrase "human rights incidents" should be in bold as it is a separate defined term.	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 37
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	It should be considered if this AR is necessary as "human rights incidents" is a separate defined term.	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 37
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	"that have been initiated" should be rephrased into "that have been initiated in the reporting periof and/or of which the undertaking have learnt in the reporting period for the first time"	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 38
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I disagree	Reporting is required on the risk of child labour, but we do not see a definition.What constitutes child labour? If there are standards, for example in ILO or OECD regulations, these should be indicated. If the standard follows local practice, this should be explained. Are the standards the same everywhere, or is there a universal norm?	S1	S1-1 - Policies related to Own workforce	
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Par 14 now say: "The objective of this Disclosure Requirement is to enable an understanding of how the undertaking's general approach to engagement with its own workforce (..)". Only engagement with own workforce? S1-2 still refers to engagement with both own workforce and workers' representatives - this seems unclear.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	14.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	More balanced application; however "head count" deviated from our countries' definition of Fulltime Employees (FTE) to determine whether or not to comply with ESRS	S1	S1-5 - Characteristics of the undertaking's employees	23. (a)
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Maybe add; depending on defenition from national legislation (analogue to #8)	S1	S1-5 - Characteristics of the undertaking's employees	23. (b)
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Consitency on the use of head count versus FTE We recommend that the use of the terms 'employees', 'non-employees' and 'own workforce' is more prominent in the DRs to make it clear on the scope for each DR. This could be explicitly included in the DR name for example.	S1	S1-5 - Characteristics of the undertaking's employees	AR 11
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Definition #8 based on national legislation, but consistentcy is important for ESRS S1 #23 as well. Sometimes, the definition of certain terms refers to local legislation in different countries. What happens if the local definition is missing in the law or interpreted in different ways? Differences per country should be explained.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	This DR only requires the total number. There are no characteristics requested anymore. Does this address the objective of the DR?	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	The threshold of 'top10' is arbitrary, and should be threshold (% or absolute of workforce). Top 10 does not make sense.	S1	S1-7 - Collective bargaining coverage and social dialogue	27.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I disagree	Employees Non-EEA - the DR does not contain the condition on regions of top 10 countries, and this does not make sense to have such a condition on a regional level. If a country meets the reporting thrsehold, do you report only the country in scope, or the entire region	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 17
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Reinstart diversity by age group, and this should include an <18 years old category	S1	S1-8 - Diversity metrics	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I disagree	The emphasis in the text seems to be too much on the minimum wage (often not an adequate wage), prefer to see this replaced by: 1. The applicable adequate minimum wage, established by legislation or collective bargaining, which is periodically reviewed and takes into account the ILO wage setting principles, as long as a Minimum wage is a living wage. 2. If an adequate minimum wage does not exist, any living wage estimate produced by an institution mandated by the public authorities of the country where the workers are based and which takes into account the ILO principles on estimating a living wage; 3. If neither i) nor ii) exists, any existing living wage estimate, which takes into account the ILO principles on estimating a living wage; 4. Any living wage estimate that meets the criteria set out by the Sustainable Trade Initiative (IDH) ('Roadmap on Living Wages - A Platform to Secure Living Wages in Supply Chains') and which takes into account the ILO principles on estimating a living wage. Even within the EU, it may occur that the minimum wage is not an adequate wage. Therefore, in each country it should also be assessed whether the statutory minimum wage is indeed an "adequate" or "living" wage.	S1	S1-9 - Adequate wages	AR 22
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	include predefined AR to prevent "greenwashing" opportunities	S1	S1-9 - Adequate wages	AR 22
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Does the undertaking exclude all employees in countries/regions where there is a legal restriction to collecting data? Or is this then assumed to be zero percent in those countries/regions?	S1	S1-11 - Persons with disabilities	36.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Include definition to prevent "greenwashing" opportunities	S1	S1-11 - Persons with disabilities	35.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	How should fatalities be treated in the lost working day reporting?	S1	S1-13 - Health and Safety metrics	AR 30
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I disagree	The inconsistent use of categories in the reporting requirements is confusing. At times, reporting is required only on employees, while in other cases it must cover both employees and non-employees. For example, data on persons with disabilities may only be reported for employees. Wherever data is requested, it should consistently apply to both employees and non-employees, but broken down separately. This would provide insight into any potential differences in the treatment of own employees versus contracted staff.	S1	S1-13 - Health and Safety metrics	40.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I agree	Note typo. Should refer to paragraph 42	S1	S1-14 - Work-life balance metrics	AR 31
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	There is no AR associated with this. Is this deliberate?	S1	S1-15 - Remuneration metrics	44.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	45 (a) should be 44 (a) + in the old version hourly pay level was clearly defined. Suggestion to reinstal definition with salary components	S1	S1-15 - Remuneration metrics	AR 33
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Comment regarding removal of the old paragraphs 14(f) and (g) of ESRS S1, with reference to their inclusion in ESRS 2 SBM-3. These paragraphs contained SFDR indicators, which are not explicitly included in ESRS 2. The relocation of ESRS S1 paragraph 20 to ESRS 2 GDR-P paragraph 35 does cover them. Attention should be paid to ensure that no data gap arises between CSRD/ESRS and SFDR for this specific disclosure requirement.	S1		
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands				DASB asks for clarification. Is it unclear whether especially under b iv) may differ from accounting requirements; maybe exemption that you can simply use the figures as applied for financial reporting purposes?	S1		AR 36
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	For this data point no information can be gathered due to lacking access to data. Data points for which no information can be gathered due to lacking access to data should be deleted from the ESRS Set 1.	S1	S1-4 - Targets related to Own Workforce	
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	In the definition of value chain workers (9) is the following part missing: "workers for a supplier contracted by the reporting undertaking who work on the undertaking's premises using the supplier's work methods." (German: z.B. Werkvertrag)	S1	S1-5 - Characteristics of the undertaking's employees	
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	The change in the country definition (from min.10% of workforce to largest 10 countries) might lead to an overrating of countries that are not signifcant for the undertaking (in particular referring to DRs that are following to this definition e.g. collective bargaining). This might lead to high effort for in fact small countries for bigger mulitnational companies.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	23. (a)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	The change in the country definition (from min.10% of workforce to largest 10 countries) might lead to an overrating of countries that are not signifcant for the undertaking (in particular referring to DRs that are following to this definition e.g. collective bargaining). This might lead to high effort for in fact small countries for bigger mulitnational companies.	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (b)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	The change in the country definition (from min.10% of workforce to largest 10 countries) might lead to an overrating of countries that are not signifcant for the undertaking (in particular referring to DRs that are following to this definition e.g. collective bargaining). This might lead to high effort for in fact small countries for bigger mulitnational companies.	S1	S1-7 - Collective bargaining coverage and social dialogue	28. (a)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	For this data point no information can be gathered due to lacking access to data. Data points for which no information can be gathered due to lacking access to data should be deleted from the ESRS Set 1.	S1	S1-7 - Collective bargaining coverage and social dialogue	
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	The adequate wage benchmark used for comparison in the EU might be difficult for companies in Germany, because currently the German minimum wage is below EU regulations, which makes it difficult for companies to set a correct benchmark value. Suggestion to add a sentence that if national law differs to EU regulation the national benchmark shall be disclosed with the remark that it differs from EU legislation.	S1	S1-9 - Adequate wages	AR 22
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	For this data point no information can be gathered due to lacking access to data. Data points for which no information can be gathered due to lacking access to data should be deleted from the ESRS Set 1.	S1	S1-10 - Social protection	
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	For this data point no information can be gathered due to lacking access to data. Data points for which no information can be gathered due to lacking access to data should be deleted from the ESRS Set 1.	S1	S1-12 - Training and skills development metrics	

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Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	- 40 (b) (i) - "other workers" please define other workers - 40 (b) (ii) - FAT from work-related ill health only recordable for own employees not for non-employees - 40 (e) number of lost days due to work-related ill health is very difficult up to impossible to record, since on sick leave certificates the reason is not noted due to privacy reasons	S1	S1-13 - Health and Safety metrics	40. (b)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Paragraph is lacking further definitions of family-related leaves and entitlement. Does an employee needs to be entitled to all kind of famility related-leaves (a) or at least to one type of leave (b) to count? In case of option a: What about men in case of maternity leaves?	S1	S1-14 - Work-life balance metrics	42.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	For this data point no information can be gathered due to lacking access to data. Data points for which no information can be gathered due to lacking access to data should be deleted from the ESRS Set 1.	S1	S1-14 - Work-life balance metrics	
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	For this data point no information can be gathered due to lacking access to data. Data points for which no information can be gathered due to lacking access to data should be deleted from the ESRS Set 1.	S1	S1-15 - Remuneration metrics	
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Employees with another Gender than male or female will not be represented in this metric.	S1	S1-15 - Remuneration metrics	44. (a)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	The information value of annual total remuneration value AR 36 44 (c) is limited. Looking at currently reported data, there is a high variance in the numbers presented by companies.	S1	S1-15 - Remuneration metrics	AR 36
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Please specifiy incidents in this case more clear in regards to confirmed incidents vs. incidents under investigation vs. not confirmed incidents.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	Main point of criticism: The sub-sub-topic level has been removed, which means that very diverse topics now have to be considered together within the sub-topics for the DMA (without the option to open the sub-sub-topic level). These combinations cannot be meaningfully assessed. This is especially true for the sub-topic "wording conditions."	S1		
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	RE S1 par 8: The definition of "non-employees" has become even more unclear. Which groups are meant to be included? What falls under S1 and what under S2? For S1, we interpret it to mean "agency workers" (i.e., people employed by third parties engaged in employment activities) and "freelancers" (i.e., self-employed persons). Now, the definition is becoming "blurred" by the use of the term "contractors," which we have so far classified as value chain workers (see also point 7: "This Standard does not cover workers in the undertaking's upstream or downstream value chain.").	S1		
Excels	SZEF	Trade union	Hungary			I partially agree and partially disagree	Gender breakdown for zero-hours employees should be brought back in	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	SZEF	Trade union	Hungary			I partially agree and partially disagree	Age distribution should not be deleted, as it provides crucial information on the characteristics of workforce, which is relevant for a whole host of IROs, e.g. aging of the workforce	S1	S1-8 - Diversity metrics	29.
Excels	SZEF	Trade union	Hungary			I partially agree and partially disagree	Retirement should be brought back in as a mandatory datapoint	S1	S1-10 - Social protection	34.
Excels	SZEF	Trade union	Hungary			I partially agree and partially disagree	Gender breakdown for training hours should be reinstated	S1	S1-12 - Training and skills development metrics	38.
Excels	SZEF	Trade union	Hungary			I partially agree and partially disagree	Fatalities from ill health for non-employees and workers on site should be reinstated	S1	S1-13 - Health and Safety metrics	40.
Excels	SZEF	Trade union	Hungary			I partially agree and partially disagree	Datapoint on workers actually taking family-related leave should be reinstated	S1	S1-14 - Work-life balance metrics	42.
Excels	SZEF	Trade union	Hungary			I partially agree and partially disagree	Country-level information should be provided on the ratio of the higest paid individual in that country to the country median should be reported	S1	S1-15 - Remuneration metrics	44. (b)
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	This change brings no relevance to the table and renders the concept of significative country less practical, it may inflict an undue charge of work on smaller entities for bigger groups, hence going against the concept of simplification. We suggest reverting back to 10% total employees + 50+ employees.	S1	S1-5 - Characteristics of the undertaking's employees	23. (a)
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	Precision on the methodology while useful for comparability, here means all historic values won't be comparable t o the new one when changing methodology, making reports unequal between companies that already had that methodology and others.	S1	S1-5 - Characteristics of the undertaking's employees	AR 13
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	This new threshold proves an issue here and will mean a new workload for a lot of entities, some very small.	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (b)
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	Taking away the reference to benchmarks and to the fair wage network means additional workload for companies committed to the Fair Wage Network work and methodology, while proving lesser results and benefits.	S1	S1-9 - Adequate wages	AR 22
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	No significant simplification has been proposed and no issues are adressed. To ensure the relevance of such an indicator, we suggest disaggregating by significative countries to avoid unfairly comparing countries with different purchasing powers for multi-countries companies.	S1	S1-15 - Remuneration metrics	44.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	Due to local legislation, it is not possible to use the hourly pay, however this would be solved by allowing companies to use either hourly or annual, and making it mandatory to write which one was chosen within the report.	S1	S1-15 - Remuneration metrics	AR 33
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	This topic presents a high reputational risk for big companies that are more likely to have more reported incidents (due to the sheer number of employees). We suggest to make the reporting mandatory on either proven cases or cases judged by courts, rather than the number of incidents reported.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	This reporting provides little value to readers of the reports as it is related to local legislation and would be the same for all companies report. As such, it seems like a big workload for very little relevance or value. We suggest either deleting it or making it disagregated on significative countries.	S1	S1-10 - Social protection	34.
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	We suggest making this datapoint voluntary. Depending on the negative impact aforementionned, the companies may be tied by local legislation in what remediation plans it can offer (ex : health and safety).	S1	S1-3 - Actions and Resources related to Own workforce	19. (a)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Please clarify "own workforce is a material topic" (similar comment for non-employees). Suggest replacing with "...concludes that one or more specific topics of its own workforce (or non-employees) are a significant driver of material impacts, risks, or opportunities".	S1	S1 - Objective	3.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Since sub-sub topics were eliminated, it is not clear why they are still indicated in brackets of sub-topics and what is expected to be disclosed. We recommend deleting them to avoid the risk of auditors requiring individual assessments for each one	S1	S1 - Objective	4.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Exclude "non-employees" from S-1 Own workforce reporting. They are implicitly covered under S-2. Metrics for "non-employees" are monitored and stewarded as part of site contractor (i.e., workers in the value chain) management programs and policies. Itemizing the metrics for this group of site contractors requires a major system and work process revision across all operating and/or office assets.	S1	S1 - Objective	7.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I agree	Removal of the additional requirements on the ESRS2 parts reporting (ie SBM / IRO / GOV) that were in the previous versions is very positive and creates better readability.	S1	S1-1 - Policies related to Own workforce	11.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Too prescriptive. Remove or clarify what is meant by, or examples of "other outcomes that the undertaking has reached with workers' representatives."	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	15. (b)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Assessing the effectiveness of channels presents an additional layer of complexity for us, as we are essentially evaluating the very mechanisms designed to verify the effectiveness of our system.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	16.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	(a) We suggest to append 2nd line where examples are given for channels with phrase "for example but not limited to.." to ensure that it is open and not interpreted as only those in example. (b) Last sentence need to be clarified - "..as well as, under certain circumstances whistleblowing mechanisms.". What are those circumstances, why do not we simly include that mechanism?	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	AR 3
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Last phrase in this paragraph is not clear and open for interpretation: "including its approach in situations where tensions arise between such actions and other business pressures".	S1	S1-3 - Actions and Resources related to Own workforce	19. (a)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Regarding " The actions taken by the undertaking differ depending on its connection to the impact (causation, contribution, direct linkage), and how it has identified the actions as appropriate for addressing material impacts" it is not clear what the undertaking is expected to report on. Shall the distinction between causation, contribution and direct linkage be reported separately? In the previous version of ESRS the request was "whether the undertaking causes or contributes to a material impact" with "or" that was reflecting an alternative approach rather than the simplified requirement which seems to require three kind of impact to be disclosed separately. This is not a simplification therefore we suggest to eliminate the brackets or insert "or"	S1	S1-3 - Actions and Resources related to Own workforce	AR 6
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Remove statement: "This applies to measures taken to mitigate negative impacts on its own workforce that arise from the transition to a greener, climate-neutral economy." This may not be relevant or material for all undertakings. The objective of this statement is unclear.	S1	S1-3 - Actions and Resources related to Own workforce	AR 7
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	DRs are subject to materiality, but S1-5 lacks a clear connection to a specific material sub-topic and does not provide decision-useful information, except in the limited context of secure employment. The requirement is triggered whenever the own workforce is deemed a material topic, yet the stated objective—to offer insight into employment practices—is not effectively achieved through headcount and employee breakdowns. Consequently, we recommend removing DR S1-5. If S1-5 is retained, it should be made clear that it only should be disclosed if related to a specific material topic and relevant to the reader. We strongly propose the removal of the requirement to disaggregate employees by contract type (permanent, temporary, non-guaranteed). This level of granularity introduces significant complexity for preparers while offering limited value to users. Definitions of contract types vary widely across jurisdictions, resulting in inconsistent and non-comparable data. Moreover, these categories tend to fluctuate throughout the year, particularly in sectors with seasonal or project-based employment, further undermining the reliability and relevance of the data.	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Please refer to question 27 of the General section	S1	S1-5 - Characteristics of the undertaking's employees	23. (a)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Comment to §23e: in some companies the "non-guaranteed hours employees" are the non-employee, therefore it creates confusion to §25 where the total amount of non-employees to be reported. We suggest removing §23e requirement or changing it to "other group" to remove confusion.	S1	S1-5 - Characteristics of the undertaking's employees	23. (d)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	"Disregarding differences in national legal definitions" will provide an inaccurate total number. Suggest removing requirement to count temporary or non-guaranteed hours employees.	S1	S1-5 - Characteristics of the undertaking's employees	AR 9
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	"significant" term is not clear how to be applied (2nd line)	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	AR 14
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	This requirement presents a significant hurdle for disclosure, as in many countries (both within and outside the EU), this information cannot be obtained legally or without incurring undue costs. We suggest either removing this requirement or clarifying that the information should be obtainable without additional cost.	S1	S1-7 - Collective bargaining coverage and social dialogue	27.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The disaggregation required by this disclosure is not relevant. Especially for a multinational company, it is more meaningful to ask for the disclosure of workforce in every macro-geographical area or continent rather than per country with more than 50 employees (that for example may be all in Europe without adding any value to the information disclosed). We recommend to restore to the previous version of the disclosure, asking for the disclosure in countries where there are more than 50 employees representing 10% of the total workforce	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (b)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	This requirement presents a significant hurdle for disclosure, as in many countries (both within and outside the EU), this information cannot be obtained legally or without incurring undue costs. We suggest either removing this requirement or clarifying that the information should be obtainable without additional cost.	S1	S1-7 - Collective bargaining coverage and social dialogue	28.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	"significant" term is not clear how to be applied (3rd line)	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 18
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Remove "which is periodically reviewed/adjusted every two years" as this is a behavioral requirement and should not be a part of the reporting instructions.	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 22
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Please refer to question 28 of the General section	S1	S1-9 - Adequate wages	22.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Remove "At least once per year" as this is a behavioral requirement and should not be a part of the reporting instructions.	S1	S1-12 - Training and skills development metrics	AR 24
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Not every company makes a break-down between employees and non-employees, we suggest the figure to be reported for the own workforce in total.	S1	S1-13 - Health and Safety metrics	40.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	With reference to the number of days lost due to work-related ill health, it is important to highlight that, once an employee submits a medical certificate to justify their absence, the nature of the illness—whether work-related or not—is typically not specified. In many countries, employees are not allowed to self-declare a work-related illness. Instead, they must submit a formal request to the National Institute for Social Security, which is the only authority entitled to assess and officially recognize the illness as work-related. As a result, companies are generally unable to determine how many of the lost workdays are attributable to occupational diseases, since this information depends on external validation and is not systematically reported to employers	S1	S1-13 - Health and Safety metrics	40. (e)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Remove AR and allow an undertaking to use their own system for calculating work-related accidents and hours as these are built for consistency across their business for strategy purposes. Requiring use of definitions as per the national laws of every country in which an undertaking operates would necessitate building a complex and inconsistent system to count accidents.	S1	S1-13 - Health and Safety metrics	AR 27
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I agree	Excellent option for simplification.	S1	S1-14 - Work-life balance metrics	AR 31
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Please refer to question 31 of the General section	S1	S1-15 - Remuneration metrics	44. (a)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Delete DR as it is not decision useful to the reader. This disclosure is not related to a sustainability topic or subtopic (equal pay for equal work or gender pay gap). Higher paid individuals reflect their level of experience, performance, and decision making. In addition, this disclosure is burdensome and may require a complex system to calculate.	S1	S1-15 - Remuneration metrics	44. (b)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The removal of the term "severe" from the disclosure requirements for human rights incidents across all social standards is particularly concerning. Without a clear limitation to the most serious cases, companies may be required to report even minor or less relevant incidents. This broad scope risks undermining the materiality of disclosures and contradicts the objective of simplification. Maintaining a focus on severe human rights incidents is essential to ensure that reporting remains meaningful, proportionate, and aligned with the principles of relevance and efficiency. It is of utmost importance to clarify if incidents are referred basically to social aspects (child labor, restrictions, overtime not recognized or not compensated or if they are referred also to security aspects and healty environment	S1	S1-16 - Incidents of discrimination and other human rights incidents	45.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Compensation for incidents is often private and privileged information and will likely require creating a system to track. This information is not decision useful, and reflects outcomes of due diligence rather than demonstrating actively conducting it. Suggest deleting.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (c)
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I agree	We support the deletion of S1 paragraph 14, as it was flagged as excessively burdensome.	S1	S1 - Interaction with other ESRS	1.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	Need to further clarify: basic wage, pay category, and fixed additional payments	S1	S1-9 - Adequate wages	AR 21
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I agree	We support the changes proposed.	S1	S1-3 - Actions and Resources related to Own workforce	3.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	Risk of lenghty disclosures: As soon as any one employee is not covered collectively by all social protection types as listed in [DRAFT] S1-10 para. 34, the reporting entity must disclose "the countries where employees lack those protections for the following major life events." As the unavailability of any one social protection from the list is treated as non-fulfilment of the disclosure requirement, this is likely to result in lengthy disclosures on a very detailed level (i.e. i) country, ii) type of social protection, iii) type of employee group for each type of social protection). In order to address these challenges and to streamline data collection efforts while still achieving the declared goal, we suggest limiting the reporting on social protection like in current S1-6 para. 50a to "countries in which the undertaking has 50 or more employees representing at least 10% of its total number of employees". Furthermore, in order to address the challenge on lengthy disclosures, we suggest introducing to [DRAFT] S1-10 the same principle as applied in current S1-15 para. 93 (report on percentage of employees entitled to social protection instead of country level disclosures).	S1	S1-10 - Social protection	10.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I agree	We support the changes proposed.	S1	S1-4 - Targets related to Own Workforce	4.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We support the changes proposed, but human rights incidents required in current S1-17, S2-4, S3-4, and S4-4 could be centralised for more efficient reporting.	S1	S1-16 - Incidents of discrimination and other human rights incidents	16.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	Appraisal interviews are not always compulsory, and there is no need to introduce them. When they are introduced, companies often exclude employees on fixed-term contracts, or even impose a minimum length of service requirement for employees on permanent contracts. Certain categories, such as blue-collar workers, are sometimes excluded. Finally, the frequency of these interviews is not always annual. This paragraph should be replaced by: "Percentage of eligible employees that participated in regular performance and career development reviews". Provide for an adjusted indicator accounting for eligibility. Indeed, not all employees are eligible for training (e.g. due to seniority requirements) which distorts the interpretation of the indicator.	S1	S1-12 - Training and skills development metrics	38. (a)
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It remains unclear/illogic if only employees who are entitled to all four types of family-related leave during the reporting year qualify for counting into this percentage. Availablity of family-related leave types depends on national law, and is outside of the sphere of influence of any organization. If a break-down by family-related leave type availability is required, the disclosure becomes lengthy. Overall, the message of the DR is unclear - if any type counts, the percentage would like be large/close to 100% if considering only e.g. maternity leave; while if all should be considered, close to 0%. Suggestion to make information related to work-life balance narrative-based.	S1	S1-14 - Work-life balance metrics	14.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	Explanation in AR 18 does not fully match with the definition provided in the DR28 to which it relates. Should be clarified, that the percentage of employees covered by worker's representatives or councils, should be reportet - avoiding adding complexity through the specification mentioned in AR "employees in that country which are employed in establishments in which employees are represented by workers representatives".	S1	S1-7 - Collective bargaining coverage and social dialogue	7.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	Social protection against listed major life events is publicly driven, and does not depend on the organization. There is a risk of lengthy disclosures and more excessive than in previous format. Could be limited to a principle of the 10 largest countries or another threshold.	S1	S1-7 - Collective bargaining coverage and social dialogue	10.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	Reference to ILO wage setting principles not helpful; leaves it up to undertakings to judge if local legislation, collective bargaining agreements, institutional living wage estimates are considering ILO wage setting principles. There needs to be a country-level indication of adequate wage levels to be practical.	S1	S1-9 - Adequate wages	9.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	It should be defined for which countries this information is expected to be legally collected, and for which countries it is prohibited. This exercise should not be performed by the organizations themselves, as there is a high risk of unlawful disclosure.	S1	S1-11 - Persons with disabilities	11.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	While we agree with the deletion of that voluntary datapoint, [DRAFT] DR S1-15 still requires the undertaking to disclose the percentage gap in pay between its female and male employees and the ratio between the remuneration of its highest paid individual and the median remuneration for its employees. The undertaking must also disclose the annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees (excluding the highest-paid individual). Depending on the local legislation, it is impossible to apply hourly pay since some work contracts rely specifically on there being no working hours (annual working days). Creating a methodology to approach hourly pay would defeat the purpose of this kind of contract and couldn't represent accurately the hourly pay of such workers. In addition, disclosing only one gender pay gap disadvantages disproportionately groups that have companies in emerging countries, as the pay in such countries will be compared to those of developed countries.	S1	S1-15 - Remuneration metrics	43.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	[1] As regards [DRAFT] DR S1-15 paragraph 44(b) on the ratio of highest to median pay, the indicators are too global and not relevant, difficult to prepare and again, will disproportionately discriminate groups that have activities in Asia, Eastern Europe or Africa. In addition, a consequent amount of the top management's remuneration relies on variable income, which in turn relies on the financial results and statements; this indicator cannot therefore be calculated accurately before the certification of the financial statement, which puts its publication in jeopardy every year. The preparation of these disclosures is significantly challenging for large multinational groups with numerous subsidiaries. This would require having data on the annual salary of each employee of the group, which would have to be collected outside the HR and payroll system. Obtaining such data would be also difficult in the context of the EU data protection law, as it is only available to the employer at subsidiary level.	S1	S1-15 - Remuneration metrics	44. (b)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	[2] We reiterate that [DRAFT] DR S1-15 paragraph 44(a) should be calculated on the basis of comparable profiles. It should be replace by "Gender pay gap by employee category". In [DRAFT] DR S1-15 paragraph 44(b), the ESRS should give the possibility to present only an adjusted ratio or to use the concept defined previously by the EFRAG of "countries with a significant number of employees" and disclose the ratio of such countries, or the 5 biggest countries of the company (e.g. current S1-8).	S1	S1-15 - Remuneration metrics	44. (b)
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	EFRAG should consider excluding "non-employees" from S-1 Own workforce reporting. Non-employees are implicitly covered under S-2 as they are contractors (i.e., workers in the value chain). Treating non-employees as part of own workforce can have legal implications. Furthermore, metrics for non-employees are monitored and stewarded as part of site contractor management programs and policies. Itemizing the metrics for this group of site contractors requires a major system and work process revision across all operating and/or office assets.	S1	S1 - Objective	1.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	The terms pay, remuneration and wages (ESRS S1-9) should be better differentiated from one another. It would be desirable if the requirements of ESRS S1-9 and S-15 were combined, as all reporting requirements relate to pay and other remuneration.	S1	S1-15 - Remuneration metrics	44.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Information on the grievance mechnism should be removed from S1-2, as this is addressed in the G-standard. Alternatively, it should be noted in the DR that a reference to the Governance information is sufficient, if there is no separate channel for employees..	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	16.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	The publication of remuneration ratios is problematic because it can reveal sensitive information about individuals (data protection). In addition, the ratio is often distorted and not very meaningful, especially in small or specialised companies. Finally, there is a lack of clear methodological standards for calculation (gross/net, bonuses, full-time equivalents, etc.), which further limits comparability and meaningfulness -> deletion	S1	S1-15 - Remuneration metrics	44. (b)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	The workload is extremely high, as appropriate wages must be researched for each country. The EU should publish an annual overview of all appropriate wages for each country. How should performance-related salary components be included? Need for clarification.	S1	S1-9 - Adequate wages	13.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Simplification	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	10.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	simplification edit, thanks for the examples in brackets - better move to ESRS 2	S1	S1-1 - Policies related to Own workforce	11.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-1 - Policies related to Own workforce	12.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-1 - Policies related to Own workforce	13.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-1 - Policies related to Own workforce	AR 1
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	14.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	15.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	15. (a)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	15. (b)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit, as part of the merging S1-2 and S1-3	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	16.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit, as part of the merging S1-2 and S1-3	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	17.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	AR 2
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	AR 3
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	AR 4
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	AR 5
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-3 - Actions and Resources related to Own workforce	18.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	different wording	S1	S1-3 - Actions and Resources related to Own workforce	19.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	duplication of ESRS S1-18 We disagree as now the "tension" description becomes a "shall" criteria (initally, it was a "may" datapoint). The wording "where potentially / significant tension arise" should be added as otherwise it would counteract the intention to simplify the reporting requirements.	S1	S1-3 - Actions and Resources related to Own workforce	19. (a)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	duplication of ESRS S1-18	S1	S1-3 - Actions and Resources related to Own workforce	19. (b)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	new disclosure requirement description without helpful examples	S1	S1-3 - Actions and Resources related to Own workforce	AR 6
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	previous description more clear	S1	S1-3 - Actions and Resources related to Own workforce	AR 7
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-4 - Targets related to Own Workforce	20.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-4 - Targets related to Own Workforce	21.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-4 - Targets related to Own Workforce	AR 8
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-5 - Characteristics of the undertaking's employees	22.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-5 - Characteristics of the undertaking's employees	23. (a)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-5 - Characteristics of the undertaking's employees	23. (b)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-5 - Characteristics of the undertaking's employees	23. (c)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-5 - Characteristics of the undertaking's employees	23. (d)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-5 - Characteristics of the undertaking's employees	AR 9

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-5 - Characteristics of the undertaking's employees	AR 10
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	possibility to provide the information in a narrative format or in a tabular format	S1	S1-5 - Characteristics of the undertaking's employees	AR 11
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-5 - Characteristics of the undertaking's employees	AR 12
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	clarification regarding the employee turnover calculation	S1	S1-5 - Characteristics of the undertaking's employees	AR 13
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	24.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	AR 14
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	AR 15
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Unchanged	S1	S1-7 - Collective bargaining coverage and social dialogue	26.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Unchanged	S1	S1-7 - Collective bargaining coverage and social dialogue	27.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Unchanged	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (a)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Explanation of abbreviation EEA, Revised threshold for significant employment	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (b)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Unchanged	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (c)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-7 - Collective bargaining coverage and social dialogue	28.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-7 - Collective bargaining coverage and social dialogue	28. (a)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-7 - Collective bargaining coverage and social dialogue	28. (b)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Unchanged	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 16
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 17
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 18
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Deletion of datapoint on age distribution	S1	S1-8 - Diversity metrics	29.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-8 - Diversity metrics	30.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-8 - Diversity metrics	AR 19
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-9 - Adequate wages	31.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Merged and consolidate former 69 and 70	S1	S1-9 - Adequate wages	32.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-9 - Adequate wages	AR 20
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Editorial change - EU insted of EEA	S1	S1-9 - Adequate wages	AR 21
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Revision of the hierarchy for EU and non-EU countries based on an ILO proposal	S1	S1-9 - Adequate wages	AR 22
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Unchanged	S1	S1-10 - Social protection	33.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	simplification edit - Merged of former 74 and 75, but if a country specific overview is required, the EU Commission or EFRAG should provide an overview of social protection worldwide so that the undertakings do not have to prepare such an overview themselves. This would also lead to a more standardised reporting from the individual undertakings.	S1	S1-10 - Social protection	34.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Unchanged	S1	S1-10 - Social protection	34. (a)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Unchanged	S1	S1-10 - Social protection	34. (b)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Unchanged	S1	S1-10 - Social protection	34. (c)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Maternity leave insted of parental leave, retirement deleted	S1	S1-10 - Social protection	34. (d)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Unchanged	S1	S1-11 - Persons with disabilities	35.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Unchanged	S1	S1-11 - Persons with disabilities	36.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Gives some more guidance	S1	S1-11 - Persons with disabilities	AR 23
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Unchanged	S1	S1-12 - Training and skills development metrics	37.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-12 - Training and skills development metrics	38.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - the undertaking does not need to provide information by gender	S1	S1-12 - Training and skills development metrics	38. (a)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - the undertaking does not need to provide information by gender	S1	S1-12 - Training and skills development metrics	38. (b)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Inclusion of new formula	S1	S1-12 - Training and skills development metrics	AR 24
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-12 - Training and skills development metrics	AR 25
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	The proposal introduces a new term, 'work-related accident,' which is not defined anywhere in the standard. This fundamental omission immediately introduces significant misleading ambiguity and confusion, leaving its precise meaning open to subjective interpretation by different undertakings and jurisdictions. Suggestion: Amend to: The objective of this DR is to allow an understanding of the coverage, quality and performance of the health and safety management system established to prevent work-related injuries, ill-health and fatalities. The current absence of a clear, standardized definition for "work-related ill health" presents a critical vulnerability within the disclosure requirements. Suggestion: Add the comprehensive definition of "work-related ill health" to the annex or guidance notes, as per the previous version: "Work-related ill health can include acute, recurring, and chronic health problems caused or aggravated by work conditions or practices. These include musculoskeletal disorders, skin and respiratory diseases, malignant cancers, diseases caused by physical agents (for example, noise-induced hearing loss, vibration-caused diseases), and mental illnesses (for example, anxiety, post-traumatic stress disorder). For the purpose of the required disclosures, the undertaking shall, at a minimum, include in its disclosure those cases outlined in the ILO List of Occupational Diseases"	S1	S1-13 - Health and Safety metrics	39.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-13 - Health and Safety metrics	40.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Unchanged	S1	S1-13 - Health and Safety metrics	40. (a)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	simplification edit - deletion of the datapoints related to ill-health for non-employees and workers in the value chain. Reduction of scope of the metric	S1	S1-13 - Health and Safety metrics	40. (b)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	The definition of "recordable work-related accidents" within the EFRAG proposal explicitly encompasses both work-related injury and ill-health. 1)Duplication and Misalignment with Simplification: If "recordable work-related accidents" includes ill-health, and there is also a separate requirement for "recordable work-related ill health" (40. (d)), this creates a direct duplication of reporting requirements. This redundancy contradicts the fundamental objective of simplification and streamlining data collection, leading to unnecessary complexity and potential inconsistencies in reported figures. 2) Data Collection Challenges for Non-Employees (Privacy Concerns): The most critical issue arises from the inclusion of ill-health, particularly for non-employees. While injury data for non-employees working on site is generally accessible (e.g., through incident reports), collecting detailed ill-health data for non-employees is exceptionally difficult, if not impossible, due to stringent data privacy regulations. In most countries, especially within the European Union, policies like GDPR severely restrict an undertaking's access to, and processing of, sensitive medical information for individuals not directly employed by them, adding a challenge that was already limited from 40. (d). Amend to: "the number and rate of recordable work-related injuries.	S1	S1-13 - Health and Safety metrics	40. (c)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Unchanged	S1	S1-13 - Health and Safety metrics	40. (d)

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Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	simplification edit - deletion of the datapoint days lost to fatalities. The definition of "recordable work-related accidents" within the EFRAG proposal explicitly encompasses both work-related injury and ill-health, and critically, it also includes fatalities. To emphasize and uphold the clear EFRAG decision regarding the deletion of 'days lost to fatalities' – a decision made due to the inherent lack of a robust and comparable methodology for such calculations – it is fundamental to sharpen the interpretation of this requirement. Therefore, while the term "recordable work-related accident" encompasses fatalities, the calculation of "days away from work" must be understood to apply solely to non-fatal incidents. Suggestion: Amend to: with regard to the undertaking's employees, the number of days away from work related to work-related injuries or work-related ill health	S1	S1-13 - Health and Safety metrics	40. (e)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-13 - Health and Safety metrics	AR 26
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	The inherent diversity in national definitions for "work-related accidents" means that data collected from different countries within the same undertaking will not be directly comparable. This significantly complicates the ability to aggregate global health and safety data consistently, limiting an undertaking's capacity to gain a holistic and accurate view of its performance across all operations, and provide precise and reliable information essential for robust management of health and safety aspects, as expected by financial markets.. Therefore, suggestion of deletion of "work-related accidents, the undertaking shall use the definitions as per the national laws of the countries where the employees are based."	S1	S1-13 - Health and Safety metrics	AR 27
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-13 - Health and Safety metrics	AR 28
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-13 - Health and Safety metrics	AR 29
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-13 - Health and Safety metrics	AR 30
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-14 - Work-life balance metrics	41.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-14 - Work-life balance metrics	42.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-14 - Work-life balance metrics	AR 31
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-14 - Work-life balance metrics	AR 32
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-15 - Remuneration metrics	43.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-15 - Remuneration metrics	44.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Unchanged	S1	S1-15 - Remuneration metrics	44. (a)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Unchanged	S1	S1-15 - Remuneration metrics	44. (b)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-15 - Remuneration metrics	AR 33
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-15 - Remuneration metrics	AR 34
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Unchanged	S1	S1-15 - Remuneration metrics	AR 35
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-15 - Remuneration metrics	AR 36
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-16 - Incidents of discrimination and other human rights incidents	45.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-16 - Incidents of discrimination and other human rights incidents	46.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change and consilidation	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (a)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change and consilidation	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (b)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change and consilidation	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (c)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 37

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Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 38
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 39
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 40
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	simplification edit - Editorial change	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 41
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	ANNEX II to the [Draft] Amended ESRS Exposure Draft July 2025: This definition, rooted in OSHA criteria, introduces ambiguity through two critical flaws: 1)Loss of Consciousness as a Standalone Criterion The current framework treats all loss of consciousness incidents as recordable, regardless of causation (e.g., workplace hazards like chemical exposure vs. pre-existing conditions like epilepsy). This overinclusiveness distorts workplace safety metrics by conflating occupational and non-occupational factors. Further, severity variations (e.g. brief first-aid cases vs. multi-day absences) are unaddressed, preventing nuanced risk assessment. 2)Undefined "Significant Injury" The term "significant injury" lacks objective parameters, leading to inconsistent interpretation across medical professionals and jurisdictions. For example, a laceration requiring stitches might be deemed "significant" in one context but not another. This subjectivity undermines data harmonization and comparative analysis. Suggestion to delete: Deletion of “loss of consciousness” and “significant injury”, remaining "Work-related injury or ill health that results in any of the following: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid or ill health diagnosed by a physician or other licensed healthcare professional, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid"	S1	S1-13 - Health and Safety metrics	40. (c)
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	Statkraft has previously emphasized the importance of clarifying whether business consultants should be classified as non-employees—such as consultants hired (typically through firms like KPMG, EY, PwC, etc.) to support sustainability reporting teams within the reporting undertaking in implementing ESRS requirements. Historically, Statkraft has engaged a significant number of consultants. These individuals perform the same tasks as employees, work on Statkraft premises, and follow Statkraft’s working methods. Statkraft believes they should be classified as non-employees, as excluding them would present a misleading picture of the number of employees/non-employees. The amended ESRS remains unclear on this point. While some examples have been removed, the scope has been broadened through language changes—from “include” to “could include” and the use of “such as.” This creates ambiguity around who should be counted as non-employees. Statkraft therefore requests further guidance on which individuals should be included in the non-employee category, and specifically recommends that the ESRS provide an explicit example confirming that business consultants fall within this scope.	S1	S1 - Objective	7.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	See comment above.	S1	S1 - Objective	8.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I agree	Agree with the changes to the breakdown of employees by country. Removing the sentence 'representing at least 10% of its total number of employees' will likely lead companies to include more countries in their reporting, thereby enhancing transparency.	S1	S1-5 - Characteristics of the undertaking’s employees	23. (a)
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I agree	Agree with the changes whereby no ESRS 2 specifications for SBM in the topical standards. Reduce repetition.	S1	S1 - Interaction with other ESRS	10.
Excels	SAIM GmbH	Consultant (including software vendor)	Germany			I disagree	Insufficient reasoning as to why parental leave has been removed in favour of JUST maternity leave.	S1	S1-10 - Social protection	10.
Excels	SAIM GmbH	Consultant (including software vendor)	Germany			I disagree	Since policies around inclusion and discrimination are no longer required, diversity metrics should be increased beyond just gender disaggregation.	S1	S1-8 - Diversity metrics	8.
Excels	SAIM GmbH	Consultant (including software vendor)	Germany			I partially agree and partially disagree	In the application requirements for the number and rate of accidents (AR29), it says that undertakings should include fatalities caused by work-related injuries should be included in the number and rate of work-related accidents. Is this the same case for the number of days lost due to work-related accidents? Should it also be considered?	S1	S1-13 - Health and Safety metrics	13.
Excels	SAIM GmbH	Consultant (including software vendor)	Germany			I disagree	The suggested table in AR 16/17 is confusing. Where is the total % for bargaining agreements supposed to go? Is it listed separately? Also, the % coverage for the employees per country is unclear. Is it the % of total employees that are covered by that country's bargaining agreement, or is it the % of the country's employees covered by a bargaining agreement? If the second, it would also help if the example included a case where two countries fit into the same category, to show how best to go about this	S1	S1-7 - Collective bargaining coverage and social dialogue	7.
Excels	SAIM GmbH	Consultant (including software vendor)	Germany			I partially agree and partially disagree	It is not clear whether the total hours worked refer to gross or net hours. We assume it is net hours, but this is not explicitly defined, as compared to previous paragraphs where gross working hours are required.	S1	S1-13 - Health and Safety metrics	AR 27
Excels	SAIM GmbH	Consultant (including software vendor)	Germany			I agree	We agree with the new threshold requirement of top 10 countries.	S1	S1-7 - Collective bargaining coverage and social dialogue	7.
Excels	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland			I partially agree and partially disagree	Gender breakdown for zero-hours employees should be brought back in	S1	S1-5 - Characteristics of the undertaking’s employees	23.
Excels	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland			I partially agree and partially disagree	Age distribution should not be deleted, as it provides crucial information on the characteristics of workforce, which is relevant for a whole host of IROs, e.g. aging of the workforce	S1	S1-8 - Diversity metrics	29.
Excels	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland			I partially agree and partially disagree	Retirement should be brought back in as a mandatory datapoint	S1	S1-10 - Social protection	34.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland			I partially agree and partially disagree	Gender breakdown for training hours should be reinstated	S1	S1-12 - Training and skills development metrics	38.
Excels	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland			I partially agree and partially disagree	Fatalities from ill health for non-employees and workers on site should be reinstated	S1	S1-13 - Health and Safety metrics	40.
Excels	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland			I partially agree and partially disagree	Datapoint on workers actually taking family-related leave should be reinstated	S1	S1-14 - Work-life balance metrics	42.
Excels	Central Organisation of Finnish Trade Unions SAK	Trade union	Finland			I partially agree and partially disagree	Country-level information should be provided on the ratio of the higest paid individual in that country to the country median should be reported	S1	S1-15 - Remuneration metrics	44. (b)
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	See our response to the questionnaire : Companies do not agree with the new definition of the treshold for reporting metrics disaggregated at Country Level	S1	S1-5 - Characteristics of the undertaking's employees	AR 9
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	Non-employees are not part of the company's own workforce by principle ; by consequence they are not recorded in the social data information systems of companies : that makes it impossible to disclose information on this category of workers. The notion of "non employees being a key part of the undertaking's business model" will open the door to interpratation and endless discussions with auditors. We continue to ask for deletion of this DR	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	14.
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	Companies prefer to return to the previously proposed definition of the threshold for all DR. Outside the EEA, companies do not understand what a region is (which countries are included in a region ?) and prefer to report on countries where they have significant employment only.	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 16
Excels	MEDEF	Business association (other than association of financial institution)	France			I agree	The term 'diversity' does not correspond to the indicator, which only measures gender distribution	S1	S1-8 - Diversity metrics	AR 19
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	We still consider it irrelevant and very complicated to publish information outside the EU ; however in the AR 22 we believe outside the EU, it is entirely appropriate to compare the lowest wages in the company with the statutory minimum wage established by legislation or collective bargaining; and where these do not exist, to use the benchmarks developed by the ILO – a tripartite international organisation – on living wage estimates rather than resorting to consultants or private organisations.	S1	S1-9 - Adequate wages	AR 20
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	The two-year review frequency does not depend on companies and should be abolished.	S1	S1-9 - Adequate wages	AR 22
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	The number of life events covered remains very broad and should focus only on (i)sickness (ii) employment injury. Other items depend heavily on jurisdictional factors with limited company involvement (e.g., unemployment) or are already covered elsewhere in the standard (e.g., maternity leave overlaps with S1-14). The DR requires disclosure by country, with cumulative consideration of the risks listed: are countries listed rather than risks? If a single risk is not covered, the country is 'disqualified'? This DR shall limit disclosure to significant employment countries, applying the old threshold, and allow for refinement based on the risks covered	S1	S1-10 - Social protection	14.
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	This data is very difficult to aggregate at group level. Definitions vary from one country to another. The company cannot collect individual data. The data is aggregated at country level, so it cannot be verified, which will complicate the audit.	S1	S1-11 - Persons with disabilities	AR 23
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	To be relevant this disclosure should be based on the number of employees eligible for training and appraisal interviews, rather than the total number of employees.	S1	S1-12 - Training and skills development metrics	AR 24
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	The amount of information to be disclosed is too detailed and redundant; the number of cases of recordable work related ill health and the number of days lost to work related injuries shall be removed. The publication of all these indicators shall be limited to employees and to countries where the undertaking has a significant workforce.	S1	S1-13 - Health and Safety metrics	AR 26
Excels	MEDEF	Business association (other than association of financial institution)	France			I partially agree and partially disagree	This disclosure will require a lot of work and is of little interest: it merely lists the existence of leave for family reasons, whether provided for by law or by a collective agreement.	S1	S1-14 - Work-life balance metrics	AR 31
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	With regard to remuneration, whether it be the pay gap or the ratio (S1-15), companies question the value of unadjusted indicators that do not provide any useful information and which, if reproduced without contextual explanation, may contribute to damaging their reputation. The adjusted pay gap is the only metric that directly measures compliance with the principle of "equal pay for equal work or work of equal value."	S1	S1-15 - Remuneration metrics	AR 33
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	The same remuneration elements should be provided for both indicators – why is only the ratio (AR36) detailed and not AR 35? The requirements for collecting data on the pay ratio are too burdensome, and we would be in favor of aligning its calculation basis with that of the gender pay gap, which is simpler and more realistic for large global groups.	S1	S1-15 - Remuneration metrics	AR 35
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	Interns and work-study students shall be excluded, and only the company's own workforce should be targeted. Benefits in kind will be very difficult to isolate and aggregate.	S1	S1-15 - Remuneration metrics	AR 36
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	Our requests for amendments have not been taken into account; the definition of incident of discrimination is still too broad. It shall be limited to proven and dealt with incidents, i.e. those that have resulted in a final court decision.	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 37
Excels	MEDEF	Business association (other than association of financial institution)	France			I disagree	Regarding penalties: what period should be taken into account? There is inevitably a time lag between the incident and any penalty. A financial materiality threshold should be introduced	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 41
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This is problematic, as it suggests that disclosure requirements related to the topic of "own workforce" are dispersed across various sections of the ESRS, which may hinder clarity and coherence in implementation.	S1	S1 - Objective	2.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The current wording stipulates that the undertaking must report on DRs S1-5 and S1-16 whenever "own workforce" is deemed a material topic, regardless of the materiality assessment for the specific sub-topic. This contradicts the principle that disclosures should only be required if the relevant topic is identified as material. The same issue applies to DR S1-6 in relation to "non-employees." Furthermore, the "Objective" section should not contain disclosure requirements.	S1	S1 - Objective	3.

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Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	It is unclear why the sub-topic of social protection is classified under "working conditions," given that social protection is primarily a state responsibility. This categorisation is not compatible with the CSRD, where the term "social protection" does not appear once, nor is it included among the 24 social and human rights factors referenced in the directive. Beyond that we would like to address generally the issue with the new breakdown of sub-sub-topics (SSTs). It is very unclear how the brackets in the new ESRS are to be interpreted and why some SSTs stand alone while others are placed in brackets. We are concerned that this could lead to additional reporting requirements and discussions with auditors.	S1	S1 - Objective	4. (a)
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The inclusion of "privacy" and "adequate housing" as sub-topics in the ESRS is highly problematic. These concepts are neither among the 24 social and human rights factors referenced in the CSRD, nor do they reflect corporate responsibilities in a manner consistent with the directive's scope. "Privacy" is already comprehensively regulated under existing legal frameworks such as the GDPR, and "adequate housing" is a state obligation, not a corporate one. Moreover, these topics appear solely in the "Objective" section without any corresponding disclosure requirements, creating unnecessary ambiguity for undertakings as to whether reporting obligations arise from the descriptive text alone.	S1	S1 - Objective	4. (f)
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The expectation to avoid duplication entirely is unrealistic and potentially counterproductive. In practice, overlapping or identical reporting content is required across multiple disclosure requirements, which creates confusion for undertakings. Faced with ambiguity, companies are likely to over-comply to avoid the risk of non-compliance or penalties—undermining the goal of streamlined and efficient reporting.	S1	S1 - Objective	5. (b)
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The current structure would lead to fragmented reporting if companies struggle to align general Policies, Actions, Targets (PAT) disclosures with the specific impacts, risks, and opportunities (IROs) identified in ESRS S1. A more integrated approach, such as allowing optional topic-specific PAT disclosures where material is needed.	S1	S1 - Objective	6.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The inclusion of self-employed individuals and agency workers (NACE Code N78) under the same reporting umbrella raises serious concerns regarding data availability, legal clarity, and cross-border comparability. Although the paragraph rightly states that this classification does not affect legal status under labour law, in practice, undertakings face significant challenges in collecting consistent and reliable data on non-employees—particularly when these individuals are engaged via third-party contracts. This creates a high risk of reporting inconsistencies and audit complications, especially in multinational contexts where labour classifications differ. Furthermore, while the conceptual separation between ESRS S1 and ESRS S2 is sound, the boundary between "own workforce" and "value chain" is often blurred in complex outsourcing arrangements. To avoid co-employment risks and ensure legal certainty, non-employees should be reported exclusively under ESRS S2.	S1	S1 - Objective	7.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The proposed definitions of self-employed individuals and agency workers (NACE Code N78) are overly broad and operationally unworkable. Reporting entities do not have access to reliable data on these individuals, especially when engaged via third-party contracts, due to legal constraints under GDPR and the "need-to-know" principle. Including such workers under ESRS S1 risks misclassification and co-employment liabilities. These categories should be clearly excluded from the "own workforce" as they are already sufficiently addressed under ESRS S2, where value chain relationships are more appropriately framed.	S1	S1 - Objective	8.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The examples stretch the definition of value chain workers to include individuals with regular on-site presence and operational integration. This risks blurring the line between own workforce and value chain labour, especially in cases of long-term maintenance contracts. Such ambiguity undermines legal clarity and creates potential co-employment risks. The standard must provide sharper boundaries and adopt a risk-based approach reflecting the limited control and visibility undertakings have over third-party personnel.	S1	S1 - Objective	9.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The call for consistency and linkage between ESRS S1 and ESRS S2 is conceptually sound but practically problematic. The boundaries between own workforce and value chain workers remain unclear, and the standards lack operational guidance on how to ensure coherent reporting across both. This risks double reporting, legal uncertainty, and disproportionate burden—especially in complex outsourcing arrangements. Clear separation and risk-based alignment are needed to avoid confusion and ensure legal compliance.	S1	S1 - Interaction with other ESRS	10.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The requirement to describe workforce policies and specify coverage for "specific groups" or "all of its own workforce" is overly granular, lacks a clear legal basis in the CSRD, and creates unnecessary reporting complexity. The CSRD only requires information "necessary to understand the undertaking's impacts on sustainability matters." The level of detail demanded here—especially the breakdown by sub-groups—exceeds the directive's intent and imposes a disproportionate burden on companies, particularly those with complex or international structures. This requirement is also redundant with disclosures already required under ESRS 2, leading to double reporting and further increasing complexity. To ensure legal certainty, proportionality, and practical feasibility, the obligation to specify coverage by "specific groups" should be deleted. Beyond that we suggest that this should be a voluntary information.	S1	S1-1 - Policies related to Own workforce	11.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	Disclosure of policies on trafficking, forced or compulsory labour, and child labour should only be required if these topics are material, as per the CSRD's materiality principle. Mandating disclosure regardless of materiality is disproportionate (Art. 5(4) TEU) and exceeds the CSRD's intent. The "explicit address" requirement should be deleted, as the CSRD does not require policies to use specific wording. This change would ensure legal certainty, reduce unnecessary reporting burden, and align with the principle of proportionality. Beyond that we suggest that this should be a voluntary information.	S1	S1-1 - Policies related to Own workforce	12.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	Disclosure of health and safety policies or management systems should only be required if these topics are material. Mandating disclosure regardless of materiality is disproportionate (Art. 5(4) TEU) and exceeds the CSRD's intent. This risks obscuring material information among immaterial details, undermining transparency and increasing reporting burden. Beyond that we suggest that this should be a voluntary information.	S1	S1-1 - Policies related to Own workforce	13.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The requirement to disclose communication channels for policies is redundant, overly granular, and goes beyond the CSRD. This disclosure was intentionally removed from ESRS 2 and should not be reintroduced in topical standards. If guidelines for policy disclosure are not streamlined in ESRS 2, this will lead to inconsistent presentations across standards and increased reporting burden. To ensure clarity, comparability, and proportionality, AR 1 should be deleted.	S1	S1-1 - Policies related to Own workforce	AR 1
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The requirement to disclose information on grievance mechanisms is redundant and should be removed. Grievance mechanisms are already addressed, e.g., in the Governance standard, and duplicating this requirement in S1-2 leads to unnecessary double reporting and increased complexity. Maintaining consistency and avoiding overlap is essential for clarity and proportionality (Art. 5(4) TEU). The standard should be streamlined to prevent redundant disclosures and ensure comparability across reporting. Beyond that we suggest that this should be a voluntary information.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	14.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The requirement to disclose engagement with the workforce and perspectives of vulnerable or marginalised groups is overly vague and lacks clear criteria. Terms such as "particularly vulnerable," "marginalised," and "perspectives" are undefined, risking inconsistent application and undermining comparability. The CSRD does not require such granularity or sub-classification. Disclosure should be limited to material engagement processes, and only where relevant and clearly defined. The obligation to report on Global Framework Agreements or similar outcomes can only be voluntary, as not all undertakings are party to such agreements. The standard must provide precise definitions and avoid unnecessary complexity to ensure legal certainty and proportionality.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	15.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The requirement to disclose channels and grievance mechanisms is redundant, as grievance mechanisms are already addressed in the Governance standard (G-standard). Duplicating this requirement increases the reporting burden and risks inconsistent reporting. The obligation to explain the effectiveness of these channels is vague and impractical, especially for large or global undertakings. To ensure clarity, comparability, and proportionality (Art. 5(4) TEU), this requirement should be deleted or streamlined.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	16.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The generic application requirement risks inconsistent interpretation and reporting across undertakings and Member States, especially endless negotiations with auditing entities. Without a clear definition or threshold, companies may face uncertainty about what is expected, undermining comparability and legal certainty. The standard should state that only material engagement processes need to be disclosed and should avoid prescriptive or open-ended requirements that go beyond the CSRD's intent. To ensure proportionality and reduce unnecessary reporting burden, the application requirement should be streamlined and aligned with established legal frameworks and national practices.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	AR 2
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The definition of "channels" is overly broad and lacks clarity, risking inconsistent interpretation and reporting across undertakings and Member States. The inclusion of third-party and external mechanisms (such as NGOs or industry associations) goes beyond the CSRD's intent and established national practices. This could create legal uncertainty and unnecessary reporting burden, especially where such channels are not under the undertaking's control. Whistleblowing channels are typically regulated by specific national or EU legislation (e.g., the EU Whistleblower Directive) and are designed for reporting legal violations, not general workforce concerns. Mandating their disclosure in this context risks conflating distinct legal frameworks and could undermine the protective intent of whistleblowing laws. The standard should focus on channels directly established or managed by the undertaking and clarify that only material, relevant channels must be disclosed. Overly prescriptive or open-ended requirements should be avoided to ensure proportionality and comparability.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	AR 3
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The reference to the UN Guiding Principles' effectiveness criteria (principle 31) introduces subjectivity and complexity, risking inconsistent application and legal uncertainty across Member States. Many companies already have governance structures and management systems for human rights due diligence, often based on the UN Guiding Principles or OECD Guidelines. Making these voluntary frameworks de facto mandatory through reporting standards is not appropriate, as they are not intended as binding corporate policy instruments. Other frameworks should be equally acceptable. The cross-reference to ESRS G1-1 adds another layer of complexity and creates overlapping requirements, increasing the risk of double reporting and confusion for preparers. The standard should ensure that requirements are streamlined, mutually exclusive, and do not require the same information to be reported in multiple places. Overly prescriptive requirements and redundant disclosures must be avoided to ensure proportionality, clarity, and practical feasibility.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	AR 4
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The requirement to disclose "key actions and resources" is overly broad and lacks clear boundaries, risking excessive and inconsistent reporting. The CSRD does not require such a level of detail; the focus should remain on material information only. Disclosing detailed information on resources—especially financial or human resources—poses a high risk to competitiveness and may reveal sensitive business strategies. Furthermore, the standard's lack of clarity on what constitutes "key actions" and "resources" undermines comparability and legal certainty. The requirement should be strictly limited to material actions, avoid duplication with other disclosure requirements, and ensure that sensitive or strategic information is protected. Overly granular or redundant disclosures must be avoided to ensure proportionality and practical feasibility. Beyond that we suggest that this should be a voluntary information.	S1	S1-3 - Actions and Resources related to Own workforce	18.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This requirement duplicates the requirement of para 18 and unnecessarily expands the reporting burden. The focus should be strictly on "key actions" addressing "material negative impacts," in line with the CSRD's materiality principle. Requiring detailed descriptions of actions planned or underway, especially in relation to business pressures, goes beyond the CSRD and risks introducing subjectivity and inconsistency1. The standard should be clarified and streamlined to avoid double reporting and to ensure that only material, outcome-relevant actions are disclosed.	S1	S1-3 - Actions and Resources related to Own workforce	19. (a)

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Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This requirement is duplicative of the general disclosures on tracking performance in ESRS 2 GDR-T and GDR-M. While a cross-reference is permitted, this creates unnecessary structural complexity in the standards. More fundamentally, the requirement to track the "effectiveness" of actions in delivering "outcomes" is disproportionately burdensome and often unfeasible. It is practically impossible to isolate the causal link between a specific corporate action and a subjective "outcome" for an employee, as countless external factors are at play. This level of detailed effectiveness measurement goes beyond the scope of the CSRD, which focuses on disclosing the actions taken, not on conducting a complex impact assessment for each one. Therefore, to reduce redundant reporting and avoid imposing an impractical and overly granular burden, this paragraph should be deleted entirely. The general requirements in ESRS 2 are sufficient.	S1	S1-3 - Actions and Resources related to Own workforce	19. (b)
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement introduces the concept of using "leverage," which is legally problematic and practically unfeasible. The expectation that a company must use commercial "leverage" over its business partners is an exaggerated and normative standard of conduct not mandated by the CSRD. This requirement interferes with the right to entrepreneurial independence and freedom of contract, representing a significant legal overreach. Furthermore, the concept is unrealistic for many companies that hold a weak market position relative to their partners, failing to reflect business realities. The term "leverage" itself is vague and undefined, which will inevitably lead to inconsistent application and legal uncertainty for both preparers and auditors. To ensure the standards remain grounded in law and practical application, the reference to using "leverage" must be deleted. The focus should be on actions within a company's direct sphere of control and influence.	S1	S1-3 - Actions and Resources related to Own workforce	AR 6
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	While the CSRD mentions the principle of a "just transition" in its recitals, it does not provide a legal definition or prescribe detailed reporting obligations on the matter. This requirement oversteps its mandate by taking this high-level, undefined concept and turning it into a specific, prescriptive reporting requirement. This constitutes a significant infringement on entrepreneurial freedom. By imposing a specific and politically charged framework, the standard dictates how a company must frame and manage the social impacts of its climate strategy, interfering with its fundamental freedom to make independent strategic and operational decisions. Furthermore, the term "just transition" is inherently vague, introducing subjectivity and legal uncertainty that undermine the goal of comparable reporting. This creates a disproportionate analytical burden. To respect entrepreneurial freedom and ensure legal clarity, the specific, prescriptive references to "just transition" must be deleted from this Application Requirement.	S1	S1-3 - Actions and Resources related to Own workforce	AR 7
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This paragraph as it is structurally redundant and substantively problematic. It creates unnecessary complexity by placing a target-setting requirement in a topical standard that is governed entirely by the general standard, ESRS 2 GDR-T. This cross-reference is flawed: The requirement forces the disclosure of specific workforce targets that often constitute strategic business secrets. Targets for skills, talent, or restructuring are core to a company's competitive strategy. Publicly disclosing them is detrimental to a company's competitive position and infringes upon its entrepreneurial freedom. To streamline the standards and protect commercially sensitive information, this DR should be deleted. The general requirements for target-setting must reside exclusively in ESRS 2, which itself must be amended to introduce a robust, explicit exemption for strategic targets that are commercially sensitive.	S1	S1-4 - Targets related to Own Workforce	20.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	While the CSRD mandates a dialogue with workers' representatives, this paragraph's requirement to disclose engagement specifically on "target-setting" is an overreach. Worker consultation and co-determination are highly regulated and sensitive areas governed by diverse national laws and established practices across the EU. By imposing a uniform, granular disclosure requirement on the process of setting strategic targets, the ESRS interferes with these carefully balanced national systems. It creates a de facto European standard that runs parallel to, and potentially conflicts with, existing national legal frameworks, infringing upon both corporate governance structures and the specific rights and duties established in member states. This represents a clear intrusion into entrepreneurial freedom and national legal competences. The reporting standard should not be used to harmonize complex national labor relations through the back door. Therefore, this paragraph must be deleted. The general obligation for dialogue is set by the CSRD, and its practical application is properly managed by the applicable national laws on co-determination.	S1	S1-4 - Targets related to Own Workforce	21.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement reinforces the overreach identified in paragraph 21 by intruding further into a company's internal management processes. While engagement is mandated by the CSRD, this AR goes beyond a general dialogue about "sustainability information." It prescriptively frames worker engagement as a specific tool for "informing the undertaking's understanding of the effectiveness of its management" and for the "identification of lessons learnt or improvements". These are core functions of internal management, control, and strategic review. Dictating how a company should derive its "lessons learnt" or assess its own management effectiveness is a clear infringement on entrepreneurial freedom and organizational autonomy. The ESRS's role is to standardize the reporting of outcomes, not to prescribe the internal methodologies for performance review and strategic adaptation. This requirement is a disproportionate and unjustified intrusion into corporate governance. It should be deleted.	S1	S1-4 - Targets related to Own Workforce	AR 8

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Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This paragraph's stated objective to "provide insight into the undertaking's approach to employment practices" is an overreach and an infringement on entrepreneurial freedom. A company's employment practices and its approach to employment security are core components of its business model and human resources strategy. The CSRD requires reporting on material impacts, not a broad, subjective disclosure of the company's "approach," which is not defined and can be interpreted in a way that forces the disclosure of commercially sensitive strategic information. This requirement goes beyond the specific 24 social human rights and factors listed in the directive and forces a narrative justification of internal HR policy, which must not the purpose of a reporting standard. The vague and overreaching objective of providing "insight into the undertaking's approach" should be deleted.	S1	S1-5 - Characteristics of the undertaking's employees	22.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This paragraph mandates the disclosure of granular employee data that is not necessarily indicative of any material sustainability impact and therefore goes beyond the CSRD's requirements. The disproportionate breakdown by contract type—permanent, temporary, and non-guaranteed hours—does not, in itself, provide meaningful information about a company's sustainability performance. It touches upon sensitive aspects of a company's business model and HR strategy without a clear link to a sustainability outcome. Furthermore, the new threshold for country-level reporting in point (a)—the ten largest countries with over 50 employees—is not a simplification. For many international companies, this significantly increases the administrative burden by expanding the number of jurisdictions for which data must be collected and reported. To align with the principle of materiality and reduce the burden, the breakdowns by contract type in (c), (d), and (e) should be deleted. The threshold for country reporting in (a) should revert to the previous, less burdensome rule (10% threshold of the workforce in a country).	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement is methodologically flawed and undermines the fundamental objective of comparability. The text acknowledges that the definitions of key employment types differ across national laws. It then instructs companies to aggregate these legally distinct, non-comparable data points into a single, meaningless total. This approach is illogical and misleading. Combining data from different legal contexts creates a distorted figure that has no analytical value and cannot be reliably compared across different international companies. This requirement creates a significant burden for companies to collect and aggregate data, only to produce a result that is inherently unreliable and worthless for any meaningful analysis. It is a prime example of a disproportionate reporting obligation that fails to produce decision-useful information.	S1	S1-5 - Characteristics of the undertaking's employees	AR 9
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement highlights a significant operational challenge. Its permissive and vague language ("may provide") implicitly concedes that compiling consistent, high-quality employee data is extremely difficult in practice. The operational reality for large, international companies is that sourcing reliable data on headcount, FTEs, and contract types across numerous jurisdictions with disparate HR systems is a complex and disproportionately burdensome task. The lack of a single, feasible compilation methodology—as acknowledged by this AR's vagueness—ensures that the data reported under DR S1-5, paragraph 23 will not be comparable across undertakings, severely limiting its value for any stakeholder. Given that the data is operationally difficult to collect consistently and the resulting metrics lack comparability, the underlying disclosure requirement imposes an excessive burden for little informational gain. It should therefore be deleted.	S1	S1-5 - Characteristics of the undertaking's employees	AR 10
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement is overly prescriptive and its templates highlight flawed underlying requirements. The template in Table 1 mandates an "Other" gender category that is not legally recognized in all Member States, forcing companies into a legally inconsistent reporting framework that requires burdensome explanations. The template in Table 2 is driven by the new "ten largest countries" rule, which is not a simplification. For international companies, this significantly increases the administrative burden by expanding the number of countries to report on, without a clear increase in the value of the information. To ensure proportionality and legal consistency, the tabular formats must be presented as optional, non-mandatory examples. Furthermore, the country reporting threshold must revert to the previous, less burdensome rule.	S1	S1-5 - Characteristics of the undertaking's employees	AR 11
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement and its prescriptive Table 3 mandate a granular breakdown of employees by contract type and gender that goes beyond the CSRD's requirements and infringes on entrepreneurial freedom. This detailed data, especially the distinction between permanent, temporary, and non-guaranteed hours employees, does not in itself provide meaningful information about a company's material sustainability impacts. Forcing all companies to report this specific breakdown is a disproportionate burden that reveals sensitive aspects of a company's HR strategy and business model without a clear link to a sustainability outcome. Furthermore, the rigid, mandatory format is an unnecessary intrusion into how a company presents its data. The template should be provided as an optional, non-mandatory example, not a prescribed format. Companies must retain the flexibility to report relevant data in a way that accurately reflects their operational reality and legal context, especially given the legal and cultural complexities surrounding gender reporting in different Member States.	S1	S1-5 - Characteristics of the undertaking's employees	AR 12

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Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement is overly simplistic and prescribes a one-size-fits-all calculation that fails to reflect diverse business realities. The mandated formula for employee turnover aggregates vastly different reasons for departure—voluntary leave, dismissal, retirement, and death—into a single, crude metric. This approach is methodologically weak, as it obscures the underlying drivers of turnover. For example, a high turnover rate due to retirements in an aging workforce has a completely different strategic implication than one caused by dismissals or voluntary departures. By forcing a single, non-nuanced calculation, the standard produces a metric that is of limited value and can be highly misleading. It infringes upon a company's ability to report on workforce dynamics in a way that is meaningful and relevant to its specific situation, industry, and strategic context. To provide decision-useful information, this AR should be amended to allow companies to use their own established and more contextually relevant methodologies for calculating and explaining employee turnover, rather than mandating a single, overly simplified formula.	S1	S1-5 - Characteristics of the undertaking's employees	AR 13
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	A company's reliance on non-employees is a core component of its business model and strategic resourcing. Forcing a company to provide an "understanding" of this reliance compels the disclosure of sensitive operational and strategic information without a direct or necessary link to a material sustainability impact. Critically, lumping non-employees into the concept of an undertaking's "own workforce" is legally problematic. It disregards the clear legal and contractual separation between employees and independent contractors or workers from third-party agencies. This risks creating a false impression of a direct employment relationship, which could have unintended legal consequences (e.g., co-employment risk). The CSRD's focus is on material impacts, not on demanding a justification of a company's chosen business model. This DR and its objective go beyond the directive's mandate. Therefore, this Disclosure Requirement should be deleted. Any material impacts on non-employees should be covered under ESRS S2 "Value Chain Workers. Beyond that we suggest that this should be a voluntary information.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	24.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This paragraph mandates the disclosure of data that is practically unfeasible and legally problematic for companies to obtain. A reporting company does not have direct access to the personnel data of its contractors or the employees of third-party agencies. The details of these non-employees are the responsibility of the third-party employer, and this information is rightly protected by data protection laws and the "need to know" principle. Forcing a company to report on a total number of individuals over which it has no direct oversight or data access creates an impossible compliance burden. The expected effort is significant, as this data cannot be derived from a company's own systems and would require extensive manual data requests that third parties are often legally unable or unwilling to fulfill. Given that the data is not reliably accessible and its collection raises significant legal and data protection issues, this requirement is disproportionate and impractical. It must be deleted.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	While the new Application Requirement attempts to introduce a materiality filter, it does not solve the fundamental flaws of the Disclosure Requirement in paragraph 25. The AR itself relies on vague, subjective terms like "significant driver" and "substantial proportion," which fail to provide a clear, auditable threshold for reporting and thus create legal uncertainty. More importantly, even if the topic were deemed material under this ambiguous test, it does not change the operational reality: companies cannot reliably and legally access the personnel data required to report a total number of non-employees. This information is held by third-party agencies or contractors and is rightly protected by data protection laws. The requirement to provide a specific number remains practically unfeasible. Given these overriding practical and legal barriers, the requirement to disclose a specific number is not fit for purpose. It imposes an impossible compliance burden. Therefore, both this Application Requirement and the underlying disclosure in paragraph 25 must be deleted.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	AR 14
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement is an unworkable fallback for a fundamentally flawed disclosure. It fails to recognize that estimates in social reporting are vastly different from those in financial reporting. Financial estimates are typically based on historical data, statistical models, and established valuation techniques within a company's control. In contrast, estimating the number of non-employees—individuals who are not in a company's own HR systems—lacks any reliable basis. Such an estimate would be pure speculation, not a reasoned calculation. It would be impossible to audit and would have no informational value. By suggesting estimation as a solution, this AR sidesteps the core issue: the data is not just difficult to collect; it is fundamentally inaccessible to the reporting entity for legal and practical reasons. Forcing companies to produce a speculative number is misleading and creates a false sense of precision. This AR does not provide a viable solution to an impractical requirement. It should be deleted along with the underlying disclosure in paragraph 25.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	AR 15
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This paragraph's objective is an overreach that disregards the diverse and legally established systems of labor relations across the EU. "Social dialogue" and collective bargaining are governed by specific national laws, with which companies are already legally required to comply. Demanding a standardized, separate report on this topic is therefore redundant and offers no added value, as it merely documents existing legal compliance. Furthermore, this DR overlaps significantly with other requirements, such as DR S1-2, which already requires a description of how workers are engaged. This creates internal redundancy within the standard itself. Given that the subject is already covered by both national law and other disclosure requirements, this DR is superfluous and should be deleted.	S1	S1-7 - Collective bargaining coverage and social dialogue	26.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This paragraph mandates granular data disclosures that are disproportionately burdensome and produce misleading, non-comparable metrics. The requirement in point (b) to report on the "10 largest countries" creates an excessive administrative burden for international companies, forcing extensive data collection for no clear informational gain. Critically, the entire exercise is methodologically flawed. The meaning of "collective bargaining agreements" differs profoundly across national legal systems, rendering any comparison of these percentages misleading. This problem is compounded in point (c) by the use of the term "region," which is completely undefined. This creates significant legal uncertainty and forces companies to use arbitrary definitions, making the resulting data worthless for comparison. Given that the data is burdensome to collect and the resulting metrics are not comparable or decision-useful, this entire paragraph should be deleted.	S1	S1-7 - Collective bargaining coverage and social dialogue	27.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This paragraph mandates granular, country-level data that is disproportionately burdensome and produces a misleading metric. The requirement in point (a) to report the percentage of employees covered by workers' representatives is flawed. The definition, role, and structure of "workers' representatives" are governed by diverse and complex national laws, meaning the data is not comparable across different EEA countries. Forcing this disclosure creates a significant administrative burden to produce a metric that has little to no comparative value. Furthermore, the requirement in point (b) regarding European Works Councils is redundant. The existence of these bodies is already a matter of public record and is governed by specific EU directives. Demanding this disclosure within the ESRS adds no new information and is a superfluous reporting exercise. Given that the data is not comparable and the requirements are redundant with existing legal frameworks, this entire paragraph should be deleted.	S1	S1-7 - Collective bargaining coverage and social dialogue	28.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement provides a formula that is deceptively simple and produces a fundamentally flawed and misleading metric. The formula's critical weakness is its reliance on the term "collective bargaining agreements," which lacks a uniform legal definition across the EU. The legal status, scope, and application of such agreements vary significantly between Member States. This AR creates a false sense of precision by mandating a single calculation for legally distinct national concepts, making the resulting percentage non-comparable and worthless for any meaningful cross-country or cross-company analysis. Furthermore, it fails to account for diverse national practices, such as "in-house collective bargaining agreements" or situations where companies voluntarily apply the terms of an agreement without being legally bound to it. By forcing a simplistic calculation onto a complex legal reality, this AR produces a distorted and unreliable figure. It is not fit for purpose and should be deleted.	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 16
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement and its prescriptive table are methodologically flawed and create a misleading picture of social dialogue. The table mandates the aggregation of legally distinct and non-comparable data points from different EEA countries into a single format. As a result, the concepts of "collective bargaining" and "workers' representatives" vary significantly across jurisdictions, so presenting them as uniform metrics is analytically unsound and provides no decision-useful information. The rigid format infringes on a company's ability to report this information in a way that accurately reflects the specific national legal contexts in which it operates. Therefore, this table cannot be a prescribed template. If material, companies must retain the flexibility to report on these matters in a narrative format that respects the legal diversity of their operations.	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 17
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement and its formula are overly simplistic and legally inconsistent, producing a metric that is both misleading and non-comparable. The calculation relies on the term "workers' representatives," which has vastly different legal definitions, roles, and structures across the EEA. Forcing a single, uniform calculation onto these diverse national systems is methodologically flawed and creates a distorted picture that cannot be reliably compared. Furthermore, the formula is legally imprecise. For example, in Germany, members of upper management ("Leitende Angestellte") are counted as employees in the denominator but are not represented by the works council. This makes a simple "100% or 0%" calculation for single establishments incorrect and demonstrates the AR's failure to account for critical details in national law. This AR produces a meaningless metric through a disproportionate effort. It is not fit for purpose and should be deleted.	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 18
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This paragraph's objective is overly narrow and reductionist. It incorrectly equates the broad concept of "diversity" with a single, prescribed metric: "gender diversity at top management level". This one-size-fits-all approach is flawed as it disrespects the undertaking's own materiality assessment and fails to reflect the broader scope of diversity outlined in the CSRD itself. The directive lists multiple grounds for equal treatment, including age, disability, and racial or ethnic origin, not just gender. The aspects of diversity that are most material will vary significantly between companies. Therefore, this narrow objective should be deleted. It should be replaced with a principles-based objective that enables an understanding of the company's overall approach to diversity and inclusion, allowing undertakings to report on the specific topics and metrics they have identified as material for their business. This ensures the information is relevant and aligns with the holistic view of diversity intended by the CSRD.	S1	S1-8 - Diversity metrics	29.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This requirement to disclose a single, prescribed diversity metric is reductionist and inconsistent with the principle of materiality. Forcing the disclosure of this specific metric is especially problematic and misleading when the general topic of diversity is material to a reporting company. It disproportionately elevates one aspect of diversity, implying it is the most important one, while obscuring other issues—such as age, disability, or ethnicity—that the company may have identified as being far more material to its specific context. This creates a distorted and incomplete picture of the company's actual diversity priorities and performance. This approach infringes upon a company's ability to report on what is genuinely material. Therefore, this specific metric should not be mandatory. It should be presented as an optional example of a diversity metric that a company may choose to report if it has identified gender diversity at the top management level as a material topic.	S1	S1-8 - Diversity metrics	30.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	While the CSRD mandates reporting on "adequate wages," this paragraph's objective is based on a flawed premise that a single, comparable "understanding" of wage adequacy can be achieved across the EU. The concept of an "adequate wage" is not a uniform standard but is inextricably linked to diverse national socio-economic conditions, legal frameworks, and long-standing systems of collective bargaining managed by social partners. Companies comply with these diverse and complex national systems. By setting a single, overarching objective, the ESRS disregards these fundamental national differences and disrespects the legal competence of Member States and the autonomy of social partners in the sensitive area of wage-setting. It forces companies to report against an ambiguous and non-existent European benchmark, which is a clear overreach. The objective should be reframed to respect national diversity. It should focus on enabling an understanding of how a company's wage practices align with the specific legal and collective bargaining frameworks of the countries in which it operates, rather than pursuing an unworkable, one-size-fits-all European standard.	S1	S1-9 - Adequate wages	31.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This paragraph's requirement for a binary "yes/no" disclosure on paying an "adequate wage" is unworkable and fundamentally flawed. The term "adequate wage" lacks a single, legally binding, or universally accepted benchmark, especially across different countries. It is a complex socio-economic concept, not a simple compliance check. Forcing a company to make a definitive "yes/no" statement against such a vague and subjective standard is misleading and creates significant legal uncertainty. Different companies will inevitably use different benchmarks, making any disclosures non-comparable and of little value to stakeholders. This requirement forces companies into a disproportionate and legally precarious exercise of judging their own wage practices against a non-existent standard. Given the lack of a clear and objective benchmark, this disclosure requirement is not fit for purpose and should be deleted.	S1	S1-9 - Adequate wages	32.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	While presenting a "single affirmative statement" appears simple, it does not reduce the operational burden. To make such a definitive claim, a company would need to conduct an extensive, legally precarious internal assessment against a non-existent, universally accepted benchmark for an "adequate wage". Furthermore, this statement would need to be verified by an auditor, who would require robust, objective evidence to support the claim. Since no such objective standard for "adequate wage" exists, proving compliance would be impossible, leading to significant legal risk and potential conflicts during the assurance process. This AR creates a false sense of simplicity while ignoring the immense compliance and audit challenges it generates. It is a prime example of a requirement that is unworkable at the operational level and should be deleted along with the underlying disclosure in paragraph 32. The requirement to research "appropriate wages" for each country of operation imposes a disproportionate and impractical burden on undertakings. To ensure consistency and feasibility, the EU Commission or EFRAG must provide a centralized, annual overview of these wage benchmarks. Furthermore, the standard lacks critical guidance on the treatment of variable, performance-related salary components, creating significant ambiguity that makes a reliable calculation impossible.	S1	S1-9 - Adequate wages	AR 20
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement is legally problematic and operationally unworkable. The requirement to calculate the "lowest wage" is a significant infringement on employee privacy and personal data protection rights. In many cases, especially within specific countries or company units, the lowest-paid individual can be easily identified, and disclosing their remuneration data, even indirectly, would constitute a serious data breach. A legal basis for processing and disclosing this highly sensitive personal data is not provided for in the GDPR. Furthermore, the calculation methodology is ambiguous. The term "fixed additional payments that are guaranteed to all employees" is unclear. Many allowances (e.g., Christmas bonuses) are subject to tenure or other conditions and are not guaranteed to all employees, making a consistent calculation impossible. Given the severe data privacy violations and the practical impossibility of a consistent calculation, this AR is not fit for purpose and must be deleted.	S1	S1-9 - Adequate wages	AR 21

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement is a clear case of regulatory overreach that infringes on national sovereignty and the autonomy of social partners. The AR attempts to define a benchmark for "adequate wage" by referencing various sources, but it fundamentally misrepresents their legal nature: First, the values in the EU Directive on Adequate Minimum Wages are indicative and non-binding for Member States, who retain the sovereign competence for setting wage policies. On top of that, in January 2025, ECJ Advocate General Nicholas Emiliou delivered his Opinion agreeing with Denmarkt proposing to repeal the directive in full. Secondly, the ILO conventions and principles it refers to are addressed to sovereign states, not directly to private companies. They do not create direct, legally binding corporate obligations. By elevating these non-binding and state-level principles into a de facto benchmark for corporate reporting, the ESRS improperly interferes with national wage-setting systems and creates legally unfounded obligations for companies. The entire framework is built on a flawed legal premise and is practically unworkable. This AR must be deleted.	S1	S1-9 - Adequate wages	AR 22
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Disclosure Requirement lacks a clear legal basis, as "social protection" is not one of the social and human rights factors explicitly listed for reporting in the CSRD. This omission in the directive is appropriate, as social protection is a matter of state social policy and national law, not a corporate responsibility. This objective improperly blurs the lines between corporate duties and state functions. Furthermore, it is impractical to expect a company to conduct its own "field research" to assess the adequacy of diverse and complex national social security systems worldwide. This creates a disproportionate burden for little valuable information, a fact underscored by this DR's recurring status as a phase-in requirement. Given that this DR lacks a clear mandate in the CSRD, infringes on national competences, and is unworkable in practice, it must be deleted.	S1	S1-10 - Social protection	33.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This paragraph is unworkable, legally precarious, and imposes a disproportionate burden. It requires an undertaking to make a definitive assessment of whether its employees "lack social protection". This is practically impossible, as a company cannot reliably possess or verify the detailed, personal information needed to determine the social security coverage of every individual employee. Requesting such sensitive data would likely violate data protection laws. Furthermore, companies already adhere to all applicable national social policy laws. Reporting on the outcomes of these legally mandated systems - in terms of the elements mentioned in a)-d) - is redundant and provides little value to users. Given that the disclosure is unfeasible, legally problematic, burdensome, and redundant, this paragraph must be deleted.	S1	S1-10 - Social protection	34.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This paragraph's objective is unworkable and legally precarious, as it requires data that companies are often prohibited by law from collecting. In many Member States, directly asking employees about disabilities is prohibited by law and is considered an illegitimate invasion of privacy. The legal framework for collecting such sensitive personal data is extremely restrictive, and companies cannot simply request this information to fulfill a reporting requirement. Even where legally permissible, data on disabilities relies on voluntary self-disclosure by employees. This makes any collected data unverifiable, inconsistent, and ultimately unreliable for standardized reporting. Companies already comply with all applicable national laws regarding the employment of persons with disabilities. Reporting on this topic is a redundant exercise in documenting existing legal compliance. From the offset this disclosure requirement has been a phase-in requirement, which is now again subject to new transitional provisions of the delegated act "quick fix". Information related to compliance with existing legal requirements appears to be of litle to users of the information. Given that the necessary data is legally protected and practically impossible to collect reliably, this disclosure requirement is not fit for purpose. It must be deleted.	S1	S1-11 - Persons with disabilities	35.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This paragraph is unworkable and its caveat, "subject to legal restrictions," is a tacit admission of its fundamental flaws. The requirement to disclose a percentage of employees with disabilities is legally problematic in many Member States, where collecting such sensitive personal data is prohibited to protect employee privacy. The caveat does not solve this problem; it fractures it. It will lead to a situation where companies in some countries report a number (based on unreliable self-disclosure) while those in stricter jurisdictions report nothing. This makes the resulting data completely non-comparable and of no value for any meaningful analysis. Given that it is legally contentious and produces non-comparable data, this paragraph should be deleted.	S1	S1-11 - Persons with disabilities	36.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement does not solve the fundamental flaws of paragraph 36; it only highlights them. The AR explicitly states that the DR only requires data that can be "lawfully collected". This is a direct acknowledgement that the requirement is unworkable in many Member States where such data collection is prohibited by law. A standard that is not universally applicable is not a standard. The AR allows undertakings to use either a single internal definition or various national definitions of "disability". This flexibility guarantees that the resulting data will be completely non-comparable across companies, rendering it useless for stakeholders. The suggestion to use "voluntary employee surveys" as a data source confirms that the data is unverifiable and unreliable. This AR attempts to provide flexibility for a requirement that is fundamentally broken. It produces non-comparable, unreliable data. This AR should be deleted along with the entire Disclosure Requirement.	S1	S1-11 - Persons with disabilities	AR 23

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This paragraph's objective is an overreach that imposes a normative standard on companies not mandated by the CSRD. The CSRD's focus regarding training is on ensuring "equal treatment and opportunities for all". This DR's objective, however, shifts the focus to broader, undefined concepts like "continuous professional growth" and "continued employability". This represents a significant expansion of scope. It imposes a specific, normative view of a company's responsibility for its employees' entire career trajectory, which is a matter of entrepreneurial freedom and strategic HR management, not a standardized reporting topic. The ESRS should not be used to prescribe specific HR policy goals. The objective should be reframed to align strictly with the CSRD's mandate: to enable an understanding of how the undertaking ensures equal treatment and opportunities in its training and skills development activities. Beyond that we suggest that this should be a voluntary information.	S1	S1-12 - Training and skills development metrics	37.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	These prescribed, one-size-fits-all metrics are simplistic and produce a misleading, non-comparable picture of a company's training efforts. A simple percentage of performance reviews or an average of training hours provides no insight into the quality, relevance, or effectiveness of the training provided. A high number of hours in outdated or irrelevant training is of less value than fewer hours in highly specialized, strategic skills development. These metrics encourage a focus on quantity over quality. The metric for "training hours" is based on an outdated, classroom-centric view of learning. Modern professional development often consists of on-the-job learning, coaching, peer exchanges, and self-directed digital learning, none of which can be meaningfully or consistently measured in "hours". Because "training" and "performance reviews" are not uniformly defined and companies utilize vastly different methods, these metrics will not be comparable across undertakings, rendering them useless for benchmarking. These simplistic and misleading metrics should be deleted. Companies should instead be allowed to report on their overall approach to training and skills development, focusing on the qualitative and quantitative information that is material to their specific strategic needs and business context.	S1	S1-12 - Training and skills development metrics	38.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement and its formula are overly simplistic and fail to produce a meaningful metric. The AR attempts to create a standardized definition for "regular performance review," but the reality is that modern performance management systems are diverse and continuous, often moving away from the traditional, once-a-year model this AR describes. Forcing companies to report a single percentage based on this outdated definition is a reductionist exercise that provides no insight into the quality or effectiveness of their performance and career development processes. A simple participation rate does not distinguish between a brief, formalistic check-in and a substantive, year-round development dialogue. This creates a non-comparable metric that encourages a check-the-box approach rather than a focus on meaningful employee development. This prescribed metric is a poor proxy for performance management and should be deleted.	S1	S1-12 - Training and skills development metrics	AR 24
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement and its prescribed formula are based on an outdated and overly simplistic view of professional development, leading to a misleading and non-comparable metric. The formula's reliance on "training hours" fails to capture the reality of modern corporate learning, which increasingly consists of non-hourly activities like on-the-job coaching, self-directed digital learning, and peer exchanges. Forcing these diverse and often more effective methods into an artificial "hour" equivalent is impractical and produces an unreliable figure. This creates a perverse incentive for companies to focus on easily quantifiable but low-quality "hours" of training rather than on impactful skills development. The resulting metric is a poor proxy for the quality of a company's training efforts and will not be comparable across undertakings that use different learning methodologies. This AR is not fit for purpose and should be deleted.	S1	S1-12 - Training and skills development metrics	AR 25
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This objective is redundant and leads to a disproportionately burdensome reporting exercise that is not fit for purpose. Occupational health and safety is already governed by strict and comprehensive national laws and regulations in Member States, which are monitored by state authorities and accident insurance bodies. Companies are already legally required to comply with these high standards. Demanding a separate, standardized report on this topic is a redundant exercise in documenting existing legal compliance and provides no added value. The definitions of "work-related accidents" and "ill-health," as well as the specific legal requirements, differ significantly across countries. This makes it impossible to produce a single, standardized set of metrics that would be meaningful or comparable across the EU. Given that this area is already heavily regulated at the national level and a standardized, comparable report is practically impossible, this Disclosure Requirement is superfluous. It should be deleted.	S1	S1-13 - Health and Safety metrics	39.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This paragraph mandates the collection and disclosure of metrics that are impractical to collect, legally problematic, and not comparable across jurisdictions due to vague and undefined terms. The requirement in point (d) to report on "work-related ill health" is unworkable. In many Member States, companies are legally prohibited from demanding the specific diagnosis for an employee's sick leave and cannot determine if an illness is "work-related". The definitions of "recordable work-related accidents" and "ill-health" differ significantly across countries, making a standardized, comparable metric impossible. The term "recordable" is insufficiently defined and creates significant legal uncertainty. As it stands, "recordable" could be broadly interpreted to mean any circumstance that can be documented, which is an unworkably vague standard. To ensure clarity and a consistent basis for reporting, the term must be replaced with the more precise phrase "subject to recording," linking the requirement to a clear legal or official obligation. The phrase in point (b)(i) "other workers that work on its sites" is completely undefined. It is unclear if this refers to contractors, visitors, or employees of other tenants. The difference between "work-related incident" and "work-related accident" is not rational. This entire paragraph should be deleted.	S1	S1-13 - Health and Safety metrics	40.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement is overly prescriptive and unnecessarily rigid. By mandating a single calculation method ("head count rather than a full-time equivalent basis"), this AR infringes on a company's ability to present data in a way that is most meaningful and relevant to its specific operational reality. Different industries and business models may use FTE as a more accurate and established basis for workforce-related metrics. This one-size-fits-all approach reduces flexibility without a clear corresponding increase in the quality or comparability of the information, as the underlying national health and safety systems are already non-comparable. The requirement should be amended to allow companies the flexibility to use either a head count or an FTE basis, provided they clearly disclose the methodology used.	S1	S1-13 - Health and Safety metrics	AR 26
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement is methodologically flawed and produces a non-comparable, misleading metric. The AR explicitly instructs undertakings to use the differing national legal definitions of "work-related accidents" and then plug them into a single, standardized formula. This is analytically unsound. It creates a false sense of precision and comparability by treating legally distinct concepts as if they were the same. The resulting accident rate will be a meaningless aggregation of disparate national statistics, not a comparable EU-wide metric. The formula's denominator ("total hours worked") may conflict with established national reporting systems, which often use a different basis for calculation (e.g., per 1,000 employees). This forces companies into a duplicative calculation for no added value. This AR mandates a burdensome calculation that produces a fundamentally unreliable and non-comparable metric. It is not fit for purpose and should be deleted.	S1	S1-13 - Health and Safety metrics	AR 27
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement is methodologically flawed and undermines the clarity of health and safety reporting. Conflating "recordable work-related accidents" with "fatalities" into a single metric is analytically unsound. These are two distinct categories with vastly different levels of severity and regulatory implications. Combining them into one number obscures the most critical information—the occurrence of a fatality—and diminishes the analytical value of the accident rate. Fatalities should be treated as a separate, standalone key performance indicator to ensure they are given the appropriate visibility and severity they warrant. This AR creates a less transparent and less decision-useful metric. Therefore, this requirement should be amended. Fatalities must be reported as a distinct metric, separate from the general rate of recordable accidents.	S1	S1-13 - Health and Safety metrics	AR 28
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement is unworkable and legally precarious. It requires an undertaking to record and report "cases of work-related ill health" based on informal notifications from various parties, including the affected person. This is fundamentally flawed. A company is neither qualified nor legally permitted to make a medical determination that an employee's illness is "work-related". In Member States like Germany, the official determination of an occupational disease is the exclusive responsibility of competent national authorities, such as statutory accident insurance bodies. This AR improperly shifts a state-level diagnostic responsibility onto the company, creating significant legal risk and forcing it to report on data that has no official, verified status. The requirement is based on a misunderstanding of a company's legal role and capabilities. It must be deleted.	S1	S1-13 - Health and Safety metrics	AR 29
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement is methodologically flawed and produces a misleading, non-comparable metric. Mandating the use of "calendar days" instead of "work days" to calculate lost time is inconsistent with established and logical national practices. It artificially inflates the number of lost days by including weekends and public holidays, which are non-working days. This approach creates a distorted and less accurate picture of the actual impact on productivity and operations. Furthermore, it undermines comparability, as it conflicts with the "work day" basis used by many national authorities and companies for their own internal and statutory reporting. This AR is illogical and counterproductive. It must be amended to require the calculation to be based on "work days" to ensure the metric is accurate, meaningful, and consistent with established practices.	S1	S1-13 - Health and Safety metrics	AR 30
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This paragraph's objective is overly narrow and reductionist. This requirement's continuous deferral as a phase-in signals its practical complexity and questionable value. Reporting on mandatory legal compliance is redundant and offers minimal insight to users. The objective incorrectly equates the broad and complex topic of "work-life balance" with a single, specific issue: "family-related leave". This is a misleading oversimplification. Modern work-life balance encompasses a wide range of material topics, such as flexible work options, part-time arrangements, and mental health support, which are completely ignored by this narrow focus. Entitlement to family-related leave is already comprehensively regulated by national law in Member States. Companies are legally required to comply with these provisions. Demanding a separate disclosure on this topic is a redundant exercise in documenting existing legal compliance and provides no added value to users. This DR is not fit for purpose. It focuses on a non-material, legally mandated entitlement while ignoring more relevant aspects of work-life balance. It should be deleted. A meaningful disclosure on this topic would allow companies to report on the material work-life balance initiatives relevant to their specific workforce, rather than mandating a single, redundant metric. Beyond that we suggest that this should be a voluntary information.	S1	S1-14 - Work-life balance metrics	41.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This paragraph is redundant and legally problematic. Entitlement to family-related leave is comprehensively regulated by binding national law in all Member States. Companies are already legally required to grant these entitlements. Disclosing a percentage of entitled employees is a superfluous exercise in documenting existing legal compliance and provides no meaningful insight into a company's performance. Furthermore, determining an individual employee's specific entitlement often depends on personal circumstances (e.g., the age of a child, the health of a relative). Requesting such sensitive personal information from the entire workforce to calculate a percentage raises significant data privacy concerns and is a disproportionate intrusion. Given that this requirement is redundant and legally problematic, it should be deleted.	S1	S1-14 - Work-life balance metrics	42.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This paragraph is redundant and highlights the flawed premise of the entire Disclosure Requirement. Entitlement to family-related leave is already comprehensively regulated by binding national law in all Member States. Therefore, for a vast majority of undertakings operating in the EU, the condition in this paragraph—that all employees are entitled to such leave—is already met by default through legal compliance. This AR merely confirms that companies can state what is already a legal fact. It is a superfluous provision for a superfluous requirement. Given that the underlying disclosure is redundant with existing national law, this paragraph and the entire DR should be deleted.	S1	S1-14 - Work-life balance metrics	AR 31
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement is redundant and creates a misleading picture of the legal reality. The primary and overriding basis for an employee's entitlement to family-related leave is binding national law, not a disparate mix of "organisational policies, agreements, contracts or collective bargaining agreements". Companies and employees are already subject to these comprehensive legal frameworks. This AR is therefore superfluous, as the entitlement is a matter of statutory law, not optional company policy. It also creates a false impression that these entitlements are discretionary or based on company-specific arrangements, which is incorrect in the vast majority of cases within the EU. This AR is a redundant and confusing provision. It should be deleted.	S1	S1-14 - Work-life balance metrics	AR 32
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This objective is based on flawed metrics and confusing terminology, leading to a misleading and disproportionate reporting requirement. The objective focuses on the "global gap in pay," which refers to the unadjusted gender pay gap. This is a statistically flawed and misleading indicator that does not account for legitimate factors like job role, experience, or location. It creates a false impression of discrimination where none may exist and fails to align with the CSRD's focus on "equal pay for work of equal value". The concept of "remuneration inequality" is a vague, normative standard that goes beyond the CSRD's mandate. It is not the role of a reporting standard to assess or define "inequality"; this is a complex socio-economic issue that falls under the competence of national law and social partners. The standard fails to clearly differentiate between "pay," "remuneration," and "wages," creating ambiguity. Given that its objective is based on a misleading metric and constitutes a legal overreach, this Disclosure Requirement is not fit for purpose and should be deleted. Beyond that the "global gap in pay" is not aligned with the pay transparency directive.	S1	S1-15 - Remuneration metrics	43.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	There are serious concerns regarding this requirement to disclose the gender pay gap and the highest-to-median pay ratio. Such disclosure risks violating data protection laws, as publishing pay figures might reveal personal information (e.g. the top earner's pay) beyond what GDPR permits. The measure also lacks proportionality and materiality: it imposes a burdensome one-size-fits-all obligation even when these metrics are not salient to a company's sustainability context. Undertakings should have the option of using the median or the average for the calculation. Using the average for the calculation would simplify the data collection. Operationally, calculating and explaining these figures is complex and costly, amounting to unnecessary "gold-plating" of the CSRD's requirements. Furthermore, the EU Pay Transparency Directive already mandates extensive internal gender pay gap reporting; duplicating similar disclosures in ESRS creates inconsistency and needless effort. Finally, there are doubts about comparability and relevance of these indicators: divergent methodologies and definitions can yield incoherent results across companies, and the highest-vs-median pay ratio (a non-PTD metric) may mislead stakeholders without meaningful context. Removing this requirement and focusing on truly material information remain important. Beyond that we suggest that this should be a voluntary information.	S1	S1-15 - Remuneration metrics	44.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The requirement for a gender pay gap disclosure based on average gross hourly pay is an impractical and misleading obligation. The provided formula yields a single, raw figure that is a "simplistic calculation". It fails to account for legitimate, objective factors such as occupational segregation, seniority, or the distribution of part-time versus full-time work.This metric, lacking context, is not "necessary" for a sound sustainability assessment. It also introduces a "group-based approach" that is not clearly provided for in the CSRD. The disclosure imposes an excessive administrative burden on companies, leading to a focus on compliance rather than performance. This also can lead to public misinterpretation and reputational damage for companies. The disclosure of such data points is part of the ESRS framework that has proven to be excessively burdensome.	S1	S1-15 - Remuneration metrics	AR 33
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The requirement for an undertaking to disclose its data compilation methodology, cross-referencing GDR-M paragraph 41(a), is viewed as redundant and an instance of excessive administrative burden. This provision risks creating a cascade of duplicative reporting, a problem explicitly identified in the BDA's position paper. By mandating that companies detail their methodology, the regulation requires them to disclose information that is already often standardized within auditing processes. This level of granularity is neither necessary nor proportionate to the CSRD's goals.	S1	S1-15 - Remuneration metrics	AR 34
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	For a company that has recently started reporting under the new directive, a three-year lookback period is not always feasible. Such retrospective reporting can be difficult and costly to compile accurately, diverting valuable resources from core business activities. Furthermore, this requirement for historical data is based on a metric that is, in itself, considered flawed and misleading. Instead of focusing on a single, decontextualized figure, the reporting should be more flexible and principles-based to provide genuinely useful information for capital allocation and decision-making.	S1	S1-15 - Remuneration metrics	AR 35

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	Mandating the inclusion of every component of remuneration, from base salary to benefits in kind and long-term incentives, is excessively granular and burdensome. It represents an "overstretching" of the CSRD's framework. The concepts used are also not clear in a cut-and-dry manner. The pay ratio is a fundamentally flawed metric that provides no meaningful insight into a company's remuneration strategy. A high ratio can simply reflect a company's high performance and subsequent market-based executive bonuses, not an inherently unfair pay structure. This detailed reporting interferes with entrepreneurial freedom by implicitly forcing companies to justify their compensation decisions. The CSRD is an information directive, not a tool to enforce a "race to the top" for pay practices.	S1	S1-15 - Remuneration metrics	AR 36
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The term “incident” is not clearly defined, creating legal uncertainty for companies. It is unclear whether all allegations, including unsubstantiated or minor complaints, must be reported, or only substantiated and material cases. This ambiguity risks inconsistent reporting and undermines comparability. Collecting and disclosing data on discrimination or human rights incidents may conflict with national data protection laws (e.g., GDPR). In many jurisdictions, companies are prohibited from processing or publishing sensitive personal data, especially if individuals could be identified. Companies are already subject to strict anti-discrimination laws and national frameworks (e.g., AGG in Germany). Additional reporting obligations create unnecessary administrative burden without added value, as legal remedies and sanctions already exist. The DR does not distinguish between material and immaterial incidents. Reporting all incidents, regardless of severity or outcome, may lead to information overload and reputational harm based on unsubstantiated claims, rather than focusing on genuinely material risks. Disclosure should be limited to substantiated, significant cases, in line with national legal definitions and only where reporting is legally permissible. Clear definitions and thresholds are needed to ensure legal certainty, proportionality, and relevance.	S1	S1-16 - Incidents of discrimination and other human rights incidents	45.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	To ensure consistency between the SFDR and the ESRS, the term “severe” should be reintroduced. The meaning of “incidents” varies across standards; if the intention is to report complaints filed through specific channels, this should be explicitly stated. If the requirement concerns actual, confirmed incidents, this must also be clearly indicated. Only confirmed (substantiated) incidents should be subject to reporting. Importantly, the term “substantiated” should appear directly in the Disclosure Requirement itself, not just in the Application Requirements, to provide legal clarity and prevent over-reporting of unverified cases.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The reference to “internationally recognised human rights” as defined in ESRS 2 AR 30 and CSRD Art. 29b(2)(b)(iii) lacks sufficient clarity and legal certainty for reporting companies. The scope of “human rights incidents” remains vague, as the referenced instruments are broad and open to interpretation. Without a clear, operational definition, companies face significant uncertainty about what must be reported, risking both over-reporting and inconsistent application across undertakings. Furthermore, the requirement does not specify whether only substantiated and material incidents are in scope, or if all allegations must be included. This ambiguity increases the risk of reporting unverified or immaterial cases, which may conflict with data protection obligations and undermine the relevance and comparability of disclosures. The AR should explicitly limit the scope to substantiated, significant violations of internationally recognised human rights, and provide concrete definitions or examples. Alignment with national legal definitions and reporting only where legally permissible is essential to ensure legal certainty and proportionality.	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 37
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The inclusion of both judicial/non-judicial proceedings and internally registered incidents as “substantiated instances” lacks legal clarity and creates significant uncertainty for reporting companies. The scope is overly broad: it is unclear what threshold or process determines when an internal incident is considered “substantiated,” especially in the absence of a formal legal outcome. This risks inconsistent reporting and over-inclusion of unverified or minor cases. Furthermore, including all complaints filed with external bodies (such as OECD National Contact Points) regardless of outcome may lead to reporting of unresolved or unsubstantiated allegations. It is important to note that the OECD Guidelines for Multinational Enterprises are voluntary instruments, not binding legal standards. Reporting requirements should not be based on voluntary frameworks, as this may conflict with national law and create legal uncertainty. Only incidents that are confirmed and substantiated—either by a final legal decision or a robust internal investigation—should be reported. The standard should provide clear criteria for what constitutes a “substantiated” incident and ensure alignment with national legal definitions and data protection requirements.	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 38
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	While acknowledging that an increase in reported incidents may reflect improved grievance mechanisms, this requirement risks misinterpretation and reputational harm. Without clear guidance, stakeholders may wrongly equate a higher number of reported incidents with deteriorating workplace conditions, rather than improved transparency or trust in reporting channels. Furthermore, requiring disclosure of the methodology for compiling incident data is appropriate for transparency, but only if the underlying definitions and thresholds for what constitutes a reportable incident are clear and harmonized. Without such clarity, methodologies will vary widely, undermining comparability and legal certainty. The standard should clarify that increases in reported incidents may result from enhanced reporting culture, not necessarily from more actual incidents. Methodology disclosures must be accompanied by clear, standardized definitions of incidents and substantiation criteria to ensure meaningful, comparable, and fair reporting.	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 39

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The instruction to cross-reference how incidents have been addressed with DR ESRS S1-3 is redundant and adds unnecessary complexity. DR S1-3 already requires disclosure of actions and resources related to managing material impacts, including remediation processes. Repeating this requirement here does not provide additional value and may lead to duplicative or fragmented reporting. To avoid unnecessary duplication and ensure clarity, the standard should require reporting on remediation actions only once, with a clear reference to the relevant section. Cross-references should be minimized to streamline reporting and reduce administrative burden.	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 40
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The definition of "fines, penalties and compensation" should be strictly limited to amounts imposed through final administrative or judicial proceedings. Reporting on amounts that are not legally final or are still under dispute could mislead stakeholders and expose companies to reputational and legal risks.	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 41
Excels	BDO Poland	Auditor	Poland			I partially agree and partially disagree	An explicit reference to non-discrimination, including harassment, should remain part of the mandatory disclosure requirements. While the proposed revision retains disclosures on serious human rights violations such as forced labour and child labour, it omits discrimination — an issue that is more prevalent across sectors and geographies. Non-discrimination, equal opportunity, and inclusion are material for most undertakings. Relegating these disclosures to non-mandatory guidance weakens the standard's ability to capture key social impact.	S1	S1-1 - Policies related to Own workforce	12.
Excels	BDO Poland	Auditor	Poland			I partially agree and partially disagree	This paragraph appears to summarize the general intention behind the disclosure rather than clearly specifying the information to be disclosed. A clear separation between the purpose of the requirement and the actual disclosure content would improve clarity and ensure consistent application, aligning with EFRAG's decision to remove explicit 'Objectives' paragraphs from topical disclosure requirements.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	14.
Excels	BDO Poland	Auditor	Poland			I partially agree and partially disagree	The disclosure requirements address the existence of channels for raising concerns and the assessment of their effectiveness. However, there is a lack of explicit requirements regarding the accessibility and promotion of channels for raising concerns, beyond the reference in paragraph 14. Accessibility and awareness are critical factors influencing the practical effectiveness of grievance mechanisms. To improve usefulness for intended users and ensure undertaking's accountability, mandatory disclosure on this aspect is recommended.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	16.
Excels	BDO Poland	Auditor	Poland			I partially agree and partially disagree	Regarding paragraph 23. (g). The phrase "most representative number in the financial statement" lacks clarity. It is recommended to specify which financial statement metric this refers to (e.g. most representative number in the financial statement related to the number of employees), so that undertakings can clearly assess whether a discrepancy requires explanation. This would improve consistency in interpretation and prevent unjustified omissions.	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	BDO Poland	Auditor	Poland			I partially agree and partially disagree	Although Application Requirements (ARs) are intended to be mandatory methodology, the phrase "may provide contextual information" suggests optionality. If the intention is to require the disclosure of the method used (e.g. year-end vs average), this should be reworded using prescriptive language (e.g. "shall disclose"). Otherwise, it risks being overlooked and creates ambiguity.	S1	S1-5 - Characteristics of the undertaking's employees	AR 10
Excels	BDO Poland	Auditor	Poland			I disagree	Limiting disclosure under DR S1-6 only when non-employee workers are deemed material may lead to inconsistent or under- reporting due to the subjective nature of materiality assessments. Given the prevalence of non-employees in certain industries and member states, clearer guidance or quantitative thresholds for assessing materiality in this context are needed to reduce discretion. To enhance transparency, comparability and usefulness for all intended users, a "disclose or explain" approach is recommended. This balances the need for relevant disclosures with practical reporting considerations.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	AR 14
Excels	BDO Poland	Auditor	Poland			I partially agree and partially disagree	Both the current disclosure requirement and the proposed change do not fulfill their intended purpose. From this information, we cannot determine what the actual work-life balance looks like or whether the company is family-friendly. The GRI indicators are better, as they require reporting how many people took parental leave, how many returned, and how many stayed for 12 months afterward. This way, we can assess whether the company is truly family-friendly and whether employees want to return after parental leave.	S1	S1-14 - Work-life balance metrics	42.
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	This point is a DP so should be put in paragraph in DR and not as an AR.	S1	S1-1 - Policies related to Own workforce	AR 1
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	Not clear concerning the part on policies for protecting individuals. Is it a DP ? If yes, it would be better to put it directly as a paragraph	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	AR 4
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	We think it would be better to separate the point on the effectiveness of theses channels as it is another DP	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	16.
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	The first part of the paragraph is coved by GDR-A ? Why do we need to reapeat it?	S1	S1-3 - Actions and Resources related to Own workforce	19. (a)
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I disagree	Need to be clarified.	S1	S1-3 - Actions and Resources related to Own workforce	AR 6

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Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I agree	Simplification ok	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.
Excels	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden			I partially agree and partially disagree	Does rate refer to % or integer?	S1	S1-5 - Characteristics of the undertaking's employees	AR 13
Excels	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden			I agree	Good clarification and reasonable reporting.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	24.
Excels	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden			I agree	Good clarification and reasonable reporting.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.
Excels	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden			I disagree	This is related to former para 61 (not S1 - 27c. I disagree that it should be deleted. It is essential to disclose how organisations (or part of organisations) ensure fair working conditions and enable social dialogue for employees that are not covered by a collective agreement. The DR might need a rephrasing.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	27. (c)
Excels	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden			I disagree	Age distribution within top management and among employees are a rather basic level of reporting, and fundamental part of an organisation. It is my firmest belief that S1-8 30b should be mandatory.	S1	S1-8 - Diversity metrics	30.
Excels	ASSIREVI	Auditor	Italy			I disagree	We suggest to remove this AR, considering that the information has been already deleted from GDR-P.	S1	S1-1 - Policies related to Own workforce	AR 1
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We propose re-integrating the total number of employees who have left the undertaking, since it remains essential for calculating the turnover rate and its exclusion therefore results in only an apparent simplification.	S1	S1-5 - Characteristics of the undertaking's employees	23. (c)
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We suggest formulating the requirement with "shall" and rewording it in order to clarify the methodology used.	S1	S1-5 - Characteristics of the undertaking's employees	AR 10
Excels	ASSIREVI	Auditor	Italy			I disagree	We suggest reintegrating former paragraph 55(b) (with "shall") into the main standard as a new Application Requirement under ESRS S1 paragraph 25 (on how non-employee data are compiled- e.g. at yera-end or as an average) in line with the approach applied for employees.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.
Excels	ASSIREVI	Auditor	Italy			I disagree	We propose re-integrating from NMIG for ESRS S1-6 the "NMIG 25 for para. 25 " in the main standard as a new Application Requirement to ESRS S1 para 25. (most common type of non employees)	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.
Excels	ASSIREVI	Auditor	Italy			I disagree	We propose re-integrating from NMIG for ESRS S1-8 the "NMIG 27 for para. 29 " in the main standard as a mandatory Data Point to ESRS S1 para 30. We propose retaining this Data Point, as it is essential for reflecting diversity and is readily available to companies. (distribution of employees by age group)	S1	S1-8 - Diversity metrics	30.
Excels	ASSIREVI	Auditor	Italy			I disagree	We suggest keeping the reference to "parental leave," or replacing it with "family related leave," as defined in the glossary to include paternity leave, parental leave, and carers' leave.	S1	S1-10 - Social protection	34. (d)
Excels	ASSIREVI	Auditor	Italy			I disagree	We suggest considering the retention as AR of the elements that were removed, which provided guidance on what qualifies as an accident or occupational disease. Their inclusion could support undertakings by offering clearer direction and facilitating more consistent and comparable reporting.	S1	S1-13 - Health and Safety metrics	AR 26
Excels	ASSIREVI	Auditor	Italy			I disagree	We propose re-integrating from NMIG for ESRS S1-15 the "NMIG 35 for para. 44 " in the main standard as a mandatory Data Point to ESRS S1 para 44. We propose retaining in the main standard as a new Application Requirement to ESRS S1 para 44. Furthermore, we propose restoring former paragraphs 98 and 99, as they add useful detail to gender pay gap reporting. In particular, we suggest para 98, which requires disclosure of the gender pay gap by employee category (and, where applicable, by country), to be a "shall" requirement; while para 99, which introduces the adjusted gender pay gap to account for differences in purchasing power, as to be disclosed where relevant.	S1	S1-15 - Remuneration metrics	44.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We don't agree with the renaming of the paragraphs (e.g. S1-6, now S1-5). It is understandable, but in practice this leads to additional work and a need for clarification for undertaking that already report in ESRS. The names of the pragraphs have already become established in undertaking reporting worldwide. Furthermore, the designations have also been stored in the IT systems. A renaming would also lead to additional effort and possibly additional costs.	S1	S1 - all	all
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We welcome the use of the average, because in case of averaging, consideration of additions and disposals pro rata, this reduces the calculation effort. This leads to better comparability for benchmarking by using a standardised average.	S1	S1-5 - Characteristics of the undertaking's employees	AR 13
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The paragaph does not support the aim of simplifiying the ESRS. This paragraph generates considerable additional work in reporting and additional coordination requirements (e.g. determining and adjusting the reporting scope yearly, establishing new data collection processes). Due to the varying and company-specific reporting scope we do not see any added value, as it prevents meaningful comparisons across years and between companies.	S1	S1-5 - Characteristics of the undertaking's employees	23. (a)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We do not agree with the definition "50 or more employees by head count and that are the 10 largest countries in terms of employee numbers for the undertaking" for significant employment. The definition misleadingly implies a substantial employee presence in these countries, when in reality, the number of employees may be very small. In our case, these 10 countries also include countries that cover only 0.2 % of the total number of employees.	S1	S1-5 - Characteristics of the undertaking's employees	23. (a)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The total number of employees by head count should not be shown as a breakdown by country. The total number of employees should be shown by region, as the undertakings are easier to compare than by country breakdown. For this, a standardised definition of region should be used (e.g. UN classification). The regional breakdown enables to take a position on regional priorities, benchmarking, undertaking culture.	S1	S1-5 - Characteristics of the undertaking's employees	23. (a)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We welcome the general definition of the management levels 1 and 2 - this should be mandatory for all companies for benchmarking reasons. Maybe this obligation needs to be made clearer.	S1	S1-8 - Diversity metrics	AR 19

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	We welcome the fact that companies can use their own definitions, but only in addition. The first step must be mandatory reporting according to the definition of "top management". If the own definition will be used, we agree with the obligation to disclose.	S1	S1-8 - Diversity metrics	AR 19
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The paragaph does not support the aim of simplifying the ESRS. This paragraph generates considerable additional work in reporting and additional coordination requirements (e.g. determining and adjusting the reporting scope yearly, establishing new data collection processes). Due to the varying and company-specific reporting scope we do not see any added value, as it prevents meaningful comparisons across years and between companies.	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (b)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We do not agree with the definition "50 or more employees by head count and that are the 10 largest countries in terms of employee numbers for the undertaking" for significant employment. The definition misleadingly implies a substantial employee presence in these countries, when in reality, the number of employees may be very small. In our case, these 10 countries also include countries that cover only 0.2 % of the total number of employees.	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (b)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	While the proposal to further specify the definition of social dialogue was rejected to take account of national differences, the decision has a significant drawback. Without a more standardized definition, the breakdown by 10 countries creates a misleading impression of comparability between these countries that does not exist.	S1	S1-7 - Collective bargaining coverage and social dialogue	28. (a)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	If the 10-country rule is introduced, the Collective Bargaining and Social Dialogue KPIs would be disproportionately weighted compared to other KPIs.	S1	S1-7 - Collective bargaining coverage and social dialogue	28. (a)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	We would appreciate to have a common Database on adequate wages provided by the EU to ensure comparability between Companies. Especially as it cannot be ensured that published local minimum wages take into account the ILO wage setting principles.	S1	S1-9 - Adequate wages	AR 22
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We do not agree that the denominator "by average number of employees" includes 23 a (total number by number of employees). We would welcome it, if the involvement of employees by contract can be defined and described. If, for example, a large number of holiday workers are employed during the summer holidays, this drives up the fluctuation rate and distorts the informative value.	S1	S1-5 - Characteristics of the undertaking's employees	AR 13
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Better comparibility for benchmarking by using only rate of employee turnover.	S1	S1-5 - Characteristics of the undertaking's employees	23 (f)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	The legal text now specifies exactly how the distribution must be reported; distribution in number (head count) and percentage.	S1	S1-8 - Diversity metrics	30.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The designation "not reported/not disclosed" should be defined clearly. Does this refer to values that cannot be determined due to the current personnel systems (e.g., the system does not evaluate gender), or does it refer to an additional gender specification by the employee (i.e., the employee did not provide a gender)?	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The specification "Gender as specified by the employees themselves..." in Table 3 should also be integrated into the explanlation of "others" in AR 11.	S1	S1-5 - Characteristics of the undertaking's employees	AR 12
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Also refers to AR 11, table 1, 2: The undertaking should not be allowed to choose how it presents the information. For benchmarking, it is better if only the tables are used.	S1	S1-5 - Characteristics of the undertaking's employees	AR 12
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	In general, the reporting requirements are now more clearly defined. We welcome that the disclosure requirements have been narrowed down and that the word "complaint" has been removed.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	We support the narrowing of the former 103b scope (labor-related complaints) to incidents specifically concerning respect for internationally recognized human rights. However, we recommend to reintroduce the severity threshold of former 104 here as our reporting approach for severe human rights incidents is already set up.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (b)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	We support the introduction of a threshold for incidents. However, we strongly recommend defining the term "substantiated" or changing it to "confirmed" to ensure cross-company comparability. The interpretation of the term "substantiated" varies significantly across countries and legal fields, and without a clear definition, we anticipate challenges in establishing a reporting approach.	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 38
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Diverging requirements from ESRS S1-12 § 38a (regular performance and career development reviews) and AR 24 (here only performance review). It is therefore unclear whether the disclosure requirement only includes performance meetings and/or development discussions. This can lead to a lack of comparability in the disclosure.	S1	S1-12 - Training and skills development metrics	AR 24
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	The elimination of the distinction of performance reviews according to number/proportion of performance reviews per employee (a) and number of reviews in proportion to the agreed number of reviews by the management (b) simplifies data collection and thus involves less effort in the data collection process.	S1	S1-12 - Training and skills development metrics	AR 24
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	The elimination of the gender distinction in the training hours simplifies data collection and is therefore associated with less effort in the data collection process.	S1	S1-12 - Training and skills development metrics	38.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We welcome the possibility of the undertakings to explain the scope of the report in a qualitative way, in case of inconsistency between financial statement. This increases the transparency and comprehensibility of the data. It promotes the flexibility of the undertakings if the data collection on the own workforce is not possible due to legal/country-specific or undertakings regulations.	S1	S1-5 - Characteristics of the undertaking's employees	23 (g)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	For "age group", deleting as mandatory content and moving to NMIG is not useful for comparability in benchmarking. Information on age should continue to be integrated into S1-8. Statements on age have an interesting informative value in the context of HR strategy and other reporting topics/key figures (e.g. diversity, promotion of young talent, trainings, health and safety). As an alternative, the company-wide average age should be integrated into the report.	S1	S1-8 - Diversity metrics	30.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We disagree with the delete of the definition "non-guaranteed hours employees" and we strongly recommend to keep this definition. This definition has supported us in establishing a reporting approach and has now been recognised and accepted in the whole undertaking worldwide. Without this definition, we have difficulties with the worldwide data collection, the KPI has no meaningfulness and cross-company comparability is not guaranteed in the future.	S1	S1-5 - Characteristics of the undertaking's employees	AR 9

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	In order to data quality and comparability, the definition of "non-guaranteed" rather should be concretised clearly and not consistently removed. It is clear that this category includes "own workforce" employees, not "non-employees" or "value chain workers," and these employees do not have guaranteed minimum working hours. However, it is not explicitly stated if "non-guaranteed hours employees" only include on-call workers considered vulnerable workers. It should be clarified whether non-guaranteed hours employees only include on-call workers or also include employees without guaranteed hours but with mutual agreements on work availability.	S1	S1-5 - Characteristics of the undertaking's employees	AR 9
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The number of EEA countries to be reported in S1-7 is unclear. Should the list be derived from 23a (minus non-EEA), potentially resulting in fewer than 10 EEA countries, OR should a separate list of 10 EEA countries be compiled, potentially including more EEA countries than listed in 23a.	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (b)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Same as above. The number of EEA countries to be reported in S1-7 is unclear.	S1	S1-7 - Collective bargaining coverage and social dialogue	28. (a)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The undertaking should not be able to choose how it presents the information. For benchmarking, it is better, if only the tables are used.	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 17
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Since AR 54 was deleted, the definition of region no longer exists. For S1-7, 27c, Collective Bargaining, a definition of region is needed (e.g. Classification UN) for cross-company comparability.	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (c)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	For consistency and efficiency, a 'significant employment' threshold should also be applied to non-EEA countries, aligning the reporting requirements of 27c with 27b.	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (c)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We welcome the standardised use of scope between the KPIs. In S1-7 we use the scope of EEA- and non-EEA countries. We think it is better to use the EU/Non-EU Scope for this (as for S1-9).	S1	S1-7 - Collective bargaining coverage and social dialogue	27.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The definition of Collective Bargaining can be interpreted in several ways. We advocate for a broader interpretation: In countries where trade unions exist but their agreements do not apply to a company, internal agreements covering working conditions should be considered "Collective Bargaining". ESRS S1 aims to protect employees, and this protection can be provided through agreements with both trade unions and Works Councils. We recommend to clarify the definition accordingly. A clear definition will lead to better cross-company comparability.	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (c)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We welcome, S1-5 as the basis for calculating certain quantitative metrics required by other DRs in this Standard. This helps to create transparancy and comparability. It should be no deviation in the KPIs from this (exception S1-9).	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	We agree that EFRAG also declined to give guidance about whether interns, trainees or inactive employees must be included as this depends on the national legislation. But to increases the transparency and comprehensibility of the data the undertakings must explain the sope "total number of employe" in a qualitative way and had to give feedback which employees are included or not. In our opinion, the explanation of this applied scope is particularly also necessary due to pragraph 23g "in case of inconsistency between financial statement".	S1	S1-5 - Characteristics of the undertaking's employees	23 (g)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The defintion "For work-related accidents, the undertaking shall use the definition as per national laws of the countries where the employees are based." shall include the wording "recordable" as it only refers to the recordable definition but does not refer to the accident definition itself. If not, all accidents do not have the same scope and base and therefore are not comparable. Extended workload without any sense for all participants incoming.	S1	S1-13 - Health and Safety metrics	AR 27
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Number of fatalities from accidents and ill-health cases shall not be summed up as for accidents there are short term actions necessary and ill-health very long term or none actions. Also fatalities of external employees shall never be summed up with internal employees Since there are usually more fatal accidents among external than internal employees. Additonally external accidents do not result in necessary actions for a company internal processes as we dont have full responsibility on the measures. Especially for the reputation it is essential to differentiate between fatal incidents which we are not repsonsible for but has happened on our premises and incidents we are fully responsible for.	S1	S1-13 - Health and Safety metrics	40. (b)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	We agree that total number of non-employee only have to be reported, when they are significant driver of IROs. But it is not clear when this situation arises. The definition "key part of the undertaking's business model, for example when they are used to provide flexible labour or when they are used in key processes" is missing. Possible interpretation: If we would not use the non-employees model, the business could not be continued. We recommend to clarify the definition accordingly.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	AR 14
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Reporting of the total number of non-employees should not be required (at first step) to prove that non-employees are a driver of IROs, if they make up a significant portion of own workforce. If this is the case, AR 14 would not be an advantage for the undertakings and would not make reporting easier.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	AR 14
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	We agree, the undertaking shall disclose the calculation methodology, data types and sources used as input. However, we recommend that a combination of "collected voluntary employee surveys and the information from mandatory disability quotas reported by the undertaking" be used for this. This also covers the nation legal definiton.	S1	S1-11 - Persons with disabilities	AR 23
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We welcome it only to report data that can be lawfully collected and the recognition that disability status depends on national legal definition	S1	S1-11 - Persons with disabilities	AR 23
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We welcome the eliminating of the requirement to disclose the types of employees that do not enjoy social protection.	S1	S1-10 - Social protection	34.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We welcome the eleminating of retirement from the list of life events and changing 'parental leave' to 'maternity leave.	S1	S1-10 - Social protection	34.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We welcome the move to NMIG in relation to the percentage of employees who have taken leave for family reason.	S1	S1-14 - Work-life balance metrics	42.

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Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	We welcom the reduction of non-employee reporting (all disclosures about non-employees were deleted except for the total number) due to data limitations.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	We welcome the changes. It would be helpful to clarify whether fines, penalties and compensation for damages that are recognised during the current reporting year but relate to incidents disclosed under 46(a)(b) in the previous reporting year(s) also fall under 46c.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (c)
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We do not support the removal of the "severity" concept from ESRS S1-16 § 46b). The previous focus on severe human rights incidents provided a clear and operational threshold for reporting, which enabled consistent and justifiable disclosures—such as the exclusion of non-severe cases from our 2024 reporting. Eliminating this threshold introduces ambiguity and would require us to define our own criteria for inclusion, particularly in areas like occupational safety or freedom of association. This increases complexity and audit effort while undermining comparability. For example, we are not classifying occupational safety issues as human rights violations under the LkSG framework, given our robust governance and preventive measures. We believe that fair and decision-useful reporting requires clear boundaries, and the removal of the severity filter undermines this principle.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (b)
Excels	PwC International Limited	Auditor	United Kingdom			I agree	There are currently two different definitions of work-related accidents—one definition in ESRS S1 AR 27 and a separate definition in Annex II. We recommend the definition in ESRS S1 AR 27 is retained. In addition, the phrase 'work-related accidents' should be removed from ESRS S1 paragraph 40(e) because it is duplicative with the work-related injuries and work-related ill-health already included in ESRS S1 paragraph 40(e).	S1	S1-1 - Policies related to Own workforce	40.
Excels	PwC International Limited	Auditor	United Kingdom			I agree	ESRS S1 paragraph 44(a) and 44(b) refer to pay and remuneration, respectively. For pay there is no AR, but there is a definition in the glossary; ESRS S1 AR 36 lists components of remuneration. We believe the use of these two different terms and lack of clear definition may create confusion. We recommend that either the term 'pay' or 'remuneration' be used for both metrics and one definition is provided. ESRS S1 AR 36 on remuneration includes the "total fair value of all annual long-term incentives". In practice, there have been several questions related to these calculations and whether these amounts provide material information. There are questions in practice about whether this relates to the fair value at the reporting date, the fair value at the recognition date, or the fair value required by the accounting standards.	S1	S1-1 - Policies related to Own workforce	44.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The objective described in para. 1 of each draft topical ESRS is inconsistent with Draft ESRS 1. The statement about "dependencies when relevant" and "financial effects" should be deleted to make it consistent with ESRS 1. Change the wording to: "When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS S1 Own workforce when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, metrics and targets (if in place)."	S1	S1 - Objective	1.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Remove parts (a) and (b) and keep the introductory paragraph to avoid unnecessary duplication. Paragraph 5 should read as follows: "The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M."	S1	S1 - Objective	5.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	The statement about value chain workers does not belong to S1. The paragraph should be moved to S2.	S1	S1 - Objective	9.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	The statement does not belong here and is inconsistent to all other topical standards. The paragraph should be deleted.	S1	S1 - Interaction with other ESRS	10.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The move of former §19./20. to ESRS 2 and the pooling of human rights policy commitments for all four social stakeholder groups make sense.	S1	S1-1 - Policies related to Own workforce	11.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	S1-1 paragraph 12 requires an undertaking to state whether its policies in relation to its own workforce explicitly address trafficking in human beings, forced labour or compulsory labour and child labour issues. This is usually related to overarching human rights policy and should be consolidated with ESRS 2 General Disclosure Requirement for policies GDR-P paragraph 35.	S1	S1-1 - Policies related to Own workforce	12.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The rewording of former paragraph 23 is clearer (safeguarding the health and safety / preventing occupational risk) and the moving of former paragraph 24 to NMIG is appreciated. However, we would appreciate more guidance on when the disclosure under paragraph 13 of S1-1 is required. In the NMIG's "Mapping of sub-topics to disclosures in topical standards", S1-1 has been mapped to 'any sub-topic' under all the S standards (S1, S2, S3 and S4). However, ESRS S1-1 paragraph 13 is specifically related to policies for safeguarding the health and safety of one's own workforce, and hence does not seem to be related to e.g. subtopics under S3 Affected communities. In general, despite the non-mandatory status, some guidance provided in the NMIG may cause more confusion than clarify for preparers. In view of the above example, we would appreciate EFRAG provide more clarifications on the use of the mapping provided in NMIG, and more broadly on circumstances where preparers have challenges applying the guidance in the NMIG.	S1	S1-1 - Policies related to Own workforce	13.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The amendment and consolidation of former §26. makes sense.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	14.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The move of former §27. to NMIG is appreciated.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	15.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The amendment and consolidation of former 32 (a) make sense.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	16.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	We would like EFRAG to clarify how the tensions between actions and other business pressures should be disclosed.	S1	S1-3 - Actions and Resources related to Own workforce	19. (a)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The amendment and consolidation make sense.	S1	S1-3 - Actions and Resources related to Own workforce	19.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	This is redundant to GDR-A. Delete.	S1	S1-3 - Actions and Resources related to Own workforce	AR 6
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	To align with the simplification approach, we suggest reformulating as follows: "if the undertaking engaged directly with its own workforce or workers' representatives for the purpose of target-setting and/or tracking performance against those targets, it shall disclose this fact when disclosing in accordance with [Draft] Amended ESRS 2 GDR-T". If not, we would like EFRAG to clarify on how the amendment results in simplification.	S1	S1-4 - Targets related to Own Workforce	21.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	ESRS S1 AR 8 does not seem to be methodological guidance or a presentation option, it reads more as optional guidance better suited for placement in NMIG. ARs should be easily applied to DRs in actual reporting.	S1	S1-4 - Targets related to Own Workforce	AR 8
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The removal of gender for non-guaranteed is a simplification.	S1	S1-5 - Characteristics of the undertaking's employees	23. (b)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The removal of number of employees who have left is a simplification.	S1	S1-5 - Characteristics of the undertaking's employees	23. (c)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	We suggest to either: (1) maintain the previous formulation letting the undertaking decide which denominator to use or (2) require reference to the number of total employees as calculated for par. 23(a).	S1	S1-5 - Characteristics of the undertaking's employees	AR 13
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The changes have enhanced clarity.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	24.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The changes have enhanced clarity.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	The presentation of these percentages should also follow criteria based on occupational relevance.	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (c)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	How would the percentage of representation be calculated if not divided by the total employee population (global)?	S1	S1-7 - Collective bargaining coverage and social dialogue	28. (a)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	The presentation of these percentages should also follow criteria based on occupational relevance.	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 17
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The removal of age is a simplification.	S1	S1-8 - Diversity metrics	30.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	We do not understand maintaining "unemployment" as the major life event. This is only covered by public programmes (so consistent it is for all companies in a same country), and it is complex for companies to collect related data. If we have to disclose the list of countries where employees lack protections for one or more major life event, it would be interesting to know for which of the four major life events the protection is not in place.	S1	S1-10 - Social protection	34.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	We would like EFRAG to clarify why paternity leave was removed.	S1	S1-10 - Social protection	34. (d)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	As a starting point, we question the decision-usefulness of this information in the market and suggest potentially removing this datapoint from the S1 standard. The amendment that limits reporting to data that can be "lawfully collected" is sensible and addresses privacy constraints across jurisdictions. However, legal regimes often restrict not only collection but also the disclosure of sensitive data. To avoid creating pressure to publish data that cannot be released under local law, even if collected internally, the constraint should extend to lawful disclosure. Amend AR 23 to: "This DR requires the undertaking to report only data that can be lawfully collected and lawfully disclosed."	S1	S1-11 - Persons with disabilities	36.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The removal of gender is a simplification.	S1	S1-12 - Training and skills development metrics	38. (a)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The removal of gender is a simplification.	S1	S1-12 - Training and skills development metrics	38. (b)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	The amended defintion of recordable work-related accidents in the glossary is not really clear. The first sentence makes it seem like the ill health is not necessarily work-related.	S1	S1-13 - Health and Safety metrics	39.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	We suggest to align this DR with the new DR S1-6, meaning the disclosure of data regarding non-employees should be required only if such categories are material.	S1	S1-13 - Health and Safety metrics	40.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	We would like EFRAG to clarify on how the amendment results in simplification.	S1	S1-13 - Health and Safety metrics	40. (b)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The changes have enhanced clarity.	S1	S1-13 - Health and Safety metrics	40. (e)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	AR 30 defines "days lost" on a calendar-day basis (including weekends and public holidays), which overstates time lost for five-day workers and reduces comparability with entities that measure only scheduled workdays. While EFRAG has improved the metric elsewhere (e.g., removing days lost to fatalities), the weekend counting issue remains unaddressed. Revise AR 30 to require scheduled working days as the basis and require the inclusion of weekends/holidays only if they form part of the individual's contracted schedule.	S1	S1-13 - Health and Safety metrics	AR 30
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The removal of gender is a simplification.	S1	S1-14 - Work-life balance metrics	41.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The removal of entitlement breakdown / gender is a simplification.	S1	S1-14 - Work-life balance metrics	42.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	We agree with the changes.	S1	S1-14 - Work-life balance metrics	AR 31
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Paragraph 43 now refers to "the global … gap," which creates confusion. The goal remains to understand the gap in pay between women and men and Set 1 already required an unadjusted (aggregate) gender pay gap; adding "global" could lead to this requirement being misinterpreted. Edit paragraph 43: "to allow an understanding of any gap in pay between women and men among the undertaking's employees, and to provide insight into remuneration inequality." Keep the calculation text unchanged and place optional contextual disaggregation (e.g., by category or country) in NMIG.	S1	S1-15 - Remuneration metrics	43.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	The definitions from the ESRS glossary and/or application requirements in relation to pay and annual total remuneration should be streamlined to avoid generating confusion in the identifcation of remuneration items to be considered. In particular: - the concept of pay includes basic salary and any other form of remueneration (including variable components) just like the definition of total annual remuneration - it is not clear why annual total remuneration is defined both in the application requirement and the glossary	S1	S1-15 - Remuneration metrics	AR 36
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	While we appreciate the addition of the definition for "Human rights incidents", the international frameworks referenced offers broad guidance and there is a lack of harmonized interpretation which could bring implementation challenges. We would like to understand what the new term "human rights incidents" covers and to have more clarity on the information that we will need to gather (in comparison with the number of the complaints previously) because this change to "incidents" from "complaints" and the removal of "severe" are not clear enough to understand what kind of data should be disclosed. The new ARs define the scope of "human rights incidents," introduce "substantiated" criteria (including types of proceedings) and add methodology and connectivity expectations. While clarifying, this package increases burden and could create an implicit expectation to explain omissions, contrary to the simplification intent, and may not apply evenly across undertakings with very different risk profiles and grievance systems. Move AR 37–AR 41 to NMIG as non-mandatory application guidance. Retain the DR in the Standard narrowly focused on reporting the number of substantiated incidents of discrimination and other human rights incidents and any related material fines, sanctions or compensation (with the 'substantiated' filter preserved).	S1	S1-16 - Incidents of discrimination and other human rights incidents	45.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The concept of incidents and how to identify them is still unclear. Among Disclosure Requirements, Application Requirements and the Glossary there are several definitions of incidents and confirmed/substantiated incidents. We suggest the best approach would be having specific definitions for each case (e.g. human rights incidents, incidents of corruption and bribery, etc.) and presenting them under the related application requirements. Such definitions would then include detailed explanations of: a) the scope of the matter (e.g. "discrimination at work on the grounds of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation, or other relevant forms of discrimination, including harassment"); and b) the type of instances that trigger the reporting of the corresponding metrics (e.g. "judicial and non-judicial proceedings that have been initiated such as cases before domestic courts, mediation, complaints filed with the National Contact Points for OECD Multinational Enterprises"). In our view the best path to support simplification in relation to point (b) above would be to focus on incidents that have been confirmed through a final decision issued by a court of law or relevant authorities.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (a)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The changes have enhanced clarity.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (b)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	The changes have enhanced clarity.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (c)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	It is not clear how the definition of human rights incidents in the ESRS Glossary is linked with AR 38. Are the examples presented in the AR the only possibile instances of substantiated incidents? If not, how is an undertaking supposed to identify other incidents relevant for this metric?	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 38
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I disagree	Since other labor-related human rights each have different characteristics, child labour, forced labour, and privacy should be addressed separately.	S1	S1 - Objective	4.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I disagree	Comment: When applying the ESRS at the consolidated level—particularly when the ultimate parent company is located outside the EU—collecting gender-related data presents challenges. In certain jurisdictions, legal or cultural norms discourage or prohibit the collection or disclosure of gender identity information. Recommendation: Allow undertakings the flexibility to report the number of employees either by sex or by gender, depending on what is legally permissible in each jurisdiction.	S1	S1-5 - Characteristics of the undertaking's employees	5. (a)
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I disagree	Comment: When applying the ESRS at the consolidated level—particularly when the ultimate parent company is located outside the EU—collecting gender-related data presents challenges. In certain jurisdictions, legal or cultural norms discourage or prohibit the collection or disclosure of gender identity information. Recommendation: Allow undertakings the flexibility to report the number of employees either by sex or by gender, depending on what is legally permissible and culturally appropriate in each jurisdiction.	S1	S1-5 - Characteristics of the undertaking's employees	5. (b)
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I disagree	Comment: When applying the ESRS at the consolidated level—particularly when the ultimate parent company is located outside the EU—difficulty in standardizing the definition of safety and health management systems. Recommendation: Keep flexibility for companies to define their health and management system.	S1	S1-13 - Health and Safety metrics	13.
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I disagree	Original requirement (42): "The undertaking shall disclose the percentage of employees entitled to take family-related leave during the period." Suggested clarification: When applying the ESRS at the consolidated level—particularly where the ultimate parent company is located outside the EU—it is challenging to standardize definitions of family-related leave across jurisdictions. While it is generally feasible to report the percentage of employees who took family-related leave, identifying those merely entitled or who applied for such leave is significantly more complex due to varying local legal frameworks and HR systems. Recommendation: Allow undertakings to define "family-related leave" in accordance with local context and internal policies, and limit the disclosure requirement to the percentage of employees who actually took family-related leave during the reporting period.	S1	S1-14 - Work-life balance metrics	14.
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	We disagree as now the "tension" description becomes a "shall" criteria (initally, it was a "may" datapoint). The wording "where potentially / significant tension arise" should be added as otherwise it would counteract the intention to simplify the reporting requirements.	S1	S1-3 - Actions and Resources related to Own workforce	19. (a)
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The proposal introduces a new term, 'work-related accident,' which is not defined anywhere in the standard. This fundamental omission immediately introduces significant misleading ambiguity and confusion, leaving its precise meaning open to subjective interpretation by different undertakings and jurisdictions. Suggestion: Amend to: The objective of this DR is to allow an understanding of the coverage, quality and performance of the health and safety management system established to prevent work-related injuries, ill-health and fatalities.	S1	S1-13 - Health and Safety metrics	39.
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The current absence of a clear, standardized definition for "work-related ill health" presents a critical vulnerability within the disclosure requirements. Suggestion: Add the comprehensive definition of "work-related ill health" to the annex or guidance notes, as per the previous version: "Work-related ill health can include acute, recurring, and chronic health problems caused or aggravated by work conditions or practices. These include musculoskeletal disorders, skin and respiratory diseases, malignant cancers, diseases caused by physical agents (for example, noise-induced hearing loss, vibration-caused diseases), and mental illnesses (for example, anxiety, post-traumatic stress disorder). For the purpose of the required disclosures, the undertaking shall, at a minimum, include in its disclosure those cases outlined in the ILO List of Occupational Diseases"	S1	S1-13 - Health and Safety metrics	40. (b)
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The definition of "recordable work-related accidents" within the EFRAG proposal explicitly encompasses both work-related injury and ill-health. 1)Duplication and Misalignment with Simplification: If "recordable work-related accidents" includes ill-health, and there is also a separate requirement for "recordable work-related ill health" (40. (d)), this creates a direct duplication of reporting requirements. This redundancy contradicts the fundamental objective of simplification and streamlining data collection, leading to unnecessary complexity and potential inconsistencies in reported figures. 2) Data Collection Challenges for Non-Employees (Privacy Concerns): The most critical issue arises from the inclusion of ill-health, particularly for non-employees. While injury data for non-employees working on site is generally accessible (e.g., through incident reports), collecting detailed ill-health data for non-employees is exceptionally difficult, if not impossible, due to stringent data privacy regulations. In most countries, especially within the European Union, policies like GDPR severely restrict an undertaking's access to, and processing of, sensitive medical information for individuals not directly employed by them, adding a challenge that was already limited from 40. (d). Amend to: "the number and rate of recordable work-related injuries.	S1	S1-13 - Health and Safety metrics	40. (c)

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Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	ANNEX II to the [Draft] Amended ESRS Exposure Draft July 2025: This definition, rooted in OSHA criteria, introduces ambiguity through two critical flaws: 1)Loss of Consciousness as a Standalone Criterion The current framework treats all loss of consciousness incidents as recordable, regardless of causation (e.g., workplace hazards like chemical exposure vs. pre-existing conditions like epilepsy). This overinclusiveness distorts workplace safety metrics by conflating occupational and non-occupational factors. Further, severity variations (e.g. brief first-aid cases vs. multi-day absences) are unaddressed, preventing nuanced risk assessment. 2)Undefined "Significant Injury" The term "significant injury" lacks objective parameters, leading to inconsistent interpretation across medical professionals and jurisdictions. For example, a laceration requiring stitches might be deemed "significant" in one context but not another. This subjectivity undermines data harmonization and comparative analysis. Suggestion to delete: Deletion of "loss of consciousness" and "significant injury", remaining "Work-related injury or ill health that results in any of the following: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid or ill health diagnosed by a physician or other licensed healthcare professional, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid"	S1	S1-13 - Health and Safety metrics	40. (c)
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The definition of "recordable work-related accidents" within the EFRAG proposal explicitly encompasses both work-related injury and ill-health, and critically, it also includes fatalities. To emphasize and uphold the clear EFRAG decision regarding the deletion of 'days lost to fatalities' – a decision made due to the inherent lack of a robust and comparable methodology for such calculations – it is fundamental to sharpen the interpretation of this requirement. Therefore, while the term "recordable work-related accident" encompasses fatalities, the calculation of "days away from work" must be understood to apply solely to non-fatal incidents. Suggestion: Amend to: with regard to the undertaking's employees, the number of days away from work related to work-related injuries or work-related ill health	S1	S1-13 - Health and Safety metrics	40. (e)
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The inherent diversity in national definitions for "work-related accidents" means that data collected from different countries within the same undertaking will not be directly comparable. This significantly complicates the ability to aggregate global health and safety data consistently, limiting an undertaking's capacity to gain a holistic and accurate view of its performance across all operations, and provide precise and reliable information essential for robust management of health and safety aspects, as expected by financial markets.. Therefore, suggestion of deletion of "work-related accidents, the undertaking shall use the definitions as per the national laws of the countries where the employees are based."	S1	S1-13 - Health and Safety metrics	AR 27
Excels	Leaseurope	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	More clarity is needed here. What is the largest countries are not within Scope of CSRD reporting (e.g. outside of the EU). Additionally is the breakdown by gender for the entity responsible for filing the sustainability statement or for all employees across all operations, even those outside the EU?	S1	S1-5 - Characteristics of the undertaking's employees	23. (a)
Excels	Leaseurope	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	While the ESRS has stated that the purpose of these included data points is to enhance transparency for investors and stakeholders, it is reasonable that the ESRS should take into account the specific perspective and context that private companies operate in to make appropriate rules for reporting. This is one of those cases, as this data point requires the reporting of business sensitive information held by a privately-held company that is generally otherwise not subject to public disclosure. Further, neither the ISSB IFRS S1/S2 nor the SEC climate disclosure rules require this level of granularity on workforce data. To ensure interoperability, ESRS should align with global standards and avoid imposing unique EU-only burdens. For companies with limited EU operations, this datapoint may not be material to stakeholders or relevant to sustainability impacts, and requiring disclosure would create an undue and inconsistent burden from that presented by other disclosure requirements. The ESRS should allow materiality-based exemptions or simplified reporting for non-EU companies.	S1	S1-5 - Characteristics of the undertaking's employees	22.
Excels	Leaseurope	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is questionable what added value is provided by this data point vis-a-vis the costs associated with gathering and processing the data, as it provides minimial additional value for investors and stakeholders when the responding entity is a private company. At a minimum, given the variation in sizes in responding companies, the data point should be modified to reflect the share of incidents in relation to the total number of employees rather than as a gross value to make the response comparable between differently sized businesses. Further, given that OSHA (US) and ISO 45001 use specific definitions for "recordable incidents," "lost time," and "fatalities," the definitions included in the ESRS should be aligned whenever possible so as to avoid creating double reporting burdens and inconsistencies for companies already complying with OSHA or ISO frameworks.	S1	S1-13 - Health and Safety metrics	39.
Excels	Leaseurope	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Given that this data point requires the reporting of business sensitive information held by a privately-held company that is generally otherwise not subject to public disclosure, it appears to undercut ESRS's stated purpose of including these data points in order to enhance transparency for investors and stakeholders. Further, since this disclosure requirement has been included to support the information needs of financial market participants subject to Regulation (EU) 2019/2088, it is not relevant in the context of private companies, and therefore should be excluded or at least caveated to exclude private companies. Further, disclosing the highest-paid individual's remuneration can breach confidentiality and data protection laws, especially in jurisdictions like the US where executive pay disclosure is not mandatory for private companies. For small entities or subsidiaries, this metric could identify individuals, creating GDPR and local privacy compliance issues. Also, neither ISSB IFRS S1/S2 nor SEC climate disclosure rules require this ratio. While GRI 2-21 includes a similar metric, it does not mandate country-level or entity-level disclosure, and it allows flexibility in methodology. ESRS should avoid creating EU-only requirements that undermine interoperability.	S1	S1-15 - Remuneration metrics	44. (b)

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Excels	Leaseurope	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	This data point presents multiple issues: 1- The definition of a grievance can be quite broad and employees are often raising human rights grievances while being performance managed or exited to lift their severance entitlements. Quantifying what amounts to report is very ambiguous and does not adequately capture human rights grievances vs. just severance payments to exit an employee. 2- The requirement for a reconciliation, given the ambiguous and broad nature of financial data requested, opens the door for an unreasonably broad disclosure of financial data from a private company unrelated to human rights violations or work-related incidents. 3- It is possible that data will not be specifically tracked as it relates to compensation for human rights violations or employee grievances. Aggregating that data presents an unduly burdensome reporting obligation with no clear connection to any double materiality obligation .4- Compensation for employee grievances and work-related incidents are typically subject to confidentiality agreements. Public disclosure of this compensation would violate these agreement as well as raise privacy concerns. 5- It would be preferable to set the reporting requirement at a "rate per 100 FTE employees" to align with separate employee incident reporting obligations.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (c)
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The added mandatory requirements (reference to materials impacts, risk and opportunities) could potentially increase the reporting complexity	S1	S1-1 - Policies related to Own workforce	12.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Same as above	S1	S1-1 - Policies related to Own workforce	13.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I agree	The amendments to the requirements on how a company engages with its own workforce streamlined the process	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	15.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The requirement of disclosing actions to mitigate or remediate material negative impacts on the workforce is now streamlined, but more clarity is needed for the wording "key actions"	S1	S1-3 - Actions and Resources related to Own workforce	19.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I agree	The requirement now makes the detail level of information to disclose	S1	S1-3 - Actions and Resources related to Own workforce	AR 8
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	Evaluating differently the top management level only creates more disalignment. In the initial ESRS, this requirement was for both top management and employees.	S1	S1-8 - Diversity metrics	29.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	The qualifier "severe" in human rights disclosures should be maintained because it provides a clear threshold that focuses reporting on the most significant and material impacts. Removing the concept of severity broadens the scope excessively, obliging companies to report on every minor or hypothetical issue, which dilutes attention from genuinely serious human rights risks and undermines comparability across companies. The concept of severity is well-established in international human rights frameworks such as the UN Guiding Principles and the OECD Guidelines, ensuring alignment with globally recognized due diligence standards. Keeping the severity threshold helps companies prioritize the most critical risks, enhances the usefulness of disclosures for stakeholders, and avoids unnecessary reporting burden on less material issues.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (b)
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	A clarification of this update would be welcome. Review of S1-23 (a) in conjunction with AR11 suggests that there are two separate metrics. For example: (a) the total number of employees by head count and breakdowns by gender [AR11 - Table 1] and by country for the countries in which the undertaking has 50 or more employees and that are the ten largest countries in terms of employee numbers [AR11 - Table 2]. Is the intent for S1-23(a) to limit the threshold of disclosure to only the countries in which the undertaking has 50 or more employees and that are the ten largest countries in terms of employee numbers? For example, would AR11 - Table 1 be limited to the number of employees for the countries in which the undertaking has 50 or more employees and that are the ten largest countries in terms of employee numbers, or would AR11 - Table 1 be represented of the total number of employees for the undertaking?"	S1	S1-5 - Characteristics of the undertaking's employees	23. (a)
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	A clarification of this data point would be welcome: 1-23. (a) asks for data related to the top 10 countries as far as employment; 1-23 (b) should be limited in the same way or the data will be confusing, and it will create a lot of added work.	S1	S1-5 - Characteristics of the undertaking's employees	23. (b)
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	A clarification of this data point would be welcome: 1-23. (a) asks for data related to the top 10 countries as far as employment; 1-23 (c) should be limited in the same way or the data will be confusing, and it will create a lot of added work.	S1	S1-5 - Characteristics of the undertaking's employees	23. (c)
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I disagree	1-23. (d) should be deleted as it is inevitable that financial statements, on a consolidated basis, will be different than our 10 top country headcounts.	S1	S1-5 - Characteristics of the undertaking's employees	23. (d)
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Please clarify this data point. 1-25 should be similarly limited to the top 10 countries as far as employment;or the number of non-employees could look a lot larger than employees noted in 1-23(a).	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The revised methodology in ESRS S1 AR 22 introduces a hierarchy for calculating adequate wages outside the EU, drawing on the ILO's 2024 agreement on wage policies. While this alignment with international standards is welcome, concerns remain regarding the risk of underreporting, hierarchy limitations, and lack of disclosure clarity.	S1	S1-9 - Adequate wages	22.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	Agree	S1	S1-13 - Health and Safety metrics	13.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	Agree	S1	S1-13 - Health and Safety metrics	14.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	Agree	S1	S1-13 - Health and Safety metrics	39.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	Agree	S1	S1-13 - Health and Safety metrics	40.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	Agree	S1	S1-13 - Health and Safety metrics	40. (b)
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	Agree	S1	S1-13 - Health and Safety metrics	40. (e)
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	Paragraph 89: agree with the deletion	S1	S1-13 - Health and Safety metrics	13.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	Agree	S1	S1-13 - Health and Safety metrics	AR 26
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	AR 81: agree with the deletion	S1	S1-13 - Health and Safety metrics	13.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	AR 82: agree with the deletion	S1	S1-13 - Health and Safety metrics	13.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	AR 83: agree with the deletion	S1	S1-13 - Health and Safety metrics	13.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	AR 84: agree with the deletion	S1	S1-13 - Health and Safety metrics	13.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	AR 85: agree with the deletion	S1	S1-13 - Health and Safety metrics	13.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	AR 86: agree with the deletion	S1	S1-13 - Health and Safety metrics	13.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	AR 87: agree with the deletion	S1	S1-13 - Health and Safety metrics	13.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	AR 88: agree with the deletion	S1	S1-13 - Health and Safety metrics	13.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	AR 27 and AR 89: Disagree with the first sentence (a common definition for multinational organisations is needed to have a comparable dataset); and with the following paragraph: term injuries is easier to track as there are different definitions for accidents.	S1	S1-13 - Health and Safety metrics	AR 27
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I disagree	General comment: inconsistent use of accidents vs injury, it is not clear what is meant by the use of the term accident.	S1	S1-13 - Health and Safety metrics	13.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	Agree	S1	S1-13 - Health and Safety metrics	AR 29
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I agree	Agree	S1	S1-13 - Health and Safety metrics	AR 30
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I disagree	Disagree	S1	S1-13 - Health and Safety metrics	AR 28
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I disagree	AR 92: Disagree	S1	S1-13 - Health and Safety metrics	13.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I disagree	AR in general: Suggestion: Use and link to GRI 403 Standards to ensure that basic requirements are met.	S1	S1-13 - Health and Safety metrics	13.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I disagree	It is strongly recommended that EFRAG allows companies operating in the EU to report pay gaps in accordance with the EU Pay Transparency Directive, as transposed into national legislation. Requiring alternative methodologies, particularly for entities reporting on a consolidated basis, introduces undue complexity, legal uncertainty, and increases the risk of inconsistent or misleading disclosures. Given the significant variation in wage definitions and reporting frameworks across jurisdictions, a uniform approach is neither practical nor appropriate. Alignment with existing legal obligations should be prioritized to ensure clarity, efficiency, and reliability in reporting. Furthermore, to promote regulatory coherence and minimize duplication, EFRAG should explicitly allow the use of CEO pay ratio disclosures already mandated under U.S. SEC requirements. Where the CEO is the highest-paid executive, companies should be permitted to interpret the 'highest-paid individual' in ESRS S1-15 accordingly. This clarification is essential to support interoperability, reduce compliance burden, and enhance comparability across global reporting regimes.	S1	S1-15 - Remuneration metrics	15. (b)
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	See our response to the questionnaire : Companies do not agree with the new definition of the treshold for reporting metrics disaggregated at Country Level	S1	S1-5 - Characteristics of the undertaking's employees	AR 9

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	Non-employees are not part of the company's own workforce by principle ; by consequence they are not recorded in the social data information systems of companies : that makes it impossible to disclose information on this category of workers. The notion of "non employees being a key part of the undertaking's business model" will open the door to interpratation and endless discussions with auditors. We continue to ask for deletion of this DR	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	14.
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	Companies prefer to return to the previously proposed definition of the threshold for all DR. Outside the EEA, companies do not understand what a region is (which countries are included in a region ?) and prefer to report on countries where they have significant employment only.	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 16
Excels	Afep	Business association (other than association of financial institution)	France			I agree	The term 'diversity' does not correspond to the indicator, which only measures gender distribution	S1	S1-8 - Diversity metrics	AR 19
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	We still consider it irrelevant and very complicated to publish information outside the EU ; however in the AR 22 we believe outside the EU, it is entirely appropriate to compare the lowest wages in the company with the statutory minimum wage established by legislation or collective bargaining; and where these do not exist, to use the benchmarks developed by the ILO – a tripartite international organisation – on living wage estimates rather than resorting to consultants or private organisations.	S1	S1-9 - Adequate wages	AR 20
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	The two-year review frequency does not depend on companies and should be abolished.	S1	S1-9 - Adequate wages	AR 22
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	The number of life events covered remains very broad and should focus only on (i)sickness (ii) employment injury. Other items depend heavily on jurisdictional factors with limited company involvement (e.g., unemployment) or are already covered elsewhere in the standard (e.g., maternity leave overlaps with S1-14). The DR requires disclosure by country, with cumulative consideration of the risks listed: are countries listed rather than risks? If a single risk is not covered, the country is 'disqualified'? This DR shall limit disclosure to significant employment countries, applying the old threshold, and allow for refinement based on the risks covered	S1	S1-10 - Social protection	14.
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	This data is very difficult to aggregate at group level. Definitions vary from one country to another. The company cannot collect individual data. The data is aggregated at country level, so it cannot be verified, which will complicate the audit.	S1	S1-11 - Persons with disabilities	AR 23
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	To be relevant this disclosure should be based on the number of employees eligible for training and appraisal interviews, rather than the total number of employees.	S1	S1-12 - Training and skills development metrics	AR 24
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	The amount of information to be disclosed is too detailed and redundant; the number of cases of recordable work related ill health and the number of days lost to work related injuries shall be removed. The publication of all these indicators shall be limited to employees and to countries where the undertaking has a significant workforce.	S1	S1-13 - Health and Safety metrics	AR 26
Excels	Afep	Business association (other than association of financial institution)	France			I partially agree and partially disagree	This disclosure will require a lot of work and is of little interest: it merely lists the existence of leave for family reasons, whether provided for by law or by a collective agreement.	S1	S1-14 - Work-life balance metrics	AR 31
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	With regard to remuneration, whether it be the pay gap or the ratio (S1-15), companies question the value of unadjusted indicators that do not provide any useful information and which, if reproduced without contextual explanation, may contribute to damaging their reputation. The adjusted pay gap is the only metric that directly measures compliance with the principle of "equal pay for equal work or work of equal value."	S1	S1-15 - Remuneration metrics	AR 33
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	The same remuneration elements should be provided for both indicators – why is only the ratio (AR36) detailed and not AR 35? The requirements for collecting data on the pay ratio are too burdensome, and we would be in favor of aligning its calculation basis with that of the gender pay gap, which is simpler and more realistic for large global groups.	S1	S1-15 - Remuneration metrics	AR 35
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	Interns and work-study students shall be excluded, and only the company's own workforce should be targeted. Benefits in kind will be very difficult to isolate and aggregate.	S1	S1-15 - Remuneration metrics	AR 36
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	Our requests for amendments have not been taken into account; the definition of incident of discrimination is still too broad. It shall be limited to proven and dealt with incidents, i.e. those that have resulted in a final court decision.	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 37
Excels	Afep	Business association (other than association of financial institution)	France			I disagree	Regarding penalties: what period should be taken into account? There is inevitably a time lag between the incident and any penalty. A financial materiality threshold should be introduced	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 41
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I agree	Point (d) should be clarified, in particular what this means in practice and whether the reference to 23 (a) relates to the total number of employees or whether a geographical split should be considered.	S1	S1-5 - Characteristics of the undertaking's employees	23. (d)
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	Additional flexbility should be provided by allowing companies to breakdown the data at the most appropriate level from the perspective of the company itself, i.e. its mode of operations, considering the unique and specific circumstances by each company (e.g., disaggregate the information per country, market, region or group of countries).	S1	S1-5 - Characteristics of the undertaking's employees	23. (a)
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I disagree	The focus of the requirements is on transparency about the volume of concerns being raised within an organization, rather than only reporting incidents where wrongdoing was ultimately proven. This approach allows stakeholders insight into the extent of workplace issues being surfaced, which is valuable information for assessing organizational culture and management effectiveness. We suggest deleting the AR and maintaining the requirement (DR 46(a)) to report the total number of discrimination and harassment incidents that were raised during the reporting period, regardless of whether subsequent investigations confirmed, substantiated or dismissed those allegations.	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 38

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	(Part 1): The definition and handling of "non-employees" is a significant challenge and not precise enough. The definitions are not workable and does not capture the development in the labour market (including discussion on whether it's labour or a service that is being delivered) The reliance on the suppliers NACE-code is not practical as this is not something that is logged in the ERP-systems and often quite arbitrary and linked to the historic establishment of the business. Two identical suppliers can belong to different NACE-codes, and hence their services would be accounted for differently. Most ERP-systems does not capture the numbers, partly because defining and gathering the data is very difficult. There may exist "proxies", like "# of deliveries" or similar accounting trails, but they are not standardised or uniform. We believe the definition should exclude all individuals already counted as "employees", even though some of these are technically "non-employees" but are handled as employees for practical reasons. This will ensure consistency to the financial statements.	S1	S1 - Objective	7.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	(Part 2): We believe that "Non-employees" can never be regarded as part of an entity's own workforce from a financial or strategic perspective. From an operational and workforce planning perspective, it makes sense to include the non-employees. The premise for reporting is a clear distinction between the two and ensure consistency in the Annuel Report i.e. financial FTE is based on "people" who are in an employment relationship with the undertaking only and does not include non-employees. We believe the only solution is to delete ESRS S1, paragraph 25, (disclose the number of non-employees) and instead put more emphasis on the narratives as we suggest in the comments to ESRS S1, paragraph 24. This also makes sense as to consistency to the other elements in S1, where employee statistics are only required for employees.	S1	S1 - Objective	7.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	The definition of "self-employed" is extremely difficult to navigate in practise. There are so many borderline definitions between being "self-employed" or "employed" and whether the work performed is in reality a delivery of service. We also believe that the current change in the dynamics of the labour market - for instance the shift in marketing from formal agencies to broader use of influencers – is making the traditional definitions very difficult to navigate. If removing the requirement in ESRS S1, paragraph -25, and place more emphasis on the narrative part as well as clearly outlining the materiality element, then we may be able to work with the current definition. If ESRS S1, paragraph 25, is retained, then a much more narrow and precise definition of ESRS S1, paragraph -8, needs to be developed.	S1	S1 - Objective	8.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially agree The amendment made is not just clarifying timeframe. An important word 'whether' is proposed deleted. As some entities might not engage directly with its own workforce or worker's representatives, whether can't be deleted as it is difficult to disclose on a SHALL, if the DR does not apply. In ESRS-S1-15a, the amendment made is not just editorial. Applicable needs to stay in the sentence. Similar in ESRS-S1-15b "applicable" is proposed deleted. Applicable needs to stay in the sentence.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	15.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree We believe additional reporting obligations have been added with the following addition: "In particular, it shall state whether it has grievance mechanism3. It shall also explain how it assesses the effectiveness of these channels." We believe this is added as it was not previously a "shall" requirement and should consequentially be removed as a "shall" requirement.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	16.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	We suggest deleting ESRS-S1-19 We believe the content of this DR is already covered by ESRS-S1-18 The content in 19a could be part of the NMIG-document, but we suggest to delete 19 as it from our perspective only add complexity thereby increasing the reporting obligations and compliance without adding essential reporting requirements not already covered by ESRS-S1-18 – if material.	S1	S1-3 - Actions and Resources related to Own workforce	19.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	We suggest deleting ESRS-S1-21 We believe the content of this DR is already covered by ESRS-S1-20 as well as the other requirements around stakeholder engagement. The content in 21 could be part of the NMBIGNBMIGNMIGNMIGNMIG-document, but we suggest deleting this as an DR as it from our perspective only add complexity.	S1	S1-4 - Targets related to Own Workforce	21.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	Please refer to our answer for Q27 in part 2. In addition to this we note that the requirement in ESRS-S1-27c refers to regions when being outside the EEA, which for annual reporting context makes more sense than individual countries. We believe this needs to be harmonised – referring to regions – or similar relevant aggregation for the reporting entity.	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree We do not agree with the first sentence in the AR "The undertaking shall present the requested disclosures either in a narrative format or in the following tabular formats…" We agree that the information can be provided both in a narrative way as well as in a tabular format, but we do not agree with mandating the specific tabular format no limiting the use of other presentation formats, like graphs. We believe the tabular format should be only an example, located in the NMIG.	S1	S1-5 - Characteristics of the undertaking's employees	AR 11
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree We do not agree with the first sentence in the AR "The undertaking shall present the requested disclosures either in a narrative format or in the following tabular formats…" We agree that the information can be provided both in a narrative way as well as in a tabular format, but we do not agree with mandating the specific tabular format no limiting the use of other presentation formats, like graphs. We believe the tabular format should be only an example, located in the NMIG.	S1	S1-5 - Characteristics of the undertaking's employees	AR 12

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree We believe the first sentence of AR 14 needs to be included directly in the DR to avoid misunderstanding as it is a very important materiality filer. More emphasis should be placed on the narrative element, including the description about the critical/key parts of the business model/business functions that are performed by non-employees. This description will naturally depend on the facts and circumstances of the individual reporting entity, but would naturally touch on the types of services/functions performed. The description could also cover for instance coverage of H&S-policies etc..	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	24.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	We believe the requirement to disclose the total number of non-employees should be deleted. As stated in our comments to ESRS S1, paragraph 7, we believe the requirement to disclose a number should be removed. We believe that the narrative elements in ESES-S1-24 should provide the relevant information needed, but we could encourage the inclusion of relevant proxies to support/quantify the explanations (for instance # of deliveries or percentage of deliveries). If retained, the materiality threshold in AR 14 needs to included. Furthermore, "non-employees" reported as part of "employees" in the financial statements (see our comment on ESRS-S1-7) should be excluded.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree We believe the reference should be to ESRS-S1-24, not 25. We further believe that the AR should be more neutral in the language as it focusses primarily on the potential, negative impacts while disregarding for instance flexibility. The AR should cover our comments on ESRS S1, paragraph 24.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	AR 14
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree Please refer to our answer for Q27 in part 2 – opposing the change in 27b as it refers to "top ten". In addition to this we note that the requirement in ESRS-S1-27c refers to regions when being outside the EEA, which for annual reporting context makes more sense than individual countries. We believe this needs to be harmonised – referring to regions – or similar relevant aggregation for the reporting entity	S1	S1-7 - Collective bargaining coverage and social dialogue	27.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree We do not agree with the first sentence in the AR "The undertaking shall present the requested disclosures either in a narrative format or following the table below ..." We agree that the information can be provided both in a narrative way as well as in a tabular format, but we do not agree with mandating the specific tabular format no limiting the use of other presentation formats, like graphs. We believe the tabular format should be only an example, located in the NMIG.	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 17
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I disagree	Regarding ESRS S1, paragraph 38b, we suggest that EFRAG carefully reconsiders the need for this, and if so, then how this can be measured in practice and become "decision useful" The average number of training hours per employee is very difficult to calculate in practice for a modern workplace. We are concerned about whether this could be anything other than an estimate, as training in a modern workplace consist of 1) formal training, 2) informal training, 3) on the job training, 4) coaching & mentoring, 5) microlearning and 6) social & collaborative learning. Of which 5 out of 6 is not necessarily recorded, and the last (formal training), the hours are most often not recorded. Strong definitions as to expectations to what is included and how entities are expected to do complete reporting is needed in order to make the DR decision useful.	S1	S1-12 - Training and skills development metrics	38. (b)
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree We note that the inconsistency between 44 (a) and 44 (b) is not proposed amended. We also understand that the current definitions originate from other EU-regulation as they are PAI-indicators. We propose that EFRAG secures consistency between the calculation of gender pay gap (average pay level) and total remuneration ratio (median annual). Our preference is to use average for both calculations, following how financial reporting would normally deal with assessing aggregated impact and budgeting. In achieving the consistency, we believe this also needs to be accompanied by a suggestion to the EU-Commission on how to ensure consistency with the other EU-legislation, based on the EFRAG proposal achieving this consistency. It is important that the inconsistency is amended both in the EFRAG disclosures as well as the corresponding legislations in order to ensure the infrastructure of information remains in place.	S1	S1-15 - Remuneration metrics	44.
Excels	Danish Industri	Business association (other than association of financial institution)	Denmark			I partially agree and partially disagree	Partially disagree ESRS S1, paragraph 46a, refers to "own workforce", which includes "non-employees". In most instances, It does not make sense, that an entity is made responsible for disclosing non-employee incidents of discrimination, as these would be registered with the legal structure for that non-employee and not with the entity. This also impacts 46b+c, as the entity would not be the receiver of such fines. In most of these situations, "non-employees" are more aligned with the generics of "workers in the value chain" and not aligned with own employees.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	The revised ESRS S1 does not take into account the possibility of joint operations where one party is responsible for the health & safety of the people. For example, in Oil & Gas a joint operation may be created with one party being the 'operator', with the operator taking ownership of the health & safety of employees and applying its own H&S policies and methods. ESRS E1 includes the idea of operational control, however it is not clear how this concept could in general apply to joint operations.	S1	S1 - Objective	7.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	The requirement is not clear - what does not apply if a sub-topic is material? How do the two requirements work together (if the topic is material and specific sub-topics also material)? NB also the note on p10 NMIG on own workforce/human rights which is not understandable but is important guidance that clearly relates to S1:3.	S1	S1 - Objective	3.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	It is not clear how AR1 relates to paragraph 11. Paragraph 11 makes no mention of communication of policies. AR1 is repurposed from Set 1 AR 14 which is clearer in setting out communication of policy as an additional consideration for the disclosure ('The undertaking may provide an illustration of the types of communication of its policies to those individuals, group of individuals or entities for whom they are relevant...'). The revised text does not make sense - communication of the policy is clearly a different disclosure. It might be useful to users, but it should not be stated as a consideration for paragraph 11 - if disclosure of communication is needed to fulfil the DR then this shoud be specified in the DR.	S1	S1-1 - Policies related to Own workforce	AR 1
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Reference to AR 2- AR 5 The content is useful but it is all 'may' guidance. Consider whether it is all needed in the standard or some or all could be moved to NMIG if it is not mandatory.	S1	S1-1 - Policies related to Own workforce	AR 2
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	We understand from practice that the removed AR6-AR10 were very helpful and valuable pieces of guidance in helping to provide undertakings with examples of how to think about the impacts on their own workforce and interaction with other concepts such as strategy, just transition, climate change etc. AR 83-AR88 are also useful on how to look at classification of injuries/ill-health. We suggest adding these to the NMIG as non-mandatory considerations.	S1	S1-3 - Actions and Resources related to Own workforce	AR 6
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	The undertaking's method for compiling employee data (for example, at the end of the reporting year or average) may provide contextual information.' Is this truly a 'may' or does this need to be a 'shall' requirement?	S1	S1-5 - Characteristics of the undertaking's employees	AR 10
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	The amended wording states ': for the purpose of target setting and /or tracking performance against those targets'. This does not seem to cover the same requirement as in the current S1:47 which states directly that tracking of the undertaking's performance shall be disclosed. The amended wording doesn't specify that tracking performance needs to be disclosed as it is simply phrased as a purpose of target setting.	S1	S1-4 - Targets related to Own Workforce	21.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Existing ESRS S1:24 on policies related to discrimintation has been deleted and moved to NMIG without explanation as to why. Policies relating to discrimination could be important in this context. There do not seem to be any other requirements which cover this instead in the amended ESRS S1.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	24.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	The undertaking shall disclose the total number of non-employees in the undertaking's own workforce': it should be clarified whether the data should be provided as headcount or FTE (as for S1-6).	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Not needed - ESRS 1 already sets out the principle.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	AR 15
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	As drafted this paragraph requires the use of a highly significant judgement for both the entity and the auditor as to determine whether there is a lack of social protection. In addition restricting disclosures to instances of lack of social protection is in practice a 'net' approach in assessing the materiality of information which is not consistent with the overall approach set out in ESRS 1. Should EFRAG not change this proposal, it is necessary to provide an auditable framework that defines social protection - and the lack of - for example by reference to an international framework such as ILO. We suggest retaining the reference to 'parental leave,' or replacing it with 'family-related leave', as defined in the glossary to include paternity leave, parental leave, and carers' leave.	S1	S1-10 - Social protection	34.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Editorial: "(AR 76 amended) In accordance with GDR-T paragraph 41(a), ..." Should it not be GDR-M?	S1	S1-11 - Persons with disabilities	AR 23
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Reference to: 46(a)(b) and AR 38 (See also separate entry on current/prior year and substantiated instances). 'Incidents referred to in paragraph 46(a)(b) include the number of substantiated instances of: ...' What is the definition of 'substantiated instances' in the ESRS? It is currently not defined. The Basis for Conclusions explains that 'substantiated instances' imply the need for incidents to be supported by verifiable and objective evidence. This appears to conflict with 46 (a) and (b), which refer to 'judicial and non-judicial proceedings that have been initiated' and 'incidents registered'. We recommend a definition or example of substantiated instance is provided (if a matter has been logged, is that an indication of being substantiated, or does it relate to the initiation of formal proceedings etc?).	S1	S1-16 - Incidents of discrimination and other human rights incidents	46.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Reference to: 46(a)(b) AR 38 Linked to our separate comment on 'substantiated instances': ESRS S1: 46(a) refers to 'initiated" which we assume means that it can be an initial claim rather than being a ruling that concludes on the validity of claims. What happens if the reported incident eventually comes out as being not an incident - for example, a court ruling in the current reporting period for an incident arising in the prior year, which is now concluded to be non-substantiated, should an undertaking include this in the 2025 number as a negative or restate the 2024 numbers as at that time it was considered substantiated? Does the number of incidents refer to all incidents registered (i.e., irrespective of categorisation as unsubstantiated, partially substantiated, or substantiated), or only substantiated incidents? EFRAG Q&A ID 550 – 'Disclosure of discrimination/harassment incidents found inconclusive' clarified that the requirement refers to 'registered' incidents, i.e., incidents registered, irrespective of categorisation as unsubstantiated, partially substantiated, or substantiated. However, this referenced AR103, which is deleted in the revised ESRS. AR38 says that 'incidents referred to in paragraphs 46(a)(b) include the number substantiated incidents'. The word 'include' may not be sufficiently prescriptive to state that 46(a) only requires substantiated incidents.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	Also reference to: AR38 (AR103 deleted) Consideration should be given to aligning the 2023/2772/EU Annex II definition of 'Incident' and 'Work-related incident' so that both or neither refer to 'registered'. Currently, the Annex II 'Incident' definition refers to 'registered', whereas 'Work-related incident' makes no reference to 'registered'.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (a)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG We understand this paragraph to mean that a reporting requirement is being introduced regardless of the materiality analysis. The Undertaking should only be required to disclose information if the relevant topics have been identified as material. In addition, these reporting requirements should be included in the disclosure requirements themselves and not in the objective.	S1	S1 - Objective	3.
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG An undertaking's own workforce includes (i) people who are in an employment relationship with the undertaking ('employees') and (ii) people who, for the purposes of ESRS reporting, are called non-employeesin the undertaking's own workforce. The latter comprise people with contracts with the undertaking to supply labour ('self-employed people'). Contractors should not be included in the reporting requirements for metrics in ESRS S1, as they are not employees and the reporting undertaking has less or no influence over the ESRS S1 reporting topics with regard to contractors. Since most of the metrics in ESRS S1 are aimed at 'employees', this approach should be maintained. The few metrics that are aimed at 'non-employees' appear to be appropriate. Nevertheless, the definition of 'non-employees' should be further refined to enable a clear distinction to be made between 'employees' and 'workers in the value chain'.	S1	S1 - Objective	8.
Excels	DRSC	(National) standard setter	Germany			I disagree	The added value of this requirement is not apparent, as the information in the sustainability report should be consistent anyway. Either the exact interaction referred to should be clarified, or this paragraph should be deleted.	S1	S1 - Interaction with other ESRS	10.
Excels	DRSC	(National) standard setter	Germany			I disagree	NMIG 3 for para. 11 Communication channels were removed from MDR-Ps, why bringing them up here introducing additional requirements (even as "possible elements")? If the guidelines on how to disclose information on policies are not streamlined in ESRS 2, this will lead to different way of presentation across the standards. Possible solution: streamline in ESRS 2 or eliminate completely.	S1	S1-1 - Policies related to Own workforce	11.
Excels	DRSC	(National) standard setter	Germany			I disagree	NMIG xyz for para. xyz The NMIG could include a statement that policies could address the core principles of the International Labour Organisation.	S1	S1 - Interaction with other ESRS	11.
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG The Undertaking should only be required to disclose information about policies if the topics listed here have been identified as material. Suggestion: Remove "explicitly express" from this paragraph.	S1	S1-1 - Policies related to Own workforce	12.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORAL There is an inconsistency between the Log of Amendments and the exposure draft. The Log of Amendments refers to 'child labour issues', while the exposure draft only refers to 'child labour'.	S1	S1-1 - Policies related to Own workforce	12.
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG The Undertaking should only be required to disclose information about policies if the topics listed here have been identified as material. It should therefore be made clearer that only material disclosures are required. Currently, the paragraph could be interpreted to mean that such information must always be disclosed.	S1	S1-1 - Policies related to Own workforce	13.
Excels	DRSC	(National) standard setter	Germany			I disagree	ESRS S1.19a is a duplication of ESRS S1.18. This may simply be a clarification regarding "key actions" in relation to "material negative impacts".	S1	S1-3 - Actions and Resources related to Own workforce	19. (a)
Excels	DRSC	(National) standard setter	Germany			I disagree	Duplicate to ESRS 2 GDR-T or GDR-M.	S1	S1-3 - Actions and Resources related to Own workforce	19. (b)
Excels	DRSC	(National) standard setter	Germany			I disagree	Suggestion: replace with "confirmed incidents of non-respect of adequate wages".	S1	S1-9 - Adequate wages	32.
Excels	DRSC	(National) standard setter	Germany			I disagree	It is recommended that AR 22(b)(i) employ the term 'collective agreement' rather than 'collective bargaining agreement', in order to ensure consistency with Article 3(4) of Directive (EU) 2022/2041.	S1	S1-9 - Adequate wages	AR 22
Excels	DRSC	(National) standard setter	Germany			I disagree	This disclosure requirement is subject to the new transitional provisions of the delegated act on the quick fix (C(2025) 4812 final). As there is limited experience with these disclosure requirements in relation to metrics, the related disclosures should not be required until a comprehensive field test has been conducted. The field test should be intended in particular to determine what information is useful to users of the information. Information that relates to compliance with legal requirements appears to be of little value to users of the information. PATs should still be reported, if the topic is material.	S1	S1-10 - Social protection	34.
Excels	DRSC	(National) standard setter	Germany			I disagree	A country-specific overview should not be required. Qualitative information on the countries in which social protection is provided beyond the statutory requirements is preferable to a country-specific overview. PATs should still be reported, if the topic is material. If a country-specific overview is required, the EU Commission or EFRAG should issue an overview of social protection worldwide so that individual undertakings do not have to prepare such an overview themselves.	S1	S1-10 - Social protection	34.
Excels	DRSC	(National) standard setter	Germany			I disagree	This disclosure requirement is subject to the new transitional provisions of the delegated act on the quick fix (C(2025) 4812 final). As there is limited experience with these disclosure requirements in relation to metrics, the related disclosures should not be required until a comprehensive field test has been conducted. Voluntary reporting should be possible. The field test should be intended in particular to determine what information is useful to users of the information. PATs should still be reported, if the topic is material.	S1	S1-11 - Persons with disabilities	36.
Excels	DRSC	(National) standard setter	Germany			I disagree	Better than "regular performance and career development reviews" would be "formalized performance and career development reviews".	S1	S1-12 - Training and skills development metrics	38. (a)
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG This disclosure requirement distinguishes between work-related a) injuries, b) accidents, c) ill health and d) fatalities. However, much of the information requested is difficult or impossible to collect. Work-related ill health could, for example, only become apparent decades after the end of employment, or the proportion of work contributing to the illness is uncertain, which is why the reporting undertaking has no knowledge of such circumstances. Furthermore, due to data protection regulations, reporting entities do not know whether an employee is absent due to a) injury or b) ill health.Therefore, only information on a) injuries, b) accidents, c) ill health and d) fatalities that are 'subject to other legal recording and reporting requirements' should be reported.	S1	S1-13 - Health and Safety metrics	40.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	DRSC	(National) standard setter	Germany			I disagree	This DR contains the term "recordable" in various passages. There is also a new entry in the glossary for "recordable work-related accidents". However, there is no adequate definition of what is meant by the term "recordable". "Recordable" generally covers all possible circumstances, as they can all be documented. However, it should only refer to circumstances that are "subject to recording". The new glossary term "recordable work-related accidents include both work-related injury or ill health that results in any of the following ...". At the same time, ED S1-13(40)(e) stipulates: "The undertaking shall disclose the following information ...: with regard to the undertaking's employees, the number of days lost to work-related injuries, recordable work-related accidents and work-related ill health." However, if reportable work-related accidents are understood to encompass both work-related injuries and work-related ill health, then the number of days lost to work-related injuries and to work-related ill health should, in principle, add up to the total number of days lost to work-related accidents. To avoid inconsistent reporting, the standard should clarify this relationship explicitly.	S1	S1-13 - Health and Safety metrics	40. (c)
Excels	DRSC	(National) standard setter	Germany			I disagree	This disclosure requirement is subject to the new transitional provisions of the delegated act on the quick fix (C(2025) 4812 final). As there is limited experience with these disclosure requirements in relation to metrics, the related disclosures should not be required until a comprehensive field test has been conducted. The field test should be intended in particular to determine what information is useful to users of the information. Information that relates to compliance with legal requirements appears to be of little value to users of the information. PATs should still be reported, if the topic is material.	S1	S1-14 - Work-life balance metrics	42.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL Suggestion: Insert "reporting" before "period" to be consistent with other requirements	S1	S1-14 - Work-life balance metrics	42.
Excels	DRSC	(National) standard setter	Germany			I disagree	Undertakings should have the option of using the median or the average for the calculation. Using the average for the calculation would simplify data collection.	S1	S1-15 - Remuneration metrics	44. (b)
Excels	DRSC	(National) standard setter	Germany			I disagree	"Substantiated incidents" should already be mentioned in the paragraphs and not only in the Application Requirements.	S1	S1-16 - Incidents of discrimination and other human rights incidents	45.
Excels	DRSC	(National) standard setter	Germany			I disagree	In ESRS Set 1, depending on the standard "incidents" meant different things. If it is about the complaints filed through channels it should state that/ if it is about actual confirmed incidents, it should also state that. Only confirmed incidents should have to be reported.	S1	S1-16 - Incidents of discrimination and other human rights incidents	45.
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG Previously (ESRS S1.104), the focus was only on "severe human rights incidents". Indicator No. 14 in table III of annex I to Delegated Regulation (EU) 2022/12888 also refers to "severe human rights issues and incidents". In order to ensure consistency between the SFDR and the ESRS, the word "severe" should be reinserted. With regard to the determination of "severe" human rights impacts, the definition of the United Nations Guiding Principles on Business and Human Rights should be adopted.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (b)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	We would like to point out that the newly introduced definition of "non-employees" based on national legislation (par.8 and AR 9) will result in additional complexity for multinational undertakings, who may have adopted a different approach (e.g., Group-level definition) in their reporting. We suggest aligning all S1 provisions with the approach of AR 23 for para. 36 (disability), that allows flexibility to undertakings on the definition to adopt (national legislation or Group-level.	S1	S1-1 - Policies related to Own workforce	8
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	In order to limit boiler plate texts and increase the relevance and readability of the disclosure, we suggest requiring only disclosures if policies do not explicitly address trafficking in human beings, forced labour or compulsory labour and child labour.	S1	S1-1 - Policies related to Own workforce	12
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	In order to limit boiler plate texts and increase the relevance and readability of the disclosure, we suggest requiring only disclosures if it has not a policy or management system for safeguarding the health and safety.	S1	S1-1 - Policies related to Own workforce	13
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	The paragraph does not require to report key actions taken, planned or underway to cause positive impacts and to manage risks and opportunities. It should also require these actions because this would be critical for undertakings that did not identify material negative impacts.	S1	S1-3 - Actions and Resources related to Own workforce	19(a)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I disagree	Change in definition/threshold of significant headcount for the metrics regarding characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1) leads to additional effort as it triggers changes in methodology and additional disclosure requirements. In particular, with respect to S1-5 and S1-7 this additional effort to collect the relevant data is considerable.	S1	S1-5 - Characteristics of the undertaking's employees	23(a)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	This paragraph should clearly state how the denominator of employee turnover is calculated. As stated, it can be interpreted that the denominator can consider only employees who leave voluntarily, only employees who leave due to dismissal and retirement or only employees who leave due to death in service. For better understanding the "or" conjunction should be replaced by the "and" conjunction.	S1	S1-5 - Characteristics of the undertaking's employees	AR 15 for 23(c)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	In order to limit boiler plate texts and increase the relevance and readability of the disclosure, we suggest requiring only explanations if employees are not paid an adequate wage.	S1	S1-9 - Adequate wages	32
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	In order to limit boiler plate texts and increase the relevance and readability of the disclosure, we suggest requiring only explanations if not all employees are covered by social protection against loss of income due to major life events.	S1	S1-10 - Social protection	33
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I disagree	As this data is only allowed to be collected in a limited number of EU countries the percentage will not provide meaningful and complete information. Additionally, the DR requires the undertaking to only report data that can be lawfully collected. Since there are significant limitations to collect this data (e.g. GDPR), we suggest this to be deleted.	S1	S1-11 - Persons with disabilities	36
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	It does not take into consideration that companies may be subject to high turnover rates during the year which may show an inaccurate measure of this metric. In this way, the denominator should consider the number of employees that were subject to performance and career development reviews during the year and that did not leave the company before the career development review was conducted. It may be the case that employees need to be hired for a minimum of days to be subject to the development reviews.	S1	S1-12 - Training and skills development metrics	38(a)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	Ill-health data is only allowed to be collected in a limited number of EU countries; hence the percentage will not provide meaningful and complete information. Therefore, we suggest deleting. Additionally, the requirement to disclose the percentage of people in its own workforce who are covered by the undertaking's health and safety management system should be only if less than 100% of the workforce is covered in order to provide a more meaningful disclosure and reduce boiler plate texts.	S1	S1-13 - Health and Safety metrics	40
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	The newly introduced definition of "work-related accidents" based on national legislation (par.8 and AR 9) will result in additional complexity for multinational undertakings, who may have adopted a different approach (e.g., Group-level definition) in their reporting. We suggest aligning all S1 provisions with the approach of AR 23 for para. 36 (disability), that allows flexibility to undertakings on the definition to adopt (national legislation or Group-level).	S1	S1-13 - Health and Safety metrics	AR 27 for 40 (c)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	The requirement to disclose the percentage of employees entitled to family related leave should be only if less than 100% of the workforce is entitled, in order to provide a more meaningful disclosure and reduce boiler plate texts.	S1	S1-14 - Work-life balance metrics	42
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	We would like to refer you to Directive (EU) 2023/970, which provides exactly this information, and suggest therefore a deletion of the data point. If this is not possible, we would at least propose a simplification of the data point since calculating the median is disproportionately burdensome. We would recommend the following: "The undertaking shall disclose the percentage gap in pay between its female and male employees and the ratio between the average remuneration of its executive members of its administrative and management bodies and the average remuneration of its employees (excluding the before mentioned)."	S1	S1-15 - Remuneration metrics	44(b)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	The amended wording replaces "number of severe human rights [incidents/issues]" with "number of human rights [incidents/issues]." This broadens the scope from substantiated, high-impact cases to potentially all recorded incidents, regardless of severity. It also risks undermining alignment with SFDR PAI Indicator #14, which refers to "identified cases of severe human rights issues and incidents". We recommend reintroducing the qualifier "severe" to ensure conceptual clarity and consistency.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46(b)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	The option to report figures adjusted for purchasing power differences has been removed. The deletion of voluntary data points was cited as the reason. However, we believe that this was not a data point, but rather a disclosure option. This option was particularly useful for corporate groups operating in countries with different purchasing power. We recommend deleting the entire data point. But if this is not the case this option should definitely be given to international groups.	S1	S1-16 - Incidents of discrimination and other human rights incidents	Former para 99
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	We would like to point out that the newly introduced definition of "non-employees" based on national legislation (par.8 and AR 9) will result in additional complexity for multinational undertakings, who may have adopted a different approach (e.g., Group-level definition) in their reporting. We suggest aligning all S1 provisions with the approach of AR 23 for para. 36 (disability), that allows flexibility to undertakings on the definition to adopt (national legislation or Group-level.	S1	S1-1 - Policies related to Own workforce	8
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	In order to limit boiler plate texts and increase the relevance and readability of the disclosure, we suggest requiring only disclosures if policies do not explicitly address trafficking in human beings, forced labour or compulsory labour and child labour.	S1	S1-1 - Policies related to Own workforce	12
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	In order to limit boiler plate texts and increase the relevance and readability of the disclosure, we suggest requiring only disclosures if it has not a policy or management system for safeguarding the health and safety.	S1	S1-1 - Policies related to Own workforce	13
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	The paragraph does not require to report key actions taken, planned or underway to cause positive impacts and to manage risks and opportunities. It should also require these actions because this would be critical for undertakings that did not identify material negative impacts.	S1	S1-3 - Actions and Resources related to Own workforce	19(a)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I disagree	Change in definition/threshold of significant headcount for the metrics regarding characteristics of the undertaking's employees, collective bargaining coverage and social dialogue in the European Economic Area (S1-5 and S1-7 of Amended ESRS S1) leads to additional effort as it triggers changes in methodology and additional disclosure requirements. In particular, with respect to S1-5 and S1-7 this additional effort to collect the relevant data is considerable.	S1	S1-5 - Characteristics of the undertaking's employees	23(a)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	This paragraph should clearly state how the denominator of employee turnover is calculated. As stated, it can be interpreted that the denominator can consider only employees who leave voluntarily, only employees who leave due to dismissal and retirement or only employees who leave due to death in service. For better understanding the "or" conjunction should be replaced by the "and" conjunction.	S1	S1-5 - Characteristics of the undertaking's employees	AR 15 for 23(c)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	In order to limit boiler plate texts and increase the relevance and readability of the disclosure, we suggest requiring only explanations if employees are not paid an adequate wage.	S1	S1-9 - Adequate wages	32
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	In order to limit boiler plate texts and increase the relevance and readability of the disclosure, we suggest requiring only explanations if not all employees are covered by social protection against loss of income due to major life events.	S1	S1-10 - Social protection	33
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I disagree	As this data is only allowed to be collected in a limited number of EU countries the percentage will not provide meaningful and complete information. Additionally, the DR requires the undertaking to only report data that can be lawfully collected. Since there are significant limitations to collect this data (e.g. GDPR), we suggest this to be deleted.	S1	S1-11 - Persons with disabilities	36
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	It does not take into consideration that companies may be subject to high turnover rates during the year which may show an inaccurate measure of this metric. In this way, the denominator should consider the number of employees that were subject to performance and career development reviews during the year and that did not leave the company before the career development review was conducted. It may be the case that employees need to be hired for a minimum of days to be subject to the development reviews.	S1	S1-12 - Training and skills development metrics	38(a)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	Ill-health data is only allowed to be collected in a limited number of EU countries; hence the percentage will not provide meaningful and complete information. Therefore, we suggest deleting. Additionally, the requirement to disclose the percentage of people in its own workforce who are covered by the undertaking's health and safety management system should be only if less than 100% of the workforce is covered in order to provide a more meaningful disclosure and reduce boiler plate texts.	S1	S1-13 - Health and Safety metrics	40

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Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	The newly introduced definition of "work-related accidents" based on national legislation (par.8 and AR 9) will result in additional complexity for multinational undertakings, who may have adopted a different approach (e.g., Group-level definition) in their reporting. We suggest aligning all S1 provisions with the approach of AR 23 for para. 36 (disability), that allows flexibility to undertakings on the definition to adopt (national legislation or Group-level).	S1	S1-13 - Health and Safety metrics	AR 27 for 40 (c)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	The requirement to disclose the percentage of employees entitled to family related leave should be only if less than 100% of the workforce is entitled, in order to provide a more meaningful disclosure and reduce boiler plate texts.	S1	S1-14 - Work-life balance metrics	42
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	We would like to refer you to Directive (EU) 2023/970, which provides exactly this information, and suggest therefore a deletion of the data point. If this is not possible, we would at least propose a simplification of the data point since calculating the median is disproportionately burdensome. We would recommend the following: "The undertaking shall disclose the percentage gap in pay between its female and male employees and the ratio between the average remuneration of its executive members of its administrative and management bodies and the average remuneration of its employees (excluding the before mentioned)."	S1	S1-15 - Remuneration metrics	44(b)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	The amended wording replaces "number of severe human rights [incidents/issues]" with "number of human rights [incidents/issues]." This broadens the scope from substantiated, high-impact cases to potentially all recorded incidents, regardless of severity. It also risks undermining alignment with SFDR PAI Indicator #14, which refers to "identified cases of severe human rights issues and incidents". We recommend reintroducing the qualifier "severe" to ensure conceptual clarity and consistency.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46(b)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	The option to report figures adjusted for purchasing power differences has been removed. The deletion of voluntary data points was cited as the reason. However, we believe that this was not a data point, but rather a disclosure option. This option was particularly useful for corporate groups operating in countries with different purchasing power. We recommend deleting the entire data point. But if this is not the case this option should definitely be given to international groups.	S1	S1-16 - Incidents of discrimination and other human rights incidents	Former para 99
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Reference to S1 §3: Logic for this new paragraph is not understandable. This is counter-intuitive to the double materiality analysis that should make sure to only report on material sub-topics and map the material topics to the respective (sub-)disclosure requirements. It would only make sense to move S1-5,-6,-16 to ESRS 2 General disclosures where general DRs that are always relevant, are stated. In general, S1-16 overall should also be mapped to specific sub-topics (discrimination/harassment and child/forced labour and the reporting should be then based on materiality.	S1	S1 - Own workforce	3.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Reference to S1 §4a-f: Very confusing why previous sub-sub-topics are sometimes moved to extra sub-topics and sometimes in brackets. This will lead to discussions on which level materiality is going to be defined, whether to use topics in front or in the brackets. Materiality analysis needs to be fully and new implemented due to this change. Only reasonable approach: Leave out sub-topics in general and just list the previous sub-sub-topics one after each other. Furthermore, a proper mapping won't be possible like this!	S1	S1 - Own workforce	4.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Move this to ESRS 2, this is related to the general statement with regards to the human rights policy.	S1	S1-1 - Policies related to Own workforce	12.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Either move this to ESRS 2 GDR-P, as it is a general disclosure no matter if the sub-topic "Health&Safety" is material, or delete it and only state a health & safety policy if health&safety is material for this company. This again does not follow the overall systematic.	S1	S1-1 - Policies related to Own workforce	13.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The requirement is not fully clear. It would make sense to move this disclosure requirement to ESRS 2 as it related to the human rights policy and how the company works with it and how the HR policy is being trated within the company with regards to stakeholders.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	15. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	The requirement to state actions is clear but what is meant with the term resources (personnel, money, time...)? Definition not clear enough. Maybe keep focus only on key actions related to material topics. Furthermore, how can "KEY" actions be identified? Either delete the word "key" or mention in the glossary: "The company may defined themselves the thresholds for key actions." OR "Key actions are those most relevant for strategy and business modell and are at the heart of the company." for example.	S1	S1-3 - Actions and Resources related to Own workforce	18.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Please note that the possibility to report in FTE is only sated under 23(b), not 23(a). This could lead to confusion. Put the remark whether to report in head count or FTE under 23. in general or only focus on headcount.	S1	S1-5 - Characteristics of the undertaking's employees	23. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	Great improvement that the number alone has been deleted which is less meaningful than the rate.	S1	S1-5 - Characteristics of the undertaking's employees	23. (c)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Reporting on "non-guaranteed hours employees" should be deleted overall. No information materiality (see benchmaking of already existing ESRS reports, amount of NGHE was below 1%).	S1	S1-5 - Characteristics of the undertaking's employees	23. (b)iii.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Disclosure of countries in EEA and their collective bargaining coverage is fine, but stating how many different bargaining contracts there are is not a valuable information. Left alone that due to different countries and sometime different segments within a company, there are always more than one. And knowing how much does not really represent anything. Percentage per country should be sufficient!	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Region is not really defined. This could lead to different approaches in reporting. Why not use countries as in 27b or continents as defined by UN?	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (c)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Definition required what "loss of income" means: Is a one-off payment sufficient or does social protection only mean that there is a monthly payment covering an adequate amount?	S1	S1-10 - Social protection	33.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	More clear to only refer to maternity leave. Open question: the basis to calculate the coverage is then only all female employees? Which would be different basis than calculating the coverage for the other life events.	S1	S1-10 - Social protection	34. (d)

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Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	Reduction is perceived very well.	S1	S1-5 - Characteristics of the undertaking's employees	38. (a)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	Reduction is perceived very well.	S1	S1-12 - Training and skills development metrics	38. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Please delete the part "c) the number...". It does not make sense to report on sheer numbers. Rate alone is sufficient transparency and more relative. Same change has been made for attrtion rate under Amended S1-5.	S1	S1-13 - Health and Safety metrics	40. (c)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Please note that from a definition perspective, every injury includes an accident. Especially work-related. It does not make sense to separate work-related accidents and work-related injuries. An accident always includes an injury and vice-versa. Please only write "work-related accident" and ill-health! This will also be more relatable to S1 - 40. (b) and (c).	S1	S1-13 - Health and Safety metrics	40. (e)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	It is recommended that these metrics should be voluntary and only necessary if the sub-topics of discrimination and human rights incidents are material. The scope of mandatory metrics need to be clarified so that there is no variation in interpretation between undertakings.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (a)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	It is recommended that these metrics should be voluntary and only necessary if the sub-topics of discrimination and human rights incidents are material. The scope of mandatory metrics need to be clarified so that there is no variation in interpretation between undertakings.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Table 2: Make sure to combine the requirement of former ESRS 2, paragraph 40(a)iii in the table. Both geographical areas as well as countries can be combined in this table. In general, mix-up of FTE and headcount again that is not made clear in S1-5.	S1	S1-5 - Characteristics of the undertaking's employees	AR 11
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Table 3: The table in this way does not allow multi-year reporting. Please see table in the BMW Group report 2024 for better reporting that allows pre-year comparisons. In general, mix-up of headcount and FTE that is not made clear throughout S1-5!	S1	S1-5 - Characteristics of the undertaking's employees	AR 12
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Table is fine, just the mix-up of region and country is difficult. No clear definition on what a region is. Continents as per UN definition could be used instead of region to make it more comparable. Or for non-EEA, also use country and the threshold. Could be more of use for the reader.	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 17
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Correction: MDR-T --> GDR-T	S1	S1-11 - Persons with disabilities	23.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Please add: "However, the undertaking can use its own definition for accident. In this case it shall disclose that fact."	S1	S1-13 - Health and Safety metrics	AR 27
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Since a work-related accident inherently involves an injury, distinguishing fatalities by injury and accident in this context is redundant. All accidents are already injuries, so the differentiation does not make sense. Better keep wording from previous standard but just delete fatalities.	S1	S1-13 - Health and Safety metrics	AR 28
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Please exclude "number". Rate is sufficient for transparency and more valuable to reader and it is relatable.	S1	S1-13 - Health and Safety metrics	AR 28
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Please add to the first part: "and where an official investigation has show that the case of work-related ill health is causally linked to the company's working conditions and requirements."	S1	S1-13 - Health and Safety metrics	AR 29
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	This AR is not required if it is already stated in GDR-M.	S1	S1-15 - Remuneration metrics	AR 34
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	This is a non-understandable AR. Why is S1-15 the only metric where you indicate how many previous years need to be reported? This is usually standardized within the integrated reports (usually 5-6 years, depending on when the reporting on this metric started). This AR should be deleted and the company should decide on how many years are reported and harmonize this themselves or include it in CSRD overall.	S1	S1-15 - Remuneration metrics	AR 35
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	This should also be the definition of gross pay as stated in amended ESRS S1 paragraph 44(b) for the gender pay gap. And it should also be the reference on how to calculate the CEO remuneration. Still not enough clarification between remuneration and pay. Too many different definitions and non-alignment with EU Pay Transparency Act, where salary components are not clarified.	S1	S1-15 - Remuneration metrics	AR 36. (b)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The life areas of social security are not clear after discussion with several experts worldwide: Most of the time, the topic acquired disability is secured via the health insurance. So the five areas are not separate, rather then intertwined, at least for reason 1 and 3.	S1	S1-10 - Social protection	34. (a)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Double reporting required due to EU Pay Transparency Act and ESRS. No clear alignment between the two regulations can lead two different approaches in reporting Gender Pay Gap. Trust in reporting will be lost as differences need to be explained to audience.	S1	S1-15 - Remuneration metrics	AR 36. (b)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	There is no impact on the KPI data collection or methodology; the change only concerns the presentation	S1	S1-5 - Characteristics of the undertaking's employees	23. (a)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	There is no impact on the KPI data collection or methodology; the change only concerns the presentation	S1	S1-7 - Collective bargaining coverage and social dialogue	
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Inserting the concept of materiality assessment for non employee	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	No further definition on Non employees which could clarify and standardize the approach cross companies	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The previous standard version allowed for a simpler approach, such as benchmarking against a fair or living wage—including using providers like the Fair Wage Network. Given our global footprint, the new proposed approach would introduce more complexity and leave room for subjective interpretation across countries. For example, it would require determining whether a minimum wage is “adequate,” identifying which institutes are mandated by public authorities, and assessing alignment with ILO principles, all of which can vary and be challenging to standardize.	S1	S1-9 - Adequate wages	
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	Clarification on the limitation of reporting scope due to privacy regulation. However no detail overview of the countries privacy regulation to support the assessment.	S1	S1-11 - Persons with disabilities	
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	Inclusion a reference that persons of disabilities definition may be different per country regulation	S1	S1-11 - Persons with disabilities	
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	Clarifying that cases reported are only substantiated cases	S1	S1-16 - Incidents of discrimination and other human rights incidents	
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Remuneration ratio not change to average (still median	S1	S1-15 - Remuneration metrics	
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Comment relates to the overall 'objective' of S1, article 3: it mentions that if own workforce is material - all metrics from S1-5 / S1-16 need to be disclosed (of course mindful of phase in). Which was not addressed as such in the 2023 ESRS and not in line with the ID 177 EFRAG guidance as published that links the sub(sub) topic to the metrics to be disclosed.	S1	S1-1 - Policies related to Own workforce	11.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Revisions remove complaints and potentially oversimplify incidents of discrimination and human rights incidents. All social standard (i.e., S1-S4) requirements for human rights incidents have removed the term "severe" and in doing so significantly broadened the scope of reporting on this metric.	S1	Metrics - Incidents	46(a)-(c)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Conflicting definitions and guidance regarding "incident": Definition of incident in glossary does not refer to "substantiated". The metric for incidents of discrimination requires incidents to be counted and these should be substantiated incidents. AR38 refers to substantiated incidents. The definition of what needs to be counted should be in one place. Or, similar to the new definition of "confirmed human rights incidents", please introduce a definition of "confirmed disrimination incidents" which is what the metric should be measuring. Use of the word "incident" and its definition needs to be cleaned up as currently extremely burdensome to follow what is required.	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 38
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Material sub topics: Only required to report on material sub topics apart from S1-5 and S1-16. How have these been selected as “non negotiables”? Requirement is not clear and purpose of doing materiality assessment seems redundant if topics are selected to be reported notwithstanding materiality.	S1	S1 - Objective	3.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Para 7-9: These terms should be clearly defined such that all the additional guidance is not necessary. If guidance still considered necessary, should either be in definitions section or stay as Objective AR.	S1	S1 - Objective	7.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Rationale states this is proposed to be moved from S2 AR3 but it is only partial and now inconsistent with the same guidance now moved to S2 Objective.	S1	S1 - Objective	9.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Existing AR6-8 Cobtains helpful examples which are now proposed to be deleted. Should be moved to NM disclosure guidance. Useful in absence of clear definitions.	S1	S1-3 - Actions and Resources related to Own workforce	18.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Existing AR25a – is a “may” proposed to become mandatory. Explanation just says moved. It has added to the disclosure requirements, not simplified.	S1	S1-2 - Engagement with own workforce and workers’ representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	15.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Still not clear and poorly worded, including circular references.	S1	S1-2 - Engagement with own workforce and workers’ representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	AR 5
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Existing AR31 - Rationale states that it is proposed to be removed from mandatory content, but it is a “may” requirement – not mandatory.	S1	S1-2 - Engagement with own workforce and workers’ representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	15.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Unclear distinction between para 16 and 19b regarding effectiveness of channels and actions for remedy – expect there is a large overlap. Additionally, regarding requirements for effectiveness, whilst some detail is proposed to be deleted, appear to be proposed to be in both S1-2 and S1-3 – complicated to follow. Recommend combining S1-2 and S1-3 with one clear set of disclosure requirements.	S1	S1-3 - Actions and Resources related to Own workforce	19.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	New disclosure requirement to present actions in a way that shows interaction between different topics. The requirement is vague - what is expected to be disclosed “in a way that…” – reporters can select "any way" to show this. Assurers also have no clear basis. Further, it is not clear what impacts on own workforce arise from transition to green economy – what are the impacts identified by EFRAG? This AR has removed some much needed examples and detail in such a vague and unclear disclosure requirement.	S1	S1-3 - Actions and Resources related to Own workforce	AR 7
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Erroneous bracket	S1	S1-5 - Characteristics of the undertaking’s employees	AR 9

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	Deletion of requirement to show non guaranteed hours headcount by gender is welcomed. But not clear on rationale for why this has been deleted but not other detailed breakdowns. How are EFRAG decisions made regarding usefulness of information - how are non guaranteed hours deemed not significant enough to do by gender but other categories are?	S1	S1-5 - Characteristics of the undertaking's employees	23. (c)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Deleted useful guidance on non guaranteed hours. Would put in NM guidance at least.	S1	S1-5 - Characteristics of the undertaking's employees	23. (c)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	AR60 Rationale states that this is a removal of a voluntary data point. But it becomes a "shall" data point in the absence of data. Rationale doesn't make sense.	S1	S1-5 - Characteristics of the undertaking's employees	AR 13
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Would expect this to be addressed as part of DMA. Is it duplicate?	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	AR 14
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Relates to EEA but other disclosures on adequate wage changed to EU. Can disclosures relate to either EEA or EU and can definition or list of countries please be provided for each.	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (b)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Reduction in DR relating to retirement - no explanation given as to why retirement de-prioritised as a major life event.	S1	S1-10 - Social protection	34.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	In the absence of a clear definition (definition in glossary is extremely vague), the deleted guidance was helpful to use as a definition for what was being reported and made the disclosure more meaningful. Suggest to provide clearer definition (use previous AR75).	S1	S1-10 - Social protection	34.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	"The DR about persons with disabilities requires the undertaking to only report data that can be lawfully collected". This does not need clarifying. Standard setter shouldn't be needing to defend the disclosure requirements as only relating to lawful information. Or to imply that reporters may collect data unlawfully. Also, the clarifications only provide clarification on the actual issue itself that reporters previously fed back on – that, due to such data collection difficulties and limitations, the numbers reported will be incomplete and not meaningful. Given lack of consistency in definitions, will also not be comparable. Instead of merely clarifying the actual issue, standard setter should be seeking solutions to the reporting issue.	S1	S1-11 - Persons with disabilities	AR 23
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Disagree with metric since lack of clear definitions, or inconsistent definitions, and data collection limitations and challenges will not result in meaningful quality disclosures, and potentially lead to damaging misinterpretations.	S1	S1-11 - Persons with disabilities	35.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Disagree with metrics: Meaningless information for readers e.g. how does a company get assessed based on number of training hours. Training encompasses all forms of training e.g. on the job, making external content available etc hence definition is not capturing full value of training that can be done nowadays with change to agile and global working with technology advancements.	S1	S1-12 - Training and skills development metrics	38.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Proposal to clarify that accidents include ill health. Unilever disagrees with this definition, where we consider accidents to result in injuries. Ill-health can occur over a period of time hence is not in line with definition of accident.	S1	S1-13 - Health and Safety metrics	40. (e)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	AR83-88, 92: Deletion of useful guidance in the absence of clear definitions which are subject to judgement. Suggest moving to NMIG.	S1	S1-13 - Health and Safety metrics	40.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Addition of definitional requirement should go into glossary and definition of recordable work related accident.	S1	S1-13 - Health and Safety metrics	AR 27
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	A new definition of human rights incident has been added, yet, guidance on "human rights incident" and "incident" are provided separately – very confusing – just use one definition.	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 37
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Incidents is a defined term. Very confusing to add another layer of definition in particular disclosure requirement.	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 38
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	New requirement. Not clear what is meant by providing the methodology to compile the data. Not a simplification to add a new unclear requirement.	S1	S1-16 - Incidents of discrimination and other human rights incidents	AR 39
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Paragraph 19 singles out disclosure of key actions to manage only material negative impacts. however the immeditately preceeding paragraph, DR 18, requires disclosure in accordance with GDR -A which requires disclosure of key actions in relation to ALL material impacts, risks and opportunities. Further, old para S1-4 DR 38. (c) relating to the dsiclosure of key actions in relation to positive impacts has been deleted from mandatory and moved to NMIG. Is the intention of the EFRAG, only keep the disclosures key actions in relation to Own Workforce material negative impacts as a manadatory DR and ALL key actions in relation to material positive impacts, risks and oppotunities as voluntary? We request clarifictions on this topic.	S1	S1-3 - Actions and Resources related to Own workforce	19. (a)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	We would like to ask for more clarification. The note that is added below Table 1 in the revised ESRS states: Template for presenting information on employee head count by gender, suggests that the "Other" gender category needs to follow legal registrations and when this is not allowed to indicate 'Not applicable" . However, AR12 Table 3 note "Gender as specified by the employees themselves" suggest a self ID source is to be used. Resulting in two different sources of this attribute, and table 1 and table 3 gender totals would differ. We don't believe this is the intention of the EFRAG and clarification is necessary, Legal Registration would be prefered as this is a readily available source. This will also impact other metrics by gender attribute, S1-12 Training and skills development and S1-15 gender pay gap	S1	S1-5 - Characteristics of the undertaking's employees	AR 11
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	This feedback relates to paragraph ESRS S1 - 23. (a) and ESRS S1 - 27. (b) and ESRS S1 - 28. (a) . There is a change in threshold of "significant employment country" from at least 10% of total employees to > ten largest countries. This would increase reporting disclosures for most companies and is not aligned to clarification and simplication objective. While its understood that this more applicable to "companies whose workforce is distributed over many countries." this is not applicable to companies not fitting this description. Suggest to maintaining the current threshold and this could be applied voluntarily where relevant.	S1	S1-5 - Characteristics of the undertaking's employees	23. (a)

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Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	We have noticed that there has been a change in the calculation (the denominator). Currently the selection of the denominator is open to companies, but the revision stipulates "average employee headcount" this will result in comparative figures not being comparable after revision. Suggest to revert back to original requirement.	S1	S1-5 - Characteristics of the undertaking's employees	AR 13
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	This feedback relates to paragraph. Disclosure of Collective bargaining coverage outside EEA. Threshold of "at least 10%" removed from the Table 1 (AR70 amended). This essentially increases the reporting requirements, suggest to maintain the current.	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 17
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The revision imposes an additional burden to companies to assess whether the minimum wages as published by local authorities, does in fact takes into account ILO Minimum Wage Fixing Convention No. 131. This is not a readily available benchmark. We are in favor of the strengthening of the adequate wage benchmark however this burden should not fall completely on companies and suggest EFRAG provides a yearly overview of the wage benchmark to be used by companies for CSRD reporting. Further, we do not agree 'adequate wage' methodologies to diverge in respect to EU verses non-EU. Suggest a clear alignment across CSRD , CSDDD and ILO definitions of 'adequate wage', single methodology globally. Both CSDDD and the ILO refer to living wage. Moreover, companies' stakeholders have expectations regarding "living wage" rather than "minimum wage". We recognize it may be difficult for other smaller-scale companies to afford this reporting as obtaining credible 'living wage' benchmark, again we believe a yearly overview published by EFRAG would truly drive significant relief for all companies while still meeting the core objectives. Additionally, this would make reporting across companies more consistent and comparable.	S1	S1-9 - Adequate wages	AR 22
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	In paragraph ESRS S1 - 40 guidance on "work-related" removed and replaced with local national laws which can differ across countries - giving rise to inconsistent reporting. For example certain commute travel is treated differently. We suggest to use recognised international standards such as OSHA. This is what most global companies adopt to ensure consistent reporting. Further it would take significant time and cost to revert to national law definitions. Additionally would make prior period reported metrics incomparable.	S1	S1-13 - Health and Safety metrics	40.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Paragraph ESRS S1 - AR 29 which is related to Guidance on "work-related" and ESRS S1 AR 86 on mental - ill-health cases has been removed. Related to this, AR 93 (mental ill-health) has been amended. This guidance narrowed the scope of reporting to mental ill-health cases "supported by an opinion from a licensed healthcare professional with appropriate training and experience; and if such opinion states that the illness is work-related." This guidance was crucial as it unburdens companies (which would usually lack the internal resources and competence to investigate each mental ill-health case to conclude the root cause is infact work related. Mental ill-health cases are typically difficult to narrow down root cause). Suggest to retain guidance since without this guidance and together with the amended AR93 companies are required to reported on ill-health cases they are informed on by affected persons and internally determine "work relatedness" and "recordability" which is far more difficult than assessing work-related injuries. Further, in order for companies to determine work relatedness - this would result in collection the data that is subject to legal restriction in most countries making this information inconsistent from country to country.	S1	S1-13 - Health and Safety metrics	AR 29
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Paragraph ESRS S1 - AR 27. The text has been changed from "Guidance on computing the rate of work-related injuries" to a broader guidance "computing the rate of work-related accidents" - This amendement brings into scope accidents relating to both injuries and ill-health - increasing the scope from 'injuries' only to 'accidents' (which includes both injuries and ill-health). The current guidance has been applied by companies and it would take time (and costs) to implement this increase in scope. Additionally, this would make prior period reported metrics incomparable.	S1	S1-13 - Health and Safety metrics	AR 27
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	We request clarity on this paragraph since the scope to report days lost to 'work-related injuries' and 'recordable work-related accidents' are stipulated separately. However, the EU definition of Recordable work-related accidents is the same as the OHSA definition and links to anything more severe than a first aid incident. Therefore, "work-related injuries" resulting in days away, meet the definition of "recordable" and so will be naturally in-scope when reporting "recordable work related inccidents". Include these definition in two seperate places, results in unclarity and possibly double counting.	S1	S1-13 - Health and Safety metrics	40. (e)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The CSRD disclosure requirements currently group discrimination and harassment under a single category. However, these are distinct risks with different definitions, root causes, and mitigation measures. The ILO also have separate conventions to define them - Convention 111 (Discrimination (Employment and Occupation) Convention, 1958) and Convention 190 (Violence and Harassment Convention, 2019). In practice, many companies, including ASML, segregate discrimination and harassment in their grievance mechanisms with different mitigation measures. Combining them in reporting may lead to risks overlooking harassment cases not linked to discrimination, and misalignment with how organizations address these risks internally. To improve clarity and accuracy in reporting, we recommend that CSRD separate discrimination and harassment in its disclosure requirements, especially for reporting incidents.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	General suggestion on the ED: Streamline wording issues and redundancies, as several sections still contain unclear or awkward wording, as well as unnecessary repetition (e.g., duplication of GDR content) Review the structure and placement of AR to distinguish: (i) what belongs in the glossary (e.g., definition of non-employees, third-party mechanisms), (ii) what is essential and should remain in the AR, and (iii) what should be deleted or moved to the NMIG (e.g., explanatory content on international texts)	S1	S1 - Objective	1.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Remove the requirement to systematically apply S1-6 and S1-16 whenever the own workforce is material, as DR should be subject to materiality of subtopics and information, notably in a context where the materiality principle is being reinforced. While S1-5 may reasonably be considered material whenever S1 is material, the materiality of S1-6 should not be imposed, as companies may legitimately consider non-employees immaterial.	S1	S1 - Objective	3.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Duplicates with ESRS 2: Remove the details on ESRS 2 provisions as it duplicates ESRS 2 content (§31)	S1	S1 - Objective	5. (a)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Non-employees: Move the details on the definition of non-employees either to the AR or Glossary not overburden the main body with extensive definition that relates only to limited number of data points, and improve the definition	S1	S1 - Objective	6.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Just transition: If this section is retained, add the interaction with environmental topics ("just transition") as an interaction with other standards	S1	S1 - Interaction with other ESRS	10.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	This item on health and safety coverage should be rather disclosed through the following metric: "the percentage of people in its own workforce who are covered by the undertaking's health and safety management system based on legal requirements and/or recognised standards or guidelines"	S1	S1-1 - Policies related to Own workforce	13.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Contextual information: Delete AR on contextual information, as it duplicates the content of ESRS 2 GDR-M Headcount methodology: Clarify in AR that that the annual average of monthly headcount during the reporting period is more appropriate than the year-end headcount, as it better represents the workforce over time; and mention in AR that FTE may be more suited for seasonal activities	S1	S1-5 - Characteristics of the undertaking's employees	AR 10
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	The breakdown by gender for permanent/temporary employees is overly granular as this DP is already disclosed at consolidated level (total number of employees, with breakdown by gender) and lacks relevance.	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	ESRS S1- 23 (f): Require disclosure of "total number of employees who have left the undertaking during reporting period" in addition to "rate of employee turnover," as users prioritise absolute figures and information is calculated for the rate	S1	S1-5 - Characteristics of the undertaking's employees	23. (d)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	The disclosure requirement should include the distribution of employees by age group (under 30, 30-50, over 50). Users mentioned interest in insights on youth employment, senior employment, and overall workforce age structure management.	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Clarify the definition (§7 & 8 and AR14)	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	AR 14
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Estimated number of non employees: Suggestion to replace "the total number of non-employees" by "an estimated number of non-employees when they represent a significant proportion of the own workforce and their role" in §25 instead of AR 15	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Move adequate wage from mandatory to voluntary Alternatively, see ANC proposal in the consultation questionnaire PART 2	S1	S1-9 - Adequate wages	32.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	The number of life events covered remains very broad (4 life events) and should focus only on 2 such as (i) unemployment and (ii) retirement. Other items depend heavily on jurisdictional factors or are already covered elsewhere in the standard (e.g., maternity leave overlaps with S1-14).	S1	S1-10 - Social protection	34.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Gender pay gap: replace by a breakdown of gender pay gap by employee category and at country or geographical levels, as it is the main driver of the pay gap, consequently both preparers and users stress that it is necessary to ensure the relevance of the metric disclosed.	S1	S1-15 - Remuneration metrics	44. (a)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Delete AR on contextual information as it duplicates the content of ESRS 2 GDR-M	S1	S1-15 - Remuneration metrics	AR 34
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Delete AR on comparative information, as it duplicates the content of ESRS 2 GDR-M; historical data will be accessible anyway.	S1	S1-15 - Remuneration metrics	AR 35
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	The inconsistent scope for health and safety metrics, which alternates between 'employees', 'non employees' and 'workers on site', creates confusion and hinders comparability. We propose streamlining these datapoints to mandate reporting only for a company's employees (with the exception for fatalities of on site workers). Including non-employees is problematic as companies lack the direct operational control and access required to collect reliable and verifiable data from third-party entities, making disclosure on them optional and based on materiality is a more practical approach.	S1	S1-13 - Health and Safety metrics	40.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Positive impacts have unfortunately disappeared from the ED. In the current version of the ESRS, they were explicitly covered under §36 ('to achieve positive material impacts'). We recommend that such a formulation be reintroduced to ensure that the Standards capture not only the mitigation of negative impacts but also the pursuit of positive contributions	S1	S1-9 - Adequate wages	19.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	It would be advisable to reinstate in AR7 the condition currently set out in AR43 ('if the undertaking has taken measures to mitigate negative impacts on its own workforce that arise from the transition to a greener, climate-neutral economy').	S1	S1-3 - Actions and Resources related to Own workforce	AR 7
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Clarify the definition (§7 & 8 and AR14). In addition, the example in AR14 is not needed and the following part should be deleted, as it provides limited additional inputs compared to "when non-employees are a key part of the undertaking's business model": delete "for example when they are used to provide flexible labour or when they are used in key processes"	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	AR 14
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	We recommend excluding interns and apprentices from point (a), as well as removing in-kind benefits from point (b.iii), given the excessive complexity their inclusion would entail.	S1	S1-15 - Remuneration metrics	AR 36
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	Glossary should include a definition for "management system" which has been added in S1-1.13.	S1	S1-1 - Policies related to Own workforce	13.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	ED AR 13 should refer to 23f rather than 23c. End of fixed-term contracts (i.e. contractually agreed end date) is not listed in AR 13 for paragraph -23f.)). This is a common and material reason for exit, especially in sectors with high use of fixed-term contracts. Its exclusion may lead to inconsistent reporting and underestimation of turnover rates. Additionally, the term "average employee headcount" should be clarified to explicitly include permanent employees, temporary employees, and non-guaranteed hours workers in line with S1-6 § 23(b) i) ii) iii). Without this clarification, undertakings may apply inconsistent definitions, undermining comparability across reports. Proposed rewording : "For the employee turnover calculation, the undertaking shall divide the number of employees who leave voluntarily, due to dismissal, retirement, death in service, or end of contract, by the average employee headcount. In line with S1-5 §23a and b, the average employee headcount includes all type of employees. We also recommend EFRAG clarifies in the AR that populations retained for numerator and denominator of the turnover ratio should be consistent.	S1	S1-5 - Characteristics of the undertaking's employees	AR 13
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	Paragraph 25 states : "The undertaking shall disclose the total number of non-employees in the undertaking's own workforce." Guidance in NMIG could mention that methodologies used to determine number of employes for S1-6 are aligned with those used to determine S1-5 metrics, as far as possible.	S1	S1-6 - Characteristics of non-employees in the undertaking's own workforce	25.
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	AR 20 for paragraph 32 says "If all employees are paid an adequate wage, stating this is sufficient to fulfil this requirement and no further information is needed." This wording from set 1 leads undertakings to only state that their employes were paid an adequate wage without disclosing any methodology elements and especially which applicable references have been taken in account. «no further information is needed from AR» should be replaced by «the undertaking shall disclose the methodology used in assessing paying adequate wage, in accordance with GDR-M from ESRS 2»	S1	S1-9 - Adequate wages	AR 20
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	AR 22 for paragraph 32 shares new methodology to determine ESRS S1-9 §32 datapoint. In addition to our comments in Part 2, we suggest EFRAG to provide some tools to assist preparers in assessing adequacy of wages. For non-EU countries, we recommend EFRAG clarifies: - where the undertaking shall find the list of countries where wage has been set according to ILO wage setting principles (e.g. provide confirmation if the list in the following link corresponds to the list of countries having ratified C131 - Minimum Wage Fixing Convention, 1970 : https://normlex.ilo.org/dyn/nrmlx_en/f?p=NORMLEXPUB:11300:0::NO::P11300_INSTRUMENT_ID:312276) - where the undertaking shall find the list of institutions, mandated by the public authorities of the country where the workers are based, having estimated local wage according to ILO wage setting principles - where the undertaking can find a tool allowing to assess local wage according to ILO wage setting principles. For EU countries, we recommend EFRAG checks that adequate minimum wages will be available in all EU Member states at the date of the first application of the new set of ESRS, which implies that the Directive (EU) 2022/2041 of the European Parliament has been locally transposed as well as the corresponding adequate minimum wage has locally been enacted.	S1	S1-9 - Adequate wages	AR 22
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We recommend EFRAG defines "covered by social protection against loss of income" and clarify whether it corresponds to a certain level of protection or threshold to define (which, for example, could be linked to a living wage).	S1	S1-10 - Social protection	33.
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	We recommend EFRAG define "Lack of social protection". Does it refer to full absence of coverage or to insufficient coverage based on duration or remuneration thresholds? Absence of definition will create various interpretations and impair comparison. The standard should clarify whether it is required to disclose whether the company has not identified any country where employees lack those protections for the listed major life events. Regarding the datapoint ESRS S1-10 34c), we recommend EFRAG confirms that the scope of the datapoint is the social protection for any case of acquired disability, including those not resulting from work.	S1	S1-10 - Social protection	34.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We acknowledge the clarification in AR27 on work-related accidents related to the systematic reference to the national laws where the employees are based. However, national laws might not be explicit on whether commuting accidents are work-related accidents. We suggest clarifying that based on ESRS 2 §41-a, undertakings should indicate whether commuting accidents have been included or excluded from the metric based on local laws, or on other basis if local law is silent.	S1	S1-13 - Health and Safety metrics	40. (c)
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	This DP implies situation where undertakings would report the same percentage of employees entitled to take family leave during the period even if the rights granted to employees in relation to these family leaves are different for example in terms of remuneration or duration. For example, in one case the employee might remain fully remunerated during leave and entitled to a substantial leave period, whereas in another case, the employee is not entitled to any remuneration during the leave and the leave duration is limited e.g. few days. We suggest EFRAG to clarify in AR whether there are specific conditions or thresholds regarding duration as well as remuneration when reporting family-related leave, or whether any type of family-leave is de facto covered by this disclosure irrespective of the underlying conditions.	S1	S1-14 - Work-life balance metrics	42.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	AR 33 for paragraph 44 (a) should clarify whether gross hourly pay should be computed on the basis of worked hours or on the basis of hours including absence time. Taking into account number of worked hours will increase individual hourly pay. Taking into account absence time would reflect cases where remuneration is lower during the absence period.	S1	S1-15 - Remuneration metrics	AR 33
Excels	Ernst & Young	Auditor	United Kingdom			I disagree	List of remuneration elements from AR 33 for paragraph 44 (a) for gender pay gap and AR 36 for paragraph 44(b) for annual total remuneration ratio should be reconciled and consistent, with clear statement that both metrics should have the same components of remunerations. If that is not the intent, we urge EFRAG to clearly identify in AR 33 which remuneration elements listed in AR 36 are included or excluded for gender pay gap determination, considering the very broad definitions of "pay" and "annual total remuneration" in the glossary. There is still a misalignment between the list of elements in AR 36 and the definition of "Annual total remuneration" regarding change in pension value (included in the latter but not the former). AR36 should be adjusted to align. We ask also guidance on how to consider elements such as pensions, long terms incentives and whether social contributions paid by employers are considered benefits-in-kind in both remuneration metrics.	S1	S1-15 - Remuneration metrics	AR 36
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	Several metrics in ESRS S1 are based on a formula including the number of employees as denominator: -"average employee head count" for "employee turnover calculation" in AR 13 for para 23c) -"number of employees for "percentage of employees covered by collective bargaining agreements" covered by AR 16 for para 27a) -"number of employees" for "the percentage of employees covered by workers' representatives" covered by AR 18 for para. 28a) -« employee headcount figures from DR ESRS S1-5 » for the "Calculation performance review » covered by AR 24 for para. 38(a) -"head count figures for total employment reported in DR ESRS S1-5 » for "the average number of training hours" covered by AR 25 for para 38b) As different wordings are used for those metrics, we recommend EFRAG clarify whether the same information is expected to be used as denominator for all metrics and consequently align wording as well as the specific reference to S1-5 datapoint(s).	S1	S1-5 - Characteristics of the undertaking's employees	AR 16
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	It's unclear what would count as training as per EFRAG as all guidance is in NMIG . EFRAG should bring back in the core standard the wording in the NMIG which includes a "must" and therefore belongs to the requirements: "To be counted as training under paragraph 38(b), there must be a connection between the training activity and the maintenance, or improvement, of an employee's professional skills. The ultimate goal is professional growth, maintaining employability, technical skills development training or management and leadership development training. »	S1	S1-12 - Training and skills development metrics	38.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	NMIG 30 for § 38 states "the undertaking might consider excluding inactive employees from the denominators in the calculations. In this case, it might state this fact and how many employees were counted as inactive. It might consider disclosing the definition used for inactive employees in its calculations." This seems to indicate that inactive employees should be included in the DP in § 38 but that companies might also decide to exclude them. We suggest EFRAG to clarify in AR what should be the treatment of inactive employees and what inactive means. The core standard does not mention "active" nor "inactive employees", and there is no definition of inactive employees (definition deleted from V1.6).	S1	S1-12 - Training and skills development metrics	38.
Excels	Ernst & Young	Auditor	United Kingdom			I agree	We noticed that "Appendix A List of datapoints in cross-cutting and topical standards that derive from other EU legislation" of ESRS 2 has been updated ("ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b) » has been replaced by "ESRS S1-15 Annual total remuneration ratio ») in order to reflect ESRS S1 requirements. We recommend EFRAG confirms that disclosing ESRS S1-15.44b) metric is sufficient to comply with Indicator number 8 Table #3 of Annex I needed for financial market participants subject to Regulation (EU) 2019/2088.We also recommend EFRAG to clarify whether the « highest paid individual » shall be an employee of the undertaking or any person of the undertaking organization including the CEO or a member of administrative, management and supervisory bodies of the undertaking who are not systematically employees. There can be situations where a part of the management (eg CFO,…) are employees of an undertaking (A) but allocated to a undertaking (B), their costs being reinvoiced by A to B. We recommend Efrag clarify whether these individuals shall be considered for the identification of the highest paid individual of the second undertaking (B), as the undertaking (B) pays the undertaking (A) and not directly the individual.	S1	S1-15 - Remuneration metrics	44. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Reference to S1 §3: Logic for this new paragraph is not understandable. This is counter-intuitive to the double materiality analysis that should make sure to only report on material sub-topics and map the material topics to the respective (sub-)disclosure requirements. It would only make sense to move S1-5,-6,-16 to ESRS 2 General disclosures where general DRs that are always relevant, are stated. In general, S1-16 overall should also be mapped to specific sub-topics (discrimination/harassment and child/forced labour and the reporting should be then based on materiality.	S1	S1 - Own workforce	3.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Reference to S1 §4a-f: Very confusing why previous sub-sub-topics are sometimes moved to extra sub-topics and sometimes in brackets. This will lead to discussions on which level materiality is going to be defined, whether to use topics in front or in the brackets. Materiality analysis needs to be fully and new implemented due to this change. Only reasonable approach: Leave out sub-topics in general and just list the previous sub-sub-topics one after each other. Furthermore, a proper mapping won't be possible like this!	S1	S1 - Own workforce	4.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Move this to ESRS 2, this is related to the general statement with regards to the human rights policy.	S1	S1-1 - Policies related to Own workforce	12.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Either move this to ESRS 2 GDR-P, as it is a general disclosure no matter if the sub-topic "Health&Safety" is material, or delete it and only state a health & safety policy if health&safety is material for this company. This again does not follow the overall systematic.	S1	S1-1 - Policies related to Own workforce	13.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The requirement is not fully clear. It would make sense to move this disclosure requirement to ESRS 2 as it related to the human rights policy and how the company works with it and how the HR policy is being trated within the company with regards to stakeholders.	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	15. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The requirement to state actions is clear but what is meant with the term resources (personnel, money, time...)? Definition not clear enough. Maybe keep focus only on key actions related to material topics. Furthermore, how can "KEY" actions be identified? Either delete the word "key" or mention in the glossary: "The company may defined themselves the thresholds for key actions." OR "Key actions are those most relevant for strategy and business modell and are at the heart of the company." for example.	S1	S1-3 - Actions and Resources related to Own workforce	18.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Please note that the possibility to report in FTE is only sated under 23(b), not 23(a). This could lead to confusion. Put the remark whether to report in head count or FTE under 23. in general or only focus on headcount.	S1	S1-5 - Characteristics of the undertaking's employees	23. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Great improvement that the number alone has been deleted which is less meaningful than the rate.	S1	S1-5 - Characteristics of the undertaking's employees	23. (c)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Reporting on "non-guaranteed hours employees" should be deleted overall. No information materiality (see benchmaking of already existing ESRS reports, amount of NGHE was below 1%).	S1	S1-5 - Characteristics of the undertaking's employees	23. (b)iii.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Disclosure of countries in EEA and their collective bargaining coverage is fine, but stating how many different bargaining contracts there are is not a valuable information. Left alone that due to different countries and sometime different segments within a company, there are always more than one. And knowing how much does not really represent anything. Percentage per country should be sufficient!	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Region is not really defined. This could lead to different approaches in reporting. Why not use countries as in 27b or continents as defined by UN?	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (c)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Definition required what "loss of income" means: Is a one-off payment sufficient or does social protection only mean that there is a monthly payment covering an adequate amount?	S1	S1-10 - Social protection	33.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	More clear to only refer to maternity leave. Open question: the basis to calculate the coverage is then only all female employees? Which would be different basis than calculating the coverage for the other life events.	S1	S1-10 - Social protection	34. (d)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Reduction is perceived very well.	S1	S1-12 - Training and skills development metrics	38. (a)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Reduction is perceived very well.	S1	S1-12 - Training and skills development metrics	38. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Please delete the part "c) the number...". It does not make sense to report on sheer numbers. Rate alone is sufficient transparency and more relative. Same change has been made for attrtion rate under Amended S1-5.	S1	S1-13 - Health and Safety metrics	40. (c)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Please note that from a definition perspective, every injury includes an accident. Especially work-related. It does not make sense to separate work-related accidents and work-related injuries. An accident always includes an injury and vice-versa. Please only write "work-related accident" and ill-health! This will also be more relatable to S1 - 40. (b) and (c).	S1	S1-13 - Health and Safety metrics	40. (e)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Fine.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (a)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Fine.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Table 2: Make sure to combine the requirement of former ESRS 2, paragraph 40(a)iii in the table. Both geographical areas as well as countries can be combined in this table. In general, mix-up of FTE and headcount again that is not made clear in S1-5.	S1	S1-5 - Characteristics of the undertaking's employees	AR 11
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Table 3: The table in this way does not allow multi-year reporting. Please see table in the BMW Group report 2024 for better reporting that allows pre-year comparisons. In general, mix-up of headcount and FTE that is not made clear throughout S1-5!	S1	S1-5 - Characteristics of the undertaking's employees	AR 12
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Table is fine, just the mix-up of region and country is difficult. No clear definition on what a region is. Continents as per UN definition could be used instead of region to make it more comparable. Or for non-EEA, also use country and the threshold. Could be more of use for the reader.	S1	S1-7 - Collective bargaining coverage and social dialogue	AR 17
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Correction: MDR-T --> GDR-T	S1	S1-11 - Persons with disabilities	23.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Please add: "However, the undertaking can use its own definition for accident. In this case it shall disclose that fact."	S1	S1-13 - Health and Safety metrics	AR 27
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Since a work-related accident inherently involves an injury, distinguishing fatalities by injury and accident in this context is redundant. All accidents are already injuries, so the differentiation does not make sense. Better keep wording from previous standard but just delete fatalities.	S1	S1-13 - Health and Safety metrics	AR 28
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Please exclude "number". Rate is sufficient for transparency and more valuable to reader and it is relatable.	S1	S1-13 - Health and Safety metrics	AR 28
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Please add to the first part: "and where an official investigation has show that the case of work-related ill health is causally linked to the company's working conditions and requirements."	S1	S1-13 - Health and Safety metrics	AR 29
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	This AR is not required if it is already stated in GDR-M.	S1	S1-15 - Remuneration metrics	AR 34

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	This is a non-understandable AR. Why is S1-15 the only metric where you indicate how many previous years need to be reported? This is usually standardized within the integrated reports (usually 5-6 years, depending on when the reporting on this metric started). This AR should be deleted and the company should decide on how many years are reported and harmonize this themselves or include it in CSRD overall.	S1	S1-15 - Remuneration metrics	AR 35
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	This should also be the definition of gross pay as stated in amended ESRS S1 paragraph 44(b) for the gender pay gap. And it should also be the reference on how to calculate the CEO remuneration. Still not enough clarification between remuneration and pay. Too many different definitions and non-alignment with EU Pay Transparency Act, where salary components are not clarified.	S1	S1-15 - Remuneration metrics	AR 36. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The life areas of social security are not clear after discussion with several experts worldwide: Most of the time, the topic acquired disability is secured via the health insurance. So the five areas are not separate, rather then intertwined, at least for reason 1 and 3.	S1	S1-10 - Social protection	34. (a)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Double reporting required due to EU Pay Transparency Act and ESRS. No clear alignment between the two regulations can lead two different approaches in reporting Gender Pay Gap. Trust in reporting will be lost as differences need to be explained to audience.	S1	S1-15 - Remuneration metrics	AR 36. (b)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The statement does not belong here and is inconsistent to all other topical standards. The paragraph should be deleted.	S1	S1 - Interaction with other ESRS	10.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	(19 a) "including the approach in situations where tensions arise between such actions and other business pressures" - voluntary DP in original ESRS. Making voluntary DP mandatory goes against aim of simplification. Initial disclosure requirement S1-4 paragraph 41 is sufficient " whether and how it ensures that its own practices do not cause or contribute to material negative impacts on own workforce".	S1	S1-3 - Actions and Resources related to Own workforce	19. (a)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	More clarity is needed here. What is the largest countries are not within Scope of CSRD reporting (e.g. outside of the EU). Additionally is the breakdown by gender for the entity responsible for filing the sustainability statement or for all employees across all operations, even those outside the EU?	S1	S1-5 - Characteristics of the undertaking's employees	23. (a)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	While the ESRS has stated that the purpose of these included data points is to enhance transparency for investors and stakeholders, it is reasonable that the ESRS should take into account the specific perspective and context that private companies operate in to make appropriate rules for reporting. This is one of those cases, as this data point requires the reporting of business sensitive information held by a privately-held company that is generally otherwise not subject to public disclosure. To the extent reporting remains required of private companies, it would seem reasonable for these data points to be amended to only include required gender break downs in countries where the number of employees passed a certain threshold. Further, neither the ISSB IFRS S1/S2 nor the SEC climate disclosure rules require this level of granularity on workforce data. To ensure interoperability, ESRS should align with global standards and avoid imposing unique EU-only burdens. For companies with limited EU operations, this datapoint may not be material to stakeholders or relevant to sustainability impacts, and requiring disclosure would create an undue and inconsistent burden from that presented by other disclosure requirements. The ESRS should allow materiality-based exemptions or simplified reporting for non-EU companies.	S1	S1-5 - Characteristics of the undertaking's employees	23. (a)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	there is a significant reporting burden that comes with reporting on Paragraph 23(d) and (e): Temporary employees and breakdown by gender, and non-guaranteed hours employees.	S1	S1-5 - Characteristics of the undertaking's employees	25.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				Under S1-7 on collective bargaining, we recommend clarification that only national and sectorial CBAs should be in scope for the required metrics. These CBAs cover the widest set of topics and help companies to align with industry best practices. Including local level CBAs in scope should be optional and can be burdensome for companies.	S1	S1-7 - Collective bargaining coverage and social dialogue	
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	ESRS S1 - 27 (b) : (Column B appears to be referring to ESRS E5). More clarify is needed here. If the ten largest countries by employee count are all outside the EEA, does the undertaking still need to report the percentage of EEA employees covered by a collective bargaining agreements?	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (b)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	ESRS S1 - 28 (a) : (Column B appears to be referring to ESRS E5). More clarify is needed here. If the ten largest countries by employee count are all outside the EEA, does the undertaking still need to report the percentage of EEA employees covered by a workers representatives? Additionally, this disclosure feels repetitive to the above mentioned disclosure	S1	S1-7 - Collective bargaining coverage and social dialogue	28. (a)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	ESRS S1 - 38 : (Column B appears to be referring to ESRS E5). Recommend making this a "may disclose" metric as collecting data on employees with disabilities is challenging and can be not feasible due to local regulations. Due to the inherent challenges of employees being remiss to disclose if they have a disability, the data reported is likely not a true represenation of an undertakings workforce and will not be decision useful	S1	S1-11 - Persons with disabilities	38.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Question the decision-usefulness of this information in the market and suggest potentially removing this datapoint from the S1 standard.	S1	S1-11 - Persons with disabilities	36.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	NOTE - COLUMN SHOULD READ 'ESRS S1 - 38' - Question the decision-usefulness of this information in the market and suggest potentially removing this datapoint from the S1 standard.	S1	S1-12 - Training and skills development metrics	10.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	It is questionable what added value is provided by this data point vis-a-vis the costs associated with gathering and processing the data, as it provides minimial additional value for investors and stakeholders when the responding entity is a private company. At a minimum, given the variation in sizes in responding companies, the data point should be modified to reflect the share of incidents in relation to the total number of employees rather than as a gross value to make the response comparable between differently sized businesses. Further, given that OSHA (US) and ISO 45001 use specific definitions for "recordable incidents," "lost time," and "fatalities," the definitions included in the ESRS should be aligned whenever possible so as to avoid creating double reporting burdens and inconsistencies for companies already complying with OSHA or ISO frameworks.	S1	S1-13 - Health and Safety metrics	39.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				S1-15 Remuneration - Overall, there should be alignment with EU Pay Directive and individual country directives, and U.S. SEC requirements. Adding another pay gap is not only complex, but makes messaging to employees challenging to explain what the difference in each of these pay gaps are The definition of employee should also be harmonized as the in scope population changes amongst these different reporting obligations.	S1	S1-15 - Remuneration metrics	
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Delete subparagraph (b)(iii)	S1	S1-15 - Remuneration metrics	AR 36
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Given that this data point requires the reporting of business sensitive information held by a privately-held company that is generally otherwise not subject to public disclosure, it appears to undercut ESRS's stated purpose of including these data points in order to enhance transparency for investors and stakeholders. Further, since this disclosure requirement has been included to support the information needs of financial market participants subject to Regulation (EU) 2019/2088, it is not relevant in the context of private companies, and therefore should be excluded or at least caveated to exclude private companies. Further, disclosing the highest-paid individual's remuneration can breach confidentiality and data protection laws, especially in jurisdictions like the US where executive pay disclosure is not mandatory for private companies. For small entities or subsidiaries, this metric could identify individuals, creating GDPR and local privacy compliance issues. Also, neither ISSB IFRS S1/S2 nor SEC climate disclosure rules require this ratio. While GRI 2-21 includes a similar metric, it does not mandate country-level or entity-level disclosure, and it allows flexibility in methodology. ESRS should avoid creating EU-only requirements that undermine interoperability.	S1	S1-15 - Remuneration metrics	44. (b)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	It is recommended that these metrics should be voluntary and only necessary if the sub-topics of discrimination and human rights incidents are material. The scope of mandatory metrics need to be clarified so that there is no variation in interpretation between undertakings.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	This data point presents multiple issues: 1- The definition of a grievance can be quite broad and employees are often raising human rights grievances while being performance managed or exited to lift their severance entitlements. Quantifying what amounts to report is very ambiguous and does not adequately capture human rights grievances vs. just severance payments to exit an employee. 2- The requirement for a reconciliation, given the ambiguous and broad nature of financial data requested, opens the door for an unreasonably broad disclosure of financial data from a private company unrelated to human rights violations or work-related incidents. 3- It is possible that data will not be specifically tracked as it relates to compensation for human rights violations or employee grievances. Aggregating that data presents an unduly burdensome reporting obligation with no clear connection to any double materiality obligation .4- Compensation for employee grievances and work-related incidents are typically subject to confidentiality agreements. Public disclosure of this compensation would violate these agreement as well as raise privacy concerns. 5- It would be preferable to set the reporting requirement at a "rate per 100 FTE employees" to align with separate employee incident reporting obligations.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (c)
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The added mandatory requirements (reference to materials impacts, risk and opportunities) could potentially increase the reporting complexity	S1	S1-1 - Policies related to Own workforce	12.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Same as above	S1	S1-1 - Policies related to Own workforce	13.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I agree	The amendments to the requirements on how a company engages with its own workforce streamlined the process	S1	S1-2 - Engagement with own workforce and workers' representatives, existence of channels for own workers to raise concerns or needs and approaches to remedy	15.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The requirement of disclosing actions to mitigate or remediate material negative impacts on the workforce is now streamlined, but more clarity is needed for the wording "key actions"	S1	S1-3 - Actions and Resources related to Own workforce	19.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I agree	The requirement now makes the detail level of information to disclose	S1	S1-3 - Actions and Resources related to Own workforce	AR 8
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	Evaluating differently the top management level only creates more disalignment. In the initial ESRS, this requirement was for both top management and employees.	S1	S1-8 - Diversity metrics	29.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	The qualifier "severe" in human rights disclosures should be maintained because it provides a clear threshold that focuses reporting on the most significant and material impacts. Removing the concept of severity broadens the scope excessively, obliging companies to report on every minor or hypothetical issue, which dilutes attention from genuinely serious human rights risks and undermines comparability across companies. The concept of severity is well-established in international human rights frameworks such as the UN Guiding Principles and the OECD Guidelines, ensuring alignment with globally recognized due diligence standards. Keeping the severity threshold helps companies prioritize the most critical risks, enhances the usefulness of disclosures for stakeholders, and avoids unnecessary reporting burden on less material issues.	S1	S1-16 - Incidents of discrimination and other human rights incidents	46. (b)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				Under S1-7 on collective bargaining, we recommend clarification that only national and sectorial CBAs should be in scope for the required metrics. These CBAs cover the widest set of topics and help companies to align with industry best practices. Including local level CBAs in scope should be optional and can be burdensome for companies.	S1	S1-7 - Collective bargaining coverage and social dialogue	
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				S1-15 Remuneration - Overall, there should be alignment with EU Pay Directive and individual country directives, and U.S. SEC requirements. Adding another pay gap is not only complex, but makes messaging to employees challenging to explain what the difference in each of these pay gaps are The definition of employee should also be harmonized as the in scope population changes amongst these different reporting obligations.	S1	S1-15 - Remuneration metrics	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	Since other labor-related human rights each have different characteristics, child labour, forced labour, and privacy should be addressed separately.	S1	S1 - Objective	4.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	We disagree as now the "tension" description becomes a "shall" criteria (initally, it was a "may" datapoint). The wording "where potentially / significant tension arise" should be added as otherwise it would counteract the intention to simplify the reporting requirements.	S1	S1-3 - Actions and Resources related to Own workforce	19. (a)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The proposal introduces a new term, 'work-related accident,' which is not defined anywhere in the standard. This fundamental omission immediately introduces significant misleading ambiguity and confusion, leaving its precise meaning open to subjective interpretation by different undertakings and jurisdictions. Suggestion: Amend to: The objective of this DR is to allow an understanding of the coverage, quality and performance of the health and safety management system established to prevent work-related injuries, ill-health and fatalities.	S1	S1-13 - Health and Safety metrics	39.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	The current absence of a clear, standardized definition for "work-related ill health" presents a critical vulnerability within the disclosure requirements. Suggestion: Add the comprehensive definition of "work-related ill health" to the annex or guidance notes, as per the previous version: "Work-related ill health can include acute, recurring, and chronic health problems caused or aggravated by work conditions or practices. These include musculoskeletal disorders, skin and respiratory diseases, malignant cancers, diseases caused by physical agents (for example, noise-induced hearing loss, vibration-caused diseases), and mental illnesses (for example, anxiety, post-traumatic stress disorder). For the purpose of the required disclosures, the undertaking shall, at a minimum, include in its disclosure those cases outlined in the ILO List of Occupational Diseases"	S1	S1-13 - Health and Safety metrics	40. (b)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	The definition of "recordable work-related accidents" within the EFRAG proposal explicitly encompasses both work-related injury and ill-health. 1)Duplication and Misalignment with Simplification: If "recordable work-related accidents" includes ill-health, and there is also a separate requirement for "recordable work-related ill health" (40. (d)), this creates a direct duplication of reporting requirements. This redundancy contradicts the fundamental objective of simplification and streamlining data collection, leading to unnecessary complexity and potential inconsistencies in reported figures. 2) Data Collection Challenges for Non-Employees (Privacy Concerns): The most critical issue arises from the inclusion of ill-health, particularly for non-employees. While injury data for non-employees working on site is generally accessible (e.g., through incident reports), collecting detailed ill-health data for non-employees is exceptionally difficult, if not impossible, due to stringent data privacy regulations. In most countries, especially within the European Union, policies like GDPR severely restrict an undertaking's access to, and processing of, sensitive medical information for individuals not directly employed by them, adding a challenge that was already limited from 40. (d). Amend to: "the number and rate of recordable work-related injuries.	S1	S1-13 - Health and Safety metrics	40. (c)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	ANNEX II to the [Draft] Amended ESRS Exposure Draft July 2025: This definition, rooted in OSHA criteria, introduces ambiguity through two critical flaws: 1)Loss of Consciousness as a Standalone Criterion The current framework treats all loss of consciousness incidents as recordable, regardless of causation (e.g., workplace hazards like chemical exposure vs. pre-existing conditions like epilepsy). This overinclusiveness distorts workplace safety metrics by conflating occupational and non-occupational factors. Further, severity variations (e.g. brief first-aid cases vs. multi-day absences) are unaddressed, preventing nuanced risk assessment. 2)Undefined "Significant Injury" The term "significant injury" lacks objective parameters, leading to inconsistent interpretation across medical professionals and jurisdictions. For example, a laceration requiring stitches might be deemed "significant" in one context but not another. This subjectivity undermines data harmonization and comparative analysis. Suggestion to delete: Deletion of "loss of consciousness" and "significant injury", remaining "Work-related injury or ill health that results in any of the following: death, days away from work, restricted work or transfer to another job, medical treatment beyond first aid or ill health diagnosed by a physician or other licensed healthcare professional, even if it does not result in death, days away from work, restricted work or job transfer, medical treatment beyond first aid"	S1	S1-13 - Health and Safety metrics	40. (c)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	The definition of "recordable work-related accidents" within the EFRAG proposal explicitly encompasses both work-related injury and ill-health, and critically, it also includes fatalities. To emphasize and uphold the clear EFRAG decision regarding the deletion of 'days lost to fatalities' – a decision made due to the inherent lack of a robust and comparable methodology for such calculations – it is fundamental to sharpen the interpretation of this requirement. Therefore, while the term "recordable work-related accident" encompasses fatalities, the calculation of "days away from work" must be understood to apply solely to non-fatal incidents. Suggestion: Amend to: with regard to the undertaking's employees, the number of days away from work related to work-related injuries or work-related ill health	S1	S1-13 - Health and Safety metrics	40. (e)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The inherent diversity in national definitions for "work-related accidents" means that data collected from different countries within the same undertaking will not be directly comparable. This significantly complicates the ability to aggregate global health and safety data consistently, limiting an undertaking's capacity to gain a holistic and accurate view of its performance across all operations, and provide precise and reliable information essential for robust management of health and safety aspects, as expected by financial markets.. Therefore, suggestion of deletion of "work-related accidents, the undertaking shall use the definitions as per the national laws of the countries where the employees are based."	S1	S1-13 - Health and Safety metrics	AR 27
Excels	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	The requirement to disclose the annual ratio of the highest paid individual to the median remuneration of employees lacks clarity. It is not clear whether "highest paid individual" refers to an employee or to any person within the undertaking's own workforce. Published reports show inconsistent reporting practices. This should be clarified to ensure comparability.	S1	S1-15 - Remuneration metrics	44. (b)
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I disagree	§a) This new formulation does not simplify but complexify our reporting, we would suggest to come back to previous formulation	S1	S1-5 - Characteristics of the undertaking's employees	23.

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Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	The publication of all these indicators shall be limited to employees. The mention to "other workers" should be deleted. Indeed the latency between occupational exposure, the onset of the disease, and death makes it impossible to identify deaths due to occupational diseases among subcontractors' employees, as these usually occur several years after the work was performed.	S1	S1-13 - Health and Safety metrics	AR 26
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I disagree	This indicator shall be deleted, it does not provide useful information	S1	S1-15 - Remuneration metrics	44. (b)
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I disagree	Outside the EEA, the notion often does not exist and is therefore impossible to collect. Therefore this paragraph could be deleted.	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (c)
Excels	UNESPA (Spanish Association of Insurers and Reinsurers)	Association of financial institutions	Spain			I disagree	S1-3 §19(a) (Previously §S1-4 38(a)) does not require to report key actions taken, planned or underway to cause positive impacts and to manage risks and opportunities. It should also require these actions because this would be critical for undertakings that did not identify material negative impacts.	S1	S1-3 - Actions and Resources related to Own workforce	19. (a)
Excels	UNESPA (Spanish Association of Insurers and Reinsurers)	Association of financial institutions	Spain			I disagree	S1-5 §23(f) (previously S1-6 §50(c)) should clearly state how the denominator of employee turnover is calculated. As stated, it can be interpreted that the denominator can consider only employees who leave voluntarily, only employees who leave due to dismissal and retirement or only employees who leave due to death in service. For better understanding the "or" conjunction should be replaced by the "and" conjunction.	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	ASD					I disagree	All reporting obligations under S2 are qualitative and not quantitative, therefore inconsistent across companies and industries given their subjectivity in interpretation. The Exposure Draft recognises the issue, yet it does not appear to solve it.	S2	S2 - Objective	1.
Excels	ASD					I partially agree and partially disagree	The standard was simplified, but we still suggest to provide further guidance on how to directly engage workers in value chain, or to eliminate this data point	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	13.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	A boolean DP (whether) will complicate the structure of a generic GDR-P. Suggestion: create a separate datapoint in S2-1: "It shall state whether policies cover specific groups of value chain workers (e.g. particular age groups or workers in a particular factory or country) or all value chain workers." Or, create an AR to specify content (without a boolean).	S2	S2-1 - Policies related to value chain workers	10.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	This DP would likely be overlapping with the generic GDR-A content. Transforming it to a AR would allow to include the content in the GDR-A. "The undertaking shall describe key actions taken, planned or underway, to prevent, mitigate and remediate material negative impacts on value chain workers, including its approach in situations where tensions arise between such actions and other business pressures (for example, in procurement or sales)."	S2	S2-3 - Actions and resources related to value chain workers	18. (a)
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	Should be labelled 16a	S2	S2-3 - Actions and resources related to value chain workers	17.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	Should be labelled 16b	S2	S2-3 - Actions and resources related to value chain workers	18.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	This DP would likely be overlapping with the generic GDR-A content. Transforming it to a AR would allow to include the content in the GDR-A. "The undertaking shall describe key actions taken, planned or underway to prevent, mitigate and remediate material negative impacts on affected communities, including its approach in situations where tensions arise between such actions and other business pressures (e.g. its practices in relation to planning and land acquisition or exploitation and financing raw materials)."	S2	S2-3 - Actions and resources related to value chain workers	17.
Excels	Chamber of Labour, Austria	Trade union	Austria				The BAK argues that some important nuances are lost as a result of the proposed simplifications: For example, it makes sense to design whistleblowing mechanisms and complaint channels differently, depending on whether they are designed for employees in the value chain, local communities or consumers. These are instruments that must be designed as effectively as possible in the interests of the employees, the other affected parties, but also the companies, because they enable information to be passed on quickly to the company and remedial action can be taken.	S2		
Excels	Chamber of Labour, Austria	Trade union	Austria				The reporting obligations on the systematics of negative impacts and risks are to be partially abolished, this is to be criticized. For example, the elimination of reporting obligations on problems faced by employees in the supply chain that are related to the company's strategy or business model (formerly in ESRS SBM-3, 10 and 11). In addition, reporting obligations are sometimes simplified to such an extent that relevant parts are omitted or the original meaning is no longer recognizable, such as:	S2		
Excels	Chamber of Labour, Austria	Trade union	Austria				1. Formerly ESRS SBM-3, 12 is to be moved to the NMIG. The elimination of reporting obligations on specific impacts on specific groups would lead to a deterioration in the understanding of impacts and should therefore be maintained. 2. The negative reporting obligation regarding information about employees in the supply chain is to be abolished (formerly S2-2, 24.), this is to be criticized, reference is made to the above remarks on negative reporting obligations. 3. Former S2-3, 27.c and d should be retained, as it is essential for the question of the existence of opportunities to communicate problems of workers in the supply chain to the company, how and in what form these opportunities exist and to what extent the company itself contributes to them. 4. Formerly S2-4, 36., a restriction is inserted according to which the reporting obligation should only exist "subject to the relevant privacy regulation". This unclear wording should be deleted, as data protection provisions must be observed and applied anyway, but the insertion of this exception unnecessarily restricts the reporting obligation.	S2		

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Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Information on the grievance mechnism should be removed from S2-2, as this is addressed in the G-standard. Alternatively, it should be noted in the DR that a reference to the Governance information is sufficient, if there is no separate channel for value chain workers.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	15.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Leverage effects should be eliminated due to weak market position in several sectors	S2	S2-3 - Actions and resources related to value chain workers	AR 6
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It is recommended that policy disclosures be kept general and allow companies to indicate sub-groups if applicable (remove examples).	S2	S2-1 - Policies related to value chain workers	10.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It is recommended not to have this level of granularity to call out marginalized groups	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14. (a)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It is recommended to add a phrase about "good faith efforts" to work with credible proxies/proper representation as representation is not always clear.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It is recommended to add a phrase about "good faith efforts" to work with credible proxies/proper representation as representation is not always clear.	S2	S2-4 - Targets related to value chain workers	21.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It is recommended to add a phrase about "good faith efforts" to work with credible proxies/proper representation as representation is not always clear.	S2	S2-4 - Targets related to value chain workers	AR8
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It is recommended to add clarification that when disclosing policies, companies don't need to point out individual components of the policy to different groups	S2	S2-1 - Policies related to value chain workers	AR 1
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	For social standards the removal of the term "severe" from the disclosure requirements for human rights incidents across all social standards is particularly concerning. Without a clear limitation to the most serious cases, companies may be required to report even minor or less relevant incidents. This broad scope risks undermining the materiality of disclosures and contradicts the objective of simplification. Maintaining a focus on severe human rights incidents is essential to ensure that reporting remains meaningful, proportionate, and aligned with the principles of relevance and efficiency.	S2	S2-3 - Actions and resources related to value chain workers	19.
Excels	BDEW	Other - please specify (required)	Germany			I partially agree and partially disagree	- has a new metric been introduced here?, previously only "severe incidents" were mentioned; also in indicator 14 in Table 3 in Annex I Delegated Regulation (EU) 2022/1288 - Question: does this data point correspond to the old data point in ESRS S2.36? "The undertaking shall also disclose whether severe human rights issues and incidents connected to its upstream and downstream value chain have been reported and, if applicable, disclose these."	S2	S2-3 - Actions and resources related to value chain workers	19
Excels	Otto Group	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	4a: secure employment is defined quite unspecific/ misleading	S2	S2 - Objective	4.
Excels	International Association of Drilling Contractors	Business association (other than association of financial institution)	United States			I disagree	The depth of workers in the value chain should be limited to Tier 1 suppliers. Under (b) It is unreasonable to expect disclosure on working conditions of downstream entities. These are entirely beyond our control, and in our case would include customer and customer working conditions. Under (d), whilst commodities workers are important, the relationship, and even traceability of commodities extracting workers and a product used by a company is very tenuous -e.g. steel used in equipment purchased - whilst the grade of steel is part of the equipment specification, it will be . almost impossible for the company to identify. the ultimate source (mine) and influence conditions of the workers in that undertaking	S2	S2-3 - Actions and resources related to value chain workers	8.
Excels	Materiality	Consultant (including software vendor)	Poland			I partially agree and partially disagree	It might be benefitial (either in the Application Requirements or the glossary) to clarify the distinction between a definition of: a. a company policy, which sets its commitments regarding its behaviour towards workers in the value chain and b. a supplier code of conduct, which sets expectations for suppliers regarding the treatment of their employees. From our experience working with companies, the distintion is not always clear.	S2	S2-1 - Policies related to value chain workers	10.
Excels	Materiality	Consultant (including software vendor)	Poland			I partially agree and partially disagree	Until now, companies' disclosures in this chapter have focused on engagement with the employers of workers in the value chain, rather than directly with the workers themselves. Their perspectives are rarely collected to inform eg. materiality assessments or identify negative impacts. Very few companies conduct second+ tier audits or implement (anonymous) worker voice surveys to gather feedback. ESRS could clarify whether the engagement should focus on the supplier (employer) or the supplier's workers, whose voices are intended to be heard.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	13.
Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	Similar to comment for ESRS 1 Appendix A: the social susubtopics in parenthesis are not exhaustive of the sub-topic title/ human rights instruments mentioned in CSRD. Hence all parentheses should start with 'including'.	S2	S2 - Objective	4.
Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	Former disclosure of whether and how it is ensured that own practices do not cause or contribute to material negative impacts on workers in the value chain has been deleted and should be reinstated. Key part of UNGPs/OECD Guidelines and key issue in what is driving impacts at supplier levels. 'The undertaking shall disclose whether and how it takes action to avoid causing or contributing to material negative impacts on value chain workers through its own practices, including, where relevant, in relation to procurement, sales and data use. This may include disclosing what approach is taken when tensions arise between the prevention or mitigation of material negative impacts and other business pressures.'	S2	S2-3 - Actions and resources related to value chain workers	18.

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Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	The disclosure requirement should be expanded to also include metrics in addition to target, to ensure metrics are captured at topical level for S2,S3,S4. Inspiration can be taken from E4-5 including para 21: 'In addition to paragraph 20 and in accordance with [Draft] Amended ESRS 2 GDR-M, the undertaking shall report metrics related to its material impacts on biodiversity and ecosystems.'	S2	S2-4 - Targets related to value chain workers	20.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I agree	Centralizing in ESRS 2 avoids redundancies and ensures consistency in presenting policies and commitments. Moving transversal content facilitates comparability across reports. However, it requires clarity to avoid reducing the visibility of value chain workers' specific aspects.	S2	S2-1 - Policies related to value chain workers	10.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I agree	Merging S2-2 and S2-3 into a single disclosure reduces duplication and administrative burden while improving clarity. The streamlined structure ensures coherence between engagement processes, grievance mechanisms, and remediation. This consolidation supports more effective reporting.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	13.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I agree	The new format makes the disclosure more concise and easier to understand, while avoiding overlaps with ESRS 2. Moving duplicated elements to GDR-A improves consistency across standards. The focus on key actions, mitigation, remediation, and resources ensures clarity.	S2	S2-3 - Actions and resources related to value chain workers	17.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I agree	The simplification reduces redundancy and creates a clearer link with ESRS 2 GDR-T, improving coherence. Keeping targets at S2-4 while the process is covered in GDR-T ensures consistency and avoids duplication.	S2	S2-4 - Targets related to value chain workers	20.
Excels	GKK Partners	Consultant (including software vendor)	Germany			I partially agree and partially disagree	Suggestion/question: Since this information is central and overarching, why is it not integrated as AR in ESRS 1 chapter 3.1. ?	S2	S2 - Objective	3.
Excels	GKK Partners	Consultant (including software vendor)	Germany			I agree	Essential, given the potential dilemma that value chain workers are "between different undertaking's reportings" and therefore reporting on it is challenging but crucial in a global economy.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14.
Excels	GKK Partners	Consultant (including software vendor)	Germany			I partially agree and partially disagree	Suggestion: Include "missing information" from NMIG 6 for para. 15 that might be crucial: "b) Are the channels known and accessible to the concerned stakeholder group?". E.g. by including: "They include grievance mechanisms, hotlines, trade unions, works councils, dialogue processes, as well as, under certain circumstances, whistleblowing mechanisms." It must be stated how the undertaking guarantees that the specific channels/mechanisms are known and accessible to the concerned stakeholder (group)." By adding this, NMIG 6 for para. 15 and a missing part can be accommodated.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	AR 3
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Now uses UNGP-terminology (Causation, contribution or direct linkage to impacts as well as prevent, mitigate or remediate impacts). Helpful to align with other reporting requirements/frameworks like LkSG	S2	S2-3 - Actions and resources related to value chain workers	AR 6
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Original ESRS, ESRS 2 paragrapg 65 f states: if relevant, whether and how the undertaking makes the policy available to potentially affected stakeholders, and stakeholders who need to help implement it. Revised ESRS S2 AR 1 is making this dislcosure as "example of policy apects to disclose", which might create differnent interpretation even within one report. Suggested to either remove this DP or move back to ESRS 2 with amended wording.	S2	S2-1 - Policies related to value chain workers	AR 1
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Word "Severe" has been removed from the disclosure of "human rights incidents", while reference to SFDR PAI indicator remained, where disclosure of "severe human rights incidents" remained, this creates inconsistency. Suggested to add "severe" back to the DR. In addition, definition of "severe" should be provided in alignment with internationally recognized standards.	S2	S2-3 - Actions and resources related to value chain workers	19.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Consolidation exercise limits duplication of datapoints to consider during preparation; allows having overarching disclosure and refer to this disclosure in topical chapters	S2	S2-3 - Actions and resources related to value chain workers	19.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We propose retaining former S2 27 (d) on how the undertaking involves stakeholders in ensuring the effectiveness of their grievance mechanisms, in line with GRI 2-25-e.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	15.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	For the purpose of simplification, data points on the availability of channels such as grievance mechanisms from S1, S2, S3 and S4 could be consolidated into one data point covering all categories of stakeholders and moved to ESRS 2. This would be equivalent to the consolidation done for the data point on the human rights policy commitment. This would also increase alignment with GRI 2-25. In addition, the data point could be further aligned verbatim with GRI 2-25-b and e, for greater clarity and interoperability.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	15.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	For the purpose of simplification, data points on the general approach to and processes for providing or contributing to remedy from S1, S2, S3 and S4 could be consolidated into one data point covering all categories of stakeholders and moved to ESRS 2. This would be equivalent to the consolidation done for the data point on the human rights policy commitment. This would also increase alignment with GRI 2-25. In addition, the data point could be further aligned verbatim with GRI 2-25-c, for greater clarity and interoperability.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	16.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We recommend retaining remedy actions (former S2 para 32(b)) as a stand-alone data point, in line with GRI 3-3-d-ii. Having a standalone data point ensures that this information is not overlooked and it is easily identifiable by users and stakeholders.	S2	S2-3 - Actions and resources related to value chain workers	18. (a)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	NomoGaia	NGO	United States			I partially agree and partially disagree	Insert “and grievance mechanisms” after “policies” in the first sentence. REASON: For companies’ grievance mechanism, outreach (the process of informing potential claimants of the existence of grievance mechanisms and how to access them) is key. see: https://wrap.warwick.ac.uk/id/eprint/185392/. This supports S2 DR 15 and is an alternative to our suggested change to it.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	AR 1
Excels	NomoGaia	NGO	United States			I partially agree and partially disagree	Insert “communicates their existence to potential claimants” at the end of the last sentence. REASON: For companies’ grievance mechanism, outreach (the process of informing potential claimants of the existence of grievance mechanisms and how to access them) is key. See our Report at https://nomogaia.org/wp-content/uploads/2025/09/Disclosure-Report-1.pdf and draft paper https://warwick.ac.uk/fac/soc/law/research/centres/chrp/publications/corporate_disclosure_and_mhrdd_june_2026_ext.pdf. This is an alternative to our suggested change to S2 AR 1 for DR 10.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	15.
Excels	NomoGaia	NGO	United States			I partially agree and partially disagree	Add a new paragraph: “In accordance with ESRS 2 GDR-A key actions describe all actual remedies provided for negative human rights impacts.” REASON: Specific remedy disclosures are essential to the usefulness of disclosures on human rights actions. see our Report at https://nomogaia.org/wp-content/uploads/2025/09/Disclosure-Report-1.pdf and draft paper https://warwick.ac.uk/fac/soc/law/research/centres/chrp/publications/corporate_disclosure_and_mhrdd_june_2026_ext.pdf.	S2	S2-3 - Actions and resources related to value chain workers	AR 6
Excels	NomoGaia	NGO	United States			I partially agree and partially disagree	Add a new AR: “The disclosure will include the number, type (by human right negatively impacted) and outcome of the human rights claims.” REASON: These are essential metrics needed to make these disclosures useful for relevant audiences. see https://wrap.warwick.ac.uk/id/eprint/185392/ and https://warwick.ac.uk/fac/soc/law/research/centres/chrp/governance/hrandbusiness/empiricalresearch/msigrievancemechanisms/ and referenced citations. This is similar to the use of S1 DR 46.	S2	S2-3 - Actions and resources related to value chain workers	19.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	the removal of the term "severe" from the disclosure requirements for human rights incidents across all social standards is particularly concerning. Without a clear limitation to the most serious cases, companies may be required to report even minor or less relevant incidents. This broad scope risks undermining the materiality of disclosures and contradicts the objective of simplification. Maintaining a focus on severe human rights incidents is essential to ensure that reporting remains meaningful, proportionate, and aligned with the principles of relevance and efficiency.. The disclosure requirement related to human rights incidents should be revised to limit reporting exclusively to the number of incidents in all social standards. Providing detailed information on each case may lead to legal and operational complexities. A more focused approach on quantitative information would ensure proportionality and safeguard sensitive information, while still maintaining transparency.	S2	S2-3 - Actions and resources related to value chain workers	19.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Very confusing why previous sub-sub-topics are sometimes moved to extra points and sometimes in brackets. This will lead to huge discussions on which level materiality is going to be defined, whether to use topics in front or in the brackets. Materiality analysis needs to be fully and new implemented due to this change. Only resonable approach: Leave out sub-topics in general and just list the previous sub-sub-topics one after each other. Furthermore, a proper mapping won't be possible like this!! We recommend deleting them to avoid the risk of auditors requiring individual assessments for each one.	S2	S2 - Workers in the value chain	4
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	Reduction in granularity is received very well.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I agree	The level of detail for previous no. 28 (assessment of value chain workers' awareness and trust) got reduced and is well perceived.	S2	S2-3 - Actions and resources related to value chain workers	15.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	What is meant with resources (personnel, money, time…)? Definition not clear enough. Maybe keep focus only on key actions related to material topics. Furthermore, how can “KEY” actions be identified? Delete the word “key”.	S2	S2-3 - Actions and resources related to value chain workers	17.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Delete the word "key". Moreover, The request is not clear; referring to 'procurement or sales' does not help interpret the data point	S2	S2-3 - Actions and resources related to value chain workers	18. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It would be useful to specify how this can be aligned with the scope of the Corporate Sustainability Due Diligence Directive (CSDDD), in order to ensure consistency between reporting obligations and due diligence requirements across regulatory frameworks.	S2	S2 - Objective	7.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The requirement to assess the effectiveness of actions across all social standards should be removed. Effectiveness is a complex concept that varies significantly depending on the nature of the action, and in any case, it does not allow for meaningful comparability—neither across actions nor between companies. Maintaining this requirement may lead to inconsistent interpretations and reporting practices.	S2	S2-3 - Actions and resources related to value chain workers	18. (b)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Stakeholder engagement is unnegotiably relevant for conducting effective human rights due diligence and is explicit in CSDDD. However, neither international standards not CSDDD require specifically for stakeholders to participate in metrics or target-setting. This Standard should not create more burden or requirements but rather align with due diligence obligations and best practices.	S2	S2-4 - Targets related to value chain workers	21.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The request is not clear .	S2	S2-1 - Policies related to value chain workers	AR 1
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The definition of "migrant worker" needs to be clarified, as it often varies across contexts and legal frameworks. Understanding the condition of migrant workers within global value chains remains particularly challenging, especially given the complexity of multinational operations across diverse regions, labor markets, and regulatory environments. The suggestion is to reintroduce "Where applicable" as per former 23.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14. (a)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Regarding " The actions taken by the undertaking differ depending on its connection to the impact (causation, contribution, direct linkage), and how it has identified the actions as appropriate for addressing material impacts" it is not clear what the undertaking is expected to report on. Shall the distinction between causation, contribution and direct linkage be reported separately? In the previous version of ESRS the request was "whether the undertaking causes or contributes to a material impact" with "or" that was reflecting an alternative approach rather than the simplified requirement which seems to require three kind of impact to be disclosed separately. This is not a simplification therefore we suggest to eliminate the brackets or insert "or" - NEW	S2	S2-3 - Actions and resources related to value chain workers	AR 6
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	It is unclear why the interactions with other Standards are limited to S1 and therefore exclude S3 and S4 while the 4 social standards are connected in the Set 1. For instance, the general approach to providing remedies and/or grievance mechanisms is equally relevant to own workforce, value chain workers, consumers and affected communities. We recommend clarifying these interactions and extending them to these two standards to reflect this broader applicability (cf. related comment on S3 §7 and S4 §8).	S2	S2 - Interaction with other ESRS	9.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	We recommend slightly revising the wording of this AR, as the phrasing of amended AR 16 was, in our view, clearer. One example of possible redrafting is: "Among the policy aspects that can be disclosed, the undertaking can provide an illustration of the types of communication of its policies to those individuals, group of individuals or entities for whom they are relevant, either because they are expected to implement them (for example, the undertaking's employees, contractors and suppliers), or because they have a direct interest in their implementation (for example, own workers and investors)." In the current writing, starting with the term "channels" may be misleading, as it overlaps with the terminology used in DR S2-2.	S2	S2-1 - Policies related to value chain workers	AR 1
Excels	University of Warwick, Coventry, United Kingdom	Academia	United Kingdom			I partially agree and partially disagree	Insert "and grievance mechanisms" after "policies" in the first sentence. REASON: For companies' grievance mechanism, outreach (the process of informing potential claimants of the existence of grievance mechanisms and how to access them) is key. see: https://wrap.warwick.ac.uk/id/eprint/185392/. This supports S2 DR 15 and is an alternative to our suggested change to it.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	AR 1
Excels	University of Warwick, Coventry, United Kingdom	Academia	United Kingdom			I partially agree and partially disagree	Insert "communicates their existence to potential claimants" at the end of the last sentence. REASON: For companies' grievance mechanism, outreach (the process of informing potential claimants of the existence of grievance mechanisms and how to access them) is key. See our Report at https://nomogaia.org/wp-content/uploads/2025/09/Disclosure-Report-1.pdf CITE DISCLOSURE PAPER. This is an alternative to our suggested change to S2 AR 1 for DR 10.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	15.
Excels	University of Warwick, Coventry, United Kingdom	Academia	United Kingdom			I partially agree and partially disagree	Add a new paragraph: "In accordance with ESRS 2 GDR-A key actions describe all actual remedies provided for negative human rights impacts." REASON: Specific remedy disclosures are essential to the usefulness of disclosures on human rights actions. see our Report at https://nomogaia.org/wp-content/uploads/2025/09/Disclosure-Report-1.pdf CITE DISCLOSRUE PAPER.	S2	S2-3 - Actions and resources related to value chain workers	AR 6
Excels	University of Warwick, Coventry, United Kingdom	Academia	United Kingdom			I partially agree and partially disagree	Add a new AR: "The disclosure will include the number, type (by human right negatively impacted) and outcome of the human rights claims." REASON: These are essential metrics needed to make these disclosures useful for relevant audiences. see https://wrap.warwick.ac.uk/id/eprint/185392/ and https://warwick.ac.uk/fac/soc/law/research/centres/chrp/governance/hrandbusiness/empiricalresearch/msigrievancemechanisms/ and referenced citations. This is similar to the use of S1 DR 46.	S2	S2-3 - Actions and resources related to value chain workers	19.
Excels	Triodos Bank N.V.	Bank	Netherlands			I disagree	We propose that high risk sectors for human rights and labour right violations should disclose processes and targets to manage material impacts, risks and opportunities related to value chain workers. If targets do not exist, companies need to explain why.	S2	S2-4 - Targets related to value chain workers	5.
Excels	BDO	Auditor	Belgium			I partially agree and partially disagree	"Subject to the relevant privacy regulation" - This is ambiguous, and requires clarification about whether this statement refers to local privacy regulations or GDPR etc.	S2	S2-3 - Actions and resources related to value chain workers	19.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	Since sub-sub topics were eliminated, it is not clear why they are still indicated in brackets of sub-topics and what is expected to be disclosed. We recommend deleting them to avoid the risk of auditors requiring individual assessments for each one.	S2	S2 - Objective	4.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	The request is not clear.	S2	S2-1 - Policies related to value chain workers	AR 1
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	The definition of "migrant worker" needs to be clarified, as it often varies across contexts and legal frameworks. Understanding the condition of migrant workers within global value chains remains particularly challenging, especially given the complexity of multinational operations across diverse regions, labor markets, and regulatory environments. The suggestion is to reintroduce "Where applicable" as per former 23.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14. (a)
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	The request is not clear; referring to 'procurement or sales' does not help interpret the data point.	S2	S2-3 - Actions and resources related to value chain workers	18. (a)
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	The removal of the term "severe" from the disclosure requirements for human rights incidents across all social standards is particularly concerning. Without a clear limitation to the most serious cases, companies may be required to report even minor or less relevant incidents. This broad scope risks undermining the materiality of disclosures and contradicts the objective of simplification. Maintaining a focus on severe human rights incidents is essential to ensure that reporting remains meaningful, proportionate, and aligned with the principles of relevance and efficiency	S2	S2-3 - Actions and resources related to value chain workers	19.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	Regarding " The actions taken by the undertaking differ depending on its connection to the impact (causation, contribution, direct linkage), and how it has identified the actions as appropriate for addressing material impacts" it is not clear what the undertaking is expected to report on. Shall the distinction between causation, contribution and direct linkage be reported separately? In the previous version of ESRS the request was "whether the undertaking causes or contributes to a material impact" with "or" that was reflecting an alternative approach rather than the simplified requirement which seems to require three kind of impact to be disclosed separately. This is not a simplification therefore we suggest to eliminate the brackets or insert "or".	S2	S2-3 - Actions and resources related to value chain workers	AR 6
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	Inconsistency of severe: The "severe" qualifier here has been kept for human rights issues and incidents connected to workers in the value chain. This is inconsistent with S1 and S3. We support having the word "significant" as this is an important connection to risk based HRDD. Keeping "severe" is important for the ESRS to remain in line with the principle of risk-based due diligence as outlined in the UNGPs. Inconsistency of "issues and incidents" : Why does S2 use the teminology "issues and incidents" here where in S1 and S3 it's just HR incidents? We support using the term "incidents" and not "issues"	S2	S2-3 - Actions and resources related to value chain workers	19.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	The currently applicable version (ESRS S2 paragraph 21) specifies that disclosures on engagement with value chain workers refer to material impacts on them. In the proposed draft ESRS S2 paragraph 13, this clarification has been removed. In addition, the proposed draft ESRS S2 paragraph 14 refers to actual and potential impacts on value chain workers, without specifying that this only concerns material impacts. This raises the question of whether section S2-2 is intended to address value chain workers engagement more generally, without reference to material impacts. If the intention is to preserve the current meaning, in our view this should be explicitly clarified, confirming that engagement relates specifically to material impacts.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	Draft AR 2 states that the engagement with value chain workers can take different forms, such as information. Whereas, Annex II Acronyms and Glossary of Terms defines stakeholder engagement as an ongoing process of interaction and dialogue between the undertaking and its stakeholders that enables the undertaking to hear, understand and respond to their interests and concerns. It is recommended to harmonise these formulations so that the concept of engagement is applied consistently across the standard.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	AR 2
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	In our view, companies should disclose the processes through which they support or require the availability of the channels available to value chain workers to bring their concerns or needs. This helps show whether such mechanisms exist only formally or are genuinely accessible and used, and allows stakeholders to better assess the effectiveness of a company's due diligence and ethical practices across the value chain.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	15.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	why par b) is not included under working conditions?	S2	S2 - Objective	4. (b)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	It seems metrics are not required within the framework of this standard. Should it be deleted?	S2	S2 - Objective	5.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	To be added: "Or for those who may encounter risks and opportunities"	S2	S2 - Objective	7.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	We would suggest to add something like, Even if certain labour-related human rights sub-topics—in particular, child labour and forced labour- and human trafficking are considered non-material in the double materiality assessment, the company should still state whether its workforce policies specifically address these issues.	S2	S2-1 - Policies related to value chain workers	11.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	par 18 a and b are referred to negative impacts. should not be actions for positive impacts reported? I suggest to add something like, "beside the reported requirements, as described in ESRS 2 GDR-A, in particular for material negative impacts, the undertaking shall also....	S2	S2-3 - Actions and resources related to value chain workers	18.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Should this be considered a metric?	S2	S2-3 - Actions and resources related to value chain workers	19.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	We would suggest to clarify this point, as it may cause confusion with what should be considered under the G1 (management of suppliers)	S2	S2-3 - Actions and resources related to value chain workers	AR 7
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	to be added: if the undertaking has not adopted engagement actions with workers in the value chain or its representatives for the purpose of target-setting and/or tracking performance against those targets, it shall disclose this fact	S2	S2-4 - Targets related to value chain workers	21.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	The draft proposes an amendment to consolidate DR SX-2 and SX-3 from Standards S1 to S4 into a single DR SX-2, in view of the interconnection between the three elements engagement, channels for raising concerns, and remediation. As a result, the numbering of all DRs in Standards S1 to S4 would shift by minus one. This would entail significant effort for renumbering across all external and internal documentation and publications. A reduction of this administrative burden would therefore be desirable.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	13.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	§24 was deleted to avoid the burden of a negative statement. However, if there is no engagement as required by §14, a negative statement will still be necessary. Otherwise, the "shall" in §14 will simply be ignored.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	§27(deleted).c is particularly relevant. Simply providing a channel as required by §15 is not sufficient, and deleting certain "side" information such as that in former §27 could likely result in a risk of "social washing."	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	15.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	Privacy regulation concerns leading to non-disclosure of severe human rights incidents are questionable if no alternative requirement is provided.	S2	S2-3 - Actions and resources related to value chain workers	19.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	Rather lightweight, and the scope pursued by including those ARs is not clear.	S2	S2-1 - Policies related to value chain workers	AR 1
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	Rather lightweight, and the scope pursued by including those ARs is not clear.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	AR 2
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS S2 Workers in the Value Chain, when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, and targets (if in place), dependencies when relevant, metrics and financial effects Suggestion: When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS S2 Workers in the Value Chain, when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, metrics and targets (if in place), dependencies when relevant, metrics and financial effects.	S2	ESRS S2 - Objective	1.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Unnecessary duplication: The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M. In particular: (a) if the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact; (b) the undertaking may present the description of its material impacts, risks and opportunities, in accordance with [Draft] Amended ESRS 2 IRO-2, alongside information about its policies, actions, targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative Suggestion: The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M. In particular: (a)if the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact; (b)the undertaking may present the description of its material impacts, risks and opportunities, in accordance with [Draft] Amended ESRS 2 IRO-2, alongside information about its policies, actions, targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative .	S2	ESRS S2 - Objective	5.
Excels	Allianz SE	Insurance	Germany			I disagree	Reinsert the example of franchisees in the mentioned examples on the objective of ESRS S2 (Objective of Amended ESRS S2 Workers in the value chain point 8)	S2		
Excels	Allianz SE	Insurance	Germany			I disagree	Do not add an additional disclosure requirement by adding "In particular, it shall state whether it has a grievance mechanism . It shall also explain how it assesses the effectiveness of these channels."	S2	S2-3 - Actions and resources related to value chain workers	15.
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	deletion of "severe" leads to difference to SFDR requirement and should therefore be changed again and "severe" should be added, otherwise, extended reporting burden	S2	S2-3 - Actions and resources related to value chain workers	19.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	At the end of the sentence the following should be added "and indicate all identified material negative impacts and risks that remained unaddressed by actions during the reporting year"	S2	S2-3 - Actions and resources related to value chain workers	17.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	At the end of the sentence the following should be added "against each action disclosed under DR G1-2".	S2	S2-4 - Targets related to value chain workers	20.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	It should also include at least reference to ESRS S4 Consumers and end-users, as workers in the value chain may be end-users of IT systems provided by the undertaking.	S2	S2 - Objective	9.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	"directly their attention" should be replaced with "directly its attention"	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	15.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	Whole phrase "human rights incidents" should be in bold as it is a separate defined term.	S2	S2-3 - Actions and resources related to value chain workers	19.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	The reference list of regulations should be aligned with the list in ESRS S1 as many workers in the value chain are employed in the EU.	S2	S2 - Objective	2.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	The second paragraph should include a reference to workers' representatives: "If the undertaking has policies for protecting individuals that use these channels against retaliation, including workers' representatives, and they are disclosed in [Draft] Amended ESRS G1-1, the undertaking may refer to that disclosure."	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	AR 4
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	It might be benefitial (either in the Application Requirements or the glossary) to clarify the distinction between a definition of: a. a company policy, which sets its commitments regarding its behaviour towards workers in the value chain and b. a supplier code of conduct, which sets expectations for suppliers regarding the treatment of their employees. From our experience working with companies, the distintion is not always clear.	S2	S2-1 - Policies related to value chain workers	10.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	Until now, companies' disclosures in this chapter have focused on engagement with the employers of workers in the value chain, rather than directly with the workers themselves. Their perspectives are rarely collected to inform eg. materiality assessments or identify negative impacts. Very few companies conduct second+ tier audits or implement (anonymous) worker voice surveys to gather feedback. ESRS could clarify whether the engagement should focus on the supplier (employer) or the supplier's workers, whose voices are intended to be heard.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	13.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Key topics like adequate wage, harrassment, and persons with a disability are lacking	S2	S2-1 - Policies related to value chain workers	11.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I disagree	For reporting on workers in the value chain, the same approach should apply as for reporting on own employees. This means not only the policy principles, but also the statistics. More specifically, for points 14 through 16: please apply the same requirements as for reporting on own employees.	S2	S2-1 - Policies related to value chain workers	14.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I disagree	FGAs are normally strictly confidential. A general disclosure on the presence of GFAs is possible, but specifics are impossible, especially for companies with tens of thousands of suppliers	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I disagree	Engagement with stakeholders, especially value chain workers, it something that many undertakings can experience as something complex. By removing several of the listed means of engagement (following the phrase "this shall include..."), the requirement loses important contextual clarity. Instead of removing these elements, it might be more helpful to revise the wording to "this can include...". This would preserve the informative value of the listed approaches without making them mandatory, giving undertakings clearer guidance on how engagement can be conducted and how it may inform decision-making.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	The former paragraph 27(d) appears to have been partially moved to paragraph 15. However, the reference to the monitoring and tracking of complaints has been removed. Monitoring and tracking are key components of an effective grievance mechanism.	S2	S2-3 - Actions and resources related to value chain workers	15.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Depending on ESRS S1 and as noted in ESRS S2.9 different legal systems may hamper comparability for S1 and S2	S2	S2-1 - Policies related to value chain workers	
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	The DASB sees this DR as an example of a neccesity to disclose targets without a requirement to disclose the related current metric (actual). The DASB questions the informational value of such a disclosure requirement	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	20.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It no longer refers only to "severe human rights issues and incidents" but to "human rights incidents" in general. The term "severe" should be reintroduced here. In the Log of Amendments, "severe" is still included in the text.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	19.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	More guidance is necessary for this DR. As it currently stands, it is not clear to us what the objective here is. Experience shows companies tend to resort to boilerplate disclosures here, such as repetition of UNGPs (e.g. if we cause, we provide remedy, if we contribute, we participate in providing remedy) which is of little benefit to users.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	16.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	Suggest replacing "as part of its" with "at different stages of" --> how it engages, at different stages of its ongoing due diligence process, directly with value chain workers... Stakeholder engagement has a role at various stages of the due diligence process and if information is provided "in bulk" it does not provide a full picture.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	We do not fully understand this AR. In particular the concept of "harms identified" (vs. actual impacts) is unclear, and as such we suggest further editing this AR for clarity / understandability.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	AR 5
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	The caveat "subject to privacy regulations" should be moved to apply to disclosure of details of reported human rights incidents only, not the full DR. The other caveat "if applicable" should be removed fully. If incidents have been reported, the fact that such reporting has been done should always be disclosed. The company could also then provide their response to such reports.	S2	S2-3 - Actions and resources related to value chain workers	19.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	Companies should also be required to disclose, whether they have assessed their own involvement to the impacts and what the conclusion of such assessments are. As noted in the related AR, actions that companies are expected to take differ depending on their involvement (cause, contribute, linked to) to the impact. The only way for users to assess whether companies actions are appropriate and adequate is for them to be transparent about their level of involvement.	S2	S2-3 - Actions and resources related to value chain workers	18.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	It is not clear how this AR related to para. 10.	S2	S2-1 - Policies related to value chain workers	AR 1
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Since sub-sub topics were eliminated, it is not clear why they are still indicated in brackets of sub-topics and what is expected to be disclosed. We recommend deleting them to avoid the risk of auditors requiring individual assessments for each one	S2	S2 - Objective	4.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Remove. Value chain workers should be limited to Tier 1/direct business relationships vs indirect business relationships. This is not incompatible with value chain language in the CSRD which refers to the undertaking's value chain as "its own operations, its products and services, its business relationships and its supply chains." Undertakings should spend their efforts and resources on direct business relationships where they have more influence and/or control. Furthermore, examples should be included in the NMIG.	S2	S2 - Objective	8. (d)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	In some industries there is no possibility ot have direct engagement with VCWs, this should be amended to allow the engagement be done via proxy / representatives.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The definition of "migrant worker" needs to be clarified, as it often varies across contexts and legal frameworks. Understanding the condition of migrant workers within global value chains remains particularly challenging, especially given the complexity of multinational operations across diverse regions, labor markets, and regulatory environments. The suggestion is to reintroduce "Where applicable" as per former 23	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14. (a)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Remove or clarify what is meant by "other outcomes that the undertaking has reached with workers' representatives."	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14. (b)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	It is not a practice in our industry to extend the grievance mechanism to VCWs, should be ammended for the Whistleblowing mechanism or other similar channels available for VCWs.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	15.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Shall be updated according to previous one.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	AR 4
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	(a) This is an excessive requirement, if the whistleblowing mechanism of the undertaking is used it will be done by default, if not, then the supplier whistleblowing mechanism shall be used. (b) The removal of the term "severe" from the disclosure requirements for human rights incidents across all social standards is particularly concerning. Without a clear limitation to the most serious cases, companies may be required to report even minor or less relevant incidents. This broad scope risks undermining the materiality of disclosures and contradicts the objective of simplification. Maintaining a focus on severe human rights incidents is essential to ensure that reporting remains meaningful, proportionate, and aligned with the principles of relevance and efficiency.It is of utmost importance to clarify if incidents are referred basically to social aspects (child labor, restrictions, overtime not recognized or not compensated or if they are referred also to security aspects and healty environment)	S2	S2-3 - Actions and resources related to value chain workers	19.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The distinction between "causation" and "direct linkage" is not clear, as both appear to describe direct causes of impacts. Regarding the sentence "The actions taken by the undertaking differ depending on its connection to the impact (causation, contribution, direct linkage), and how it has identified the actions as appropriate for addressing material impacts," it is also not clear what the undertaking is expected to report on. Shall the distinction between causation, contribution and direct linkage be reported separately? In the previous version of ESRS the request was "whether the undertaking causes or contributes to a material impact" with "or" that was reflecting an alternative approach rather than the simplified requirement which seems to require three kinds of impact to be disclosed separately. This is not a simplification, therefore we suggest to eliminate the brackets or insert "or."	S2	S2-3 - Actions and resources related to value chain workers	AR 6
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Actions are already addressed through IRO, and requiring an additional cross-reference to topics adds unnecessary duplication. Furthermore, the statement "This applies to measures taken to mitigate negative impacts on its own workforce that arise from the transition to a greener, climate-neutral economy" should be removed, as this may not be relevant or material for all undertakings and its objective is unclear.	S2	S2-3 - Actions and resources related to value chain workers	AR 7
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I agree	We support the changes proposed.	S2	S2-4 - Targets related to value chain workers	4.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	Potential mistake: The paragraph does no longer refer only to "severe human rights issues and incidents" but to "human rights incidents" in general. The term "severe" should be therefore reintroduced, since it is still included in the log of amendments.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	19.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Information on the grievance mechnism should be removed from S2-2, as this is addressed in the G-standard. Alternatively, it should be noted in the DR that a reference to the Governance information is sufficient, if there is no separate channel for value chain workers.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	15.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	minor changes, now related to GDR-P (ESRS2)	S2	S2-1 - Policies related to value chain workers	10.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	no changes, divided into 11. and 12.	S2	S2-1 - Policies related to value chain workers	11.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	no changes, divided into 11. and 12.	S2	S2-1 - Policies related to value chain workers	12.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	noted	S2	S2-1 - Policies related to value chain workers	AR 1
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	wording changed	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	13.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	wording changed	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	minor changes	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14. (a)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	minor changes	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14. (b)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	minor changes, several rules merged	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	16.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	noted	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	AR 2
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	noted	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	AR 3
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	noted	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	AR 4
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	noted	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	AR 5
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	minor changes	S2	S2-3 - Actions and resources related to value chain workers	17.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	no changes	S2	S2-3 - Actions and resources related to value chain workers	18.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	minor changes, several rules merged	S2	S2-3 - Actions and resources related to value chain workers	18. (a)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	explanation to reduce effort (double reporting)	S2	S2-3 - Actions and resources related to value chain workers	18. (b)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	The removal of the term "severe" from the disclosure requirements for human rights incidents across all social standards poses significant challenges. Without a clear limitation to the most serious cases, companies may be required to report even minor or less relevant incidents. This broad scope risks undermining the materiality of disclosures and contradicts the objective of simplification. Maintaining a focus on severe human rights incidents is essential to ensure that reporting remains meaningful, proportionate, and aligned with the principles of relevance and faithful representation.	S2	S2-3 - Actions and resources related to value chain workers	19.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Leverage effects should be eliminated due to weak market position in several sectors	S2	S2-3 - Actions and resources related to value chain workers	AR 6
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Extremely demanding	S2	S2-3 - Actions and resources related to value chain workers	AR 7
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Requirements according to GDR-T challenging	S2	S2-4 - Targets related to value chain workers	20.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	Requirements according to GDR-T challenging	S2	S2-4 - Targets related to value chain workers	21.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I agree	noted	S2	S2-4 - Targets related to value chain workers	AR8
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I agree	Agree with the changes whereby no ESRS 2 specifications for SBM in the topical standards. Reduce repetition.	S2	S2 - Interaction with other ESRS	9.
Excels	SAIM GmbH	Consultant (including software vendor)	Germany			I partially agree and partially disagree	The disclosures related to ESRS 2 General disclosures SBM-3 were deleted completely from ESRS S2 Workers in the value chain. The potential information loss of this change would be that disclosures about material impacts, risks and opportunities become more generic and have less information about specific stakeholder groups as specifications about the level of granularity of the materiality assessment have been deleted.	S2	S2 - Objective	1.
Excels	SAIM GmbH	Consultant (including software vendor)	Germany			I partially agree and partially disagree	With the removal of this requirement, it is conceivable that certain effects (e.g. customers refusing to buy the undertaking's products because of negative impacts of the undertaking on the workers in the value chain) will not be sufficiently taken into account.	S2	S2 - Objective	3.
Excels	SAIM GmbH	Consultant (including software vendor)	Germany			I disagree	By deleting the old S2-2 §24 companies might lack the amibition to adopt a general process to engage with workers in the value chain.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	3.
Excels	SAIM GmbH	Consultant (including software vendor)	Germany			I disagree	The deletion of the old S2-3 AR39 could lead companies to neglect or discontinue initiatives that contribute to mitigating significant adverse impacts (e.g., programs to promote financial literacy among female employees, which have led to more women being promoted and fewer reports of sexual harassment in the workplace).	S2	S2-3 - Actions and resources related to value chain workers	3.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The requirement to describe workforce policies and specify coverage for "specific groups" is overly granular, lacks a clear legal basis in the CSRD, and creates unnecessary reporting complexity. The CSRD only requires information "necessary to understand the undertaking's impacts on sustainability matters." The level of detail demanded here—especially the breakdown by sub-groups—exceeds the directive's intent and imposes a disproportionate burden on companies, particularly those with complex or international structures. This requirement is also redundant with disclosures already required under ESRS 2, leading to double reporting and further increasing complexity. To ensure legal certainty, proportionality, and practical feasibility, the obligation to specify coverage by "specific groups" should be deleted.	S2	S2-1 - Policies related to value chain workers	10.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	Disclosure of policies on trafficking, forced or compulsory labour, and child labour should only be required if these topics are material, as per the CSRD's materiality principle. Mandating disclosure regardless of materiality is disproportionate (Art. 5(4) TEU) and exceeds the CSRD's intent. The "explicit address" requirement should be deleted, as the CSRD does not require policies to use specific wording. This change would ensure legal certainty, reduce unnecessary reporting burden, and align with the principle of proportionality.	S2	S2-1 - Policies related to value chain workers	11.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The requirement to disclose channels and grievance mechanisms is redundant, as grievance mechanisms are already addressed in the Governance standard (G-standard). Duplicating this requirement increases the reporting burden and risks inconsistent reporting. The obligation to explain the effectiveness of these channels is vague and impractical, especially for large or global undertakings. To ensure clarity, comparability, and proportionality (Art. 5(4) TEU), this requirement should be deleted or streamlined.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	15.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	To ensure consistency between the SFDR and the ESRS, the term "severe" should be reintroduced. The meaning of "incidents" varies across standards; if the intention is to report complaints filed through specific channels, this should be explicitly stated. If the requirement concerns actual, confirmed incidents, this must also be clearly indicated. Only confirmed incidents should be subject to reporting. The term "substantiated" should be included directly in the Disclosure Requirement, not only in the Application Requirements, to provide legal clarity and prevent over-reporting of unverified cases. Beyond that we suggest that this should be a voluntary information.	S2	S2-3 - Actions and resources related to value chain workers	19.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This Application Requirement introduces the concept of using "leverage," which is legally problematic and practically unfeasible. Leverage effects should be excluded, as companies in many sectors lack sufficient market power to influence business partners or supply chains effectively. The expectation that a company must use commercial "leverage" over its business partners is an exaggerated and normative standard of conduct not mandated by the CSRD. This requirement interferes with the right to entrepreneurial independence and freedom of contract, representing a significant legal overreach. The term "leverage" itself is vague and undefined, which will inevitably lead to inconsistent application and legal uncertainty for both preparers and auditors. To ensure the standards remain grounded in law and practical application, the reference to using "leverage" must be deleted. The focus should be on actions within a company's direct sphere of control and influence.	S2	S2-3 - Actions and resources related to value chain workers	AR 6
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This paragraph is structurally redundant and substantively problematic. It creates unnecessary complexity by placing a target-setting requirement in a topical standard that is governed entirely by the general standard, ESRS 2 GDR-T. This cross-reference is flawed: The requirement forces the disclosure of specific targets related to value chain workers that often constitute strategic business secrets.	S2	S2-4 - Targets related to value chain workers	20.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This paragraph is structurally redundant and substantively problematic. It creates unnecessary complexity by placing a target-setting requirement in a topical standard that is governed entirely by the general standard, ESRS 2 GDR-T. This cross-reference is challenging.	S2	S2-4 - Targets related to value chain workers	21.
Excels	BDO Poland	Auditor	Poland			I partially agree and partially disagree	While the revised DR S2-2 covers the existence and effectiveness of grievance mechanisms, it no longer includes a requirement to disclose whether value chain workers are aware of and able to access these channels. Accessibility and awareness are critical for the practical functioning of such mechanisms, particularly for vulnerable workers. Their absence from the mandatory disclosure limits the information's usefulness for assessing the undertaking's responsibility and due diligence in practice. A specific disclosure on this aspect should be reinstated.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	15.
Excels	ASSIREVI	Auditor	Italy			I disagree	We suggest to remove this AR, considering that the information has been already deleted from GDR-P.	S2	S2-1 - Policies related to value chain workers	AR 1
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We propose to restore the existing para. 32(c) to provide a more comprehensive overview that also includes actions relating to positive impacts, and not only those linked to negative impacts	S2	S2-3 - Actions and resources related to value chain workers	18.
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We propose to restore the existing para. 34 to provide a more comprehensive overview that also includes actions related to risks and opportunities, and not only those related to impacts	S2	S2-3 - Actions and resources related to value chain workers	18.
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We have identified an inconsistency between the description of human rights incidents/impacts reported in S1 and the reference to severe human rights issues in S2-3, which are no longer described.	S2	S2-3 - Actions and resources related to value chain workers	19.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	A potential concern is that the reduction in narrative disclosure could reduce the quality and effectiveness of our due diligence processes, especially in sensitive areas within Human Rights. This would then misalign with efforts to improve the robustness of human rights risk management across the industry and through other regulatory pressure.	S2	S2 - Objective	1.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Across sustainability, but especially true for human rights, there is a heavy weighting of qualitative indicators that can be used to evidence metrics, actions etc. However, as more thought is still needed around how to use these as effectiveness measure, some further guidance at this stage around how effectiveness can be evidenced.	S2	S2 - Objective	1.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The objective described in para. 1 of each draft topical ESRS is inconsistent with Draft ESRS 1. The statement about "dependencies when relevant" and "financial effects" should be deleted to make it consistent with ESRS 1. Change the wording to: "When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS S2 Workers in the Value Chain when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, metrics and targets (if in place)."	S2	S2 - Objective	1.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Remove parts (a) and (b) and keep the introductory paragraph to avoid unnecessary duplication. Paragraph 5 should read as follows: "The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M."	S2	S2 - Objective	5.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Generally there may be a discrepancy with how a company defines "own workforce" as described in ESRS 1, with the definition of "own workforce" regularly referred to in S2. Given the definition of "own workforce" in the ESRS standard is very narrow, they may be considered as "value chain workers" falling under the ESRS S2 but also as part of "own workforce" as considered by the company in its policies described in ESRS S1.	S2	S2 - Objective	7.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The concept of incidents and how to identify them is still unclear. Among Disclosure Requirements, Application Requirements and the Glossary there are several definitions of incidents and confirmed/substantiated incidents. We suggest the best approach would be having specific definitions for each case (e.g. human rights incidents, incidents of corruption and bribery, etc.) and presenting them under the related application requirements. Such definitions would then include detailed explanations of: a) the scope of the matter (e.g. "discrimination at work on the grounds of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation, or other relevant forms of discrimination, including harassment"); and b) the type of instances that trigger the reporting of the corresponding metrics (e.g. "judicial and non-judicial proceedings that have been initiated such as cases before domestic courts, mediation, complaints filed with the National Contact Points for OECD Multinational Enterprises"). In our view the best path to support simplification in relation to point (b) above would be to focus on incidents that have been confirmed through a final decision issued by a court of law or relevant authorities.	S2	S2-3 - Actions and resources related to value chain workers	19.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	To align with the simplification approach, we suggest reformulating as follows: "if the undertaking engaged directly with workers in the value chain, their legitimate representatives, or with credible proxies that have insight into their situation for the purpose of target-setting and/or tracking performance against those targets, it shall disclose this fact when disclosing in accordance with [Draft] Amended ESRS 2 GDR-T"	S2	S2-4 - Targets related to value chain workers	21.
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I disagree	Since other labor-related human rights each have different characteristics, child labour, forced labour, and privacy should be addressed separately, while water and sanitation could be incorporated under health and safety.	S2	S2 - Objective	4. (f)
Excels	Japan Business Council in Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is expected to add specific examples and descriptions regarding " workers for a 'downstream' entity" for more clarification.	S2	S2 - Objective	8. (b)
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The removal of the term "severe" from the disclosure requirements for human rights incidents across all social standards poses significant challenges. Without a clear limitation to the most serious cases, companies may be required to report even minor or less relevant incidents. This broad scope risks undermining the materiality of disclosures and contradicts the objective of simplification. Maintaining a focus on severe human rights incidents is essential to ensure that reporting remains meaningful, proportionate, and aligned with the principles of relevance and faithful representation.	S2	S2-3 - Actions and resources related to value chain workers	19.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	While several changes were aimed at enhancing interoperability with IFRS S1 and S2, some simplification measures may unintentionally reduce consistency with ISSB standards. Positive developments include that ESRS now explicitly adopts a fair presentation framework, aligning with IFRS S1 principles; GHG emissions boundary in ESRS E1 has been revised to match the financial control approach used in the GHG Protocol and IFRS; References to IFRS industry-based guidance and GRI Sector Standards are now permanent, supporting comparability in the absence of ESRS sector standards; Reliefs such as "undue cost or effort" and scenario-based estimates are now embedded, mirroring IFRS S1 provisions. At the same time, some concerns remain. For instance, some reliefs go beyond IFRS S1/S2, such as broader exclusions for data quality and joint operations, which may reduce comparability; the removal of certain mandatory datapoints aligned with ISSB standards could weaken the interoperability baseline; ESRS still lacks consistent treatment of judgement and uncertainty disclosures, which are more explicitly addressed in IFRS S1 (e.g. paragraph 74).	S2	S2 - Interaction with other ESRS	1.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	There is an inconsistency between the description of human rights incidents/impacts reported in S1 and the reference to severe human rights issues in S2-3, which are no longer described.	S2	S2-3 - Actions and resources related to value chain workers	19.
Excels	DRSC	(National) standard setter	Germany			I disagree	The added value of this requirement is not apparent, as the information in the sustainability report should be consistent anyway. Either the exact interaction referred to should be clarified, or this paragraph should be deleted.	S2	S2 - Interaction with other ESRS	9.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	NMIG 1 for para. 10 Communication channels were removed from MDR-Ps, why bringing them up here introducing additional requirements (even as "possible elements")? If the guidelines on how to disclose information on policies are not streamlined in ESRS 2, this will lead to different way of presentation across the standards. Possible solution: streamline in ESRS 2 or eliminate completely.	S2	S2-1 - Policies related to value chain workers	10.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	NMIG 2 for para. 12 The NMIG contain terms that are not defined. For example, in NMIG 2 for para. 12 on the Amended ESRS S2, the terms "precarious work" and "informal workers" are used without being sufficiently defined. Terms that are only used within the NMIG should also be defined there.	S2	S2-1 - Policies related to value chain workers	12.
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG Previously (ESRS S2.36), the focus was only on "severe human rights issues". Indicator No. 14 in table III of annex I to Delegated Regulation (EU) 2022/12888 also refers to "severe human rights issues and incidents". In order to ensure consistency between the SFDR and the ESRS, the word "severe" should be reinserted. With regard to the determination of "severe" human rights impacts, the definition of the United Nations Guiding Principles on Business and Human Rights should be adopted.	S2	S2-3 - Actions and resources related to value chain workers	19.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	In order to limit boiler plate texts and increase the relevance and readability of the disclosure, we suggest requiring only disclosures if Policies do not address trafficking in human beings	S2	S2-1 - Policies related to value chain workers	11
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	In order to limit boiler plate texts and increase the relevance and readability of the disclosure, we suggest requiring only disclosures if there is no supplier code of conduct	S2	S2-1 - Policies related to value chain workers	12
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	In order to limit boiler plate texts and increase the relevance and readability of the disclosure, we suggest requiring only disclosures if there is no grievance mechanism	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	15
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	In order to limit boiler plate texts and increase the relevance and readability of the disclosure, we suggest requiring only disclosures if human rights incidents have been reported. Additionally, the amended wording replaces "number of severe human rights [incidents/issues]" with "number of human rights [incidents/issues]." This broadens the scope from substantiated, high-impact cases to potentially all recorded incidents, regardless of severity. It also risks undermining alignment with SFDR PAI Indicator #14, which refers to "identified cases of severe human rights issues and incidents". We recommend reintroducing the qualifier "severe" to ensure conceptual clarity and consistency.	S2	S2-3 - Actions and resources related to value chain workers	19
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Very confusing why previous sub-sub-topics are sometimes moved to extra points and sometimes in brackets. This will lead to huge discussions on which level materiality is going to be defined, whether to use topics in front or in the brackets. Materiality analysis needs to be fully and new implemented due to this change. Only resonable approach: Leave out sub-topics in general and just list the previous sub-sub-topics one after each other. Furthermore, a proper mapping won't be possible like this!!	S2	S2 - Workers in the value chain	4

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	Reduction in granularity is received very well.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I agree	The level of detail for previous no. 28 (assessment of value chain workers' awareness and trust) got reduced and is well perceived.	S2	S2-3 - Actions and resources related to value chain workers	15.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The requirement to state actions is clear but what is meant with the term resources (personnel, money, time…)? Definition not clear enough. Maybe keep focus only on key actions related to material topics. Furthermore, how can "KEY" actions be identified? Either delete the word "key" or mention in the glossary: "The company may defined themselves the thresholds for key actions." OR "Key actions are those most relevant for strategy and business modell and are at the heart of the company." for example.	S2	S2-3 - Actions and resources related to value chain workers	17.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	How can "KEY" actions be identified? Either delete the word "key" or mention in the glossary: "The company may defined themselves the thresholds for key actions." OR "Key actions are those most relevant for strategy and business modell and are at the heart of the company." for example.	S2	S2-3 - Actions and resources related to value chain workers	18. (a)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is recommended that policy disclosures be kept general and allow companies to indicate sub-groups if applicable (remove examples).	S2	S2-1 - Policies related to value chain workers	10.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is recommended not to have this level of granularity to call out marginalized groups	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14. (a)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is recommended to add a phrase about "good faith efforts" to work with credible proxies/proper representation as representation is not always clear.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is recommended to add a phrase about "good faith efforts" to work with credible proxies/proper representation as representation is not always clear.	S2	S2-4 - Targets related to value chain workers	21.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is recommended to add a phrase about "good faith efforts" to work with credible proxies/proper representation as representation is not always clear.	S2	S2-4 - Targets related to value chain workers	AR8
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is recommended to add clarification that when disclosing policies, companies don't need to point out individual components of the policy to different groups	S2	S2-1 - Policies related to value chain workers	AR 1
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	ESRS 2 par 8 provides examples of who could fall within in the scope for this standard. Under d it states: "workers deeper in the supply chain who are extracting commodities that are then processed into components that go in the undertaking's products." We'd like to understand how /whether would impact this requirement, since Omnibus aims to limit the value chain scope (to tier 1, and in some exceptions further down the value chain). Please explain how/if this aligns with Omnibus.	S2	General disclosures	
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	The role of business in the context of human rights is not to 'align or comply' but instead to have processes in place to manage its risk on human rights adverse impacts and environmental adverse impacts. Amend to: The objective of this Standard is to specify an understanding of the processes an undertaking has in place to manage its risk on human rights adverse impacts and environmental adverse impacts.	S2	Objectives	2
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Propose removing reference to work-life balance as this should be an own workforce concept only	S2	S2 - Objective	4. (a)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Propose removing specific reference to disabilities as this is only one protected characteristic and keeping the definition of diversity and inclusion wider	S2	S2 - Objective	4. (e)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	View is more prominence should be given to forced labour and child labour to better align to SFDR requirements	S2	S2 - Objective	4. (f)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Examples are quite basic and immaterial examples that should be replaced with more sophisticated examples basis Wave 1 definitions of value chain	S2	S2 - Objective	8.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Propose to remove data point unless required under SFDR	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14. (b)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Unclear why disclosures relating to positive impacts, risks and opportunities have been removed. As per ESRS2, if a material IRO has been identified then GDR-A should be followed but then removing the requirement from S2 and only retaining explicit reference to negative impacts creates confusion	S2	S2-3 - Actions and resources related to value chain workers	18.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Although we are fully aligned to keep reporting of severe human rights incidents as part of the SFDR requirements, it is unclear why these requirements have not been grouped under one section to clarify all Human rights requirements in one place. In addition, it is unclear if general non complinaces with the UNGP has been deliberately removed or if this is an oversight. Further, a clearer definition of what should be considered as a severe human rights incident must be provided to allow comparability	S2	S2-3 - Actions and resources related to value chain workers	19.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	We note that a previously voluntary paragraph using "may disclose" has now been converted into an application requirement, suggesting a more mandatory tone through the phrase "examples of policy aspects to disclose." While we appreciate the intent to enhance clarity and consistency in disclosures, we are concerned that this shift may inadvertently reduce flexibility for entities to tailor their reporting to material topics and organizational context. We propose that this paragraph be repositioned as non-mandatory implementation guidance, rather than an application requirement. This would preserve the original intent of encouraging transparency without imposing prescriptive disclosure expectations that may not be relevant or material for all entities.	S2	S2-1 - Policies related to value chain workers	AR 1
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Consolidate ESRS on value chain stakeholders to streamline standardisation, reduce redundancy in data points, and shorten the disclosure requirements, while allowing flexibility in presentation to enable preparers to adapt based on their specific circumstances (value chain workers typically managed by procurement, affected communities by legal teams, and consumers/end-users by sales)	S2	S2 - Objective	1.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Delete the datapoint on whether the undertaking has a supplier code of conduct due to its lack of usefulness. This aspect is already covered under disclosures on policies, actions, and targets, and users generally do not consider it particularly useful.	S2	S2-1 - Policies related to value chain workers	12.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Reframe the datapoints on the process for engaging with workers in the value chain and how the perspectives of workers in the value chain inform the undertaking's decisions or activities in connection with ESRS 2 SBM-2, while highlighting key information (material IROs); current drfating is too granular in §14a and b. Proposed wording: "In addition to the general information disclosed under ESRS 2 SBM-2 on interests and views of stakeholders, the undertaking shall provide information on the type of value chain workers subject to material impacts, the nature of these impacts (i.e., whether they are widespread and systemic, or related to individual incidents), and whether and how the interests and views of these stakeholders inform its decisions or activities aimed at managing the related material topics/sub-topics."	S2	S2-1 - Policies related to value chain workers	14.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	When the undertaking has severe human rights incidents, replace "if applicable, disclose these" (overly granular) with "including, where applicable, a description of affected value chain workers"	S2	S2-3 - Actions and resources related to value chain workers	19.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Very confusing why previous sub-sub-topics are sometimes moved to extra points and sometimes in brackets. This will lead to huge discussions on which level materiality is going to be defined, whether to use topics in front or in the brackets. Materiality analysis needs to be fully and new implemented due to this change. Only resonable approach: Leave out sub-topics in general and just list the previous sub-sub-topics one after each other. Furthermore, a proper mapping won't be possible like this!!	S2	S2 - Workers in the value chain	4
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Reduction in granularity is received very well.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I agree	The level of detail for previous no. 28 (assessment of value chain workers' awareness and trust) got reduced and is well perceived.	S2	S2-3 - Actions and resources related to value chain workers	15.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The requirement to state actions is clear but what is meant with the term resources (personnel, money, time...)? Definition not clear enough. Maybe keep focus only on key actions related to material topics. Furthermore, how can "KEY" actions be identified? Either delete the word "key" or mention in the glossary: "The company may defined themselves the thresholds for key actions." OR "Key actions are those most relevant for strategy and business modell and are at the heart of the company." for example.	S2	S2-3 - Actions and resources related to value chain workers	17.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	How can "KEY" actions be identified? Either delete the word "key" or mention in the glossary: "The company may defined themselves the thresholds for key actions." OR "Key actions are those most relevant for strategy and business modell and are at the heart of the company." for example.	S2	S2-3 - Actions and resources related to value chain workers	18. (a)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is recommended that policy disclosures be kept general and allow companies to indicate sub-groups if applicable (remove examples).	S2	S2-1 - Policies related to value chain workers	10.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I agree	AR 1 for para. 10 provides clarity on examples of policy aspects to disclose. We would welcome a list of policy aspects that shall be disclosed as this would facilitate comparability across resporting companies. Clarity is needed if the policies should be publicly available.	S2	S2-1 - Policies related to value chain workers	AR 1
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is recommended not to have this level of granularity to call out marginalized groups	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14. (a)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is recommended to add a phrase about "good faith efforts" to work with credible proxies/proper representation as representation is not always clear.	S2	S2-2 - Engagement with value chain workers, existence of channels for value chain workers to raise concerns or needs and approaches to remedy.	14.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				AR 7 for para. 18 Allow companies flexibility on level of depth of this disclosure	S2	S2-3 - Actions and resources related to value chain workers	17.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I agree	Paragraph 19 should provide a clear definition on 'human rights incidents' and explain the level/depth of disclosure needed.	S2	S2-3 - Actions and resources related to value chain workers	19.

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Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is recommended to add a phrase about "good faith efforts" to work with credible proxies/proper representation as representation is not always clear.	S2	S2-4 - Targets related to value chain workers	21.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is recommended to add a phrase about "good faith efforts" to work with credible proxies/proper representation as representation is not always clear.	S2	S2-4 - Targets related to value chain workers	AR8
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is recommended to add clarification that when disclosing policies, companies don't need to point out individual components of the policy to different groups	S2	S2-1 - Policies related to value chain workers	AR 1
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				AR 7 for para. 18 Allow companies flexibility on level of depth of this disclosure	S2	S2-3 - Actions and resources related to value chain workers	17.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	Since other labor-related human rights each have different characteristics, child labour, forced labour, and privacy should be addressed separately, while water and sanitation could be incorporated under health and safety.	S2	S2 - Objective	4. (f)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is expected to add specific examples and descriptions regarding " workers for a 'downstream' entity" for more clarification.	S2	S2 - Objective	8. (b)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	The removal of the term "severe" from the disclosure requirements for human rights incidents across all social standards poses significant challenges. Without a clear limitation to the most serious cases, companies may be required to report even minor or less relevant incidents. This broad scope risks undermining the materiality of disclosures and contradicts the objective of simplification. Maintaining a focus on severe human rights incidents is essential to ensure that reporting remains meaningful, proportionate, and aligned with the principles of relevance and faithful representation.	S2	S2-3 - Actions and resources related to value chain workers	19.
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I disagree	§a) This new formulation does not simplify but complexify our reporting, we would suggest to come back to previous formulation	S1	S1-5 - Characteristics of the undertaking's employees	23.
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	The publication of all these indicators shall be limited to employees. The mention to "other workers" should be deleted. Indeed the latency between occupational exposure, the onset of the disease, and death makes it impossible to identify deaths due to occupational diseases among subcontractors' employees, as these usually occur several years after the work was performed.	S1	S1-13 - Health and Safety metrics	AR 26
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I disagree	This indicator shall be deleted, it does not provide useful information	S1	S1-15 - Remuneration metrics	44. (b)
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I disagree	Outside the EEA, the notion often does not exist and is therefore impossible to collect. Therefore this paragraph could be deleted.	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (c)
Excels	ASD					I partially agree and partially disagree	Allow to consider information related to affected communities as classified or sensitive information, therefore allow to apply ESRS 1 section 7.8 ("The undertaking is not required to disclose classified information or sensitive information, even if such information is considered material"), whilst maintaining the expectation to policies, processes and actions in relation to downstream due diligence.	S3	S3-1 - Policies related to affected communities	1.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	A boolean DP (whether) will complicate the structure of a generic GDR-P. Suggestion: create a separate datapoint in S3-1: "It shall state whether policies cover specific affected communities (e.g. a community of indigenous people or a community living around its site) or all affected communities." Or, create an AR to specify content (without a boolean).	S3	S3-1 - Policies related to affected communities	8.
Excels	Chamber of Labour, Austria	Trade union	Austria				The BAK argues that some important nuances are lost as a result of the proposed simplifications: For example, it makes sense to design whistleblowing mechanisms and complaint channels differently, depending on whether they are designed for employees in the value chain, local communities or consumers. These are instruments that must be designed as effectively as possible in the interests of the employees, the other affected parties, but also the companies, because they enable information to be passed on quickly to the company and remedial action can be taken.	S3		
Excels	Chamber of Labour, Austria	Trade union	Austria				The deletion of information on types of "affected communities" is problematic because a more detailed definition is now missing. More detailed information on the "type of impacts" has also been deleted: specifically, whether they are widespread/systemic in contexts in which the company operates or whether they are isolated incidents. Some parts have been moved to ESRS 2 – here there could be a risk that the specific focus on the "affected communities" will be lost due to the shift to the general ESRS 2, e.g. reporting obligations in the area of human rights, which were originally part of ESRS S3-1 (16th), have now been moved to ESRS 2 (GDR-P) and weakened in terms of content.	S3		
Excels	Chamber of Labour, Austria	Trade union	Austria				Furthermore, the BAK is critical of the following changes in concrete terms: 1. Elimination of negative reporting obligations with regard to "Processes for engaging with affected communities about impacts" (formerly S3-2, 24.) and "Process to remediate negative impacts and channels for affected communities to raise concerns" (formerly S3-3, 29.) 2. Formerly S3-3, 19.: "subject to the relevant privacy regulation", companies must report on human rights violations in connection with "affected communities". The restriction could serve as a loophole for companies. 3. Companies are no longer required to disclose whether and to what extent they have taken into account the role of their business model in creating, exacerbating or mitigating material impacts on affected communities, and how the business model could be adapted to address such impacts (formerly ESRS 2 SBM-2, AR 3 and 4) 4. Deletion of the reporting obligation on the extent to which impacts on affected communities may result from the strategy or business model (formerly ESRS 2 SBM-3, AR 5) 5. Examples of special characteristics of affected communities that the company could take into account (formerly ESRS 2 SBM-3, AR 7)	S3		

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Information on the grievance mechnism should be removed from S3-2, as this is addressed in the G-standard. Alternatively, it should be noted in the DR that a reference to the Governance information is sufficient, if there is no separate channel for affected communities.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	13.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Recommend add "with affected communities, or good faith effort to engage with their legitimate representatives, or with credible proxies" as this is not always clear.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	11.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Recommend add "with affected communities, or good faith effort to engage with their legitimate representatives, or with credible proxies" as this is not always clear.	S3	S3-4 - Targets related to affected communities	19.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Recommend add "with affected communities, or good faith effort to engage with their legitimate representatives, or with credible proxies" as this is not always clear.	S3	S3-4 - Targets related to affected communities	AR 10
Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	Similar to comment for ESRS 1 Appendix A: the social susubtopics in parenthesis are not exhaustive of the sub-topic title/ human rights instruments mentioned in CSRD. Hence all parentheses should start with 'including'.	S3	S3 - Objective	4.
Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	Former disclosure of whether and how it is ensured that own practices do not cause or contribute to material negative impacts on workers in the value chain has been deleted and should be reinstated. Key part of UNGPs/OECD Guidelines and key issue in what is driving impacts at supplier levels. 'The undertaking shall disclose whether and how it takes action to avoid causing or contributing to material negative impacts on affected communities through its own practices, including, where relevant, in relation to planning, land acquisition and exploitation, finance, extraction or production of raw materials, use of natural resources, and management of environmental impacts. This may include disclosing what approach is taken when tensions arise between the prevention or mitigation of material negative impacts and other business pressures.'	S3	S3-3 - Actions and resources related to affected communities	16.
Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	The disclosure requirement should be expanded to also include metrics in addition to target, to ensure metrics are captured at topical level for S2,S3,S4. Inspiration can be taken from E4-5 including para 21: 'In addition to paragraph 20 and in accordance with [Draft] Amended ESRS 2 GDR-M, the undertaking shall report metrics related to its material impacts on biodiversity and ecosystems.'	S3	S3-4 - Targets related to affected communities	18.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I agree	The consolidation under ESRS 2 GDR-P streamlines disclosures and removes unnecessary repetition.	S3	S3-1 - Policies related to affected communities	8.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I agree	Merging S3-2 and S3-3 reduces complexity and avoids overlapping requirements, while keeping the focus on key processes, channels, and remediation.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	10.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I agree	The new S3-3 improves clarity by focusing on key actions and mitigation measures while reducing reporting complexity.	S3	S3-3 - Actions and resources related to affected communities	15.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I agree	The new S3-4 simplifies reporting by focusing on the existence, nature, and management of community-related targets. Aligning with ESRS 2 GDR-T ensures consistency across disclosures.	S3	S3-4 - Targets related to affected communities	AR 10
Excels	GKK Partners	Consultant (including software vendor)	Germany			I partially agree and partially disagree	Agree with current part-content. Suggestion to add, via additional AR, the (also in NMIG) importance of "accessibilty". Via: AR 2: "Accessibility of information is an important aspect of how the undertaking communicates its policies towards affected communities. This could include translating websites or documents, using pictures or graphics in addition to text. When disclosing on paragraph 8, if and when adopted, reflecting their specific content, the undertaking should specify concrete exam- ples of communication channels (e.g.: flyers, newsletters, dedicated websites, social media or face-to-face interactions). This include information on how the undertaking ensures that those channcels are known and accessible to the sepcific affected community." A reference to AR 5 for para. 13 might be added.	S3	S3-1 - Policies related to affected communities	AR 1
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We propose retaining former S3 27 (d) on how the undertaking involves stakeholders in ensuring the effectiveness of their grievance mechanisms, in line with GRI 2-25-e.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	13.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	For the purpose of simplification, data points on the availability of channels such as grievance mechanisms from S1, S2, S3 and S4 could be consolidated into one data point covering all categories of stakeholders and moved to ESRS 2. This would be equivalent to the consolidation done for the data point on the human rights policy commitment. This would also increase alignment with GRI 2-25. In addition, the data point could be further aligned verbatim with GRI 2-25-b and e, for greater clarity and interoperability.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	13.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	For the purpose of simplification, data points on the general approach to and processes for providing or contributing to remedy from S1, S2, S3 and S4 could be consolidated into one data point covering all categories of stakeholders and moved to ESRS 2. This would be equivalent to the consolidation done for the data point on the human rights policy commitment. This would also increase alignment with GRI 2-25. In addition, the data point could be further aligned verbatim with GRI 2-25-c, for greater clarity and interoperability.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	14.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We recommend retaining remedy actions (former S3 para 32(b)) as a stand-alone data point, in line with GRI Standard 3-3-d-ii. Having a standalone data point ensures that this information is not overlooked and it is easily identifiable by users and stakeholders.	S3	S3-3 - Actions and resources related to affected communities	16. (a)
Excels	NomoGaia	NGO	United States			I partially agree and partially disagree	Insert as a new second sentence "If the undertaking contends that FPIC has been granted, it shall describe the activity consented to." REASON: It is important to make it clear when a company claims that it has obtained FPIC so that the community and interested parties can appropriately respond.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	12.
Excels	NomoGaia	NGO	United States			I partially agree and partially disagree	Insert after "mechanism" at the end of the second sentence "and how it communicates the existence and form of access that mechanism to the affected communities." REASON: For companies' grievance mechanism, outreach (the process of informing potential claimants of the existence of grievance mechanisms and how to access them) is key. see https://warwick.ac.uk/fac/soc/law/research/centres/chrp/governance/hrandbusiness/empiricalresearch/msigrievancemechanisms/ and references cited.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	13.
Excels	NomoGaia	NGO	United States			I partially agree and partially disagree	Add a new AR: "In accordance with ESRS 2 GDR-A key actions describe all Add a new AR: "In accordance with ESRS 2 GDR-A key actions describe all actual remedies provided for negative human rights impacts." REASON: Specific remedy disclosures are essential to the usefulness of disclosures on human rights actions. see our Report at https://nomogaia.org/wp-content/uploads/2025/09/Disclosure-Report-1.pdf and draft paper https://warwick.ac.uk/fac/soc/law/research/centres/chrp/publications/corporate_disclosure_and_mhrdd_june_2026_ext.pdf.	S3	S3-3 - Actions and resources related to affected communities	17.
Excels	NomoGaia	NGO	United States			I partially agree and partially disagree	Add a new AR: "The disclosure will include the number, type (by human rights negatively impacted) and outcome of the human rights claim." REASON: These are essential metrics needed to make these disclosures useful for relevant audiences. see https://wrap.warwick.ac.uk/id/eprint/185392/ and https://warwick.ac.uk/fac/soc/law/research/centres/chrp/governance/hrandbusiness/empiricalresearch/msigrievancemechanisms/ and references cited. This is similar to the use of S1 DR 46.	S3	S3-3 - Actions and resources related to affected communities	19.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	the removal of the term "severe" from the disclosure requirements for human rights incidents across all social standards is particularly concerning. Without a clear limitation to the most serious cases, companies may be required to report even minor or less relevant incidents. This broad scope risks undermining the materiality of disclosures and contradicts the objective of simplification. Maintaining a focus on severe human rights incidents is essential to ensure that reporting remains meaningful, proportionate, and aligned with the principles of relevance and efficiency	S3	S3-3 - Actions and resources related to affected communities	19.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	the clarification should be made more clear; e.g., if a sub-sub-topic (e.g., land-related impacts) is material, shall we really report the whole sub-topic (communities' economic, social and cultural rights)? In our opinion paragraph 3 should be called "When a sub-sub-topic (mentioned in parentheses) is material, the undertaking shall report only this sub-sub-topic, not the entire sub-topic." Moreover, why is the sub-sub-topic "adequate housing and food" merged? If we don´t have an IRO on food, we can´t report on that	S3	S3-1 - Policies related to affected communities	3.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	What is meant with resources (personnel, money, time…)? Definition not clear enough. Maybe keep focus only on key actions related to material topics. Furthermore, how can "KEY" actions be identified? Delete the word "key".	S3	S3-3 - Actions and resources related to affected communities	15.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Delete the word "key".	S3	S3-3 - Actions and resources related to affected communities	16. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The content covered in para. 9 is already covered in para. 8. Therefore para. 9 should be removed to avoid repetition.	S3	S3-1 - Policies related to affected communities	9.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Please see comment for ESRS S2 para. 18 (b)	S3	S3-3 - Actions and resources related to affected communities	18.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Please see comment for ESRS S1 para. 21 (there is a mistake in the excel file and this comment si applicable for ESRS S3 - 21.)	S3	S3-4 - Targets related to affected communities	19.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Since sub-sub topics were eliminated, it is not clear why they are still indicated in brackets of sub-topics and what is expected to be disclosed. We recommend deleting them to avoid the risk of auditors requiring individual assessments for each one.	S3	S3 - Objective	4.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Regarding " The actions taken by the undertaking differ depending on its connection to the impact (causation, contribution, direct linkage), and how it has identified the actions as appropriate for addressing material impacts" it is not clear what the undertaking is expected to report on. Shall the distinction between causation, contribution and direct linkage be reported separately? In the previous version of ESRS the request was "whether the undertaking causes or contributes to a material impact" with "or" that was reflecting an alternative approach rather than the simplified requirement which seems to require three kind of impact to be disclosed separately. This is not a simplification therefore we suggest to eliminate the brackets or insert "or".	S3	S3-3 - Actions and resources related to affected communities	AR 7
Excels	UNICEF	NGO	United States			I partially agree and partially disagree	Children (all persons under the age of 18) account for almost one-third of the world's population and so are always part of communities affected by business operations. UNICEF welcomes the references to the UNGPs, OECD Guidelines, and the UN Declaration on the Rights of Indigenous People; however, we believe that the UN Convention on the Rights of the Child should be added. Further, for consistency with ESRS S1 and ESRS S2, the European Convention on Human Rights, the European Social Charter, and the Charter of Fundamental Rights of the EU could also be added. This is supported by Recital 49 of the CSRD, which references a more complete range of international human rights instruments relevant for ESRS S3.	S3	S3 - Objective	2.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	UNICEF	NGO	United States			I disagree	The removal of the term "for example" from the list of economic, social, cultural, civil, and political rights of relevance to ESRS S3 is highly problematic and contradicts one of the core tenets of human rights-based approaches. For example, Principle 18 of the UNGPs states that companies "should include all internationally recognized human rights as a reference point, since enterprises may potentially impact virtually any of these rights." By removing the term "for example", ESRS 3 becomes a narrower list of sub-topics, creating the risk that companies will use this list as an exhaustive checklist, rather than considering the full range of economic, social, cultural, civil, and political rights relevant to affected communities. There are many examples, but the rule of law (UDHR 6–11), education (UDHR 16), and culture (UDHR 27) are all human rights that companies may impact in affected communities. Referencing all potentially relevant human rights, not just a subset, is significant in the context of emphasizing a "fair presentation framework" and entity-specific disclosures, as it provides the full range of potential impacts for companies to consider.	S3	S3 - Objective	4.
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	It is unclear why the interactions are limited to S1 and S2, excluding ESRS S4 while the 4 social standards are connected in the Set 1. For instance, the general approach to providing remedies and/or grievance mechanisms is equally relevant to own workforce, consumers, value chain workers, and affected communities. We recommend clarifying these interactions and extending them to ESRS S4 to reflect this broader applicability.	S3	S3 - Interaction with other ESRS	7.
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We recommend slightly revising the wording of this AR, as the phrasing of amended AR 11 was, in our view, clear. One example of possible redrafting is: "Among the policy aspects that can be disclosed, the undertaking can provide an illustration of the types of communication of its policies to those individuals, group of individuals or entities for whom they are relevant, either because they are expected to implement them (for example, the undertaking's employees, contractors and suppliers), or because they have a direct interest in their implementation (for example, own workers and investors)." In the current writing, starting with the term "channels" may be misleading, as it overlaps with the terminology used in DR S3-2.	S3	S3-1 - Policies related to affected communities	AR 1
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We invite EFRAG to revise the numbering (typo to be corrected). §17 and §18 should indeed be renumbered as §16(a) and §16(b), in line with the approach applied in DR S2-3 and S4-3 of EDs ESRS S2 and S4.	S3	S3-3 - Actions and resources related to affected communities	17.
Excels	University of Warwick, Coventry, United Kingdom	Academia	United Kingdom			I partially agree and partially disagree	Insert as a new second sentence "If the undertaking contends that FPIC has been granted, it shall describe the activity consented to." REASON: It is important to make it clear when a company claims that it has obtained FPIC so that the community and interested parties can appropriately respond.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	12.
Excels	University of Warwick, Coventry, United Kingdom	Academia	United Kingdom			I partially agree and partially disagree	Insert after "mechanism" at the end of the second sentence "and how it communicates the existence and form of access that mechanism to the affected communities." REASON: For companies' grievance mechanism, outreach (the process of informing potential claimants of the existence of grievance mechanisms and how to access them) is key. see https://warwick.ac.uk/fac/soc/law/research/centres/chrp/governance/hrandbusiness/empiricalresearch/msigrievancemechanisms/ and references cited.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	13.
Excels	University of Warwick, Coventry, United Kingdom	Academia	United Kingdom			I partially agree and partially disagree	Add a new AR: "In accordance with ESRS 2 GDR-A key actions describe all Add a new AR: "In accordance with ESRS 2 GDR-A key actions describe all actual remedies provided for negative human rights impacts." REASON: Specific remedy disclosures are essential to the usefulness of disclosures on human rights actions. see our Report at https://nomogaia.org/wp-content/uploads/2025/09/Disclosure-Report-1.pdf CITE DISCLOSRUE PAPER.	S3	S3-3 - Actions and resources related to affected communities	17.
Excels	University of Warwick, Coventry, United Kingdom	Academia	United Kingdom			I partially agree and partially disagree	Add a new AR: "The disclosure will include the number, type (by human rights negatively impacted) and outcome of the human rights claim." REASON: These are essential metrics needed to make these disclosures useful for relevant audiences. see https://wrap.warwick.ac.uk/id/eprint/185392/ and https://warwick.ac.uk/fac/soc/law/research/centres/chrp/governance/hrandbusiness/empiricalresearch/msigrievancemechanisms/ and references cited. This is similar to the use of S1 DR 46.	S3	S3-3 - Actions and resources related to affected communities	19.
Excels	BDO	Auditor	Belgium			I partially agree and partially disagree	"Subject to the relevant privacy regulation" - This is ambiguous, and requires clarification about whether this statement refers to local privacy regulations or GDPR etc.	S3	S3-3 - Actions and resources related to affected communities	17.
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I agree	Assessing the effectiveness of grievance mechanisms or community engagement channels goes beyond reasonable due diligence expectations and is hardly measurable. Disclosure should focus on the existence, accessibility, and design of such processes, not on their effectiveness assessment.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	10.
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The consolidation of engagement, grievance channels, and remedy into one disclosure requirement simplifies the architecture but reduces clarity. The different dimensions should remain more clearly separated or at least sub-structured to avoid confusion and to align with UNGP sequencing.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	11.
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The deletion of the negative disclosure datapoint (requirement to state explicitly when no engagement or grievance channels exist) reduces transparency. Users may no longer know whether absence of disclosure means absence of mechanisms. A minimum negative disclosure requirement should be retained.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	24

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The removal of datapoints on positive impacts (e.g., capacity-building for local livelihoods) narrows the focus almost exclusively to risks and negative impacts. Positive contributions should also be disclosed to ensure a balanced view.	S3	S3-3 - Actions and resources related to affected communities	16.
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	While we support the removal of the word "severe" for alignment with SFDR, the current reliance only on "materiality of information" risks creating uncertainty for preparers. We propose clarifying that materiality assessments of human rights incidents should be guided by the UN Guiding Principles on Business and Human Rights, giving particular consideration to incidents with severe consequences (in terms of scale, scope and remediability).	S3	S3-3 - Actions and resources related to affected communities	19.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	Since sub-sub topics were eliminated, it is not clear why they are still indicated in brackets of sub-topics and what is expected to be disclosed. We recommend deleting them to avoid the risk of auditors requiring individual assessments for each one.	S3	S3 - Objective	4.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	The removal of the term "severe" from the disclosure requirements for human rights incidents across all social standards is particularly concerning. Without a clear limitation to the most serious cases, companies may be required to report even minor or less relevant incidents. This broad scope risks undermining the materiality of disclosures and contradicts the objective of simplification. Maintaining a focus on severe human rights incidents is essential to ensure that reporting remains meaningful, proportionate, and aligned with the principles of relevance and efficiency	S3	S3-3 - Actions and resources related to affected communities	19.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	Regarding " The actions taken by the undertaking differ depending on its connection to the impact (causation, contribution, direct linkage), and how it has identified the actions as appropriate for addressing material impacts" it is not clear what the undertaking is expected to report on. Shall the distinction between causation, contribution and direct linkage be reported separately? In the previous version of ESRS the request was "whether the undertaking causes or contributes to a material impact" with "or" that was reflecting an alternative approach rather than the simplified requirement which seems to require three kind of impact to be disclosed separately. This is not a simplification therefore we suggest to eliminate the brackets or insert "or".	S3	S3-3 - Actions and resources related to affected communities	AR 7
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	Inconsistency of "severe": the classifier "severe" has been removed for human rights incidents connected with s3-affected communities. This signficiantly broadens the scope of what a company may be expected to disclose as a human rights impact. Potentially in the pursuit of simplification, this has signficantly increased the reporting scope by removing an imporant classifyer. This would thus become a very different datapoint than what wave 1 companies reported on for FY2024. In accordance with the concept of risk-based due diligence, Equinor believes in including a risk-classifier word ("severe") regarding disclosures on human rights incidents. Otherwise, the scope is too large. There should, additionally, be consistency in including the "severe" classifier across S1, S2 and S3 (this is not the case in the current draft standard).	S3	S3-3 - Actions and resources related to affected communities	19.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I partially agree and partially disagree	Inconsistent reference to human rights instruments across social chapters: The social objectives text (S1 objective (para 2), S2 objectivee (para 2), and S3 objective (para 2)) are not consistent in which specific international / European HR instruments they make reference to. We suggest to align so as not to communicate that certain conventions only apply to certain stakeholders. Ref. extract from relevant sections below: SEE: S1: "... the extent to which the undertaking aligns or complies with international and European human rights instruments and conven+ons, including the Interna+onal Bill of Human Rights, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Mul+na+onal Enterprises..." S2: " ...the extent to which the undertaking aligns or complies with interna+onal and European human rights instruments and conventions, including the Interna+onal Bill of Human Rights, the UN Guiding Principles on Business and Human Rights..." S3: "...understanding of the extent to which the undertaking aligns or complies with internaBonal and European human rights instruments and convenBons, including the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for MultinaBonal Enterprises, and the UN Declaration on the Rights of Indigenous People."	S3	S3 - Objective	2.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	The currently applicable version (ESRS S3 paragraph 20) specifies that disclosures on engagement with affected communities refer to material impacts on them. In the proposed draft ESRS S3 paragraph 10, this clarification has been removed. In addition, the proposed draft ESRS S3 paragraph 11 refers to actual and potential impacts on the affected communities, without specifying that this only concerns material impacts. This raises the question of whether section S3-2 is intended to address engagement more generally, without reference to material impacts. If the intention is to preserve the current meaning, in our view this should be explicitly clarified, confirming that engagement relates specifically to material impacts.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	11.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	Draft AR 2 states that the engagement with affected communities can take different forms, such as information. Whereas, Annex II Acronyms and Glossary of Terms defines stakeholder engagement as an ongoing process of interaction and dialogue between the undertaking and its stakeholders that enables the undertaking to hear, understand and respond to their interests and concerns. It is recommended to harmonise these formulations so that the concept of engagement is applied consistently across the standard.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	AR 2
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	In our view, companies should disclose the processes through which they support the availability of the channels available to affected communities to bring their concerns or needs within their business relationships. This would show whether such mechanisms are effectively implemented in practice rather than existing only formally, and would give stakeholders a clearer picture of the real effectiveness of due diligence and ethical standards across the company's wider network.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	13.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	It seems GDR-M does not apply to this standard. Should it be mention here then?	S3	S3 - Objective	5.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	To be added "If applicable", since this might not matter to all companies.	S3	S3-1 - Policies related to affected communities	9.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	same comment as per ESRS S1, S2. Since it seems information about channels is important from a social perspective, we would suggest to add this requirement in the ESRS 2 GDR-P	S3	S3-1 - Policies related to affected communities	AR 1
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	I would suggest to add the possibility to bring the S1-2, S2-2 and S3-2 disclosure requirements together, if they are referred to the Speak Up/whistleblowing channel to avoid duplications	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	10.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	what about if the undertaking has not implemented any channel?	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	14.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	We suggest that these disclosure requirements undergo a more comprehensive review, so they fully capture all impacts—positive as well as negative—instead of placing particular emphasis on adverse effects.	S3	S3-3 - Actions and resources related to affected communities	17.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	We suggest that these disclosure requirements undergo a more comprehensive review, so they fully capture all impacts—positive as well as negative—instead of placing particular emphasis on adverse effects.	S3	S3-3 - Actions and resources related to affected communities	AR 8
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS S3 Affected Communities , when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, and targets (if in place), dependencies when relevant, metrics and financial effects Suggestion: When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS S3 Affected Communities , when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, metrics and targets (if in place), dependencies when relevant, metrics and financial effects.	S3	ESRS S3 - Objective	1.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Unnecessary duplication: The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M. In particular: (a) if the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact; (b) the undertaking may present the description of its material impacts, risks and opportunities, in accordance with [Draft] Amended ESRS 2 IRO-2, alongside information about its policies, actions, targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative Suggestion: The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M. In particular: (a)if the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact; (b)the undertaking may present the description of its material impacts, risks and opportunities, in accordance with [Draft] Amended ESRS 2 IRO-2, alongside information about its policies, actions, targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative .	S3	ESRS S3 - Objective	5.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	The draft provides for an amendment consolidating DR SX-2 and DR SX-3 from Standards S1 to S4 into a single DR SX-2, in view of the interrelation between the three elements engagement, channels for raising concerns, and remediation. This consolidation would result in the renumbering of all DRs in Standards S1 to S4 by minus one. Such renumbering would entail considerable effort for updating all external and internal documentation and publications. A reduction of this administrative burden would therefore be appropriate.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	10.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	The list of “marginalised” communities (“for example, women, girls, migrants, people with disabilities”) reflects a certain level of prejudice. It would be better to rephrase this as “potentially vulnerable” and review or remove the examples provided. A clear definition of “vulnerable” is also needed. Furthermore, limiting the scope to the reporting year can obscure long-term relationships. Engagement, decisions, and impacts all develop over a multi-year perspective. While the one-year timeframe is relevant as the reporting focus, it should not serve as a boundary in itself.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	11.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	The focus is entirely on negative impacts, without recognizing that many initiatives can generate positive impacts without requiring any remediation effort. Overall, the standard places its emphasis on the negative side rather than on promoting the well-being of communities.	S3	S3-3 - Actions and resources related to affected communities	16.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	The limitation due to privacy, without accompanying alternative requirements, is too broad.	S3	S3-3 - Actions and resources related to affected communities	19.
Excels	Allianz SE	Insurance	Germany			I partially agree and partially disagree	The previous paragraph ESRS S3.36 requested the disclosure of only "severe human rights issues and incidents". The new paragraph S3.17 extends the scope to the disclosure of "human rights incidents. In order to ensure consistency (e.g. with SFDR), the word "severe" should be reinserted. With regard to the determination of "severe" human rights impacts, the definition of the United Nations Guiding Principles on Business and Human Rights should be adopted.	S3	S3-3 - Actions and resources related to affected communities	17.
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	deletion of “severe” leads to difference to SFDR requirement and should therefore be changed again and “severe” should be added, otherwise, extended reporting burden	S3	S3-3 - Actions and resources related to affected communities	19.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	At the end of the sentence the following should be added "and indicate all identified material negative impacts and risks that remained unaddressed by actions during the reporting year"	S3	S3-3 - Actions and resources related to affected communities	15.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	At the end of the sentence the following should be added "against each action disclosed under DR G1-2".	S3	S3-4 - Targets related to affected communities	18.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	It should also include at least reference to ESRS S4 Consumers and end-user, as they may be special group of consumers and/or end-users of products or services provided by the undertaking.	S3	S3 - Objective	7.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	Whole phrase "human rights incidents" should be in bold as it is a separate defined term.	S3	S3-3 - Actions and resources related to affected communities	AR 9
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	"directly their attention" should be replaced with "directly its attention"	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	13.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	It is stated that paragraph 1 (a)–(d) has now been consolidated into a single paragraph 1. However, the original sub-paragraphs (a) to (d) provided essential guidance on how an undertaking may report on affected communities—for example, how its activities impact these communities and what actions are being taken in response.The revised paragraph 1 now only refers broadly to material risks and opportunities, which removes valuable context.	S3	S3-1 - Policies related to affected communities	
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Assesses the effectiveness of channels available to affected communities to bring theier concerns or needs directly to their attention and have them adressed is impossible in this context.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	13.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It no longer refers only to “severe human rights issues and incidents” but to “human rights incidents” in general. The term “severe” should be reintroduced here. In the Log of Amendments, “severe” is still included in the text.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	19.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	More guidance is necessary for this DR. As it currently stands, it is not clear to us what the objective here is. Experience shows companies tend to resort to boilerplate disclosures here, such as repetition of UNGPs (e.g. if we cause, we provide remedy, if we contribute, we participate in providing remedy) which is of little benefit to users.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	14.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	We do not fully understand this AR. In particular the concept of "harms identified" (vs. actual impacts) is unclear, and as such we suggest further editing this AR for clarity / understandability.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	AR 6
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	If incidents have been reported, the fact that such reporting has been done should always be disclosed. As such, suggest removing the caveat "subjecto to privacy rules" from the beginning of the DR to replace the other caveat, "if applicable" later in the DR.	S3	S3-3 - Actions and resources related to affected communities	19.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	DR 16 is not really a DR and it could be combined with the following two DRs (17 and 18), as is done e.g. in S2. In addtion to key actions taken and how the company tracks their affectiveness, companies should also be required to disclose, whether they have assessed their own involvement to the impacts and what the conclusion of such assessments are. As noted in the related AR, actions that companies are expected to take differ depending on their involvement (cause, contribute, linked to) to the impact. The only way for users to assess whether companies actions are appropriate and adequate is for them to be transparent about their level of involvement.	S3	S3-3 - Actions and resources related to affected communities	16.
Excels	Finnwatch ry	NGO	Finland			I partially agree and partially disagree	It is not clear how this AR related to para. 8.	S3	S3-1 - Policies related to affected communities	AR 1
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Since sub-sub topics were eliminated, it is not clear why they are still indicated in brackets of sub-topics and what is expected to be disclosed. We recommend deleting them to avoid the risk of auditors requiring individual assessments for each one	S3	S3 - Objective	4.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Regarding " The actions taken by the undertaking differ depending on its connection to the impact (causation, contribution, direct linkage), and how it has identified the actions as appropriate for addressing material impacts" it is not clear what the undertaking is expected to report on. Shall the distinction between causation, contribution and direct linkage be reported separately? In the previous version of ESRS the request was "whether the undertaking causes or contributes to a material impact" with "or" that was reflecting an alternative approach rather than the simplified requirement which seems to require three kind of impact to be disclosed separately. This is not a simplification therefore we suggest to eliminate the brackets or insert "or"	S3	S3-3 - Actions and resources related to affected communities	AR 7
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The removal of the term "severe" from the disclosure requirements for human rights incidents across all social standards is particularly concerning. Without a clear limitation to the most serious cases, companies may be required to report even minor or less relevant incidents. This broad scope risks undermining the materiality of disclosures and contradicts the objective of simplification. Maintaining a focus on severe human rights incidents is essential to ensure that reporting remains meaningful, proportionate, and aligned with the principles of relevance and efficiency	S3	S3-3 - Actions and resources related to affected communities	19.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I agree	We support the changes proposed.	S3	S3-4 - Targets related to affected communities	4.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Potential mistake: The paragraph does no longer refer only to "severe human rights issues and incidents" but to "human rights incidents" in general. The term "severe" should be therefore reintroduced, since it is still included in the log of amendments.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	19.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Information on the grievance mechnism should be removed from S3-2, as this is addressed in the G-standard. Alternatively, it should be noted in the DR that a reference to the Governance information is sufficient, if there is no separate channel for affected communities.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	13.
Excels	Statkraft AS	Preparer (non-financial preparing a sustainability report)	Norway			I agree	Agree with the changes whereby no ESRS 2 specifications for SBM in the topical standards. Reduce repetition.	S3	S3 - Interaction with other ESRS	7.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The requirement to describe workforce policies and specify coverage for "specific groups" is overly granular, lacks a clear legal basis in the CSRD, and creates unnecessary reporting complexity. The CSRD only requires information "necessary to understand the undertaking's impacts on sustainability matters." The level of detail demanded here—especially the breakdown by sub-groups—exceeds the directive's intent and imposes a disproportionate burden on companies, particularly those with complex or international structures. This requirement is also redundant with disclosures already required under ESRS 2, leading to double reporting and further increasing complexity. To ensure legal certainty, proportionality, and practical feasibility, the obligation to specify coverage by "specific groups" should be deleted.	S3	S3-1 - Policies related to affected communities	8.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	The requirement to disclose channels and grievance mechanisms is redundant, as grievance mechanisms are already addressed in the Governance standard (G-standard). Duplicating this requirement increases the reporting burden and risks inconsistent reporting. The obligation to explain the effectiveness of these channels is vague and impractical, especially for large or global undertakings. To ensure clarity, comparability, and proportionality (Art. 5(4) TEU), this requirement should be deleted or streamlined.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	10.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This paragraph is structurally redundant and substantively problematic. It creates unnecessary complexity by placing a target-setting requirement in a topical standard that is governed entirely by the general standard, ESRS 2 GDR-T. This cross-reference is flawed: The requirement forces the disclosure of specific targets related to value chain workers that often constitute strategic business secrets.	S3	S3-3 - Actions and resources related to affected communities	15.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	To ensure consistency between the SFDR and the ESRS, the term "severe" should be reintroduced. The meaning of "incidents" varies across standards; if the intention is to report complaints filed through specific channels, this should be explicitly stated. If the requirement concerns actual, confirmed incidents, this must also be clearly indicated. Only confirmed incidents should be subject to reporting. The term "substantiated" should be included directly in the Disclosure Requirement, not only in the Application Requirements, to provide legal clarity and prevent over-reporting of unverified cases.	S3	S3-3 - Actions and resources related to affected communities	AR 9
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	While engagement with affected communities can provide valuable qualitative insights, this requirement lacks clear boundaries and practical guidance. The expectation to engage with "legitimate representatives or credible proxies" is vague and may be unworkable in practice, especially for companies operating in diverse or international contexts where identifying such representatives is complex and sometimes legally sensitive. Moreover, the effectiveness of management actions should be assessed based on objective, material outcomes rather than subjective feedback alone. Over-reliance on engagement as a performance metric risks inconsistent reporting and may not reflect actual improvements in managing negative impacts. The standard should clarify the criteria for identifying legitimate representatives and credible proxies, and emphasise that engagement is only one of several tools for evaluating effectiveness. Objective, material indicators should remain the primary basis for performance assessment, with engagement results used as supplementary context.	S3	S3-4 - Targets related to affected communities	AR 10
Excels	BDO Poland	Auditor	Poland			I partially agree and partially disagree	While this paragraph addresses the existence and effectiveness of grievance mechanisms, it omits the requirement to disclose whether affected communities are aware of, can access, and trust these mechanisms. These are critical effectiveness criteria under UNGP Principle 31. Without such information, it is impossible to assess whether the mechanisms are truly functional, especially in contexts with power asymmetries, low literacy, or limited digital access. Reinserting a disclosure requirement on accessibility, awareness, and trust would enhance both transparency and practical accountability.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	13.
Excels	ASSIREVI	Auditor	Italy			I disagree	We suggest to remove this AR, considering that the information has been already deleted from GDR-P.	S3	S3-1 - Policies related to affected communities	AR 1
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We propose to restore the existing para. 32(c) to provide a more comprehensive overview that also includes actions relating to positive impacts, and not only those linked to negative impacts	S3	S3-3 - Actions and resources related to affected communities	16.
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We propose to restore the existing para. 34 to provide a more comprehensive overview that also includes actions related to risks and opportunities, and not only those related to impacts	S3	S3-3 - Actions and resources related to affected communities	16.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Further clarity on the expectations around remediation obligations which vary under the UNGPs (based on the type of connection i.e. cause, contribute, directly linked) would be beneficial.	S3	S3 - Objective	1.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The objective described in para. 1 of each draft topical ESRS is inconsistent with Draft ESRS 1. The statement about "dependencies when relevant" and "financial effects" should be deleted to make it consistent with ESRS 1. Change the wording to: "When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS S3 Affected Communities when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, metrics and targets (if in place)."	S3	S3 - Objective	1.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Remove parts (a) and (b) and keep the introductory paragraph to avoid unnecessary dupplication. Paragraph 5 should read as follows: "The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M."	S3	S3 - Objective	5.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I agree	One of the positive outcomes is that the UNGP's effectiveness criteria is now better embedded into the reporting requirements of grievance mechanisms.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	13.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The concept of incidents and how to identify them is still unclear. Among Disclosure Requirements, Application Requirements and the Glossary there are several definitions of incidents and confirmed/substantiated incidents. We suggest the best approach would be having specific definitions for each case (e.g. human rights incidents, incidents of corruption and bribery, etc.) and presenting them under the related application requirements. Such definitions would then include detailed explanations of: a) the scope of the matter (e.g. "discrimination at work on the grounds of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation, or other relevant forms of discrimination, including harassment"); and b) the type of instances that trigger the reporting of the corresponding metrics (e.g. "judicial and non-judicial proceedings that have been initiated such as cases before domestic courts, mediation, complaints filed with the National Contact Points for OECD Multinational Enterprises"). In our view the best path to support simplification in relation to point (b) above would be to focus on incidents that have been confirmed through a final decision issued by a court of law or relevant authorities.	S3	S3-3 - Actions and resources related to affected communities	19.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	To align with the simplification approach, we suggest reformulating as follows: "if the undertaking engaged directly with affected communities, their legitimate representatives, or with credible proxies that have insight into their situation for the purpose of target-setting and/or tracking performance against those targets, it shall disclose this fact when disclosing in accordance with [Draft] Amended ESRS 2 GDR-T"	S3	S3-4 - Targets related to affected communities	21.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	The FPIC principles encompass situations requiring good faith consultations with the objective of achieving consent of indigenous people and situations requiring their consent. Therefore, we suggest replacing "their right to" with "the principle of" before the wording "free, prior and informed consent ('FPIC')" in the text. FPIC is not a one-size-fits-all concept. Its interpretation varies across jurisdictions, and its implementation must reflect both international norms and domestic legal contexts.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	12.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Here, a uniform assessment of the effectiveness of the channels available to affected communities might be difficult since these processes often dependepen on specific circumstances.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	13.
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	This paragraph mixes up two separate fact situations and international norms: a consultation obligation regarding corporate activities affecting the lands or territories of communities (Art. 32 UNDRIP), and the relocation of communities, requiring their consent (Art. 16 ILO Convention 169; Art. 10 UNDRIP).	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	AR 3
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	Considering any legal disputes related to land rights and to the free, prior and informed consent (FPIC) of indigenous peoples when determining human rights incidents can be burdensome.	S3	S3-3 - Actions and resources related to affected communities	AR 9
Excels	DRSC	(National) standard setter	Germany			I disagree	The added value of this requirement is not apparent, as the information in the sustainability report should be consistent anyway. Either the exact interaction referred to should be clarified, or this paragraph should be deleted.	S3	S3 - Interaction with other ESRS	7.
Excels	DRSC	(National) standard setter	Germany			I disagree	NMIG 1 for para. 8 Communication channels were removed from MDR-Ps, why bringing them up here introducing additional requirements (even as "possible elements")? If the guidelines on how to disclose information on policies are not streamlined in ESRS 2, this will lead to different way of presentation across the standards. Possible solution: streamline in ESRS 2 or eliminate completely.	S3	S3-1 - Policies related to affected communities	8.
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG Previously (ESRS S3.36), the focus was only on "severe human rights incidents". Indicator No. 14 in table III of annex I to Delegated Regulation (EU) 2022/12888 also refers to "severe human rights issues and incidents". In order to ensure consistency between the SFDR and the ESRS, the word "severe" should be reinserted. With regard to the determination of "severe" human rights impacts, the definition of the United Nations Guiding Principles on Business and Human Rights should be adopted.	S3	S3-3 - Actions and resources related to affected communities	19.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	In order to limit boiler plate texts and increase the relevance and readability of the disclosure, we suggest requiring only disclosures if there is no grievance mechanism	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	13
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	The amended wording replaces "number of severe human rights [incidents/issues]" with "number of human rights [incidents/issues]." This broadens the scope from substantiated, high-impact cases to potentially all recorded incidents, regardless of severity. It also risks undermining alignment with SFDR PAI Indicator #14, which refers to "identified cases of severe human rights issues and incidents". We recommend reintroducing the qualifier "severe" to ensure conceptual clarity and consistency. ESRS S2, S3 and S4 are not classified as metric-containing standards (ESRS 2 AR 37). However, the phrase "disclose these" in DR S3-3 § 19 implies quantitative disclosure, creating confusion about whether these should be treated as metrics and how they fit into the overall metrics and targets framework.	S3	S3-3 - Actions and resources related to affected communities	19
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The clarification should be made more clear; e.g., if a sub-sub-topic (e.g., land-related impacts) is material, shall we really report the whole sub-topic (communities´ economic, social and cultural rights)? In our opinion paragraph 3 should be called "When a sub-sub-topic (mentioned in parentheses) is material, the undertaking shall report only this sub-sub-topic, not the entire sub-topic."	S3	S3-1 - Policies related to affected communities	3.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Why is the sub-sub-topic "adequate housing and food" merged? If we don´t have an IRO on food, we can´t report on that	S3	S3-1 - Policies related to affected communities	3.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The requirement to state actions is clear but what is meant with the term resources (personnel, money, time…)? Definition not clear enough. Maybe keep focus only on key actions related to material topics. Furthermore, how can "KEY" actions be identified? Either delete the word "key" or mention in the glossary: "The company may defined themselves the thresholds for key actions." OR "Key actions are those most relevant for strategy and business modell and are at the heart of the company." for example.	S3	S3-3 - Actions and resources related to affected communities	15.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	How can "KEY" actions be identified? Either delete the word "key" or mention in the glossary: "The company may defined themselves the thresholds for key actions." OR "Key actions are those most relevant for strategy and business modell and are at the heart of the company." for example.	S3	S3-3 - Actions and resources related to affected communities	16. (a)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Recommend add "with affected communities, or good faith effort to engage with their legitimate representatives, or with credible proxies" as this is not always clear.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	11.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Recommend add "with affected communities, or good faith effort to engage with their legitimate representatives, or with credible proxies" as this is not always clear.	S3	S3-4 - Targets related to affected communities	19.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Recommend add "with affected communities, or good faith effort to engage with their legitimate representatives, or with credible proxies" as this is not always clear.	S3	S3-4 - Targets related to affected communities	AR 10
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Inconsistent with other Social ESRS, as it states, "shall be consistent with" instead of "shall be read in conjunction with".	S3	Interactions with other ESRS	7
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	It is unclear why AR8 only covers some of the requirements originally under para 9b and whether omission of other requirements such as the consideration of systemic / widespread risks and incidents are deliberate or an oversight. These are also not covered within ESRS2.	S3	S3-3 - Actions and resources related to affected communities	AR 8
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Unclear why disclosures relating to positive impacts, risks and opportunities have been removed. As per ESRS2, if a material IRO has been identified then GDR-A should be followed but then removing the requirement from S3 and only retaining explicit reference to negative impacts creates confusion	S3	S3-3 - Actions and resources related to affected communities	16.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Although we are fully aligned to keep reporting of severe human rights incidents as part of the SFDR requirements, it is unclear why these requirements have not been grouped under one section to clarify all Human rights requirements in one place. In addition, it is unclear if general non complinaces with the UNGP has been deliberately removed or if this is an oversight. Further, a clearer definition of what should be considered as a severe human rights incident must be provided to allow comparability e.g. does AR9 include all the incidents that should be reported or is this just an example	S3	S3-3 - Actions and resources related to affected communities	19.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	We ask for clarity related to paragraph 17, which singles out disclosure of key actions to manage only material negative impacts. however the immeditately preceeding paragraph, DR 15, requires disclosure in accordance with GDR-A which requires disclosure of key actions in relation to all material impacts, risks and opportunities. Furthermore, the old paragraph S3-4 DR 32. (c) relating to the dsiclosure of key actions in relation to positive impacts has been deleted from mandatory and moved to NMIG. Is it the intention of the EFRAG to only keep the disclosures of key actions in relation to material negative impacts related to Affected Communities as a manadatory DR and all key actions in relation to material positive impacts, risks and oppotunities as voluntary?	S3	S3-3 - Actions and resources related to affected communities	17.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Consolidate the data point on particular policy provisions on preventing and addressing impacts on indigenous peoples with the general description of policies (§8-9) to streamline reporting	S3	S3-1 - Policies related to affected communities	9.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Move the data point (§12) on the consideration of the rights of indigenous peoples in the stakeholder engagement approach to AR, as indigenous peoples are one category of affected communities	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	12.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Reframe the datapoints on the process for engaging with affected communities and how the perspectives of affected communities inform the undertaking's decisions or activities in connection with ESRS 2 SBM-2, while highlighting key information (material IROs); current drafting is overly granular. Proposed wording: "In addition to the general information disclosed under ESRS 2 SBM-2 on interests and views of stakeholders, the undertaking shall provide information on the type of value chain workers, affected communities, consumers and end users subject to material impacts, the nature of these impacts (i.e., whether they are widespread and systemic, or related to individual incidents), and whether and how the interests and views of these stakeholders inform its decisions or activities aimed at managing the related material topics/sub-topics."	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	12.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	When the undertaking has severe human rights incidents, replace "if applicable, disclose these" (overly granular) with "including, where applicable, a description of affected communities"	S3	S3-3 - Actions and resources related to affected communities	19.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	In reference to §21, delete the datapoint on whether and how the undertaking engages directly with affected communities when disclosing in accordance with ESRS 2 GDR-T as it is already adressed in S3-2	S3	S3-4 - Targets related to affected communities	19.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The clarification should be made more clear; e.g., if a sub-sub-topic (e.g., land-related impacts) is material, shall we really report the whole sub-topic (communities´ economic, social and cultural rights)? In our opinion paragraph 3 should be called "When a sub-sub-topic (mentioned in parentheses) is material, the undertaking shall report only this sub-sub-topic, not the entire sub-topic."	S3	S3-1 - Policies related to affected communities	3.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Why is the sub-sub-topic "adequate housing and food" merged? If we don´t have an IRO on food, we can´t report on that	S3	S3-1 - Policies related to affected communities	3.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The requirement to state actions is clear but what is meant with the term resources (personnel, money, time...)? Definition not clear enough. Maybe keep focus only on key actions related to material topics. Furthermore, how can "KEY" actions be identified? Either delete the word "key" or mention in the glossary: "The company may defined themselves the thresholds for key actions." OR "Key actions are those most relevant for strategy and business modell and are at the heart of the company." for example.	S3	S3-3 - Actions and resources related to affected communities	15.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	How can "KEY" actions be identified? Either delete the word "key" or mention in the glossary: "The company may defined themselves the thresholds for key actions." OR "Key actions are those most relevant for strategy and business modell and are at the heart of the company." for example.	S3	S3-3 - Actions and resources related to affected communities	16. (a)
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I agree	.	S3	S3-1 - Policies related to affected communities	8.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Recommend add "with affected communities, or good faith effort to engage with their legitimate representatives, or with credible proxies" as this is not always clear.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	11.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				(This relates to the whole S3, but S3-2 is most directly relevant) — there should be an expectation that communications/engagements with affected communities are conducted in relevant local languages, where applicable.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	13.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Recommend add "with affected communities, or good faith effort to engage with their legitimate representatives, or with credible proxies" as this is not always clear.	S3	S3-4 - Targets related to affected communities	19.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Recommend add "with affected communities, or good faith effort to engage with their legitimate representatives, or with credible proxies" as this is not always clear.	S3	S3-4 - Targets related to affected communities	AR 10
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	- First, the FPIC principles encompass situations requiring good faith consultations with the objective of achieving consent of indigenous people and situations requiring their consent. Therefore, we suggest replacing "their right to" with "the principle of" before the wording "free, prior and informed consent ('FPIC')" in the text. FPIC is not a one-size-fits-all concept. Its interpretation varies across jurisdictions, and its implementation must reflect both international norms and domestic legal contexts. - Second, point (iii) mentions "legislative or administrative measures that affect them", which gives to this DR a stricter formulation than art. 6 ILO 169 ("may directly affect"); art. 19 UNDRIP ("may affect"). Companies cannot be expected to consult communities about all government measures that might potentially affect them (e.g., taxes).	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	12.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Here, a uniform assessment of the effectiveness of the channels available to affected communities might be difficult since these processes often dependepen on specific circumstances.	S3	S3-3 - Actions and resources related to affected communities	13.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				(This relates to the whole S3, but S3-2 is most directly relevant) — there should be an expectation that communications/engagements with affected communities are conducted in relevant local languages, where applicable.	S3	S3-2 - Engagement with affected communities, existence of channels for affected communities to raise concerns or needs and approaches to remedy	13.
Excels	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	The requirement to disclose the annual ratio of the highest paid individual to the median remuneration of employees lacks clarity. It is not clear whether "highest paid individual" refers to an employee or to any person within the undertaking's own workforce. Published reports show inconsistent reporting practices. This should be clarified to ensure comparability.	S1	S1-15 - Remuneration metrics	44. (b)
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I disagree	§a) This new formulation does not simplify but complexify our reporting, we would suggest to come back to previous formulation	S1	S1-5 - Characteristics of the undertaking's employees	23.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	The publication of all these indicators shall be limited to employees. The mention to "other workers" should be deleted. Indeed the latency between occupational exposure, the onset of the disease, and death makes it impossible to identify deaths due to occupational diseases among subcontractors' employees, as these usually occur several years after the work was performed.	S1	S1-13 - Health and Safety metrics	AR 26
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I disagree	This indicator shall be deleted, it does not provide useful information	S1	S1-15 - Remuneration metrics	44. (b)
Excels	EDF	Preparer (non-financial preparing a sustainability report)	France			I disagree	Outside the EEA, the notion often does not exist and is therefore impossible to collect. Therefore this paragraph could be deleted.	S1	S1-7 - Collective bargaining coverage and social dialogue	27. (c)
Excels	ASD					I partially agree and partially disagree	Allow to consider information about downstream value chain as classified or sensitive information, therefore allow to apply ESRS 1 section 7.8 ("The undertaking is not required to disclose classified information or sensitive information, even if such information is considered material"), whilst maintaining the expectation to conduct reasonable downstream due diligence as practically feasible.	S4	S4-1 - Policies related to consumers and end-users	1.
Excels	ASD					I partially agree and partially disagree	We call to delete S4-2_01 because it is redundant	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	2.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	A boolean DP (whether) will complicate the structure of a generic GDR-P. Suggestion: create a separate datapoint in S4-1:"It shall state whether policies cover specific groups (for example, particular age groups) or all consumers and/or end-users." Or, create an AR to specify content (without a boolean).	S4	S4-1 - Policies related to consumers and end-users	9.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	14a) This DP would likely be overlapping with the generic GDR-A content. Transforming it to a AR would allow to include the content in the GDR-A. "The undertaking shall describe key actions taken, planned or underway to prevent, mitigate and remediate material negative impacts on consumers and/or end-users, including its approach in situations where tensions arise between such actions and other business pressures (for example, practices related to marketing, sales and data use)."	S4	S4-3 - Actions and resources related to consumers and end-users	14.
Excels	Chamber of Labour, Austria	Trade union	Austria				The BAK argues that some important nuances are lost as a result of the proposed simplifications: For example, it makes sense to design whistleblowing mechanisms and complaint channels differently, depending on whether they are designed for employees in the value chain, local communities or consumers. These are instruments that must be designed as effectively as possible in the interests of the employees, the other affected parties, but also the companies, because they enable information to be passed on quickly to the company and remedial action can be taken.	S4		
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Information on the grievance mechnism should be removed from S4-2, as this is addressed in the G-standard. Alternatively, it should be noted in the DR that a reference to the Governance information is sufficient, if there is no separate channel for end-users.	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	12.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It is recommended not to have this level of granularity to call out marginalized groups	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	11.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	We have concerns about disclosing our feedback loop from customers because sometimes it can involve ongoing litigations.	S4	S4-3 - Actions and resources related to consumers and end-users	16.
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	We agree with the first part (how the company engage with customers and how their perspectives inform company's decision or activities to manage impacts) but we disagree with the second part (how the company gains insights into the perspectives of consumers) as we consider this information does not add any value to the reporting. We propose to delete this second part.	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	11.
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	We consider additional clarification is required about the type of channels to be disclosed and the information to be reported about each of them. For a big company with B2B and B2C customers as ours, the number and varierty of channels is significantly high and it would require considerable effort.	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	12.
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	We consider it would not be necesary the whistleblowing channels to be reported here in order to avoid repetitiveness as they are already covered in ESRS G1.	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	AR 3
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	We consider the application of the "effectiveness criteria for non-judicial grievance mechanisms" as laid out in the UN Guiding Principles on Business and Human Rights is not possible to all the channels. For example, not possible for the conventional commercial channels (e.g. hotline). So we require additional clarification about how to assess the efectiveness of all the channels reported.	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	AR 4

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	We consider reporting resources about key actions to manage material IROs could be against competition when tackling consumer topics, so we propose to delete this part.	S4	S4-3 - Actions and resources related to consumers and end-users	14.
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	We think the numeration of the Amendments document is wrong from number 14 onwords as there are two number 14. Please, review and renumerate it again correctly in order to avoid confusion (from 15 to 18)	S4	S4-3 - Actions and resources related to consumers and end-users	15.
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	We agree with the first part (key actions taken, planned or underway to prevent, mitigate and remediate material negative impacts on consumers and/or end-users) but we disagree with the second part (including its approach in situations where tensions arise between such actions and other business pressures) as we consider this information does not add any value to the reporting.	S4	S4-3 - Actions and resources related to consumers and end-users	15. (a)
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	We propose this DR to be deleted as we consider it is not reasonable nor feasible for the company to track and assesse the effectiveness of these actions and initiatives in delivering outcomes for consumers and/or end-users.	S4	S4-3 - Actions and resources related to consumers and end-users	15. (b)
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	For social standards, the removal of the term "severe" from the disclosure requirements for human rights incidents across all social standards is particularly concerning. Without a clear limitation to the most serious cases, companies may be required to report even minor or less relevant incidents. This broad scope risks undermining the materiality of disclosures and contradicts the objective of simplification. Maintaining a focus on severe human rights incidents is essential to ensure that reporting remains meaningful, proportionate, and aligned with the principles of relevance and efficiency. Additionally, we consider the last part of the DR ("and, if applicable, disclose these") should be deleted.	S4	S4-3 - Actions and resources related to consumers and end-users	16.
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	We propose this DR to be deleted as we consider it should not be necessary to disclose how the company engage with customer to set targets. The way in which the objective is defined does not add any value. Whether or not there is a direct relationship with customers in the definition of objectives does not mean that a company is doing better or worse, nor is it relevant for comparing companies. The only important thing is whether or not there is an objective.	S4	S4-4 - Targets related to consumers and end-users	18.
Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	Similar to comment for ESRS 1 Appendix A: the social susubtopics in parenthesis are not exhaustive of the sub-topic title/ human rights instruments mentioned in CSRD. Hence all parentheses should start with 'including'.	S4	S4 - Objective	4.
Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	Former disclosure of whether and how it is ensured that own practices do not cause or contribute to material negative impacts on workers in the value chain has been deleted and should be reinstated. Key part of UNGPs/OECD Guidelines and key issue in what is driving impacts with business partners. 'The undertaking shall disclose whether and how it takes action to avoid causing or contributing to material negative impacts on consumers and/or end-users through its own practices, including, where relevant, in relation to marketing, sales and data use. This may include disclosing what approach is taken when tensions arise between the prevention or mitigation of material negative impacts and other business pressures.'	S4	S4-3 - Actions and resources related to consumers and end-users	15.
Excels	Danish Institute for Human Rights	NGO	Denmark			I partially agree and partially disagree	The disclosure requirement should be expanded to also include metrics in addition to target, to ensure metrics are captured at topical level for S2,S3,S4. Inspiration can be taken from E4-5 including para 21: 'In addition to paragraph 20 and in accordance with [Draft] Amended ESRS 2 GDR-M, the undertaking shall report metrics related to its material impacts on biodiversity and ecosystems.'	S4	S4-4 - Targets related to consumers and end-users	17.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I agree	The new S4-1 is more concise, focusing on the existence and scope of consumer-related policies. Moving detailed commitments and human rights alignment to ESRS 2 reduces redundancy.	S4	S4-1 - Policies related to consumers and end-users	9.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I agree	Combining engagement processes, grievance channels, and remediation avoids duplication and simplifies the disclosure. Moving frequency and type of engagement to NMIG reduces excessive detail.	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	10.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I agree	The new S4-3 focuses on key actions and resources for managing IROs, improving clarity. Referring to ESRS 2 GDR-T/GDR-M for effectiveness assessment avoids duplication.	S4	S4-3 - Actions and resources related to consumers and end-users	14.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I agree	The revised S4-4 prioritizes disclosure of target definition, performance monitoring, and stakeholder engagement, simplifying reporting. Removing detailed and speculative explanations about lessons learned or improvements reduces burden. Aligning with ESRS 2 GDR-T ensures consistency across disclosures.	S4	S4-4 - Targets related to consumers and end-users	16.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We propose retaining former S4 25 (d) on how the undertaking involves stakeholders in ensuring the effectiveness of their grievance mechanisms, in line with GRI 2-25-e.	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	12.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	For the purpose of simplification, data points on the availability of channels such as grievance mechanisms from S1, S2, S3 and S4 could be consolidated into one data point covering all categories of stakeholders and moved to ESRS 2. This would be equivalent to the consolidation done for the data point on the human rights policy commitment. This would also increase alignment with GRI 2-25. In addition, the data point could be further aligned verbatim with GRI 2-25-b and e, for greater clarity and interoperability.	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	12.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	For the purpose of simplification, data points on the general approach to and processes for providing or contributing to remedy from S1, S2, S3 and S4 could be consolidated into one data point covering all categories of stakeholders and moved to ESRS 2. This would be equivalent to the consolidation done for the data point on the human rights policy commitment. This would also increase alignment with GRI 2-25. In addition, the data point could be further aligned verbatim with GRI 2-25-c, for greater clarity and interoperability.	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	13.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	We recommend retaining remedy actions (former S4 para 31(b)) as a stand-alone data point, in line with GRI Standard 3-3-d-ii. Having a standalone data point ensures that this information is not overlooked and it is easily identifiable by users and stakeholders.	S4	S4-3 - Actions and resources related to consumers and end-users	15. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	the removal of the term "severe" from the disclosure requirements for human rights incidents across all social standards is particularly concerning. Without a clear limitation to the most serious cases, companies may be required to report even minor or less relevant incidents. This broad scope risks undermining the materiality of disclosures and contradicts the objective of simplification. Maintaining a focus on severe human rights incidents is essential to ensure that reporting remains meaningful, proportionate, and aligned with the principles of relevance and efficiency.	S4	S4-3 - Actions and resources related to consumers and end-users	15.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Very confusing why previous sub-sub-topics are sometimes moved to extra points and sometimes in brackets. This will lead to huge discussions on which level materiality is going to be defined, whether to use topics in front or in the brackets. Materiality analysis needs to be fully and new implemented due to this change. Only resonable approach: Leave out sub-topics in general and just list the previous sub-sub-topics one after each other. Furthermore, a proper mapping won't be possible like this!!	S4	S4 - Consumers and end-users	4
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Good change from "Access to (quality) information" to "Access to information" --> more streamlined and clear.	S4	S4 - Consumers and end-users	4.(a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	I understand the requirement to state actions but what is meant with resources (personnel, money, time...)? Definition not clear enough. Maybe keep focus only on key actions related to material topics. Furthermore, how can "KEY" actions be identified? Delete the word "key".	S4	S4-3 - Actions and resources related to consumers and end-users	14.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Delete the word "key".	S4	S4-3 - Actions and resources related to consumers and end-users	15. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Move to ESRS 2 like all other human rights related topics.	S4	S4-3 - Actions and resources related to consumers and end-users	16.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The sentence seems off: "..., or because they have a direct interest in their implementation are examples of policy aspects to disclose.". What does that mean? Very complex phrasing. Maybe two sentences?	S4	S4-1 - Policies related to consumers and end-users	AR 1
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Please see comment for ESRS S1 para. 21	S4	S4-4 - Targets related to consumers and end-users	17.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Please consider to include this indication only in a general section instead of in each topical standard, because it could be misleading. The same comment is applicable to all S standards.	S4	S4 - Objective	6.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Are commercial-related claims (and the related communication channels implemented with this purpose) raised from customers in the scope of this DR? Or other information are expected to be reported? Please consider to better detail this request for what concerns consumers and end-users.	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	12.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Regarding " The actions taken by the undertaking differ depending on its connection to the impact (causation, contribution, direct linkage), and how it has identified the actions as appropriate for addressing material impacts" it is not clear what the undertaking is expected to report on. Shall the distinction between causation, contribution and direct linkage be reported separately? In the previous version of ESRS the request was "whether the undertaking causes or contributes to a material impact" with "or" that was reflecting an alternative approach rather than the simplified requirement which seems to require three kind of impact to be disclosed separately. This seems not to be a simplification therefore we suggesto to eliminate the brackets or insert "or".	S4	S4-3 - Actions and resources related to consumers and end-users	AR 6
Excels	UNICEF	NGO	United States			I partially agree and partially disagree	It is unclear why this paragraph of ESRS S4 does not reference international human rights instruments in the same way that similar paragraphs do in ESRS S1, S2, and S3. Children are significant consumers and end-users of company products and services, and are especially vulnerable to adverse impacts; therefore, the UN Convention on the Rights of the Child should be referenced. However, consistent with Recital 49 of the CSRD, UNICEF believes the International Bill of Human Rights and other core UN human rights conventions also should be referenced.	S4	S4 - Objective	2.
Excels	UNICEF	NGO	United States			I disagree	The removal of the term "for example" from the list of economic, social, cultural, civil, and political rights of relevance to ESRS S4 is highly problematic and contradicts one of the core tenets of human rights-based approaches. For example, Principle 18 of the UNGPs states that companies "should include all internationally recognized human rights as a reference point, since enterprises may potentially impact virtually any of these rights." By removing the term "for example", ESRS S4 becomes a narrower list of sub-topics, creating the risk that companies will use this list as an exhaustive checklist, rather than considering the full range of economic, social, cultural, civil, and political rights relevant to consumers and end-users. There are many examples, but education (UDHR 16), peaceful assembly (UDHR 20), and culture (UDHR 27) are all human rights of relevant to consumers and end-users. Referencing all potentially relevant human rights, not just a subset, is significant in the context of emphasizing a "fair presentation framework" and entity-specific disclosures, as it provides the full range of potential impacts for companies to consider.	S4	S4 - Objective	4.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	UNICEF	NGO	United States			I disagree	UNICEF disagrees with the text of ESRS S4 - 7 stating that the unlawful use or misuse of a company's products and services by consumers and/or end-users should be excluded from this standard. There are many scenarios where unlawful use and misuse are material impacts (e.g., the use of tech-based products to facilitate online child sexual exploitation and abuse), making paragraph is very confusing for companies using the materiality filter. Removing this paragrpah would simplify ESRS S4 for preparers. Companies are already publicly addressing the issue of illegal use, and for many tech companies, this will be one of their most material impacts; it is also covered by a variety of EU laws with reporting requirements, such as the EU Digital Services Act. For these reasons, we do not believe it should be left out of a sustainability statement. While the risk of unlawful use or misuse may exist across different sectors, we believe this is especially important for companies operating in the digital environment, and these impacts will no longer be captured by sector-specific standards.	S4	S4 - Objective	7.
Excels	Forvis Mazars Group	Auditor	Belgium			I partially agree and partially disagree	It is unclear why the interactions are limited to S1 while the 4 social standards are connected in the Set 1. For instance, the general approach to providing remedies and/or grievance mechanisms is equally relevant to own workforce, consumers, value chain workers, and affected communities. We recommend clarifying these interactions and extending them to ESRS S2 and S3 to reflect this broader applicability (cf. related comment on S2 § 3 and S3 §7).	S4	S4 - Interaction with other ESRS	8.
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We recommend slightly revising the wording of this AR, as the phrasing of amended AR 13 was, in our view, clearer. One example of possible redrafting is: "Among the policy aspects that can be disclosed, the undertaking can provide an illustration of the types of communication of its policies to those individuals, group of individuals or entities for whom they are relevant, either because they are expected to implement them (for example, the undertaking's employees, contractors and suppliers), or because they have a direct interest in their implementation (for example, own workers and investors)."	S4	S4-1 - Policies related to consumers and end-users	AR 1
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	In the exposure drafts, § 14 is assigned twice to two separate datapoints (former § 30 and former § 31). This inconsistency in § numbering continues throughout ESRS S4 and shall be corrected.	S4	S4-3 - Actions and resources related to consumers and end-users	14.
Excels	BDO	Auditor	Belgium			I partially agree and partially disagree	"Subject to the relevant privacy regulation" - This is ambiguous, and requires clarification about whether this statement refers to local privacy regulations or GDPR etc.	S4	S4-3 - Actions and resources related to consumers and end-users	16.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	Since sub-sub topics were eliminated, it is not clear what is expected to be disclosed about the list of sub-sub topic, now indicated in parenthesis of sub-topics. For example, for ESRS S4: (a) information-related impacts for consumers and/or end-users (privacy, access to information, freedom of expression);	S4	S4 - Objective	4.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	Please consider to include this indication only in a general section instead of in each topical standard, because it could be misleading. The same comment is applicable to all S standards.	S4	S4 - Objective	6.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	Are commercial-related claims (and the related communication channels implemented with this purpose) raised from customers in the scope of this DR? Or other information are expected to be reported? Please consider to better detail this request for what concerns consumers and end-users	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	12.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	Regarding " The actions taken by the undertaking differ depending on its connection to the impact (causation, contribution, direct linkage), and how it has identified the actions as appropriate for addressing material impacts" it is not clear what the undertaking is expected to report on. Shall the distinction between causation, contribution and direct linkage be reported separately? In the previous version of ESRS the request was "whether the undertaking causes or contributes to a material impact" with "or" that was reflecting an alternative approach rather than the simplified requirement which seems to require three kind of impact to be disclosed separately. This seems not to be a simplification therefore we suggesto to eliminate the brackets or insert "or".	S4	S4-3 - Actions and resources related to consumers and end-users	AR 6
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I disagree	The removal of the term "severe" from the disclosure requirements for human rights incidents across all social standards is particularly concerning. Without a clear limitation to the most serious cases, companies may be required to report even minor or less relevant incidents. This broad scope risks undermining the materiality of disclosures and contradicts the objective of simplification. Maintaining a focus on severe human rights incidents is essential to ensure that reporting remains meaningful, proportionate, and aligned with the principles of relevance and efficiency.	S4	S4-3 - Actions and resources related to consumers and end-users	15.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	The currently applicable version (ESRS S4 paragraph 19) specifies that disclosures on engagement with consumers and end-users refer to material impacts on them. In the proposed draft ESRS S4 paragraph 10, this clarification has been removed. In addition, the proposed draft ESRS S4 paragraph 11 refers to actual and potential impacts on consumers and/or end-user, without specifying that this only concerns material impacts. This raises the question of whether section S4-2 is intended to address engagement more generally, without reference to material impacts. If the intention is to preserve the current meaning, in our view this should be explicitly clarified, confirming that engagement relates specifically to material impacts.	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	11.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	Draft AR 2 states that the engagement with consumers and end-users can take different forms, such as information. Whereas, Annex II Acronyms and Glossary of Terms defines stakeholder engagement as an ongoing process of interaction and dialogue between the undertaking and its stakeholders that enables the undertaking to hear, understand and respond to their interests and concerns. It is recommended to harmonise these formulations so that the concept of engagement is applied consistently across the standard.	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	AR 2

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	In our view, companies should disclose the processes through which they support or require the availability of the channels available to consumers and/or end-users to bring their concerns or needs within their business relationships. This would demonstrate whether such mechanisms are applied in practice or remain only formal, and it would allow stakeholders to better assess the effectiveness of due diligence and ethical practices across the company's broader network.	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	12.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	it is important to clarify whether and how the ESRS S4 standard applies to B2B companies. In this regard, it would be helpful for the ESRS to provide clear guidance and examples for B2B companies, acknowledging that their "customers" are often other companies. The ESRS should offer straightforward guidance and examples specifically for B2B companies, recognizing that their customers are usually other businesses. To give a complete and accurate overview, ESRS should also let B2B companies report on their impacts, risks, and opportunities related to these business customers, as well as how they address them.	S4	S4 - Objective	1.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	It seems GDR-M does not apply to this standard. Should it be mention here then?	S4	S4 - Objective	5.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	It seems GDR-M does not apply to this standard. Should it be mention here then?	S4	S4 - Objective	5. (b)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	We suggest that these disclosure requirements undergo a more comprehensive review, so they fully capture all impacts—positive as well as negative—instead of placing particular emphasis on adverse effects.	S4	S4-3 - Actions and resources related to consumers and end-users	14.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	in relation to topics such as privacy, It would be useful to let companies share their entire privacy strategy at once, instead of splitting the information by different affected stakeholder groups (S1-own workforce, S2-workers in the value chain, S4-end users and consumers). This approach would make it easier for companies to describe their overall privacy policies, actions, and targets, and to show how well they are performing on privacy matters.	S4	S4-3 - Actions and resources related to consumers and end-users	15.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS S4 Consumers and end-users, when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, and targets (if in place), dependencies when relevant, metrics and financial effects Suggestion: When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS S4 Consumers and end-users, when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, metrics and targets (if in place), dependencies when relevant, metrics and financial effects.	S4	S4 - Objective	1.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Unnecessary duplication: The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M. In particular: (a) if the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact; (b) the undertaking may present the description of its material impacts, risks and opportunities, in accordance with [Draft] Amended ESRS 2 IRO-2, alongside information about its policies, actions, targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative Suggestion: The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M. In particular: (a)if the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact; (b)the undertaking may present the description of its material impacts, risks and opportunities, in accordance with [Draft] Amended ESRS 2 IRO-2, alongside information about its policies, actions, targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative .	S4	S4 - Objective	5.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I partially agree and partially disagree	The draft provides for an amendment consolidating DR SX-2 and DR SX-3 from Standards S1 to S4 into a single DR SX-2, in view of the interrelation between the three elements engagement, channels for raising concerns, and remediation. This consolidation would result in the renumbering of all DRs in Standards S1 to S4 by minus one. Such renumbering would entail considerable effort for updating all external and internal documentation and publications. A reduction of this administrative burden would therefore be appropriate.	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	10.
Excels	Allianz SE	Insurance	Germany			I partially agree and partially disagree	The previous paragraph ESRS S4.35 requested the disclosure of only "severe human rights issues and incidents". The new paragraph S4.16 extends the scope to the disclosure of "human rights incidents. In order to ensure consistency (e.g. with SFDR), the word "severe" should be reinserted. With regard to the determination of "severe" human rights impacts, the definition of the United Nations Guiding Principles on Business and Human Rights should be adopted.	S4	S4-3 - Actions and resources related to consumers and end-users	16.
Excels	EnBW Energie Baden-Württemberg AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	deletion of "severe" leads to difference to SFDR requirement and should therefore be changed again and "severe" should be added, otherwise, extended reporting burden	S4	S4-3 - Actions and resources related to consumers and end-users	15.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	It should also include at least reference to ESRS S2 Workers in the value chain, as they may be end-users of IT systems provided by the undertaking. Also AR 1 for para. 9 refers to suppliers and contactors.	S4	S4 - Objective	8.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	At the end of the sentence the following should be added "and indicate all identified material negative impacts and risks that remained unaddressed by actions during the reporting year"	S4	S4-3 - Actions and resources related to consumers and end-users	14.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	Whole phrase "human rights incidents" should be in bold as it is a separate defined term.	S4	S4-3 - Actions and resources related to consumers and end-users	16.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	At the end of the sentence the following should be added "against each action disclosed under DR G1-2".	S4	S4-4 - Targets related to consumers and end-users	17.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	"directly their attention" should be replaced with "directly its attention"	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	12.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Reference (old paragraph 17) to the following should still be included: The undertaking shall disclose whether and how its policies with regard to consumers and/or end-users are aligned with internationally recognised instruments relevant to consumers and/or end-users, including United Nations (UN) Guiding Principles on Business and Human Rights.	S4	S4-1 - Policies related to consumers and end-users	9.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	There is no clear definition provided of consumers and end-users.	S4	S4-1 - Policies related to consumers and end-users	9.
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Reference (old paragraph 23) to the following should still be included: The undertaking shall describe the processes it has in place to provide for or cooperate in the remediation of negative impacts on consumers and end-users that the undertaking is connected with, as well as channels available to consumers and end-users to raise concerns and have them addressed.	S4	S4-3 - Actions and resources related to consumers and end-users	13.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Since sub-sub topics were eliminated, it is not clear what is expected to be disclosed about the list of sub-sub topic, now indicated in parenthesis of sub-topics. For example, for ESRS S4: (a) information-related impacts for consumers and/or end-users (privacy, access to information, freedom of expression);	S4	S4 - Objective	4.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Please consider to include this indication only in a general section instead of in each topical standard, because it could be misleading. The same comment is applicable to all S standards.	S4	S4 - Objective	6.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Are commercial-related claims (and the related communication channels implemented with this purpose) raised from customers in the scope of this DR? Or other information are expected to be reported? Please consider to better detail this request for what concerns consumers and end-users	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	12.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Regarding " The actions taken by the undertaking differ depending on its connection to the impact (causation, contribution, direct linkage), and how it has identified the actions as appropriate for addressing material impacts" it is not clear what the undertaking is expected to report on. Shall the distinction between causation, contribution and direct linkage be reported separately? In the previous version of ESRS the request was "whether the undertaking causes or contributes to a material impact" with "or" that was reflecting an alternative approach rather than the simplified requirement which seems to require three kind of impact to be disclosed separately. This seems not to be a simplification therefore we suggesto to eliminate the brackets or insert "or".	S4	S4-3 - Actions and resources related to consumers and end-users	AR 6
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The removal of the term "severe" from the disclosure requirements for human rights incidents across all social standards is particularly concerning. Without a clear limitation to the most serious cases, companies may be required to report even minor or less relevant incidents. This broad scope risks undermining the materiality of disclosures and contradicts the objective of simplification. Maintaining a focus on severe human rights incidents is essential to ensure that reporting remains meaningful, proportionate, and aligned with the principles of relevance and efficiency.	S4	S4-3 - Actions and resources related to consumers and end-users	15.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I agree	We support the changes proposed.	S4	S4-4 - Targets related to consumers and end-users	4.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Information on the grievance mechnism should be removed from S4-2, as this is addressed in the G-standard. Alternatively, it should be noted in the DR that a reference to the Governance information is sufficient, if there is no separate channel for end-users.	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	12.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This requirement is overly broad and lacks a clear legal basis in the CSRD, which focuses on customer relationships under governance factors, rather than as a social standard. The expectation to describe policies for all consumers and end-users, including specific groups, risks imposing disproportionate administrative burdens, particularly for companies operating in diverse markets and sectors. Many aspects of consumer and product safety are already strictly regulated by national and EU law, rendering additional reporting redundant and of limited added value. Furthermore, the definition of “consumers and end-users” is vague and may lead to inconsistent reporting. The requirement does not sufficiently account for sector-specific differences or the practical limitations companies face in monitoring and managing impacts across all consumer groups. The standard should be limited to material, sector-relevant impacts and aligned with existing legal obligations. Reporting should focus on genuinely material risks and avoid duplicating information already required by law.	S4	S4-1 - Policies related to consumers and end-users	9.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This requirement is overly broad and lacks practical feasibility. The expectation to describe engagement approaches and grievance mechanisms for all consumers and end-users, across potentially global and highly diverse markets, imposes a disproportionate administrative burden — especially for with indirect or limited contact with end-users. Many aspects of consumer protection, complaint handling, and product safety are already strictly regulated by national and EU law, making additional reporting redundant and of limited added value. Furthermore, the definition of "channels" and "remedy" is vague, and the requirement does not sufficiently account for the practical limitations companies face in monitoring and managing concerns across all consumer groups.	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	10.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This requirement is overly broad and lacks practical feasibility. Expecting companies to describe all actions taken, planned, or underway to prevent, mitigate, and remediate material negative impacts on consumers and end-users — along with approaches for balancing these actions against business pressures — imposes a disproportionate administrative burden, especially for companies operating in diverse and global markets. Many aspects of consumer protection, marketing, and data use are already strictly regulated by national and EU law, making additional reporting redundant and of limited added value. Furthermore, the requirement to track and assess the effectiveness of these actions is vague and does not sufficiently account for sector-specific differences or the practical limitations companies face in monitoring and managing impacts across all consumer groups. The option to omit this disclosure if referenced elsewhere adds complexity and risks inconsistent reporting.	S4	S4-3 - Actions and resources related to consumers and end-users	14.
Excels	Confederation of German Employers Associations (BDA)	Business association (other than association of financial institution)	Germany			I disagree	This requirement is overly broad and lacks practical clarity. Expecting companies to disclose whether and how they have engaged directly with consumers, end-users, their "legitimate representatives," or "credible proxies" for target-setting and performance tracking is vague and difficult to operationalize — especially for companies with indirect or large-scale consumer relationships. The terms "legitimate representatives" and "credible proxies" are undefined, risking inconsistent interpretation and reporting across sectors and markets. Moreover, the feasibility and relevance of such engagement will vary greatly depending on the business model and sector. For many companies, direct engagement with end-users is not practical or meaningful, and may not yield reliable input for target-setting or performance assessment. The standard should clarify the criteria for identifying legitimate representatives and credible proxies, and limit the requirement to cases where such engagement is both material and feasible. Reporting should focus on objective, material indicators, with engagement results used as supplementary context only where appropriate.	S4	S4-4 - Targets related to consumers and end-users	17.
Excels	BDO Poland	Auditor	Poland			I partially agree and partially disagree	Draft excludes "unlawful use or misuse" of products. But it does not define where misuse still implies company responsibility (e.g. foreseeable misuse). This creates loopholes. The exclusion is too broad. To close the loophole, the standard should clarify that if misuse is reasonably foreseeable and preventable through product design, labeling, education, or controls, then it still falls under company responsibility.	S4	S4 - Objective	7.
Excels	BDO Poland	Auditor	Poland			I partially agree and partially disagree	The revised drafting convention counts "shall disclose" datapoints in main body and places methodology in ARs (which are still mandatory methodological guidance but not counted as datapoints). This distinction is subtle and could cause inconsistent recording of required datapoints and confusion for assurance scope (what counts as a disclosure datapoint vs methodology).	S4	S4-1 - Policies related to consumers and end-users	AR 1
Excels	BDO Poland	Auditor	Poland			I partially agree and partially disagree	Para 11 requires explanation of how perspectives of vulnerable groups were gained and mentions "credible proxies". There is no definition of what counts as a credible proxy, how representativeness is assessed, or how consent/protection of vulnerable respondents is ensured. Auditors will need records demonstrating representativeness and methodology; these are not specified.	S4	S4-1 - Policies related to consumers and end-users	11.
Excels	BDO Poland	Auditor	Poland			I disagree	AR3 lists types of channels and states whistleblowing mechanisms are included "under certain circumstances" — that wording is ambiguous and could lead to inconsistent inclusion/exclusion of whistleblowing data in consumer reporting. Auditors will need to see policy decisions on inclusion; the standard doesn't require explaining that decision.	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	AR 3
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	Why is it an AR and not included directly as a paragraph about channels of communication	S4	S4-1 - Policies related to consumers and end-users	AR 1
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	We agree to merge S4-2 and S4-3. But in pararaph 11 there are a lot of information together. We think it would be clearer to separate the different DP. As example : the part on vulnerable poeple.	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	11.
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	We think it would be better to separate the point on the effectiveness of theses channels as it is another DP	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	12.
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	Not clear concerning the part on policies for protecting individuals. Is it a DP ? If yes, it would be better to put it directly as a paragraph	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	AR 4
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	The first part of the paragraph is coved by GDR-A ? Better to mention it. Or to present it like for targets "when disclosing in accrodance with GDR-T..."	S4	S4-3 - Actions and resources related to consumers and end-users	15. (a)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I disagree	Need to be clarified.	S4	S4-3 - Actions and resources related to consumers and end-users	AR 6
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	Good simplification but we could still better articulate the GDR and the addtionnal DP in the DR. In eahc paragraph the good wording would be "in addition to the information required by GDR-P ou GRDA-A...". Moreover we think AR should not include additional DP. If it is a DP it should be put in a paragraph of the DR. It is well done in ESRS G1	S4	S4 - Interaction with other ESRS	5.
Excels	ASSIREVI	Auditor	Italy			I disagree	We suggest to remove this AR, considering that the information has been already deleted from GDR-P.	S4	S4-1 - Policies related to consumers and end-users	AR 1
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We propose to restore the existing para. 31(c) to provide a more comprehensive overview that also includes actions relating to positive impacts, and not only those linked to negative impacts	S4	S4-3 - Actions and resources related to consumers and end-users	15.
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We propose to restore the existing para. 33 to provide a more comprehensive overview that also includes actions related to risks and opportunities, and not only those related to impacts	S4	S4-3 - Actions and resources related to consumers and end-users	15.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The objective described in para. 1 of each draft topical ESRS is inconsistent with Draft ESRS 1. The statement about "dependencies when relevant" and "financial effects" should be deleted to make it consistent with ESRS 1. Change the wording to: "When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS S4 Consumers and end-users when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, metrics and targets (if in place)."	S4	S4 - Objective	1.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	ESRS S4 is about consumers/end-users where sustainability impacts arise (e.g., health/safety, access, discrimination). Privacy/data protection risks are managed as part of enterprise operational risk, compliance and ICT/cybersecurity, with established controls, metrics and incident reporting. Treating them as "sustainability" topics blurs scopes and dilutes ESRS' focus. Adding "privacy" to S4 triggers duplicate narratives and assurance across two regimes (operational risk reporting and ESRS), without improving decision-useful sustainability information. Recommendation: Delete all remaining references to "privacy" from ESRS S4 and the cross-cutting list in ESRS 1, because privacy and data protection are already governed and reported as operational/ICT risks under existing legal and risk frameworks. ESRS should not present these matters as sustainability-related.	S4	S4 - Interaction with other ESRS	4. (a)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Remove parts (a) and (b) and keep the introductory paragraph to avoid unnecessary duplication. Paragraph 5 should read as follows: "The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M."	S4	S4 - Objective	5.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	We would like EFRAG to clarify whether the scope of S4 is restricted only to private individuals or does it also include institutional clients/corporates.	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	10.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	The concept of incidents and how to identify them is still unclear. Among Disclosure Requirements, Application Requirements and the Glossary there are several definitions of incidents and confirmed/substantiated incidents. We suggest the best approach would be having specific definitions for each case (e.g. human rights incidents, incidents of corruption and bribery, etc.) and presenting them under the related application requirements. Such definitions would then include detailed explanations of: a) the scope of the matter (e.g. "discrimination at work on the grounds of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation, or other relevant forms of discrimination, including harassment"); and b) the type of instances that trigger the reporting of the corresponding metrics (e.g. "judicial and non-judicial proceedings that have been initiated such as cases before domestic courts, mediation, complaints filed with the National Contact Points for OECD Multinational Enterprises"). In our view the best path to support simplification in relation to point (b) above would be to focus on incidents that have been confirmed through a final decision issued by a court of law or relevant authorities.	S4	S4-3 - Actions and resources related to consumers and end-users	16.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	To align with the simplification approach, we suggest reformulating as follows: "if the undertaking engaged directly with consumers and/or end-users, their legitimate representatives, or with credible proxies that have insight into their situation for the purpose of target-setting and/or tracking performance against those targets, it shall disclose this fact when disclosing in accordance with [Draft] Amended ESRS 2 GDR-T"	S4	S4-4 - Targets related to consumers and end-users	18.
Excels	DRSC	(National) standard setter	Germany			I disagree	The added value of this requirement is not apparent, as the information in the sustainability report should be consistent anyway. Either the exact interaction referred to should be clarified, or this paragraph should be deleted.	S4	S4 - Interaction with other ESRS	8.
Excels	DRSC	(National) standard setter	Germany			I disagree	NMIG 1 for para. 9 Communication channels were removed from MDR-Ps, why bringing them up here introducing additional requirements (even as "possible elements")? If the guidelines on how to disclose information on policies are not streamlined in ESRS 2, this will lead to different way of presentation across the standards. Possible solution: streamline in ESRS 2 or eliminate completely.	S4	S4-1 - Policies related to consumers and end-users	9.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL The listing in paragraph 14 appears twice.	S4	S4-3 - Actions and resources related to consumers and end-users	14.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	DRSC	(National) standard setter	Germany			I disagree	RED FLAG Previously (ESRS S4.35), the focus was only on "severe human rights issues". Indicator No. 14 in table III of annex I to Delegated Regulation (EU) 2022/12888 also refers to "severe human rights issues and incidents". In order to ensure consistency between the SFDR and the ESRS, the word "severe" should be reinserted. With regard to the determination of "severe" human rights impacts, the definition of the United Nations Guiding Principles on Business and Human Rights should be adopted.	S4	S4-3 - Actions and resources related to consumers and end-users	15.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	In order to limit boiler plate texts and increase the relevance and readability of the disclosure, we suggest requiring only disclosures if there is no grievance mechanism	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	12
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	It does not require to report key actions taken, planned or underway to cause positive impacts and to manage risks and opportunities. It should also require these actions because this would be critical for undertakings that did not identify material negative impacts.	S4	S4-3 - Actions and resources related to consumers and end-users	14(a)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	In order to limit boiler plate texts and increase the relevance and readability of the disclosure, we suggest requiring only disclosures if human rights incidents have been reported. Additionally, the amended wording replaces "number of severe human rights [incidents/issues]" with "number of human rights [incidents/issues]." This broadens the scope from substantiated, high-impact cases to potentially all recorded incidents, regardless of severity. It also risks undermining alignment with SFDR PAI Indicator #14, which refers to "identified cases of severe human rights issues and incidents". We recommend reintroducing the qualifier "severe" to ensure conceptual clarity and consistency.	S4	S4-3 - Actions and resources related to consumers and end-users	15
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	In order to limit boiler plate texts and increase the relevance and readability of the disclosure, we suggest requiring only disclosures if there is no grievance mechanism	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	12
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	It does not require to report key actions taken, planned or underway to cause positive impacts and to manage risks and opportunities. It should also require these actions because this would be critical for undertakings that did not identify material negative impacts.	S4	S4-3 - Actions and resources related to consumers and end-users	14(a)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	In order to limit boiler plate texts and increase the relevance and readability of the disclosure, we suggest requiring only disclosures if human rights incidents have been reported. Additionally, the amended wording replaces "number of severe human rights [incidents/issues]" with "number of human rights [incidents/issues]." This broadens the scope from substantiated, high-impact cases to potentially all recorded incidents, regardless of severity. It also risks undermining alignment with SFDR PAI Indicator #14, which refers to "identified cases of severe human rights issues and incidents". We recommend reintroducing the qualifier "severe" to ensure conceptual clarity and consistency.	S4	S4-3 - Actions and resources related to consumers and end-users	15
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Very confusing why previous sub-sub-topics are sometimes moved to extra points and sometimes in brackets. This will lead to huge discussions on which level materiality is going to be defined, whether to use topics in front or in the brackets. Materiality analysis needs to be fully and new implemented due to this change. Only resonable approach: Leave out sub-topics in general and just list the previous sub-sub-topics one after each other. Furthermore, a proper mapping won't be possible like this!!	S4	S4 - Consumers and end-users	4
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Good change from "Access to (quality) information" to "Access to information" --> more streamlined and clear.	S4	S4 - Consumers and end-users	4.(a)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The requirement to state actions is clear but what is meant with the term resources (personnel, money, time...)? Definition not clear enough. Maybe keep focus only on key actions related to material topics. Furthermore, how can "KEY" actions be identified? Either delete the word "key" or mention in the glossary: "The company may defined themselves the thresholds for key actions." OR "Key actions are those most relevant for strategy and business modell and are at the heart of the company." for example.	S4	S4-3 - Actions and resources related to consumers and end-users	14.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	How can "KEY" actions be identified? Either delete the word "key" or mention in the glossary: "The company may defined themselves the thresholds for key actions." OR "Key actions are those most relevant for strategy and business modell and are at the heart of the company." for example.	S4	S4-3 - Actions and resources related to consumers and end-users	15. (a)
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	Move to ESRS 2 like all other human rights related topics. Additionally We have concerns about disclosing our feedback loop from customers because sometimes it can involve ongoing litigations.	S4	S4-3 - Actions and resources related to consumers and end-users	16.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The sentence seems off: "..., or because they have a direct interest in their implementation are examples of policy aspects to disclose.". What does that mean? Very complex phrasing. Maybe two sentences?	S4	S4-1 - Policies related to consumers and end-users	AR 1
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is recommended not to have this level of granularity to call out marginalized groups	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	11.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Reframe the datapoints on the process for engaging with consumers and end-users and how the perspectives of consumers and end-users inform the undertaking's decisions or activities in connection with ESRS 2 SBM-2, while highlighting key information (material IROs) Proposed wording: "In addition to the general information disclosed under ESRS 2 SBM-2 on interests and views of stakeholders, the undertaking shall provide information on the type of consumers and end-users subject to material impacts, the nature of these impacts (i.e., whether they are widespread and systemic, or related to individual incidents), and whether and how the interests and views of these stakeholders inform its decisions or activities aimed at managing the related material topics/sub-topics."	S4	S4-1 - Policies related to consumers and end-users	11.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	When the undertaking has severe human rights incidents, replace "if applicable, disclose these" (overly granular) with "including, where applicable, a description of affected consumers and/or end-users"	S4	S4-3 - Actions and resources related to consumers and end-users	15.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Delete the datapoint on whether and how the undertaking engages directly with consumers and end-users when disclosing in accordance with ESRS 2 GDR-T as it is already adressed in S4-2	S4	S4-4 - Targets related to consumers and end-users	17.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Very confusing why previous sub-sub-topics are sometimes moved to extra points and sometimes in brackets. This will lead to huge discussions on which level materiality is going to be defined, whether to use topics in front or in the brackets. Materiality analysis needs to be fully and new implemented due to this change. Only resonable approach: Leave out sub-topics in general and just list the previous sub-sub-topics one after each other. Furthermore, a proper mapping won't be possible like this!!	S4	S4 - Consumers and end-users	4
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	Good change from "Access to (quality) information" to "Access to information" --> more streamlined and clear.	S4	S4 - Consumers and end-users	4.(a)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The requirement to state actions is clear but what is meant with the term resources (personnel, money, time...)? Definition not clear enough. Maybe keep focus only on key actions related to material topics. Furthermore, how can "KEY" actions be identified? Either delete the word "key" or mention in the glossary: "The company may defined themselves the thresholds for key actions." OR "Key actions are those most relevant for strategy and business modell and are at the heart of the company." for example.	S4	S4-3 - Actions and resources related to consumers and end-users	14.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	How can "KEY" actions be identified? Either delete the word "key" or mention in the glossary: "The company may defined themselves the thresholds for key actions." OR "Key actions are those most relevant for strategy and business modell and are at the heart of the company." for example.	S4	S4-3 - Actions and resources related to consumers and end-users	15. (a)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Move to ESRS 2 like all other human rights related topics.	S4	S4-3 - Actions and resources related to consumers and end-users	16.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I partially agree and partially disagree	The sentence seems off: "..., or because they have a direct interest in their implementation are examples of policy aspects to disclose.". What does that mean? Very complex phrasing. Maybe two sentences?	S4	S4-1 - Policies related to consumers and end-users	AR 1
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is recommended not to have this level of granularity to call out marginalized groups	S4	S4-2 - Engagement with consumers and end-users, existence of channels for consumers and end-users to raise concerns or needs and approaches to remedy	11.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium				Recommend adding flexibility for how companies do this	S4	S4-3 - Actions and resources related to consumers and end-users	14.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We have concerns about disclosing our feedback loop from customers because sometimes it can involve ongoing litigations.	S4	S4-3 - Actions and resources related to consumers and end-users	16.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium				Recommend adding flexibility for how companies do this	S4	S4-3 - Actions and resources related to consumers and end-users	14.
Excels	UNESPA (Spanish Association of Insurers and Reinsurers)	Association of financial institutions	Spain			I disagree	S4-3 §14(a) (Previously §S4-4 31(a)) does not require to report key actions taken, planned or underway to cause positive impacts and to manage risks and opportunities. It should also require these actions because this would be critical for undertakings that did not identify material negative impacts.	S4	S4-3 - Actions and resources related to consumers and end-users	14.
Excels	ASD					I agree	These disclosure requirements have been consolidated: DR on the undertaking's overall approach to prevent, detect, investigate and respond to corruption and bribery incidents; DR on training activities within the undertaking about business conduct. Therefore, we welcome EFRAG proposed changes	G1	G1-2 - Actions related to business conduct	10.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	Include in (current 2c GDR-A): "training activities within the undertaking on business conduct, including the target audience, frequency and depth of coverage. This shall include the functions and/or roles within the undertaking that are most at risk in respect of corruption and bribery, the percentage of functions and/or roles most at risk within the undertaking in respect of corruption and bribery, as well as..." This information is not related to Policies. It's a bit odd to see it here, especially since it's the point (c) and not (b) following circumstances for not having anti-corruption and anti-bribery policies.	G1	G1-1 - Policies related to business conduct	8. (c)
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	The number sequence starts over at 1 in GDR-A, which seems to be a mistake (should be 9?).	G1	G1-2 - Actions related to business conduct	9.
Excels	CLEERIT	Consultant (including software vendor)	France			I partially agree and partially disagree	Suggested inclusion to support coherence (see related feedback above): "This shall include the functions and/or roles within the undertaking that are most at risk in respect of corruption and bribery, the percentage of functions and/or roles most at risk within the undertaking in respect of corruption and bribery, as well as..." There seem to be a mistake in the paragraph numbers, this one reads 2c and not 10c in the PDF document.	G1	G1-2 - Actions related to business conduct	10. (c)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Chamber of Labour, Austria	Trade union	Austria			I partially agree and partially disagree	Disclosures (including the associated ARs) on corporate culture according to Set 1 DA should continue to apply so that stakeholders can get a transparent picture of corporate culture.	G1	G1-1 - Policies related to business conduct	1.
Excels	Chamber of Labour, Austria	Trade union	Austria			I partially agree and partially disagree	The provision "the circumstance when where it has no policies on anticorruption or anti-bribery consistent with the United Nations Convention against Corruption1" should be supplemented by "it shall state this and whether it has plans to implement them and the timetable for implementation". This information was included in Set 1. Since the topic of anti-corruption is important, the BAK believes that it is essential that information on the plans and timetable for the implementation of the policies should continue to be included in the report.	G1	G1-1 - Policies related to business conduct	8. (a)
Excels	Chamber of Labour, Austria	Trade union	Austria			I disagree	From the BAK's point of view, the registration of the company in the EU Transparency Register or an equivalent register in another EU country is a mandatory disclosure, as it is also relevant information for other stakeholders (e.g. banks).	G1	G1-5 - Metrics related to political influence and lobbying activities	17.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Business sensitive information: Some datapoints lead to the reporting of sensitive/unfavourable information , e.g. disclosures of the undertaking on its risk assessments to identify corruption and bribery (G1-3; AR5) during ongoing investigations.	G1	G1-2 - Actions related to business conduct	10. (b)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Disproportionate costs; Legal concerns (Collection of information for this datapoint requires a lot of effort and raises legal concerns especially related to in-direct financial contributions outside of the EU).	G1	G1-5 - Metrics related to political influence and lobbying activities	16.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Redundancy or contradictions with other DRs/DPs; Concerns about usefulness/interpretation (1. Information already disclosed in EU Transparency Register as well as in national Transparency Registers (e.g. Germany, USA) and therefore considered redundant. 2. A prioritization of "main topics in lobbying activities" could imply that political activities in one country could be more important or "material" than in another leading to misunderstandings with external stakeholders).	G1	G1-5 - Metrics related to political influence and lobbying activities	17.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Data not currently available; Concerns on data reliability (Not consistent with the information provided in the financial statements which does not cover the entire perimeter.)	G1	G1-6 - Metrics in relation to payment practices	20. (a)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	Data not currently available; Concerns on data reliability (Not consistent with the information provided in the financial statements which does not cover the entire perimeter.)	G1	G1-6 - Metrics in relation to payment practices	20. (b)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Only the policies for the complaints procedure are adressed in G1-1. In order to bundle the requirements on the complaints procedure, it would be advisable to bundle this reporting requirement together with the reporting requirements of ESRS S1-2, S2-2, S2-3 and S2-4 on the complaints procedure in a separate chapter. This would support the opportunitie to refer to the descriptions under G1 in the S chapters.	G1	G1-1 - Policies related to business conduct	8. (b)
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	The metrics relating to anti-corruption and anti-bribery are comprehensible and ok. When summarizing the sub-sub-topics in the ESRS 1 standard, anti-corruption and anti-bribery, animal welfare and complaints procedures were combined in one Sub-Topic. It is unclear why the topics of animal welfare and complaints procedures no longer appear separately in standard G1. This is an inconsistency between the topic overview in ESRS 1 and the G1 standard that should be rectified (see also comment on ESRS G1 - 8)	G1	G1-4 - Metrics related to Incidents of corruption or bribery	12.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It should be made clearer that only those metrics are to be reported for sub-topics that have been assessed as essential in the context of the DMA.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	12.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It should be made clearer that only those metrics are to be reported for sub-topics that have been assessed as essential in the context of the DMA.	G1	G1-5 - Metrics related to political influence and lobbying activities	15.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It should be made clearer that only those metrics are to be reported for sub-topics that have been assessed as essential in the context of the DMA.	G1	G1-6 - Metrics in relation to payment practices	19.
Excels	Federation of German Industries (BDI)	Business association (other than association of financial institution)	Germany			I disagree	It is recommended to maintain as a voluntary disclosure to avoid unintended legal and agency implications. Requiring legal violation disclosure imposes a new, potentially serious obligation in Europe where no affirmative duty currently exists.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Against simplification. Former AR2 was a may DP and now is mandatory. The rationale of replacing the 2 deleted DPs about the management of relationships with suppliers is not valid because the info required is completely different.	G1	G1-2 - Actions related to business conduct	10. (c)
Excels	Telefónica, S.A.	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Against simplification. May DP moved to mandatory. We already disclose the number of convictions and amount of fines.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The new version of G1-1 simplifies the requirement by retaining only the minimum mandatory elements, removing the obligation to disclose whistleblowing mechanisms, internal training, and the company's approach to corporate culture. This simplification reduces the depth of disclosure on ethical practices and organisational integrity, which may limit the perception of a company's ethical maturity. However, it may ease initial reporting, especially for companies still structuring their conduct policies. Voluntary disclosures could help bridge this gap.	G1	G1-1 - Policies related to business conduct	7.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The new version of G1-2 retains the essential elements on ethical management and supplier relations, while presenting a more streamlined structure focused on concrete actions. It also consolidates information requirements previously covered under G1-3 "Prevention and Detection of Corruption and Bribery". The exclusion of details on specific policies, such as late payment prevention or separation of investigative functions, may reduce disclosure depth. However, the emphasis on training and ESG integration in the supply chain strengthens the link between business conduct and sustainability, especially for companies with complex value chains.	G1	G1-2 - Actions related to business conduct	10.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I agree	We agree that companies are now required to disclose business conduct targets using the common target reporting model defined in ESRS 2 GDR-T. This includes: • Objectives to improve or maintain ethical practices and business behaviour; • Associated indicators and timelines, where applicable. The introduction of mandatory business conduct targets is a step forward in accountability and transparency. However, since reporting follows a cross-cutting model (GDR-T), there is a risk that targets may become generic or lack ambition. It is essential to ensure that these targets are clear, relevant, and aligned with the company's material risks and impacts.	G1	G1-3 - Targets related to business conduct	11.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The new version significantly reduces the depth of required information, shifting from a detailed, multifaceted approach to a focus on two main indicators: convictions and confirmed incidents. While this simplification may ease reporting and reduce administrative burden, it limits transparency on how companies respond to specific cases. In high-risk sectors, the omission of additional data may undermine stakeholder trust and credibility. Optional disclosures could help maintain confidence.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	12.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The new version reduces the level of detail required, removing the obligation to disclose internal responsible parties, transparency platform registrations, and estimates of in-kind contributions. The focus is now on aggregate values and stated lobbying positions. This simplification facilitates reporting but may limit visibility into oversight mechanisms and institutional transparency, particularly in contexts where political influence is sensitive. Encouraging voluntary disclosures could help mitigate this risk.	G1	G1-5 - Metrics related to political influence and lobbying activities	15.
Excels	GRACE empresas responsaveis	Business association (other than association of financial institution)	Portugal			I partially agree and partially disagree	The new version removes the obligation to report average payment times and the methodology used, focusing only on standard terms and pending legal proceedings. While this reduces reporting burden, it may hinder the assessment of real impacts on SMEs, especially in sectors where payment delays can have critical consequences. Including optional indicators on payment performance could help maintain transparency and support fair business practices.	G1	G1-6 - Metrics in relation to payment practices	19.
Excels	GKK Partners	Consultant (including software vendor)	Germany			I agree	Simplified and user-oriented with "total monetary value".	G1	G1-5 - Metrics related to political influence and lobbying activities	16.
Excels	SAP SE	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	we object the change of the DP for confirmed incidents of corruption (paragraph 14) from may to shall.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	Amended G1 requires reporting information on the protection of whistleblowers (paragraph 8(b)) but lacks a requirement to report on the whistleblowing mechanisms themselves. We propose reinstating former G1 10(a), for alignment with GRI 2-26-a-ii.	G1	G1-1 - Policies related to business conduct	8. (b)
Excels	Global Reporting Initiative	Standard setting initiative	Netherlands			I partially agree and partially disagree	G1 AR3 should clarify whether 'actors in its upstream and downstream value chain' include also non-employees in the undertaking's own workforce. It is important that incidents involving non-employees are also captured by this DR.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 3
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The title of G1-1 should be corrected from 'Business Conduct' to 'Corporate Culture' to accurately reflect its content. It is crucial to structure the ESRS so the materiality assessment can be applied at the subtopic level; otherwise, it forces disclosure on potentially non-material issues. We propose rewording this section to allow for a separate materiality assessment for each individual subtopic. Please also assure that the following datapoints are clearly marked per topic, so that the materiality can be utilised.	G1	G1-1 - Policies related to business conduct	7.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Datapoint 10c on corruption should be grouped with other related disclosures, not absorbed into the general G1 section. This structural change is essential to allow the materiality assessment to function as a proper filter at the subtopic level and to avoid potential conflicts with auditors over the scope of G1 disclosures. In general, Disclosure Requirement G1-2 combines several thematic areas, not all of which relate directly to the reporting of actions. For instance, information concerning suppliers or processes for handling incidents related to corruption and bribery aligns more closely with the management approach than with the implementation of specific actions. Unlike other standards, where the disclosure of actions remains open and flexible, G1-2 predefines the content to be reported. While this is not necessarily problematic, it may appear somewhat inconsistent in comparison with the structure of other standards.	G1	G1-2 - Actions related to business conduct	10.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is still not clear what is intended for "comparable position". The Standard should give clear guidance in order not to over report on comparable positions, as not ll the positions held in public administration have the same relevance (e.g. if someone was in the board of statutory auditors of an hospital is not probably a relevant information). Furthermore, a clarification of what is included in the definition of "public administration" is critical. Moreover on Datapoint 10c on corruption should be grouped with other related disclosures, not absorbed into the general G1 section. This structural change is essential to allow the materiality assessment to function as a proper filter at the subtopic level and to avoid potential conflicts with auditors over the scope of G1 disclosures.	G1	G1-5 - Metrics related to political influence and lobbying activities	10.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The input refers to G1-2 Paragraph 2 (c): Consolidation of different training purposes and activities could be challenging with view to the IRO mapping process, as it fails to clearly indicate which sub-topic G1-2 Paragraph 2 (c) relates to. Therefore, a more distinct division into the sub-topics is necessary. Especially, the disclosure requirement regarding the procurement team should be separated as it refers to the topic management of relationships with suppliers. The new wording regarding the members of the administrative, management and supervisory bodies is not clear. Recommendation: Revert to the previous text and include 'the extent to which training is given to'. Alternatively, it should be emphasized that external training is also meant in order to prevent potential conflicts of interest.	G1	G1-2 - Actions related to business conduct	7.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The input refers to G1-3 Paragraph 6: A disclosure requirement regarding the number and nature of confirmed incidents of corruption and bribery is misleading and should be deleted. A high number of incidents seems negative but might also reflect an effective compliance management system with investigation measures in place. In addition, the disclosure requirement contradicts 1. the principle of the presumption of innocence and 2. the principle under German law that offenses do not regularly have to be reported to the authorities, but it is the company's responsibility to adequately address compliance violations within the company.	G1	G1-3 - Targets related to business conduct	7.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The input refers to G1-5, AR 7 and 8 for para 16: Regarding political contributions further differentiation and explanation is needed (the purpose of a contribution as main criteria): Financial or in-kind contributions to external organizations (e.g. lobbyists, charities, think tanks or trade associations) or non-consolidated companies should only be considered, if granted with the purpose of passing it on to a relevant recipient like political parties, their elected representatives or persons seeking political office.	G1	G1-5 - Metrics related to political influence and lobbying activities	AR 7
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	The scope of the required training-related disclosures has been increased. Previously, reporting was limited to training activities on corruption and bribery. The current scope now covers broader 'business conduct' topics. It is recommended to revert to the original scope, as the expanded requirement may lead to inconsistencies and disproportionate reporting efforts, without necessarily enhancing the relevance or comparability of the information disclosed.	G1	G1-2 - Actions related to business conduct	10. (c)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We reccommend to limit the disclosure for individual case of corruption to the top management and not to "all individuals", which could be interpreted in a much broader sense. Additionally This adds an additional disclosure requirements for preparers. We believe that the principle of not increasing reporting requirements should be applied consistently. Even if the datapoint itselbf is not technically complex, the change in status to mandatory will require additional interpretation, internal coordination, and alignment with auditors—especially during first-time implementation. This effort should not be underestimated. From our point of view the ESRS revision should refrain from posing any additional effort to preparers.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 4
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The requirement to report on "standard payment terms" and supplier categorization presents significant practical challenges. The metric lacks clarity in international contexts and provides limited value for understanding supplier relationships. Tracking supplier categories by size would require substantial system changes, while reporting legal proceedings related to late payments without context offers little decision-useful information, especially since material cases are already covered in legal risk reporting. These requirements create unnecessary administrative burden without adding meaningful value to sustainability reporting. We suggest to limit this disclosure to the most relevant countries .	G1	G1-6 - Metrics in relation to payment practices	12.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	This application requirements is not clearly defined and prone to diverse interpretation, e.g.: - "shall consider": does this mean that incidents in the upstream/downstream value chain are to be disclosed? - what is meant by "direct involvement"? - does the reporting include information about the "actors"? It is unclear to which paragraphs the AR refers to (also AR 4-6). Paragraphs 13/14 do no longer exist in the amended ESRS. Update of references/paragraphs needed.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 3
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Considering the EFRAG Explanations January - May 2024 (final version,page 95), the following issues are identified: 1. It focuses solely on first-instance convictions of natural persons, including non-final decisions, leading to a lack of transparency and contradictions with the ECRIS, which only records final convictions. 2.The CSRD approach lacks transparency by mixing final and non-final convictions. A final conviction has more significance than a non-final decision. 3.Th approach fails to distinguish between the severity of convictions of board members versus employees, and it does not consider cases where the company itself is sanctioned for corruption or bribery, either through criminal proceedings or administrative fines. Relevant national registers for legal entities are disregarded by the CSRD as well. Cases where a company is sanctioned for corruption or bribery are important, as they indicate systemic issues rather than individual excesses. 4.Additionally, the reliance on information from accused individuals creates reliability issues, as court proceedings often occur years after the offense, and the employees may no longer be with the company. 5.The focus on payable fines for convictions of natural persons overlooks prison sentences (and their suspension if applicable), which are indicators of the severity of the crime.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	5. (a)
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	By deleting "for financai or in kind political contributions", the requirements seem to suggest that the total monetary calue of financial and in-kind political contributions for "political influence" needs to be disclosed. This in turn would increase the reporting burden for companies as it widens the defition of the metrics to be reported to general political influence , while at the same time being open for interpretation. Generally, the collection of information for this datapoint requires a lot of effort and raises legal concerns especially related to in-direct financial contributions outside of the EU, which is why we would suggest to limit the scope from "global! to "EU and Member States" or delete the datapoint. Alternatively, further clarification on the scope needed.	G1	G1-5 - Metrics related to political influence and lobbying activities	8.
Excels	European Round Table for Industry	Business association (other than association of financial institution)	Belgium			I disagree	Suggestion to delete this datapoint as information already disclosed in EU Transparency Register as well as in national Transparency Registers (e.g. Germany, USA) and therefore considered redundant. Additionally, a prioritization of “main topics in lobbying activities” could imply that political activities in one country could be more important or “material” than in another leading to misunderstandings with external stakeholders.	G1	G1-5 - Metrics related to political influence and lobbying activities	9.
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Remove datapoint or make voluntary - Information gathering for payment practices is connected to high efforts due to unclear methodologies and burdensome data collection. Results will not be comparable. Effort of calculation exceeds the value of information, especially for big groups with de-centralized payment practices.	G1	G1-6 - Metrics in relation to payment practices	20. (a)
Excels	REWE Group	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The definition of "legal proceedings" remains unclear, especially in its interpretation under national law. A clearer concretisation of this term should be in our view accompanied by the inclusion of a well-defined materiality threshold, ideally based on the financial volume of a specific outstanding payment. In our view, this would significantly reduce the reporting burdens.	G1	G1-6 - Metrics in relation to payment practices	20. (b)
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We recommend providing a definition of "political influence" in the ESRS glossary to ensure shared understanding and comparability in reporting.	G1	G1 - Objective	4. (b)
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We recommend providing a definition of "unfair payment practices" in the ESRS glossary to ensure shared understanding and comparability in reporting.	G1	G1 - Objective	4. (c)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We welcome the inclusion in NMIG 3 of an illustrative table to present the information on training activities. It could however be specified that the presentation of a separate "executives" category in this table is voluntary.	G1	G1-2 - Actions related to business conduct	10. (c)
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	If the mandatory nature of the DP related to confirmed incidents of corruption or bribery is confirmed, we recommend providing concrete examples of underlying situations, beyond the definition given in the ESRS glossary, which could be presented in NMIG.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We welcome the inclusion of new definition of "corruption or bribery convictions" which would ensure consistency and comparability across undertakings. Nonetheless we recommend clarifying who does "an individual" refer to in such definition (e.g. the undertaking's legal representative or any employee).	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 4
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We welcome the inclusion in NMIG 6 of an illustration to present the information on standard payment terms. The following clarifications could, however, be provided: (i) an indication that the breakdown provided by main category of suppliers is mandatory while the breakdown by region is voluntary, (ii) an indication on the fact that the "non-SMEs" category could need to be further disaggregated, depending on the undertaking's specific fact and circumstances and (iii) a reference to a specific number of days in the table instead of the references to "number of days in accordance with current EU regulation" and "number of days depending on legal requirements or specific contractual agreements" (these considerations may be maintained in a footnote).	G1	G1-6 - Metrics in relation to payment practices	20. (a)
Excels	Forvis Mazars Group	Auditor	Belgium			I agree	We recommend relying on EFRAG clarifications brought by ID 419 to specify what "currently outstanding legal proceedings" refer to (i.e. "legal proceedings that have not been legally resolved at year-end").	G1	G1-6 - Metrics in relation to payment practices	20. (b)
Excels	Triodos Bank N.V.	Bank	Netherlands			I disagree	We propose to keep policies with respect to animal welfare in place.	G1	G1-1 - Policies related to business conduct	1.
Excels	Triodos Bank N.V.	Bank	Netherlands			I partially agree and partially disagree	Yes, we advocate for transparency on exposure to controversial weapons. As a values-based financial institution, we believe that sustainability reporting must reflect not only environmental and social impacts but also ethical governance practices. ESRS G1-1, which addresses policies related to business conduct, is the appropriate location for disclosures on exposure to controversial weapons, given its alignment with SFDR PAI indicators and its relevance to anti-corruption and ethical standards. Our position is grounded in stakeholder expectations and the need for clarity on how financial institutions manage reputational and ethical risks. Transparency on exposure whether direct or indirect is essential for enabling informed decision-making by clients, investors, and civil society. It also supports alignment with international norms, such as the UN Convention against Corruption and the Treaty on the Prohibition of Nuclear Weapons. We recommend that ESRS G1-1 explicitly include a datapoint requiring disclosure of policies and screening mechanisms related to controversial weapons. This would ensure consistency with SFDR and reinforce the ESRS framework's credibility.	G1	G1-1 - Policies related to business conduct	1.
Excels	Transparency International UK	NGO	United Kingdom			I agree	Amending Disclosure Requirement 2c (in the adopted ESRS G1 Business conduct 2023), now Disclosure Requirement 4c in the exposure draft, to streamline wording to "political influence and lobbying activities" is a positive change, as it clarifies the focus of the disclosure requirement. Recommendation: Retain wording as included in the amended exposure draft.	G1	G1 - Objective	4. (c)
Excels	Transparency International UK	NGO	United Kingdom			I disagree	Deleting "how it fosters its corporate culture" from Disclosure Requirement 7 in the Exposure Draft 2025 (removes the only Diclosure Requirement on "corporate culture" despite this being an ESRS G1 sub-topic (see "Objective" paragraph 2). Stakeholders need to know how companies foster good corporate culture, which underpins responsible business conduct. Recommendation: (1) retain the original wording in Disclosure Requirement 7 (in the aopted ESRS G Business condcut 2023) and (2) clarify in ESRS 2 how reporting companies should disclose information on material topics or sub-topics where there is not a specific policy in place.	G1	G1-1 - Policies related to business conduct	7.
Excels	Transparency International UK	NGO	United Kingdom			I disagree	We understand the rationale for deleting Disclosure Requirement 9 (in the adopted ESRS G1 Business conduct 2023). We do not believe Disclosure Requirement 7 in the Exposure Draft 2025, sufficiently covers this information. In our experience, companies are unlikely to have a specific company policy on "company culture" and therefore may not be prompted to disclose material information if referring to ESRS GDR-P alone. Recommendation: (1) retain the original wording in Disclosure Requirement 9 (in the aopted ESRS G Business condcut 2023)	G1	G1-1 - Policies related to business conduct	7.
Excels	Transparency International UK	NGO	United Kingdom			I disagree	Amending Disclosure Requirement 8a in the Exposure Draft 2025 to remove the reference to "whether it has plans to implement them and the timetable for implementation" is concerning because stakeholders need to understand a company's timetable for implementing critical company policies where not in place. Recommendation: (1) retain the original wording in Disclosure Requirement 10 b (in the adopted ESRS G1 Business conduct 2023) (2) and/or amend ESRS 2 para. 30 (62 amended) to require companies to disclose the timeline for implementation where they do not have the policy in place.	G1	G1-1 - Policies related to business conduct	8. (a)
Excels	Transparency International UK	NGO	United Kingdom			I disagree	The protection of whistleblowers is a G1 Business conduct sub-topic and, therefore, ESRS 2 GDR-PAT disclosures apply. Given the sub-topic's importance, we are, however, concerned that deleting the Disclosure Requirement 10c i. (in the adopted ESRS G1 Business conduct 2023) (whether the company provides training whistleblower reporting channels and to staff receiving reports) and 10 c ii. in the adopted ESRS G1 Business conduct 2023 (measures to protect workers against retaliation) means that companies may omit to report material information. Transparency International's research shows that 19 EU countries do not comply fully with the EU Whistleblower Protection Directive (link https://www.transparency.org/en/publications/how-well-do-eu-countries-protect-whistleblowers-speakup) and, therefore, specific DRs on companies' actions to operationalise their whistleblowing channel and protect whistleblowers from retaliation are critical to ensure companies are supporting and encouraging workers to raise concerns. Recommendation: (1) retain the orginal wording in Disclosure Requirement 10 (c) i. and ii. (in the adopted ESRS G1 Business conduct 2023), and/or (2) include ARs that set out what companies should disclose on whistleblowing channels and whistleblower protection from retaliation.	G1	G1-1 - Policies related to business conduct	8. (a)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Transparency International UK	NGO	United Kingdom			I disagree	Amending Disclosure Requirement 8b in the Exposure Draft 2025 to remove the reference to "whether it has plans to implement them and the timetable for implementation" is concerning because it is unclear whether this information would be required through GDR-PAT as the company does not already have a policy in place. Stakeholders need to understand a company's timetable for implementing critical company policies if they are not already in place. Protecting whistleblowers is critical for encouraging workers and third parties to raise concerns. Recommendation: (1) retain orignial Disclosure Requirement 10 d)(in the adopted ESRS G1 Business Conduct 2023) (2) and/or amend ESRS 2 paragraph 30. (62 amended) to require companies to disclose the timeline for implementation where they do not have a policy in place.	G1	G1-1 - Policies related to business conduct	8. (b)
Excels	Transparency International UK	NGO	United Kingdom			I disagree	We acknowledge that EFRAG have kept the protection of whistleblowers as part of the sub-topics in G1 Business conduct, and because of this, the ESRS 2 GDR-PAT applies, which we welcome. However, the deletion of 10 e (in the adopted ESRS G1 Business conduct 2023) removes the requirement for companies to disclose whether the company has the procedures in place to investigate incidents and whistleblower reports promptly, independently, and objectively. This aspect may be overlooked by reporting companies without a specific reference in the topic disclosures. Stakeholders need to know that companies have the appropriate procedures in place to act on whistleblower reports to ensure both internal and external trust in the company. Recommendation: (1) retain orignal Disclosure Requirement 10 e) wording (in the adopted ESRS G1 Business conduct 2023), or (2) include ARs that set out what companies should disclose on their procedures for investigating reports by whistleblowers promptly, independently and objectively.	G1	G1-1 - Policies related to business conduct	8. (b)
Excels	Transparency International UK	NGO	United Kingdom			I disagree	Deleting Diclosure Requirement 18 b (in the adopted ESRS G1 Business conduct 2023) on whether the reporting company separates investigators or the investigating committee from management during investigations would remove material information on the company's anti-corruption and anti-bribery iROs. The independence of investigators from the team under investigation is crucial for ensuring an impartial investigation and to remove conflicts of interest. Recommendation: 1) retain Disclosure Requirement 18 (b) wording (in the adopted ESRS G1 Business conduct), or (2) include ARs that set out what companies disclose in reference to anti-corruption and anti-bribery investigations.	G1	G1-2 - Actions related to business conduct	10. (b)
Excels	Transparency International UK	NGO	United Kingdom			I disagree	Deleting Disclosure Requirement 18 c (in the adopted ESRS G1 Business conduct 2023), means the company may omit explaining how it ensures findings from investigations, and outcomes, are reported upwards to senior leadership, which is essential if findings are to be acted upon and inform remediation. Recommendation: 1) retain Disclosure Requirement 18 (c) (in the adopted ESRS G1 Business conduct) wording, or (2) include ARs that set out what companies should disclose in reference to the procedures for reporting the outcomes of investigations.	G1	G1-2 - Actions related to business conduct	10. (b)
Excels	Transparency International UK	NGO	United Kingdom			I disagree	Deleting Disclosure Requirement 19 (in the adopted ESRS G1 Business conduct 2023)removes the requirement to disclose plans to adopt procedures to prevent, detect, and address allegations or incidents of corruption and bribery. It is unclear how the ESRS 2 GDR-PAT architecture applies where there is no policy and/or procedure in place. Recommendation: Amend ESRS 2 paragraph 30. (62 amended) to require companies to disclose their plans and timeline for implementing policies or procedures where these are not in place.	G1	G1-2 - Actions related to business conduct	10. (b)
Excels	Transparency International UK	NGO	United Kingdom			I disagree	Amending Disclosure Requirement 20 (in the adopted ESRS G1 Business conduct 2023) from a mandatory to voluntary disclosure (to be included in the Non-Mandatory Illustrative Guidance) weakens this Disclosure Requirement.. Stakeholders need to know that companies are communicating their policy commitments in an accessible way and to check that commitments are understood. Recommendation: (1) retain orinigal wording from Disclosure Requirement 20 (in the adopted ESRS G1 Business conduct 2023), or (2) include ARs that reference what companies should disclose in reference to the communication of anti-bribery and anti-corruption policies.	G1	G1-2 - Actions related to business conduct	10. (b)
Excels	Transparency International UK	NGO	United Kingdom			I agree	We welcome the move to make new Disclosure Requirement 10 c mandatory and the recognition of the importance of training for high-risk teams, such as procurement. Sales and business development teams are all higher risk Recommendation: Retain wording as included in the amended Exposure Draft 2025 in new Disclosure Requirement 10 c.	G1	G1-2 - Actions related to business conduct	10. (c)
Excels	Transparency International UK	NGO	United Kingdom			I agree	We welcome the amendment to make the new Disclosure Requirement 14 mandatory and appreciate that EFRAG recognised the gap that would have resulted from deleting DR 22. Without this change, there would have been no mandatory Disclosure Requirements on confirmed incidents. It is essential that at least one DR addresses confirmed incidents. Recommendation: Retain wording included in the amended Exposure Draft 2025 in new DR 14.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.
Excels	Transparency International UK	NGO	United Kingdom			I disagree	We are concerned that moving Disclosure Requirement 25 b), 25c) and 25 d) (in the adopted ESRS G1 Business conduct 2023) to the NMIG may lead to these Disclosure Requirements being overlooked. Stakeholders need to have transparency on the action taken by companies on corruption incidents. While we recognise that these Disclosure Requirements were voluntary in ESRS G1 Business conduct, as Disclosure Requirement 25 (a) (in the adopted ESRS G1 Business condcut 2023) now Dirclosure requirement 14 has been moved to mandatory content in the amended Exposure Draft 2025, we see this as an opportunity to consider moving Disclosure Requirements 25 b), 25 c), and 25 d) (in the adopted ESRS G 1 Business conduct 2023) to mandatory. Recommendation: (1) Review Disclosure Requirements 25 (b), 25 (c), and 25 (d) and consider including in mandatory content. (2) and/or include application requirements for amended DR 14 to include information relating to corrective actions.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.
Excels	Transparency International UK	NGO	United Kingdom			I agree	We welcome the amendment to Disclosure Requirement 16 as it has provided clarity to the diclosure by create a disctinction between DPs for political influence and lobbying actitivtes.	G1	G1-5 - Metrics related to political influence and lobbying activities	16.
Excels	Transparency International UK	NGO	United Kingdom			I agree	We welcome the amendment to Disclosure Requirement 17 as it has provided clarity to the diclosure by create a disctinction between DPs for political influence and lobbying actitivtes.	G1	G1-5 - Metrics related to political influence and lobbying activities	17.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Transparency International UK	NGO	United Kingdom			I disagree	We think that deleting Disclosure Requirement 10 d) (in the adopted ESRS G1 Business conduct)will make it more difficult to easily cross-reference information included in the relevant transparency registers. We do not believe this would be onerous information to disclose. Recommendation: 1) retain original wording in the adopted ESRS G1 Business conduct 2023 wording, 2) and/or include information previously included in an application requirement for new DR 17.	G1	G1-5 - Metrics related to political influence and lobbying activities	17.
Excels	Austrian Financial Reporting Advisory Committee (AFRAC)	(National) standard setter	Austria			I partially agree and partially disagree	From a G1-perspective, summing up former G1-2, G1-3, and partially G1-4 under new G1-2 seems to reduce datapoints while rather mixing up different contents under one datapoint. This might impede clarity, readability, and comparability of ESRS reports.	G1	G1-2 - Actions related to business conduct	10.
Excels	Henkel AG & Co. KGaA	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	"Standard payment terms" do not exist in an international context; "category of suppliers" is not defined since it can not be defined across companies; hence, the data point should be deleted	G1	G1-6 - Metrics in relation to payment practices	12.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I agree	We recommend that EFRAG provide a definition of political influence, by leveraging on the definition of direct/indirect political contributions given in ARs 7 and 8, to ensure clear distinction with lobbying activities.	G1	G1 - Objective	4. (b)
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I agree	We recommend that EFRAG provide a definition of unfair payment practices, this concept being newly introduced in the ED.	G1	G1 - Objective	4. (c)
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I agree	We recommend that EFRAG provide a definition of "management of relationships with suppliers" which is a large concept. Related NMIG could be supplemented with practical examples such as (i) implementation of a department dedicated to purchases and supplier relationships or (ii) inclusion of policies in clauses of contracts signed with suppliers, in order to enlarge their scope to value chain, with clear references to the information included in the sustainability statement on the related policies.	G1	G1-2 - Actions related to business conduct	10. (a)
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I agree	We recommend that EFRAG provide a definition of "depth of coverage" and clarifies whether it relates to percentage of trained people or it refers to the level of training (e.g. basic, advanced or expert). Besides, as training activities on business conduct cover very large set of trainings, clarifying the nature of the training activities covered by this DP could be useful. We recommend also that EFRAG clarify whether this DP requires to disclose the percentage of members of the administrative, management and supervisory board who received business conduct training. Finally and with respect to NMIG 3 that provides an illustration for disclosing information on training activities, we encourage specifying that the presentation of a separate "executives" category within this illustrative table is voluntary.	G1	G1-2 - Actions related to business conduct	10. (c)
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I agree	We suggest that EFRAG provide concrete examples of "confirmed incidents" of corruption or bribery, beyond the definition given in the ESRS glossary, to facilitate the identification by the undertaking of the relevant underlying situations. These examples could be included in NMIG in order not to burden the standard. We recommend also that EFRAG transfer NMIG's following precision into § 14 of the standard: "This includes cases that were initiated in previous years where the outcome was only established in the current reporting period.". At this stage, the wording of this § allows not to report such cases, even though they were also not disclosed the year they were initiated. Such cases could therefore never be reported by an undertaking in its sustainability statement.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I agree	We recommend that EFRAG clarify the scope of people directly involved in incidents of corruption or bribery to be considered as AR 3 refers to "employees" while NMIG 4 refers to "own workers" (i.e. including non-employees).	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 3
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	We recommend that EFRAG clarify who does "an individual" refer to in the definition of "corruption or bribery convictions" (e.g. the undertaking's legal representative or any employee directly involved as specified in AR 3). Besides, there is a discrepancy in AR 4 between the wording included in ESRS G1 ED and the wording included in ESRS G1 log of amendments. The wording included in log of amendments includes the following content which is not in the ED: "In this context, final decisions include all the decisions in the reporting year while awaiting the outcome of a possible appeal. The reporting undertaking may provide additional information if an appeal is considered, has been lodged or was successful." This clarification is key to know how to consider the situations where an appeal is pending when reporting under § 13 and/or § 14 of ESRS G1. We thereof recommend adding such clarification in AR 4.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 4
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	The new definition of fines provided in AR 5 limits the information to be disclosed to the fines "paid to a public treasury". We recommend that EFRAG clarifies whether fines that comply with the applicable definition but which are paid to other bodies shall be considered in reporting under § 13.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 5
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I agree	We recommend that EFRAG provide a definition of "entrusted power" which is mentioned in corruption definition that is included in the ESRS glossary. Besides and considering the fact that the definition of corruption includes fraud incidents, we recommend that EFRAG provide illustration of frauds that correspond to corruption incidents and clarify whether the two following situations are in scope of § 13: -accounting manipulation -environmental pollution incident with corruption of agent involved in the investigation	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 6
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I partially agree and partially disagree	Former AR 14 "In meeting the requirement in paragraph 29(c) the undertaking shall consider the alignment between its public statements on its material impacts, risks and opportunities and its lobbying activities" has been moved to NMIG. This AR was considered useful as reconciling double materiality assessment with lobbying activities of the undertaking. Therefore, we recommend EFRAG transfer this guidance to the standard. Besides, we note that former § 29d) related to registration in the EU Transparency Register or in an equivalent transparency register in a Member State has been removed from the standard even if the related information was not complex to provide. Similarly, existence of a Public Affairs department withing the organization is one example of information on lobbying activities that has been disclosed in 2024 ESRS sustainability statements. Therefore, we recommend that EFRAG include in NMIG in relation to § 17 examples of information to provide regarding lobbying activities such as (i) registration in the EU Transparency Register or in an equivalent transparency register in a Member State or (ii) existence of a Public Affairs department.	G1	G1-5 - Metrics related to political influence and lobbying activities	17.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I agree	We recommend that EFRAG clarifies whether the undertaking is required to report information related to SMEs under this § even if SMEs transactions are not material compared to the total transactions made with suppliers . We also recommend that EFRAG define "SME". We also recommend that EFRAG clarify how the percentage of payment aligned with standard terms shall be computed i.e.: -on the basis of the number of invoices or the total amount of invoices; -on the basis of the payments made during the reporting period even if the invoice was received or dated during a previous reporting period. With respect to the illustration given in NMIG 6, we recommend specifying that the breakdown provided by main category of suppliers is mandatory while the breakdown by region is voluntary and that the undertaking could consider further disaggregating the "non-SMEs" category depending on its specific facts and circumstances. We finally recommend replacing in the table the references to "number of days in accordance with…" or "number of days depending on…" by a given illustrative number of days (this may be specified in a footnote to explain how the figure has been calculated).	G1	G1-6 - Metrics in relation to payment practices	20. (a)
Excels	Compagnie Nationale des Commissaires aux Comptes	Auditor	France			I agree	We recommend that EFRAG clarify whether investigations of government authorities on the undertaking's payment practices are to be considered as "legal proceedings currently outstanding for late payments". Clarifications brought by ID 419 could be usefully added to specify what "currently outstanding legal proceedings" refer to (i.e. "legal proceedings that have not been legally resolved at year-end") and whether proceedings initiated and closed during the reporting period shall also be considered.	G1	G1-6 - Metrics in relation to payment practices	20. (b)
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	We reccommend to limit the disclosure for individual case of corruption to the top management and not to "all individuals", which could be interpreted in a much broader sense.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 4
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	It is still not clear what is intended for "comparable position". The Standard should give clear guidance in order not to over report on comparable positions, as not ll the positions held in public administration have the same relevance (e.g. if someone was in the board of statutory auditors of an hospital is not probably a relevant information). Furthermore, a clarification of what is included in the definition of "public administration" is critical. The concept of lobbyng shouldi be better clarified	G1	G1-5 - Metrics related to political influence and lobbying activities	10.
Excels	Confindustria	Business association (other than association of financial institution)	Italy			I partially agree and partially disagree	It is still very difficult to calculate the percentage of payment practices aligned with the payment standard terms, especially for companies operating in several different countries. We suggest to limit this disclosure to the most relevant countries.	G1	G1-6 - Metrics in relation to payment practices	12.
Excels	Equinor ASA	Preparer (non-financial preparing a sustainability report)	Norway			I disagree	While we support transparency on anti-corruption performance, we remain concerned that obliging disclosure of "confirmed incidents" may lead to: •Risk self-incrimination – Requiring publication of internally confirmed violations that have not been tested by a court could place companies in a problematic position, threatening the important and fundamental protection against self-incrimination. •Undermine the presumption of innocence – An internal conclusion is not equivalent to a court conviction, and disclosure could prejudice ongoing or potential cases. •Create uneven or misleading data – Firms with robust internal controls may appear to have "more incidents" simply because they detect and investigate them thoroughly, not because they have higher exposure to corruption or bribery risks. This is highly-sensitive, context-dependent (Comparing "total number" across firms can be misleading without normalization), and difficult to standardize, which undermines its reliability and comparability, and hence not value adding information to the external stakeholder. Given these issues, our preference remains to retain paragraph 14 as a voluntary disclosure. If it is kept as mandatory, If retained as mandatory, we recommend narrowing its scope to avoid an obligation to also report the type of corruption and bribery where the company does not risk legal liability.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	The draft paragraph 10(a) refers to actions taken in relation to relationships with suppliers. However, the draft paragraph appears to suggest that even if another sub-topic (different from management of relationships with suppliers, including (unfair) payment practices) is identified as material, it would still have to be disclosed. In our view, this requires clarification. A clear distinction should be made between the different material sub-topics under ESRS G1 and the corresponding datapoints in G1-2. For example, this could be further specified in the section Mapping of sub-topics to disclosures in topical standards.	G1	G1-2 - Actions related to business conduct	10. (a)
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	The draft paragraph 10(b) refers to actions taken in relation to corruption and bribery. However, the draft paragraph appears to suggest that even if another sub-topic (different from corporate culture which includes anti-corruption and bribery) is identified as material, it would still have to be disclosed. In our view, this requires clarification. A clear distinction should be made between the different material sub-topics under ESRS G1 and the corresponding datapoints in G1-2. For example, this could be further specified in the Mapping of sub-topics to disclosures in topical standards.	G1	G1-2 - Actions related to business conduct	10. (b)
Excels	UHY ECA Audyt Sp. z o.o.	Auditor	Poland			I partially agree and partially disagree	The draft paragraph 10(c) refers to training activities on business conduct. The subsequent part of this paragraph concerns disclosure of whether the procurement team is involved in training related to its engagement with suppliers for the improvement of their sustainability performance. The whole paragraph as currently drafted seems to imply that even if another sub-topic (different from the management of relationships with suppliers, including (unfair) payment practices) is identified as material, it would nevertheless have to be disclosed. In our view, this requires clarification. A clear distinction should be made between the different material sub-topics under ESRS G1 and the corresponding datapoints in G1-2. For example, this could be further specified in the Mapping of sub-topics to disclosures in topical standards.	G1	G1-2 - Actions related to business conduct	10. (c)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	should fair competition be added here, as an important part of corporarte culture?	G1	G1 - Objective	4. (a)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	The management of relationships with suppliers and (unfair) payment should be recognized as different sub-topics. They may or not be always interrelated. IROs could be linked to the management of relationships with suppliers, (unfair) payments practices, or both. It should be helpful to clarify this point: b) the management of relationships with suppliers; (unfair) payments;	G1	G1 - Objective	4. (b)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Should GDR-M be also mentioned here?	G1	G1 - Objective	6.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	to be added: "if applicable, the circumstance when it has...."	G1	G1-1 - Policies related to business conduct	8. (a)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	to be added: "if applicable, the circumstance when it has...."	G1	G1-1 - Policies related to business conduct	8. (b)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	should this requirement be included under a "Policy" related requirement? Additionally, should this apply depending on the results of the materiality assessment? (whether or not corruption and bribery result material). Finally, we would also suggest to clarify "the functions and/or roles and/or units/departments	G1	G1-1 - Policies related to business conduct	8. (c)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	To be considered the possibility to refer to units/departments	G1	G1-1 - Policies related to business conduct	AR 2
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	We recommend incorporating these requirements into the standards, along with the engagement disclosure requirements (S1, S2, S3, S4), so that organizations can present their approach in a comprehensive and integrated manner. Additionally, it could cause confusion as in ESRS S1, S2, S3, S4 the following is mentioned: If the undertaking has policies for protecting individuals that use these channels against retaliation and they are disclosed in [Draft] Amended ESRS G1-1, it may refer to that disclosure. Nevertheless, apparently this is not mentioned in this standard (G1).	G1	G1-2 - Actions related to business conduct	9.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I partially agree and partially disagree	Please add "where applicable, depending on the DMA results"	G1	G1-2 - Actions related to business conduct	10.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Proposal: (21(a) amended) training activities within the undertaking , including the target audience, frequency and depth of coverage: i. on business conduct ii. on anti-corruption and anti-bribery ii. whether the procurement team is involved in training related to its engagement with suppliers for the improvement of their sustainability performance. The following to be moved to metrics: This shall include the (former 21(b) amended and former 21(c)) percentage of functions and/or roles most at risk within the undertaking in respect of corruption and bribery, as well as members of the administrative, management and supervisory board.	G1	G1-2 - Actions related to business conduct	10. (c)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	I would suggest to move here reporting requirements in relation to: - the number and percentage of employee trainned (including business conduct, anti-corruption and anti-bribery training, procurement, etc) - percentage of functions and/or roles and/or departments/units most at risks.	G1	G1-2 - Actions related to business conduct	10. (c)
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	i would suggest to align this disclosure requirements with the ones requested by GRI 205-4 . Total number and nature of confirmed incidents of corruption. b. Total number of confirmed incidents in which employees were dismissed or disciplined for corruption. c. Total number of confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption. d. Public legal cases regarding corruption brought against the organization or its employees during the reporting period and the outcomes of such cases.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	13.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Why this DP is considered as a metric?we would suggest to move it	G1	G1-5 - Metrics related to political influence and lobbying activities	17.
Excels	Amadeus IT Group, S.A	Preparer (non-financial preparing a sustainability report)	Spain			I disagree	Why this DP is considered as a metric? we would suggest to move it	G1	G1-5 - Metrics related to political influence and lobbying activities	18.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS G1 Business Conduct, when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, and targets (if in place), dependencies when relevant, metrics and financial effects Suggestion: When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS G1 Business Conduct, when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, metrics and targets (if in place), dependencies when relevant, metrics and financial effects.	G1	G1 - Objective	1.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Problem: Unnecessary duplication: The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M. In particular: (a) if the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact; (b) the undertaking may present the description of its material impacts, risks and opportunities, in accordance with [Draft] Amended ESRS 2 IRO-2, alongside information about its policies, actions, targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative Suggestion: The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M. In particular: (a)if the undertaking has not adopted policies, actions and targets with reference to a topic related to material impacts, risks and opportunities, it shall disclose this fact; (b)the undertaking may present the description of its material impacts, risks and opportunities, in accordance with [Draft] Amended ESRS 2 IRO-2, alongside information about its policies, actions, targets and metrics through which it addresses them, to avoid duplication and support a coherent narrative .	G1	G1 - Objective	5.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Why is "(unfair)" placed in brackets? Depending on the intended meaning, either remove the brackets or delete "(unfair)" entirely.	G1	G1 - Objective	4. (b)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Paragraphs counting is flawed Starting with DR G1-2 the numbering of paragraphs starts with 1 again instead of continuing the count of the paragraph which should read 9 and then the numbering should be continued	G1	G1 - Objective	2.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Why is this paragraph needed? Is this not sufficiently covered in ESRS 2, Paragraph 30? Since former S1- to S4 requirements were moved into the new ESRS 2, Paragraph 35 the question arises if for ESRS G1, Paragraph the same logic should apply. Either way, the approach should be consistent across ESRS	G1	G1-1 - Policies related to business conduct	8.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Paragraph 2 (c), last sentence related to DR G1-2, which should actually read 10 (c) The whole approach to supply chain management requires reconsideration. On the one hand, supply chain components are inherent in each of the E, S and G standards, whereas ESRS G1 seems to suggest that this is a component of G. It could also be argued that it is most appropriate to reflect supply chain management in the section on General information because the supply chain is often managed across E, S and G in which case it would be most appropriate to reflect this in the General information section. If fair presentation should be the overarching principle, it should be considered if the last sentence in Paragraph 2(c) actually should belong here	G1	G1-2 - Actions related to business conduct	2.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	It is proposed that the data point "(10(c) continued) It shall also disclose whether the procurement team is involved in training related to its engagement with suppliers for the improvement of their sustainability performance," currently a voluntary data point in the Annex, be amended to become a mandatory disclosure in order to replace the two deleted data points relating to supplier relationships. For reasons of consistency, it would appear appropriate to establish a separate metrics section on supplier management. Furthermore, additional background information would be desirable as to why the substantively new topic of training in supplier engagement is to be included.	G1	G1-2 - Actions related to business conduct	10. (c)
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Why is the addition during the reporting period needed? Is it not clear from ESRS 2 that all disclosures made refer to the reporting period? Please check all ESRS in this respect	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 1
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	Change back to "may" instead of "shall" for the number of confirmed incidents of corruption or bribery.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.
Excels	German Banking Industry Committee (GBIC)	Association of financial institutions	Germany			I disagree	There is an inconsistency between Paragraph 11 and 12. If the objective is to understand late payments to SMEs as indicated in Paragraph the disclosure requirements in Paragraph 12 do not achieve this objective.	G1	G1-6 - Metrics in relation to payment practices	12.
Excels	Allianz SE	Insurance	Germany			I disagree	Strongly disagree; this is an additional mandatory disclosure requirement and not a simplification	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.
Excels	Allianz SE	Insurance	Germany			I disagree	The definitions do not match and shed more confusion then they would help	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 4
Excels	Allianz SE	Insurance	Germany			I partially agree and partially disagree	Keep the term 'in brief' as it prevents unlimited elaboration. Removing it could lead to unnecessary discussions with the auditors	G1	G1-5 - Metrics related to political influence and lobbying activities	17.
Excels	Ferring Pharmaceuticals	Preparer (non-financial preparing a sustainability report)	Switzerland			I partially agree and partially disagree	It is not clear whether you are looking for the percentage of the roles most at risk who conduct training - or the percentage of empoyees overall who are at risk of corruption and bribery. We have assumed the first because its under training, but it is not clear.	G1	G1-2 - Actions related to business conduct	10. (c)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	Reference to ESRS 2 should be 29 to 32, instead of 29 to 31.	G1	G1 - Objective	5.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	"Metrics" should be put in bold.	G1	G1 - Objective	5. (b)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	Bold should be removed from "protection of whistle-blowers" as it is not defined in annex 2.	G1	G1-1 - Policies related to business conduct	8. (b)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	It is not enough to state that the undertaking is subject to legal requirements. The undertaking should state if it have implemented those legal requirements.	G1	G1 - Interaction with other ESRS	AR 1
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	Bold should be removed from "animal welfare" as it is not defined in annex 2.	G1	G1 - Objective	4. (a)
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	At the end of the sentence the following should be added "against each action disclosed under DR G1-2".	G1	G1-3 - Targets related to business conduct	11.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	At the end of the sentence the following should be added "and indicate all identified material negative impacts and risks that remained unaddressed by actions during the reporting year"	G1	G1-2 - Actions related to business conduct	9.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	The current wording may imit disclosures to convictions only in the EU. The following sentence should be added "The above considerations should be applied, with due consideration of differences, with respect to convictions issued outside of the EU."	G1	G1-4 - Metrics related to incidents of corruption or bribery	AR 4
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I agree	Bold should be put on "material impacts, risks [] oportunities".	G1	G1-5 - Metrics related to political influence and lobbying activities	17.
Excels	Polish Association of Listed Companies	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	The percentage should be clarified to ensure more comparable reporting. The percentage should relate to both value and number of payments aligned with these standard terms. The sentence should be rephrased as following: "a description of the undertaking's standard payment terms in number of days by main category of suppliers, including SME's, and the percentage of its payments aligned with these standard terms by value and number of payments; and"	G1	G1-6 - Metrics in relation to payment practices	20. (a)
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	We do understand the wish for an example, however we believe it would be more consistent to place this example in the NMIG than part of the ESRS	G1	G1-1 - Policies related to business conduct	AR 2
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	DASB supports the adjustments to increase interoperability with SFDR. Focus on alignment SFDR will we needed in future since SFDR will also be adjusted - how to make sure consistency remains in the future. Suggestion to add an evaluation clause or direct link to SFDR	G1	G1-1 - Policies related to business conduct	8. (a)
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	The adjusted sentence is hard to read. Suggestion to use an alternative formulation, for example splitting 10a in two sentences since it contains two requirements	G1	G1-2 - Actions related to business conduct	10. (a)
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	The adjusted sentence is an improvement, however we suggest to rephrase the sentence by changing "any" into "the" in the phrase: "[..] which includes any actions taken to address breaches in procedures and standards of anti-corruption and anti-bribery."	G1	G1-2 - Actions related to business conduct	10. (b)
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	DASB supports the adjustments to increase interoperability with SFDR. Focus on alignment SFDR will we needed in future since SFDR will also be adjusted - how to make sure consistency remains in the future. Suggestion to add an evaluation clause or direct link to SFDR	G1	G1-1 - Policies related to business conduct	8. (b)
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	DASB supports the adjustments to increase interoperability with SFDR. Focus on alignment SFDR will we needed in future since SFDR will also be adjusted - how to make sure consistency remains in the future. Suggestion to add an evaluation clause or direct link to SFDR	G1	G1-2 - Actions related to business conduct	10. (b)
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	Functions and or roles depends on the way the undertaking defines it. Stimulates entity specific reporting but simultaneously hampers comparability. Furthermore, we question the informative value of the disclosure and see a risk for boiler plate language.	G1	G1-1 - Policies related to business conduct	8. (c)
Excels	Dutch Accounting Standards Board	(National) standard setter	Netherlands			I partially agree and partially disagree	The DASB notes that G1.12 under b is an existing requirement inrespect of legal proceedings for late payments, however the DASB expects an SME to experience a high threshold to start such legal proceedings. Additionally, this focus on legal proceedings outstanding, information about legal proceedings in this respect concluded during the year might be a valuable	G1	G1-1 - Policies related to business conduct	12.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Business conduct should not include aspects of animal welfare, especially because there are no other DR's in regards to animal welfare.	G1	G1-1 - Policies related to business conduct	7.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It should be stated that it is ok, if processes to respond to allegations or incidents should only be descibed once for all kind of incidents e.g. human rights, discrimination, corruption & bribery. Furthermore metrics for all kind of incidents should also stated only once in a clearly arranged way.	G1	G1-2 - Actions related to business conduct	10. (b)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It should be added, that a reference to the EU transparency register or national transparency register is sufficient to fulfill this DR, if the data is available in the register. (16. & 17.)	G1	G1-5 - Metrics related to political influence and lobbying activities	16.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	There is no common definition for main category. Please delete the term main category and add options for the undertaking for differentiation of categories, countries, or other criteria	G1	G1-6 - Metrics in relation to payment practices	20.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	The wording of the objective of G1-6 is not reflected in the corresponding requirements.	G1	G1-6 - Metrics in relation to payment practices	19.
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	If these specific categories of delivery files are requested, we cannot provide any information. Our suppliers are not sorted into categories in any way. If these specific supplier categories are required, we are unable to provide any information. Our suppliers are not sorted into categories in any way. Furthermore, we are unable to determine whether a supplier is an SME, as no data is available for this purpose. The question also remains as to which definition of SME should be used here. The terms and conditions are very often specified by our suppliers or agreed upon individually, even though a few K+S subsidiaries have their own payment terms. -> In the case of individual agreements, there is therefore an automatic deviation from the standard – what significance does the file then still have?	G1	G1-6 - Metrics in relation to payment practices	20. (a)
Excels	German Chemical Industry Association	Business association (other than association of financial institution)	Germany			I disagree	The derivation of the sample is omitted (former ESRS-G1.33d). Accordingly, we would have to say whether ALL suppliers are complying with the payment terms. However, this is not possible because not all companies are managed in SAP and not all companies have their own defined payment terms – this would require time-consuming manual queries! Determining the key figure thus becomes highly complex and even more time-consuming than before.	G1	G1-6 - Metrics in relation to payment practices	

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Polish Chamber of Information Technology and Telecommunications	Business association (other than association of financial institution)	Poland			I disagree	While it is understandable why EFRAG wishes to focus on SMEs, it unfortunately does not match business reality. Companies do not tier their suppliers based on their size. Therefore it is impossible to extract such detailed information without undue cost or effort, such as surveying all suppliers on their size and adding new elements to currently operating supplier management systems. We believe that information on payment practices applied to all suppliers, without prejudice, would be sufficient to meet the goal of fair presentation of weather the issuer follows best practices in that respect. Therefore, keeping the division between all suppliers and SMEs as a requirement goes against the goal of simplification and avoiding undue cost or effort in the process of sustainability reporting.	G1	G1-6 - Metrics in relation to payment practices	20. (a)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	We recommend to limit the disclosure for individual case of corruption to the top management and not to all individuals, which could be interpreted in a much broader sense.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 4
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is still not clear what is intended for "comparable position". The Standard should give clear guidance in order not to over report on comparable positions, as not all the positions held in public administration have the same relevance (e.g. if someone was in the board of statutory auditors of an hospital is not probably a relevant information). Furthermore, a clarification of what is included in the definition of "public administration" is critical.	G1	G1-5 - Metrics related to political influence and lobbying activities	10.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	It is still very difficult to calculate the percentage of payment practices aligned with the payment standard terms, especially for companies operating in several different countries. We suggest to limit this disclosure to the most relevant countries.	G1	G1-6 - Metrics in relation to payment practices	12.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Refered to comment onn §2c - these requirements are excessive, it shall be up to undertaker to choose the functions / roles at high risk and do the training accordingly.	G1	G1-2 - Actions related to business conduct	7.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The requirement could ask either the persentage or the number as the exact percentage of employees trained is difficoult to disclose, due to the natural turnover of staff/roles	G1	G1-2 - Actions related to business conduct	10. (c)
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Wrong reference	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 3
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Wrong reference	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 4
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Wrong reference	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 5
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Wrong reference	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 6
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	The requirements to explain the topics discussed is excessive, a company may have hundred of such meeting per year.	G1	G1-5 - Metrics related to political influence and lobbying activities	9.
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Wrong reference	G1	G1-5 - Metrics related to political influence and lobbying activities	AR 7
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Wrong reference	G1	G1-5 - Metrics related to political influence and lobbying activities	AR 8
Excels	IOGP Europe	Business association (other than association of financial institution)	Belgium			I disagree	Wrong reference	G1	G1-5 - Metrics related to political influence and lobbying activities	AR 9
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	The information required in [DRAFT] ESRS G1-5 on political influence and lobbying activities is redundant with other EU transparency requirements. Companies should be allowed to reference the EU transparency register or any other relevant national registers for the purpose of this disclosure.	G1	G1-5 - Metrics related to political influence and lobbying activities	5.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I disagree	G1 definitions, and specifically the one for "Corruption and bribery convictions" are not aligned with United Nations Convention against Corruption or with the OECD, adding new definitions or making references to regional (ECRIS) (instead of global) references. Where available, widely accepted global frameworks should be the basis for definitions (e.g. the UN Convention or OECD).	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 4
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	Missing detail on internal viewing policies such as company employment terms and conditions. These are important and fundamental when doing investigations.	G1	G1-1 - Policies related to business conduct	1.
Excels	Cefic	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	"Confirmed incidents" should refer to proven cases after internal investigation, simple alerts should not be disclosued.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	Only the policies for the complaints procedure are adressed in G1-1. In order to bundle the requirements on the complaints procedure, it would be advisable to bundle this reporting requirement together with the reporting requirements of ESRS S1-2, S2-2, S2-3 and S2-4 on the complaints procedure in a separate chapter. This would support the opportunitie to refer to the descriptions under G1 in the S chapters.	G1	G1-1 - Policies related to business conduct	8. (b)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	The metrics relating to anti-corruption and anti-bribery are comprehensible and ok. When summarizing the sub-sub-topics in the ESRS 1 standard, anti-corruption and anti-bribery, animal welfare and complaints procedures were combined in one Sub-Topic. It is unclear why the topics of animal welfare and complaints procedures no longer appear separately in standard G1. This is an inconsistency between the topic overview in ESRS 1 and the G1 standard that should be rectified (see also comment on ESRS G1 - 8)	G1	G1-4 - Metrics related to Incidents of corruption or bribery	12.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It should be made clearer that only those metrics are to be reported for sub-topics that have been assessed as essential in the context of the DMA. The requirement to report on "standard payment terms" and supplier categorization presents significant practical challenges. The metric lacks clarity in international contexts and provides limited value for understanding supplier relationships. Tracking supplier categories by size would require substantial system changes, while reporting legal proceedings related to late payments without context offers little decision-useful information, especially since material cases are already covered in legal risk reporting. These requirements create unnecessary administrative burden without adding meaningful value to sustainability reporting.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	12.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It should be made clearer that only those metrics are to be reported for sub-topics that have been assessed as essential in the context of the DMA.	G1	G1-5 - Metrics related to political influence and lobbying activities	15.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I partially agree and partially disagree	It should be made clearer that only those metrics are to be reported for sub-topics that have been assessed as essential in the context of the DMA.	G1	G1-6 - Metrics in relation to payment practices	19.
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	It is unclear to which paragraphs the AR refers to (also AR 4-6). Paragraphs 13/14 do no longer exist in the amended ESRS. Update of references/paragraphs needed.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 3
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	Considering the EFRAG Explanations January - May 2024 (final version,page 95), the following issues are identified: 1. It focuses solely on first-instance convictions of natural persons, including non-final decisions, leading to a lack of transparency and contradictions with the ECRIS, which only records final convictions. 2.The CSRD approach lacks transparency by mixing final and non-final convictions. A final conviction has more significance than a non-final decision. 3.Th approach fails to distinguish between the severity of convictions of board members versus employees, and it does not consider cases where the company itself is sanctioned for corruption or bribery, either through criminal proceedings or administrative fines. Relevant national registers for legal entities are disregarded by the CSRD as well. Cases where a company is sanctioned for corruption or bribery are important, as they indicate systemic issues rather than individual excesses. 4.Additionally, the reliance on information from accused individuals creates reliability issues, as court proceedings often occur years after the offense, and the employees may no longer be with the company. 5.The focus on payable fines for convictions of natural persons overlooks prison sentences (and their suspension if applicable), which are indicators of the severity of the crime.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	5. (a)
Excels	ZVEI e.V.	Business association (other than association of financial institution)	Germany			I disagree	Suggestion to delete this datapoint as information already disclosed in EU Transparency Register as well as in national Transparency Registers (e.g. Germany, USA) and therefore considered redundant. Additionally, a prioritization of "main topics in lobbying activities" could imply that political activities in one country could be more important or "material" than in another leading to misunderstandings with external stakeholders.	G1	G1-5 - Metrics related to political influence and lobbying activities	9.
Excels	SAIM GmbH	Consultant (including software vendor)	Germany			I partially agree and partially disagree	Unclear what is meant by standard payment terms (and that it isn't the average time to pay). Why was the example taken out from the application requirements? That was helpful	G1	G1-6 - Metrics in relation to payment practices	12.
Excels	BDO Poland	Auditor	Poland			I partially agree and partially disagree	In addition to the elements listed under ESRS 2 GDR-P, business conduct policies should disclose topic-specific features—for instance, whether whistleblower systems accept reports from external stakeholders, how whistleblowers are protected, and whether policy effectiveness is regularly assessed. These dimensions are critical for understanding governance in practice and avoiding reporting gaps.	G1	G1-1 - Policies related to business conduct	10.
Excels	BDO Poland	Auditor	Poland			I agree	It is positive that key policy areas such as anti-corruption and whistleblower protection are explicitly singled out for disclosure. This supports consistency with EU regulatory frameworks (e.g. SFDR) and addresses areas of high stakeholder concern. No changes needed.	G1	G1-1 - Policies related to business conduct	8. (a)
Excels	BDO Poland	Auditor	Poland			I partially agree and partially disagree	The requirement lacks clarity on the scope of "business conduct policies". Without further guidance, undertakings may omit key policies due to unawareness or intentional exclusion. Including a non-exhaustive list of typical business conduct policy areas would support more complete and comparable disclosures.	G1	G1-1 - Policies related to business conduct	7.
Excels	BDO Poland	Auditor	Poland			I agree	Including a dedicated disclosure requirement for targets within ESRS G1 is strongly supported. This ensures alignment with the overall ESRS architecture and improves consistency between G, E, and S topics. No changes needed.	G1	G1-3 - Targets related to business conduct	11.
Excels	BDO Poland	Auditor	Poland			I partially agree and partially disagree	The current drafting allows undertakings to declare zero political contributions without substantiating how this conclusion was reached. Requiring a short description of the methodology in case of no identified contributions (e.g. data sources, internal controls, scope of review) would enhance reliability. This ensures disclosures reflect actual due diligence and minimize underreporting.	G1	G1-5 - Metrics related to political influence and lobbying activities	16.
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I partially agree and partially disagree	Lots of DP merge into this paragraph. Ok for the DP but the presentatin is not so clear. Better to put differetn bullet points with the DP.	G1	G1-2 - Actions related to business conduct	10. (c)
Excels	LABORATOIRES PIERRE FABRE	Preparer (non-financial preparing a sustainability report)	France			I agree	Number of confirmed incidents of corruption mandatory	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.
Excels	European Association of Co-operative Banks (EACB)	Association of financial institutions	Belgium			I partially agree and partially disagree	The consolidation of subtopics is not always effective. Excessive aggregation may dilute relevant aspects. For instance, for credit institutions it seems reasonable to address the topic of "corruption and bribery" separately, rather than combining it with less related issues such as whistleblowing or animal welfare. The draft foresees a consolidation of sub- and sub-sub-topics at the sub-topic level, with sub-sub-topics being removed. This has implications for the materiality assessment, particularly in relation to governance. The topic 'corruption and bribery' is now subsumed under 'corporate culture', together with whistleblower protection and animal welfare. As a result, the term 'corporate culture' is given a deviating definition, and the topic of 'corruption and bribery'—which is often assessed as material and clearly defined—loses significance. A clearer definition of 'corporate culture' as well as a separate consideration of 'corruption and bribery' as its own sub-topic would appear appropriate to ensure a clear delineation of topics for the materiality assessment.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	12.
Excels	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden			I agree	(Former G1-1 Disclosure Requirement related to ESRS 2 GOV-1 – The role of the administrative, management and supervisory bodies) - It is good that it is handled in ESRS 2 GOV1 instead of seperated reporting in each topical standard.	G1	G1-1 - Policies related to business conduct	6.
Excels	Kjell & Company	Preparer (non-financial preparing a sustainability report)	Sweden			I partially agree and partially disagree	Great modification to only disclose discrepencies, but which specific chapter and/or articles in UN Convention against Corruption are applicable to a company? Please specify. Otherwise it is hard to compare against. Is it Article 12?	G1	G1-1 - Policies related to business conduct	8.
Excels	ASSIREVI	Auditor	Italy			I partially agree and partially disagree	We propose to restore the existing para. 33(a) related to the average time to pay an invoice because this data is used to respond to subsequent requests (see current para. 20(a)). We therefore believe that it would not be an excessive effort for users to report it.	G1	G1-6 - Metrics in relation to payment practices	20.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	This adds an additional disclosure requirements for preparers. We believe that the principle of not increasing reporting requirements should be applied consistently. Even if the datapoint itselbf is not technically complex, the change in status to mandatory will require additional interpretation, internal coordination, and alignment with auditors—especially during first-time implementation. This effort should not be underestimated. From our point of view the ESRS revision should refrain from posing any additional effort to preparers.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.
Excels	Mercedes-Benz Group AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	This application requirements is not clearly defined and prone to diverse interpretation, e.g.: - "shall consider": does this mean that incidents in the upstream/downstream value chain are to be disclosed? - what is meant by "direct involvement"? - does the reporting include information about the "actors"?	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 3
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The objective described in para. 1 of each draft topical ESRS is inconsistent with Draft ESRS 1. The statement about "dependencies when relevant" and "financial effects" should be deleted to make it consistent with ESRS 1. Change the wording to: "When reporting in accordance with the ESRS, the sustainability statement shall cover information in relation to [Draft] Amended ESRS G1 Business Conduct when this topic relates to material impacts, risks and opportunities. The disclosure on the material impacts, risks and opportunities is expected to cover policies, actions, metrics and targets (if in place)."	G1	G1 - Objective	1.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Why is (unfair) put in brackets? Depending on what the intention was, either delete the brackets or delete the (unfair) in its entirety.	G1	G1 - Objective	4. (b)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Remove parts (a) and (b) and keep the introductory paragraph to avoid unnecessary dupplication. Paragraph 5 should read as follows: "The undertaking shall apply the provisions of [Draft] Amended ESRS 2 paragraphs 29 to 32 and GDR-P, GDR-A, GDR-T and GDR-M."	G1	G1 - Objective	5.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	Why is this paragraph needed? Is this not sufficiently covered in ESRS 2, Paragraph 30? Since former S1- to S4 requirements were moved into the new ESRS 2, Paragraph 35 the question arises if for ESRS G1, Paragraph the same logic should apply. Either way, the approach should be consistent across ESRS.	G1	G1-1 - Policies related to business conduct	8.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Starting with DR G1-2, the numbering of paragraphs starts with 1 again instead of continuing the paragraph count of the paragraph. This paragraph should read as 9 and then the numbering should be continued.	G1	G1-2 - Actions related to business conduct	9.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Part 1 of feedback on G1-2, paragraph 10(c): The whole approach to supply chain management requires reconsideration. On the one hand, supply chain components are inherent in each of the E, S and G standards, whereas ESRS G1 seems to suggest that this is a component of G. It could also be argued that it is most appropriate to reflect supply chain management in the section on general information because the supply chain is often managed across E, S and G in which case it would be most appropriate to reflect this in the general information section. If fair presentation should be the overarching principle, it should be considered if the last sentence in Paragraph 10(c) actually should belong here. We also believe that changing this from voluntary to mandatory represents an arbitrary extension of reporting and is not sufficiently justified. [Feedback on this paragraph is continued below. The below entry should be read after this entry.]	G1	G1-2 - Actions related to business conduct	10. (c)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Part 2 of feedback on G1-2, paragraph 10(c): If left unamended, we would appreciate more guidance on when the disclosure of 'whether the procurement team is involved in training related to its engagement with suppliers for the improvement of their sustainability performance' within paragraph 10(c) is required, whether it is required when the sub-topic "Management of relationships with suppliers" is deemed material and/or the other sub-topics under G1 are deemed material. In the NMIG's "Mapping of sub-topics to disclosures in topical standards", G1-2 has been mapped to all three sub-topics under G1, however it does not seem all datapoints within G1-2 are related to all the sub-topics under G1. In general, despite the non-mandatory status, some guidance provided in the NMIG may cause more confusion than clarify for preparers. In view of the above example, we would appreciate the provision of more clarifications on the use of the mapping provided in NMIG, and more broadly on circumstances where preparers have challenges applying the guidance in the NMIG.	G1	G1-2 - Actions related to business conduct	10. (c)
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Why is the addition during the reporting period needed? Is it not clear from ESRS 2 that all disclosures made refer to the reporting period? Please check all ESRS in this respect.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	12.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Why is the addition during the reporting period needed? Is it not clear from ESRS 2 that all disclosures made refer to the reporting period? Please check all ESRS in this respect.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	13.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	It is still not clear whether the number of convictions for violation of anti-corruption and anti- bribery laws applies only to the legal entity , or whether it should also include employees and members of the 'administrative, management and supervisory bodies' (AMSB) of the entity. It should be clarified that this applies to legal entities and not individual persons.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	13.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	In relation to the new G1-6 paragraph 13, we suggest to split the two requirements (i.e. number of convictions and total amount of fines) into different paragraphs for better clarity, given that the scopes of such metrics are indeed different.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	13.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Why is the addition during the reporting period needed? Is it not clear from ESRS 2 that all disclosures made refer to the reporting period? Please check all ESRS in this respect. See also our response to question 23.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	Response to Part 2 Q23 (1): AFME strongly opposes this additional mandatory datapoint. There is not sufficient justification for adding this quantitative disclosure requirement as it does not align with the simplification principles set out by the Commission for the revision of ESRS. Members have previously raised concerns about the application of definition of "confirmed" incidents and the challenges with applying the Glossary definitions on a global scale, where ESRS definitions may deviate from individual jurisdictional definitions. The new ARs 4-6 do not provide the flexibility required for reporters operating globally. Preparers should not be mandated to disclose information which poses a legal risk to the institution – this should align with reliefs available in the context of financial reporting. [the response is continued in another field]	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	Response to Part 2 Q23 (2): The proposed mandatory disclosure of the number and nature of "confirmed" incidents of corruption and bribery would potentially impair an undertaking and its parent company's legal strategy/defence and risk mitigation. Determinations as to whether or not a legal violation has occurred, and the appropriate enforcement response, are generally discretionary decisions by competent authorities. The proposed disclosure may be interpreted by authorities in and outside Europe as an admission of violation by the undertaking or its parent company, regardless of specific facts and circumstances (e.g., materiality and nature of identified misconduct). This may bias an investigation and enforcement response. Such information is also highly sensitive and complex to report in a public document. Broad sharing of sensitive information could be detrimental for various reasons (e.g. potential breach of confidentiality obligations as regards certain transactions). It is to be stressed though that, for the sake of transparency, the corresponding information is already shared with a restricted list of stakeholders (Board of Directors, auditors and certain supervisory authorities). Consequently, the disclosure requirement can result in undue harm and legal risk to the undertaking and its parent company. Internal investigations by the undertaking, even if substantiated, should not be reportable.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	It should be clarified that this refers only to employees who are active in the reporting period.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 3
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	AR 4 aligns its interpretation of "final decision" with the concept of a "conviction" under the European Criminal Courts Records Informatin System (ECRIS). In Regulation EU 2019/816 (ECRIS-TCN), the concept of a conviction is defined as a definitive resolution where no appeal is possible. The log of amendments (referring to AR 4) states the following: "In this context, final decisions include all the decisions in the reporting year while awaiting the outcome of a possible appeal. The reporting undertaking may provide additional information if an appeal is considered, has been lodged or was successful". The log of amendments, therefore, introduces a discrepency. It is essential that, to avoid any misinterpretation, the concept of conviction in AR 4 for paragraph 13 refers to final decisions not subject to appeals, and therefore paragraph added in the Log of Amendments is deleted and not added to any subseqent Q&A as it is incorrect pursuant to Regulation ECRIS.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 4
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	The application requirements should specify that reporting on G1-4 should focus on convictions to legal entities, not to individual persons.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 4
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I partially agree and partially disagree	Regarding AR 5 for p. 13, in order to keep coherence with the definition of "conviction" under the European Crimal Courts Records Infomation System, fines to be reported should be those that are definitive (i.e. not subject to appeal judicially). This would be also consistent with the concept of "fair presentation" pursued by the new ESRS.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 5
Excels	The Association for Financial Markets in Europe	Association of financial institutions	United Kingdom			I disagree	The requirements of G1-5 should be clarified to affirm that the disclosure is associated with the EU and its member states in recognition of the fact that not all jurisdictions have regulatory structures akin to the EU Transparency Register and substantial investment would be required for firms to collect, track and report information from third parties. They also go beyond current EU Transparency Register requirements. In particular, we thought the prior paragraph 29(b)(i) should have been modified to drop the reference to "indirectly" which arguably could be seen to cover payments to trade organizations that may engage with political officials either through conferences/lunches or through direct contributions. Such activity may have little connection to material ESG issues (e.g. meeting to discuss rules for participating in local check clearing market), and the EU would still have the benefit of the EU registrations and disclosures for EU-related activity under the existing EU Transparency Register. The exposure draft does not clarify this, and we ask that this is considered further.	G1	G1-5 - Metrics related to political influence and lobbying activities	16.
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	It is unclear to which paragraphs the AR refers to (also AR 4-6). Paragraphs 13/14 do no longer exist in the amended ESRS. Update of references/paragraphs needed.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 3

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Considering the EFRAG Explanations January - May 2024 (final version,page 95), the following issues are identified: 1. It focuses solely on first-instance convictions of natural persons, including non-final decisions, leading to a lack of transparency and contradictions with the ECRIS, which only records final convictions. 2.The CSRD approach lacks transparency by mixing final and non-final convictions. A final conviction has more significance than a non-final decision. 3.Th approach fails to distinguish between the severity of convictions of board members versus employees, and it does not consider cases where the company itself is sanctioned for corruption or bribery, either through criminal proceedings or administrative fines. Relevant national registers for legal entities are disregarded by the CSRD as well. Cases where a company is sanctioned for corruption or bribery are important, as they indicate systemic issues rather than individual excesses. 4.Additionally, the reliance on information from accused individuals creates reliability issues, as court proceedings often occur years after the offense, and the employees may no longer be with the company. 5.The focus on payable fines for convictions of natural persons overlooks prison sentences (and their suspension if applicable), which are indicators of the severity of the crime.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	5. (a)
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	By deleting "for financai or in kind political contributions", the requirements seem to suggest that the total monetary calue of financial and in-kind political contributions for "political influence" needs to be disclosed. This in turn would increase the reporting burden for companies as it widens the defition of the metrics to be reported to general political influence , while at the same time being open for interpretation. Generally, the collection of information for this datapoint requires a lot of effort and raises legal concerns especially related to in-direct financial contributions outside of the EU, which is why we would suggest to limit the scope from "global! to "EU and Member States" or delete the datapoint. Alternatively, further clarification on the scope needed.	G1	G1-5 - Metrics related to political influence and lobbying activities	8.
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	Suggestion to delete this datapoint as information already disclosed in EU Transparency Register as well as in national Transparency Registers (e.g. Germany, USA) and therefore considered redundant. Additionally, a prioritization of “main topics in lobbying activities” could imply that political activities in one country could be more important or “material” than in another leading to misunderstandings with external stakeholders.	G1	G1-5 - Metrics related to political influence and lobbying activities	9.
Excels	Siemens AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The requirement to report on "standard payment terms" and supplier categorization presents significant practical challenges. The metric lacks clarity in international contexts and provides limited value for understanding supplier relationships. Tracking supplier categories by size would require substantial system changes, while reporting legal proceedings related to late payments without context offers little decision-useful information, especially since material cases are already covered in legal risk reporting. These requirements create unnecessary administrative burden without adding meaningful value to sustainability reporting.	G1	G1-6 - Metrics in relation to payment practices	12.
Excels	Leaseurope	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	The requirements of G1-5 should be clarified to affirm that the disclosure is associated with the EU and its member states in recognition of the fact that not all jurisdictions have regulatory structures akin to the EU Transparency Register and substantial investment would be required for firms to collect, track and report information from third parties that may be required given broad definitions. They also go beyond current EU Transparency Register requirements. In particular, we thought the prior paragraph 29(b)(i) should have been modified to drop the reference to “indirectly” which arguably could be seen to cover payments to trade organizations that may engage with political officials either through conferences/lunches or through direct contributions. Such activity may have little connection to material ESG issues (e.g. meeting to discuss rules for participating in local check clearing market), and the EU would still have the benefit of the EU registrations and disclosures for EU-related activity under the existing EU Transparency Register. The exposure draft does not clarify this, and we ask that this is considered further.	G1	G1-5 - Metrics related to political influence and lobbying activities	16.
Excels	Leaseurope	Business association (other than association of financial institution)	Belgium			I disagree	Since, as noted in G1-4, this disclosure requirement has been included to support the information needs of financial market participants subject to Regulation (EU) 2019/2088, it is not directly applicable in the context of private companies, and therefore should be excluded or at least caveated to exclude private companies. [Please note we wished to select 'I partially agree and partially disagree' in our response, but were unable to do so]	G1	G1-4 - Metrics related to Incidents of corruption or bribery	13.
Excels	Leaseurope	Business association (other than association of financial institution)	Belgium			I disagree	Reporting of this information is already required in (most) EU constituencies, and this datapoint includes requirements that are not only redundant, but that also exceed the scope of existing EU legislation, introducing new obligations not required under the Transparency Register framework. [Please note we wished to select 'I partially agree and partially disagree' in our response, but were unable to do so]	G1	G1-5 - Metrics related to political influence and lobbying activities	16.
Excels	Leaseurope	Business association (other than association of financial institution)	Belgium			I disagree	For privately and in particularly family-held company this could include sensitive information. While the ESRS has stated that the purpose of these included data points is to enhance transparency for investors and stakeholders, it is reasonable that the ESRS should take into account the specific perspective and context that private companies operate in to make appropriate rules for reporting that that may be distinct from those applicable to publicly listed companies. This is another one of those cases, as this data point requires the reporting of business sensitive information held by a privately-held company that is generally otherwise not subject to public disclosure. Further, this requirement improperly limits flexibility. The IFRS allows for principles-based disclosures, while ESRS imposes structured datapoints, which may not suit all governance models (especially US-based or family-owned firms). Instead, companies should be able to screen applicable categories for materiality and to limit disclosures to material items. [Please note we wished to select 'I partially agree and partially disagree' in our response, but were unable to do so]	G1	G1-5 - Metrics related to political influence and lobbying activities	18.
Excels	ETSA	Business association (other than association of financial institution)	Belgium			I partially agree and partially disagree	If companies are required to disclose specific payment amounts to individual associations, there is a risk that conclusions relevant to competition could be drawn from this. There are very different models for calculating membership fees in the association landscape, for example based on total payroll or company turnover. Disclosing specific contribution amounts to individual organisations could enable competitors who are members of the same association to derive sensitive information about other companies. We therefore propose that only the type of recipient should be disclosed, but not specific organisations or contribution amounts.	G1	G1-5 - Metrics related to political influence and lobbying activities	16.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Eurometaux (European Metals Association)	Business association (other than association of financial institution)	Belgium			I disagree	In the mining industry, supplier-related data is mostly uncategorized in the way requested. Suppliers are mainly managed individually, and payment conditions are negotiated on a case-by-case basis. Applying this categorisation will increase complexity in reporting	G1	G1-6 - Metrics in relation to payment practices	20.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I disagree	Strong opposition is expressed to converting G1-4 25(a) from a voluntary to a mandatory datapoint under G1-14. EFRAG's rationale, an exception justified by the absence of other metrics on corruption and bribery, is insufficient and inconsistent with its mandate to simplify and reduce reporting burdens. This change represents a significant shift in scope and expectations. EFRAG has not provided a compelling reason, and elevating this datapoint without compelling justification undermines the credibility of the standard-setting process and imposes undue burden. The EU Commission's clear instruction to EFRAG, repeatedly emphasized, is that voluntary datapoints should not become mandatory without overwhelming justification. The claim that "no other metrics exist" does not meet that threshold.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.
Excels	MedTech Europe	Business association (other than association of financial institution)	Belgium			I disagree	Strong opposition is expressed to the conversion of G1-2 AR (b) from a voluntary to a new mandatory datapoint under G1-4 10(c). EFRAG's rationale, that this change replaces two deleted datapoints on supplier relationship management and was deemed "more meaningful", is insufficient and inconsistent with its stated mandate to simplify and reduce reporting burdens. This change introduces a significant shift in scope without compelling justification. EFRAG has consistently stated that voluntary datapoints should only be made mandatory under exceptional circumstances. The assertion of increased relevance is subjective and does not sufficiently account for the diversity of supplier governance models or the potential for immaterial disclosures. EFRAG must adhere to its principles of proportionality and materiality. Elevating this datapoint to mandatory status without overwhelming justification undermines the credibility of the standard-setting process. We urge EFRAG to retain the datapoint as voluntary.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	10. (c)
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I agree	Paragraph 9 sets the objective of G1-2 very clearly.	G1	G1-2 - Actions related to business conduct	9.
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	This amendment meets the purpose of having the information requirement set out. However, we suggest adapting the text to emphasise alignment with applicable legislation, rather, without obliging companies to disclose potentially sensitive information. for example, the clause can be formulated as follows: 10. In addition to the information required by ESRS 2 GDR-1, the undertaking shall disclose: a) information about the management of its relationships with its suppliers, if the undertaking takes into account social and environmental criteria for the selection of its suppliers based on the applicable legal requirements.	G1	G1-2 - Actions related to business conduct	10. (a)
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I agree	These paragraphs were unnecessarily complicating the disclosures. Nokia welcomes the simplification.	G1	G1-2 - Actions related to business conduct	13.
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	The meaning of "confirmed incident" should be revised as indicated in a prior comment. Additionally, we do not support the addition of this new mandatory disclosure requirement and respectfully request that it be adapted as follows: "The undertaking may disclose the total number and nature of confirmed incidents of corruption or bribery that occurred during the reporting period".	G1	G1-2 - Actions related to business conduct	14.
Excels	Nokia	Preparer (non-financial preparing a sustainability report)	Finland			I partially agree and partially disagree	While the distinction between DPs political influence and lobbying activities is welcome, the definition of what exactly constitutes "political influence" needs to be added to the glossary of terms, especially given the distinction between "financial and in-kind political contributions".	G1	G1-2 - Actions related to business conduct	16.
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	We recommend that EFRAG provide a definition of unfair payment practices, this concept being newly introduced in the ED.	G1	G1 - Objective	4. (c)
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	We recommend that EFRAG clarify the scope of people directly involved in incidents of corruption or bribery to be considered as AR 3 refers to 'employees' while NMIG 4 refers to 'own workers' (i.e., including non-employees).	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 4
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	The new definition of fines provided in AR 5 limits the information to be disclosed to the fines 'paid to a public treasury'. We recommend that EFRAG clarifies whether fines that comply with the applicable definition but which are paid to other bodies shall be considered in reporting under ESRS G1:13.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 4
Excels	Deloitte	Auditor	Spain			I partially agree and partially disagree	We recommend that EFRAG clarify whether investigations of government authorities on the undertaking's payment practices are to be considered as 'legal proceedings currently outstanding for late payments'. Clarifications brought by ID 419 could be usefully added to specify what 'currently outstanding legal proceedings' refer to (i.e. 'legal proceedings that have not been legally resolved at year-end') and whether proceedings initiated and closed during the reporting period shall also be considered.	G1	G1-6 - Metrics in relation to payment practices	20.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	EDITORIAL "(unfair) payment practices" - not clear whether this is asking undertakings to report on unfair payment practices or both, fair and unfair practices; log of amendment states that the amendment by "(unfair)" was intended to align with CSRD, but CSRD (recital (50)) does not use brackets and is therefore clear in the sense that it refers to "unfair payment practices" only; par 4(b) should be aligned (i.e. remove brackets)	G1	G1 - Objective	4. (b)
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	On paras 8(a) and 8(b) "the circumstances when it has no policies on ..." The change in the wording does not add to the clarification. The earlier version: "When it has no policies... it shall state and whether it has plans to implement" is perceived as clearer. The wording in ESRS G1 amend raises the question as to whether there is an expectation of a different disclosure now. The intention is that undertakings disclose when they do not have that policiy. However, now it could be read as if the circumstances of that are asked to be disclosed. Suggestion: keep current wording.	G1	G1-1 - Policies related to business conduct	8. (a)
Excels	DRSC	(National) standard setter	Germany			I agree	generally agree that streamlining two DP into one new DR; here: 10(c) includes new DR, but that DR (procurement team involved in training) included to replace / streamline two other data points on management of relationship with suppliers	G1	G1-1 - Policies related to business conduct	10. (c)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	DRSC	(National) standard setter	Germany			I agree	from may to shall (exception) as there would be no other remaining metrics on corruption and bribery	G1	G1-4 - Metrics related to Incidents of corruption or bribery	4.
Excels	DRSC	(National) standard setter	Germany			I partially agree and partially disagree	On para 7 et seq. According to the log of amendments the changes in G1 amend par. 7 et seq are meant to clearer distinguish between political influence and lobbying activities by differentiating between the two. However, this seems difficult to establish in G1-5. For example, par 7 states that the objective is - among other - to provide "types ... of lobbying activities" when in fact par 8 asks of different types of "political influence". Lobbying activities (par 9) are not differentiated by type, but by main topics etc. Therefore, it does not seem to clarify any differences between the two (especially since lobbying activities are (correctly) still explained as being included in "political influence" activities (par 7).	G1	G1-5 - Metrics related to political influence and lobbying activities	7.
Excels	DRSC	(National) standard setter	Germany			I disagree	Question 32) in the questionnaire, the log of amendments to G1 and BC (p. 66) refer to simplifications in G1-6. However, the amended requirements regarding "payment practices" are still questionable. While the objective of G1-6 is theoretically understandable (to have visibility regarding how undertakings engage with and support SMEs - Questionnaire, p. 23) this objective does not seem achievabel in practice. The objective of G1-6 states that the disclosure is to provide an understanding of the contractual payment terms ... especially with regard to late payments to SMEs. However, this objective cannot be met with the disclosure requirements in the paragraph that follows. On a minor note, par 12 does not provide for a disclosure regarding "late payments to SMEs" so this information cannot be derived from par. 12. In addition, par 12 remains unclear about how the disclosures are supposed to provide information on the payment practices in relation to SMEs; e.g. (a) requires information on payment terms / percentage aligned with these terms "including SMEs" - would this require a disclosure separately for SMEs or one total disclosure including the number of days for SMEs? [continues in box below]	G1	G1-6 - Metrics in relation to payment practices	11.
Excels	DRSC	(National) standard setter	Germany			I disagree	[continued from box above] Apart from the wording of the DR which does not reflect the objective of G1-6 we got the feedback that there are several issues with this DR: First of all, there often is no "standard payment term" per category of suppliers. More importantly, "SMEs" do not represent one "category of suppliers". To separate SMEs from other suppliers would often not be possible for undertakings as they do not usually categorise their suppliers by size and therefore usually do not have the information on which supplier is an SMEs (also questionable which definition to apply here). As mentioned above, companies have reported back that they do not have "standard payment terms", but that the terms are very different across suppliers (also depending on the request of suppliers as payment terms are often prescribed by the supplier). As a result, there is no "standard payment terms" in regards to SMEs that could be reported. Overall, while G1 par 33(a) (current ESRS Set 1) has been deleted the general issue regarding "payment practices" in general and with regard to SMEs in particular remain.	G1	G1-6 - Metrics in relation to payment practices	11.
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	While consolidating previous scattered datapoints on training into a single provision is understandable, the proposed approach introduces ambiguities. The current wording largely retains original phrasing, resulting in multiple distinctive datapoints in section 10c: general business conduct training (formerly 10g); percentage of high-risk functions/roles trained on corruption and bribery (formerly 21b); board members trained (formerly 21b); and members of the "procurement team" trained. Except for general training, it is unclear whether data should cover these groups regarding business conduct or anti-corruption specifically. Moreover, if these requirements are combined into one larger datapoint, undertakings that previously deemed DR G1-2 on supplier relationships non-material may be unsure whether reporting becomes mandatory under the proposed ED. The term "procurement team" also lacks clarity. We recommend designing training datapoints with clear requirements and ensuring disclosure scope aligns with materiality principles, particularly regarding supplier relationships. Additionally, the percentage of high-risk functions/roles trained provides limited value, as definitions vary across companies, reducing comparability. The first part of §10(c) already offers a sufficient overview of relevant training measures.	G1	G1-2 - Actions related to business conduct	10 c)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	ESRS G1 §18 It is unclear what "lobbying activities" refers to, considering that there is no harmonized regulation across Europe that defines it. Therefore, we suggest amending the definition in the glossary as such: Activities carried out with the objective of influencing the formulation or implementation of policy or legislation, or the decision-making processes of governments, governmental institutions, regulators, European Union institutions, bodies, offices and agencies or standard setters. Such activities include (non-exhaustive list): i.organising or participating in meetings, conferences, events; ii.contributing to/participating in public consultations, hearings or other similar initiatives; iii.organising communication campaigns, platforms, networks, grassroots initiatives; iv.preparing/commissioning policy and position papers, opinion polls, surveys, open letters, research work as per the activities covered by transparency register rules. Activities carried out by, among others, business associations in the exercise of their constitutional functions shall not be considered lobbying activities	G1	G1-5 - Metrics related to political influence and lobbying activities	17
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	It is unclear what "regulators" refers to. Therefore, we would suggest a modification: "The disclosure shall also include information about the appointment of any members of the administrative, management and supervisory bodies who held a comparable political position in public administration (including regulators) in the 2 years preceding such appointment in the current reporting period."	G1	G1-5 - Metrics related to political influence and lobbying activities	18

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	While consolidating previous training datapoints into a single provision is understandable, the proposed approach creates new ambiguities. The wording largely preserves original phrasing, resulting in multiple distinctive datapoints in section 10c: general business conduct training (formerly 10g); percentage of high-risk functions/roles trained on corruption and bribery (formerly 21b); board members trained (formerly 21b); and members of the "procurement team" trained. Except for general training, it is unclear whether data should cover these groups regarding business conduct or anti-corruption specifically. If these requirements are treated as a single, larger datapoint, undertakings that previously deemed DR G1-2 on supplier relationships non-material may be uncertain whether reporting becomes mandatory under the proposed ED. The term "procurement team" is also unclear. We recommend designing training datapoints with clear requirements and ensuring disclosure scope aligns with materiality principles, especially regarding supplier relationships. The datapoint on the percentage of high-risk functions/roles trained adds limited value, as definitions vary across companies, reducing comparability. The first part of §10(c) already provides an adequate overview of relevant training measures.	G1	G1-2 - Actions related to business conduct	10 c)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	ESRS G1 §18 It is unclear what "lobbying activities" refers to, considering that there is no harmonized regulation across Europe that defines it. Therefore, we suggest amending the definition in the glossary as such: Activities carried out with the objective of influencing the formulation or implementation of policy or legislation, or the decision-making processes of governments, governmental institutions, regulators, European Union institutions, bodies, offices and agencies or standard setters. Such activities include (non-exhaustive list): i.organising or participating in meetings, conferences, events; ii.contributing to/participating in public consultations, hearings or other similar initiatives; iii.organising communication campaigns, platforms, networks, grassroots initiatives; iv.preparing/commissioning policy and position papers, opinion polls, surveys, open letters, research work as per the activities covered by transparency register rules. Activities carried out by, among others, business associations in the exercise of their constitutional functions shall not be considered lobbying activities	G1	G1-5 - Metrics related to political influence and lobbying activities	17
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	It is unclear what "regulators" refers to. Therefore, we would suggest a modification: "The disclosure shall also include information about the appointment of any members of the administrative, management and supervisory bodies who held a comparable political position in public administration (including regulators) in the 2 years preceding such appointment in the current reporting period."	G1	G1-5 - Metrics related to political influence and lobbying activities	18
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	While consolidating scattered training datapoints into a single provision is understandable, the proposed approach introduces new ambiguities. The wording largely retains the original phrasing, resulting in multiple distinctive datapoints in section 10c: general business conduct training (formerly 10g); percentage of high-risk functions/roles trained on corruption and bribery (formerly 21b); board members trained (formerly 21b); and members of the "procurement team" trained. Except for general training, it is unclear whether data should cover these groups regarding business conduct or anti-corruption specifically. If these requirements are combined into one larger datapoint, undertakings that previously assessed DR G1-2 on supplier relationships as non-material may be uncertain whether reporting becomes mandatory under the proposed ED. The term "procurement team" also lacks clarity. We recommend designing training datapoints with clear requirements and ensuring that disclosure scope aligns with materiality principles, particularly regarding supplier relationships. The datapoint on the percentage of high-risk functions/roles trained adds limited value, as definitions vary across companies, reducing comparability. The first part of §10(c) already provides an adequate overview of relevant training measures.	G1	G1-2 - Actions related to business conduct	10 c)
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	ESRS G1 §18 It is unclear what "lobbying activities" refers to, considering that there is no harmonized regulation across Europe that defines it. Therefore, we suggest amending the definition in the glossary as such: Activities carried out with the objective of influencing the formulation or implementation of policy or legislation, or the decision-making processes of governments, governmental institutions, regulators, European Union institutions, bodies, offices and agencies or standard setters. Such activities include (non-exhaustive list): i.organising or participating in meetings, conferences, events; ii.contributing to/participating in public consultations, hearings or other similar initiatives; iii.organising communication campaigns, platforms, networks, grassroots initiatives; iv.preparing/commissioning policy and position papers, opinion polls, surveys, open letters, research work as per the activities covered by transparency register rules. Activities carried out by, among others, business associations in the exercise of their constitutional functions shall not be considered lobbying activities	G1	G1-5 - Metrics related to political influence and lobbying activities	17
Excels	Insurance Europe and Insurance CFO Forum	Association of financial institutions	Belgium			I partially agree and partially disagree	It is unclear what "regulators" refers to. Therefore, we would suggest a modification: "The disclosure shall also include information about the appointment of any members of the administrative, management and supervisory bodies who held a comparable political position in public administration (including regulators) in the 2 years preceding such appointment in the current reporting period."	G1	G1-5 - Metrics related to political influence and lobbying activities	18

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	The input refers to G1-2 Paragraph 2 (c): Consolidation of different training purposes and activities could be challenging with view to the IRO mapping process, as it fails to clearly indicate which sub-topic G1-2 Paragraph 2 (c) relates to. Therefore, a more distinct division into the sub-topics is necessary. Especially, the disclosure requirement regarding the procurement team should be separated as it refers to the topic management of relationships with suppliers. The new wording regarding the members of the administrative, management and supervisory bodies is not clear. Recommendation: Revert to the previous text and include 'the extent to which training is given to'. Alternatively, it should be emphasized that external training is also meant in order to prevent potential conflicts of interest.	G1	G1-2 - Actions related to business conduct	7.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	The input refers to G1-3 Paragraph 6: A disclosure requirement regarding the number and nature of confirmed incidents of corruption and bribery is misleading and should be deleted. A high number of incidents seems negative but might also reflect an effective compliance management system with investigation measures in place. In addition, the disclosure requirement contradicts 1. the principle of the presumption of innocence and 2. the principle under German law that offenses do not regularly have to be reported to the authorities, but it is the company's responsibility to adequately address compliance violations within the company. There is no unified scope or definition of the term „corruption incidents", neither in the affected jurisdictions and their criminal codes, nor within the undertakings reporting this KPI. For example: does corruption only mean corruption in the public or also in the private sector? Are cases of conflicts of interests covered? Are only incidents covered with confirmed violations of criminal law or also of a violation against internal rules only? What does "confirmed" mean: indictment by a prosecutor; internally proven; internal assessment that violation is highly probable or only more likely than not? These different assessment methods will lead to confusing reported data.	G1	G1-3 - Targets related to business conduct	7.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	The input refers to G1-5, AR 7 and 8 for para 16: Regarding political contributions further differentiation and explanation is needed (the purpose of a contribution as main criteria): Financial or in-kind contributions to external organizations (e.g. lobbyists, charities, think tanks or trade associations) or non-consolidated companies should only be considered, if granted with the purpose of passing it on to a relevant recipient like political parties, their elected representatives or persons seeking political office.	G1	G1-5 - Metrics related to political influence and lobbying activities	AR 7
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	This application requirements is not clearly defined and prone to diverse interpretation, e.g.: - "shall consider": does this mean that incidents in the upstream/downstream value chain are to be disclosed? - what is meant by "direct involvement"? - does the reporting include information about the "actors"?	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 3
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	This adds an additional disclosure requirements for preparers. We believe that the principle of not increasing reporting requirements should be applied consistently. Even if the datapoint itselbf is not technically complex, the change in status to mandatory will require additional interpretation, internal coordination, and alignment with auditors—especially during first-time implementation. This effort should not be underestimated. From our point of view the ESRS revision should refrain from posing any additional effort to preparers.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.
Excels	ACEA	Business association (other than association of financial institution)	Belgium			I disagree	It is recommended to have a disclosure focus on robust risk mitigation policies, processes, and identification of at-risk roles, not percentages. While clarifying low-risk roles, this overlooks the dynamic nature of global corporations, making a precise percentage of at-risk functions unfeasible.	G1	G1-3 - Targets related to business conduct	10.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	Overall, the structure of G1 chapter is now consistent with other topical chapters, by introducing 'PAT' (Policies, Actions, Targets). This is helpful and adds to the logic order, also of sustainability statements.	G1		
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	We welcome the inclusion of examples for 'functions and/or roles most at risk'.	G1	G1-2 - Actions related to business conduct	AR 2
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	This paragraph introduces a mandatory disclosure 'whether the procurement team is involved in training related to its engagement with suppliers for the improvement of their sustainability performance'. The datapoint is combining very different areas, under Business Conduct header. While understanding these points all relate to training, it is not a helpful structure to combine unrelated areas and have different datapoints 'hidden' in one DR.	G1	G1-2 - Actions related to business conduct	10. (c)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The paragraph mentions 'the undertaking shall disclose (..) training activities (..). This shall include the percentage of functions and/or roles most at risk within the undertaking in respect of corruption and bribery (..)' The disclosure requirement is unclear, what is meant with 'the percentage'? Does it refer to the percentage of functions or roles, out of the total of functions or roles within the company, that are at risk? Or the percentage training completion by this group, which is not what it says?	G1	G1-2 - Actions related to business conduct	10. (c)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	We welcome the inclusion of guidance for 'Convictions', adding to consistency in reporting.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 4
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	We welcome the inclusion of guidance for 'Fines', adding to consistency in reporting.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 5
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	We welcome the explicit reference to the ESRS definition of 'Corruption' and 'Bribery', adding to consistency in reporting.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 6
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	This datapoint has been made mandatory under the ESRS revisions, which is contrary to the general principle of simplifying the ESRSs.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	AR 7 and AR 8 include definitions for the terms used in paragraph 16. This is an example of where definitions are included in the AR, while other definitions (in this case, lobbying activities) are covered in Annex II. This inconsistency is confusing when applying.	G1	G1-5 - Metrics related to political influence and lobbying activities	AR 9
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Please see response in PART 2 template	G1	G1-6 - Metrics in relation to payment practices	20. (a)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I agree	Comment applies to the overall objective of G1 - article 3. It explicitely states that the undertaking only to disclose on the subtopics that are material - like in all other ESRSs except S1. This should be applied to S1 as well.	G1	G1-1 - Policies related to business conduct	7.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Remove reference to payment practices which is not a sustainability topic and does not add decision useful information for readers of the Sustainability Statement	G1	G1 - Objective	4. (b)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The PAT structure does not make sense for some of the G1 - Business Conduct topics, which should be included by all companies as mandatory e.g. Codes of Conduct / Supplier Conduct. Further this now creates significant diversion from other regulation where companies are required to provide more extensive disclosures on business conduct, policies, speak up processes, how business conduct matters are investigated therefore synergies between the Sustainability Statement and other sections of the Annual Report have been lost. Removal of requirements around Speak Up / non retaliation also lead to additional effort being required in Social Dislosures to report on channels / remedy which were cross referenced to G1 by many companies. In addition, it is unclear why reporters have been asked to continue to include information if ABC or whistleblowing policies not in place but no longer a mandate to explicitly say these policies are in place through GDRs.	G1	G1-1 - Policies related to business conduct	7.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	This requirement should be made 'where relevant' as many companies will have a company wide approach to corruption and bribery.	G1	G1-1 - Policies related to business conduct	8. (c)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The PAT structure does not make sense for some of the G1 - Business Conduct topics, which should be included by all companies as mandatory. Actions in relation to business conduct etc are likely to be BAU and part of policies therefore unlikely to be able to meet GDRs, however will still be recognised as material as it only takes one issue to potentially become material from a reputational perspective. Ok for other topics such as Animal Welfare.	G1	G1-2 - Actions related to business conduct	9.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Aligned to retain this requirement but similar requirements need to be kept in policies section to allow for a coherent narrative. Fundamentally EFRAG need to rethink G1 structure and whether some elements need to be retained in addition to PAT GDRs	G1	G1-2 - Actions related to business conduct	10. (b)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Depth of coverage' needs to be removed or better defined. Requirements relating to functions / roles most at risk should be made 'where relevant' as many companies will have a company wide approach to corruption and bribery .	G1	G1-2 - Actions related to business conduct	10. (c)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I partially agree and partially disagree	Disagree with making requirements relating to procurement team involvement in training mandatory. The more relevant data points are to understand how policies are embedded into the value chain and how this is monitored. Also not considering that other teams may be involved in training.	G1	G1-2 - Actions related to business conduct	10. (c)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	The PAT structure does not make sense for some of the G1 - Business Conduct topics, which should be included by all companies as mandatory. In addition, businesses are unlikely to have public targets in these areas nd will be promoting a zero tolerance policy therefore do not feel this is relevant.	G1	G1-3 - Targets related to business conduct	11.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Metrics related to payment practices should be removed as it is not a sustainability topic and does not add decision useful information for readers of the Sustainability Statement. Significant issues would either be reported through the financial statements or other external sources.	G1	G1-6 - Metrics in relation to payment practices	19.
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Definition amended with the deletion of "An incident of corruption or bribery that has been found to be substantiated". This should stay in as such incidents can only be reported once substantiated and confirmed. If not retain, this creates inconsistencies in definition and use of the word "incident" between S and G topical standards and metrics (see further comments in S1)	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 6
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	Regarding paragraph 10(c) 'percentage of functions at risk', we noticed a change from 'percentage of functions at risk covered by training'; the log of amendments clarifies that not all roles within a function may be at risk. While we support reporting the percentage of at-risk functions and administrative, management and supervisory board members covered by training, identifying specific roles within those functions and determining the % of functions at risk in an organization as a datapoint separate from training coverage reduces comparability due to differing role structures and risk assessments, and increases reporting burden without a clear benefit. Noting from the NMIG, this is not the intention of this paragraph, however may be interpreted this way given the current phrasing.	G1	G1-2 - Actions related to business conduct	10. (c)
Excels	The Financial Executives Association (FEA)	Other - please specify (required)	Netherlands			I disagree	We note that examples have been added to AR 2 for paragraph 8(c), clarifying that functions or roles most at risk may include those operating in high-risk countries or interacting with public authorities. While we understand the intent, this addition introduces ambiguity and could lead to unintended consequences, such as EU companies being perceived as singling out foreign governments. In practice, such interactions are already captured through disclosing the functions at risk (e.g. procurement). Under the fair presentation framework introduced in the revised ESRS 1, companies may feel compelled to disclose on these examples where material, which could increase the risk of double counting and create unnecessary complexity including around (legal) sensitivities. We therefore recommend retaining the original phrasing. We propose that this paragraph be repositioned as non-mandatory implementation guidance, rather than an application requirement. This would preserve the original intent of encouraging transparency without imposing prescriptive disclosure expectations that may not be relevant or material for all entities.	G1	G1-2 - Actions related to business conduct	AR 2
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	Clarify in the guidance how UN Convention against Corruption interacts with national laws, such as Sapin II in France	G1	G1-1 - Policies related to business conduct	8. (a)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Delete datapoint on confirmed incidents. Mandatory reporting would pose risks to European companies' competitiveness. It could conflict with the right against self-incrimination guaranteed by the European Convention on Human Rights and expose EU companies to investigations by third-country authorities, such as the US Department of Justice, benefiting non-EU competitors not subject to similar obligations. In the joint statement on a US-EU framework for reciprocal, fair, and balanced trade, the EU is called upon to ensure that the CSRD and CSDDD do not impose undue restrictions on transatlantic trade. Introducing mandatory reporting of confirmed incidents risks creating an unlevel playing field, as US companies may be exempted from comparable constraints. Moreover, reporting confirmed incidents is not a reliable indicator of anti-corruption policy effectiveness. A low number of incidents could reflect strong preventive measures, while a high number may indicate a trusted reporting system, particularly through whistleblowing channels. A simple numerical count or brief description of an incident's "nature" cannot capture its context, resolution, or remedial actions.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Delete the data point on the appointment of governance body members who held a comparable position in public administration within the past two years, as it is less relevant than disclosure on financial and in-kind political contributions, and poses implementation challenges	G1	G1-5 - Metrics related to political influence and lobbying activities	18.
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	Maintain a requirement on the management of relationships with suppliers, as these data points are seen as crucial by users to approximate key exposures, assess supplier concentration risks, monitor supply chain resilience, and inform risk management practices Proposed wording: "The undertaking shall provide information about the management of its relationships with its suppliers and its impacts on its supply chain, including: a) a general description of tier 1 suppliers, including, where possible without undue cost or effort, the estimated number of tier 1 suppliers, and, on a voluntary basis, the estimated number of strategic suppliers among them; and b) the percentage of tier 1 suppliers audited and/or evaluated in number and by purchasing amount."	G1	G1-2 - Actions related to business conduct	10. (a)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I partially agree and partially disagree	ANC suggests retaining datapoints on the management of relationships with suppliers (previously addressed under G1-2 and now deleted) as a higher priority compared to the datapoint on the training of procurement teams. These datapoints are particularly important for users to approximate key exposures, assess supplier concentration risks, monitor supply chain resilience, and inform risk management practices. Suggested wording: "The undertaking shall provide information about the management of its relationships with its suppliers and its impacts on its supply chain, including: a) a general description of tier 1 suppliers, including, where possible without undue cost or effort, the estimated number of tier 1 suppliers, and, on a voluntary basis, the estimated number of strategic suppliers among them; and b) the percentage of tier 1 suppliers audited and/or evaluated in number and by purchasing amount." If training for procurement teams is maintained as a datapoint without more information required on policies and actions related to the management of supplier relationships, it may be more appropriate to place it under (d) rather than (c), in order to clearly distinguish supplier relationship management from topics related to functions exposed to corruption risk.	G1	G1-2 - Actions related to business conduct	10. (c)
Excels	Autorité des normes comptables (ANC)	(National) standard setter	France			I disagree	ANC strongly rejects changing datapoints on confirmed incidents from "may" to "shall," as they are highly sensitive and of limited relevance. Mandatory reporting would pose risks to European companies' competitiveness. It could conflict with the right against self-incrimination guaranteed by the European Convention on Human Rights and expose EU companies to investigations by third-country authorities, such as the US Department of Justice, benefiting non-EU competitors not subject to similar obligations. In the joint statement on a US-EU framework for reciprocal, fair, and balanced trade, the EU is called upon to ensure that the CSRD and CSDDD do not impose undue restrictions on transatlantic trade. Introducing mandatory reporting of confirmed incidents risks creating an unlevel playing field, as US companies may be exempted from comparable constraints. Moreover, reporting confirmed incidents is not a reliable metric of anti-corruption policy effectiveness. A low number of incidents could reflect strong preventive measures, while a high number may indicate a trusted reporting system, particularly through whistleblowing channels. A simple numerical count or brief description of an incident's "nature" cannot capture its context, resolution, or remedial actions.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	"Political influence" appears in bold in ED G1 § 4 c) however this concept is not defined in the ED Glossary. We recommend EFRAG provides a definition of this concept. The segregation between "political influence" and "lobbying activities" in the list of ESRS G1 sub-topics (§ 4) intends to show that they are different concepts. However, the objective of DR G1-5 of the ED suggests that "lobbying activities" are included in "political influence" ("provide an understanding of the undertaking's activities and commitments related to exerting its political influence with political contributions, including the types and purpose of lobbying activities"). This aligns with Q&A EFRAG ID 510 which defines lobbying activities as "influencing politics, political decisions, laws and regulations". We recommend that EFRAG provides a definition of "political influence", clarifying whether "political influence" covers both "political contribution" and "lobbying activities" and whether payments made for lobbying activities are included in political contributions.	G1	G1 - Objective	4. (c)
Excels	Ernst & Young	Auditor	United Kingdom			I agree	Amended list of ESRS G1 sub-topics now includes "(unfair) payment practices". We recommend that EFRAG provides a definition for "unfair" payment practices.	G1	G1 - Objective	4. (b)

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Ernst & Young	Auditor	United Kingdom			I agree	ESRS G1 § 10 a) requires disclosing "information about the management of relationships with suppliers". As this datapoint is a datapoint of the "DR G1-2 – Actions related to business conduct", we recommend EFRAG clarifies whether the "information" relates specifically to "actions" or intend to cover other concepts to be disclosed such as governance structures (oversight of supplier relationships), strategic approach and policies (driving the actions). We also recommend EFRAG sharing in NMIG examples of types of actions which could be disclosed in respect of "management of relationships with suppliers" based on already observed practices. Those examples could include : setting an organization dedicated to purchases and supplier relationships with management involvement, or alignment of policies in place within the undertaking and policies included in contractual clauses signed with suppliers to show consistency of policies application all along the undertaking value chain, with references to the parts of the sustainability statements already describing those policies.	G1	G1-2 - Actions related to business conduct	10. (a)
Excels	Ernst & Young	Auditor	United Kingdom			I agree	The definition of "incidents" has been revised in the glossary and now includes : "These include judicial and non-judicial proceedings that have been initiated". We recommend EFRAG to add a definition for "proceedings" as well as examples of "non-judicial proceedings".	G1	G1-2 - Actions related to business conduct	10. (b)
Excels	Ernst & Young	Auditor	United Kingdom			I agree	ESRS G1 § 10 c) requires to disclose "depth of coverage" of "training activities within the undertaking on business conduct". "Depth of coverage" is not defined by the standard or glossary. G1-2 NMIG 3 for para. 10(c) presents an illustrative table including a "Training coverage" section referring to the percentage of trained people and a "Topics covered" section. We recommend the AR to clarify whether "depth of coverage" refers to percentage of trained people AND topics covered during the reporting period or whether "depth of coverage" shall be defined by the undertaking and could refer for example to the level of training (e.g. basic, advanced or expert)	G1	G1-2 - Actions related to business conduct	10. (c)
Excels	Ernst & Young	Auditor	United Kingdom			I agree	Corruption definition included in the ESRS Glossary is very large and we recommend further clarifications by providing : - a definition of "entrusted power" - illustration of incidents that correspond to incidents of corruption or bribery and clarify whether the two following situations are in scope of ESRS G1-4 DR: - accounting manipulation - environmental pollution incident with corruption of agent involved in the investigation.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	12.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We recommend that EFRAG clarify which population is in scope for each datapoint related to G1-4 DR, as there are contradicting elements in the related AR and in NMIG : AR 3 for para 13 and 14 refers to incidents "where the undertaking or its employees are directly involved". AR 4 for para 13 refers to "an individual". Lastly, NMIG 4 4 for para. 14 refers to "own workers". Own workers include employees and non-employees. An individual can be an employee, a non-employee, a worker in the value chain, a member of administrative, management and supervisory board who is an individual within the undertaking organization but not an employee.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 3
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	In the document "Log of amendments ESRS G1 Business Conduct July 2025", AR 4 paragraph for para 13 includes the following wording : "In this context, final decisions include all the decisions in the reporting year while awaiting the outcome of a possible appeal. The reporting undertaking may provide additional information if an appeal is considered, has been lodged or was successful." This wording is not included in AR4 of the ESRS G1 standard ED. We recommend that EFRAG adds this wording in ESRS G1 - AR 4 of the standard considering this clarification is key to determine G1-4 metrics in case of a situation where an appeal is pending.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 4
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	We acknowledge EFRAG's effort to clarify convictions and fines. We note that EFRAG has specified the scope of fines to those "paid to a public treasury" : it should be clarified if it was the intent to deliberately limit the scope, i.e. the public treasury must be the direct recipient of the payment. This could exclude relevant information as in some countries local fines may be paid to other bodies (independent public authorities which are not the public treasury), or proceedings could lead to payment to third parties or foreign authorities.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 5
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	Scope of ESRS G1 § 14 covers incidents "that occurred during the reporting period". G1-4 NMIG 4 for para. 14 suggests including in corruption and bribery cases the "cases that were initiated in previous years where the outcome was only established in the current reporting period." We recommend that EFRAG transfers this NMIG 4 into an AR related to DR G1-4 as this clarification is key to ensure the information is comparable across undertakings (material incidents which were substantiated during the reporting period but occurred before the reporting period should be covered by the sustainability statement).	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.
Excels	Ernst & Young	Auditor	United Kingdom			I partially agree and partially disagree	G1-5 NMIG 5 for para. 17 suggests to check the alignment between an undertaking's public statements on its material IRO and its lobbying activities. This was previously included in ESRS G1 AR 14 (Set 1). We recommend EFRAG retains this aspect into an AR related to G1-5 § 17 as it is necessary to ensure consistency and transparency on whether the lobbying activities are supportive, contradictory or neutral to the company's sustainability commitments. We also recommend that EFRAG adds into NMIG examples of ways to conduct lobbying activities based on 2024 observed disclosures such as implementation of a Public Affairs department or registration in transparency register.	G1	G1-5 - Metrics related to political influence and lobbying activities	17.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Ernst & Young	Auditor	United Kingdom			I agree	We recommend that EFRAG defines "SME" or clarify that it should align with the criteria set in the accounting directive. G1-6 § 20 a) requires description of payment terms by main category of suppliers, including SMEs. It is unclear whether SME information is required irrespective of the materiality of this supplier category from the perspective of the undertaking. This is considering the CSRD objective (protection of SMEs), the DR objective (understanding payment terms "especially with regard to late payments to SMEs") and the requirement itself. Transactions with SMEs may not be material from the perspective of the undertaking. If the intention is to address sspecific users' needs, we recommend to clearly state it in a standalone requirement for SME specific payment practice – distinct from other suppliers. We recommend EFRAG clarifies in AR whether the percentage of payment aligned with standard terms shall be computed based on: - the number or the amount of invoices, - the payments including or excluding reverse factoring transactions, - the population of all payments made during the reporting period including invoices received or dated in a different reporting period. We also recommend adding in NMIG 6 illustrative figures in the "Standard payment terms (days)" column.	G1	G1-6 - Metrics in relation to payment practices	20. (a)
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The input refers to G1-2 Paragraph 2 (c): Consolidation of different training purposes and activities could be challenging with view to the IRO mapping process, as it fails to clearly indicate which sub-topic G1-2 Paragraph 2 (c) relates to. Therefore, a more distinct division into the sub-topics is necessary. Especially, the disclosure requirement regarding the procurement team should be separated as it refers to the topic management of relationships with suppliers. The new wording regarding the members of the administrative, management and supervisory bodies is not clear. Recommendation: Revert to the previous text and include 'the extent to which training is given to'. Alternatively, it should be emphasized that external training is also meant in order to prevent potential conflicts of interest.	G1	G1-2 - Actions related to business conduct	7.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The input refers to G1-3 Paragraph 6: A disclosure requirement regarding the number and nature of confirmed incidents of corruption and bribery is misleading and should be deleted. A high number of incidents seems negative but might also reflect an effective compliance management system with investigation measures in place. In addition, the disclosure requirement contradicts 1. the principle of the presumption of innocence and 2. the principle under German law that offenses do not regularly have to be reported to the authorities, but it is the company's responsibility to adequately address compliance violations within the company. There is no unified scope or definition of the term „corruption incidents", neither in the affected jurisdictions and their criminal codes, nor within the undertakings reporting this KPI. For example: does corruption only mean corruption in the public or also in the private sector? Are cases of conflicts of interests covered? Are only incidents covered with confirmed violations of criminal law or also of a violation against internal rules only? What does "confirmed" mean: indictment by a prosecutor; internally proven; internal assessment that violation is highly probable or only more likely than not? These different assessment methods will lead to confusing reported data.	G1	G1-3 - Targets related to business conduct	7.
Excels	BMW AG	Preparer (non-financial preparing a sustainability report)	Germany			I disagree	The input refers to G1-5, AR 7 and 8 for para 16: Regarding political contributions further differentiation and explanation is needed (the purpose of a contribution as main criteria): Financial or in-kind contributions to external organizations (e.g. lobbyists, charities, think tanks or trade associations) or non-consolidated companies should only be considered, if granted with the purpose of passing it on to a relevant recipient like political parties, their elected representatives or persons seeking political office.	G1	G1-5 - Metrics related to political influence and lobbying activities	AR 7
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	The requirements of G1-5 should be clarified to affirm that the disclosure is associated with the EU and its member states in recognition of the fact that not all jurisdictions have regulatory structures akin to the EU Transparency Register and substantial investment would be required for firms to collect, track and report information from third parties that may be required given broad definitions. They also go beyond current EU Transparency Register requirements. In particular, we thought the prior paragraph 29(b)(i) should have been modified to drop the reference to "indirectly" which arguably could be seen to cover payments to trade organizations that may engage with political officials either through conferences/lunches or through direct contributions. Such activity may have little connection to material ESG issues (e.g. meeting to discuss rules for participating in local check clearing market), and the EU would still have the benefit of the EU registrations and disclosures for EU-related activity under the existing EU Transparency Register. The exposure draft does not clarify this, and we ask that this is considered further.	G1	G1-5 - Metrics related to political influence and lobbying activities	16.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Since, as noted in G1-4, this disclosure requirement has been included to support the information needs of financial market participants subject to Regulation (EU) 2019/2088, it is not directly applicable in the context of private companies, and therefore should be excluded or at least caveated to exclude private companies.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	13.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	It is recommended to maintain as a voluntary disclosure to avoid unintended legal and agency implications. Requiring legal violation disclosure imposes a new, potentially serious obligation in Europe where no affirmative duty currently exists.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	14.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	Reporting of this information is already required in (most) EU constituencies, and this datapoint includes requirements that are not only redundant, but that also exceed the scope of existing EU legislation, introducing new obligations not required under the Transparency Register framework.	G1	G1-5 - Metrics related to political influence and lobbying activities	16.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	For privately and in particularly family-held company this could include sensitive information and even information relating to minors in certain circumstances. While the ESRS has stated that the purpose of these included data points is to enhance transparency for investors and stakeholders, it is reasonable that the ESRS should take into account the specific perspective and context that private companies operate in to make appropriate rules for reporting that that may be distinct from those applicable to publicly listed companies. This is another one of those cases, as this data point requires the reporting of business sensitive information held by a privately-held company that is generally otherwise not subject to public disclosure. Further, this requirement improperly limits flexibility. The IFRS allows for principles-based disclosures, while ESRS imposes structured datapoints, which may not suit all governance models (especially US-based or family-owned firms). Instead, companies should be able to screen applicable categories for materiality and to limit disclosures to material items.	G1	G1-5 - Metrics related to political influence and lobbying activities	18.
Excels	American Chamber of Commerce to the EU	Business association (other than association of financial institution)	Belgium			I disagree	It is recommended to have a disclosure focus on robust risk mitigation policies, processes, and identification of at-risk roles, not percentages. While clarifying low-risk roles, this overlooks the dynamic nature of global corporations, making a precise percentage of at-risk functions unfeasible.	G1	G1-3 - Targets related to business conduct	10. (c)
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	If these specific categories of delivery files are requested, we cannot provide any information. Mining suppliers are not sorted into categories in any way. If these specific supplier categories are required,it is not possible to provide any information - and often it is not feasible to determine whether a supplier is an SME, as no data is available for this purpose. The terms and conditions are very often specified by our suppliers or agreed upon individually -> In the case of individual agreements, there is therefore an automatic deviation from the standard.	G1	G1-6 - Metrics in relation to payment practices	20.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	The wording of the objective of G1-6 is not reflected in the corresponding requirements.	G1	G1-6 - Metrics in relation to payment practices	19.
Excels	Euromines	Business association (other than association of financial institution)	Belgium			I disagree	Accordingly, we would have to say whether ALL suppliers are complying with the payment terms. However, this is not possible because not all companies are managed in SAP and not all companies have their own defined payment terms – this would require time-consuming manual queries	G1	G1-6 - Metrics in relation to payment practices	20. (a)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	It is unclear to which paragraphs the AR refers to (also AR 4-6). Paragraphs 13/14 do no longer exist in the amended ESRS. Update of references/paragraphs needed.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	AR 3
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	Considering the EFRAG Explanations January - May 2024 (final version,page 95), the following issues are identified: 1. It focuses solely on first-instance convictions of natural persons, including non-final decisions, leading to a lack of transparency and contradictions with the ECRIS, which only records final convictions. 2.The CSRD approach lacks transparency by mixing final and non-final convictions. A final conviction has more significance than a non-final decision. 3.Th approach fails to distinguish between the severity of convictions of board members versus employees, and it does not consider cases where the company itself is sanctioned for corruption or bribery, either through criminal proceedings or administrative fines. Relevant national registers for legal entities are disregarded by the CSRD as well. Cases where a company is sanctioned for corruption or bribery are important, as they indicate systemic issues rather than individual excesses. 4.Additionally, the reliance on information from accused individuals creates reliability issues, as court proceedings often occur years after the offense, and the employees may no longer be with the company. 5.The focus on payable fines for convictions of natural persons overlooks prison sentences (and their suspension if applicable), which are indicators of the severity of the crime.	G1	G1-4 - Metrics related to Incidents of corruption or bribery	5. (a)
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	By deleting "for financai or in kind political contributions", the requirements seem to suggest that the total monetary calue of financial and in-kind political contributions for "political influence" needs to be disclosed. This in turn would increase the reporting burden for companies as it widens the defition of the metrics to be reported to general political influence , while at the same time being open for interpretation. Generally, the collection of information for this datapoint requires a lot of effort and raises legal concerns especially related to in-direct financial contributions outside of the EU, which is why we would suggest to limit the scope from "global! to "EU and Member States" or delete the datapoint. Alternatively, further clarification on the scope needed.	G1	G1-5 - Metrics related to political influence and lobbying activities	8.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	Suggestion to delete this datapoint as information already disclosed in EU Transparency Register as well as in national Transparency Registers (e.g. Germany, USA) and therefore considered redundant. Additionally, a prioritization of "main topics in lobbying activities" could imply that political activities in one country could be more important or "material" than in another leading to misunderstandings with external stakeholders.	G1	G1-5 - Metrics related to political influence and lobbying activities	9.
Excels	DIGITALEUROPE	Business association (other than association of financial institution)	Belgium			I disagree	The requirement to report on "standard payment terms" and supplier categorization presents significant practical challenges. The metric lacks clarity in international contexts and provides limited value for understanding supplier relationships. Tracking supplier categories by size would require substantial system changes, while reporting legal proceedings related to late payments without context offers little decision-useful information, especially since material cases are already covered in legal risk reporting. These requirements create unnecessary administrative burden without adding meaningful value to sustainability reporting.	G1	G1-6 - Metrics in relation to payment practices	12.
Excels	Polish Chamber of Chemical Industry	Business association (other than association of financial institution)	Poland			I partially agree and partially disagree	The concept of a "function exposed to corruption" is not defined. In practice, companies often state that they do not identify such functions, leading to a lack of disclosures. More detailed guidance is needed to ensure meaningful and comparable reporting.	G1	G1 - Interaction with other ESRS	1.

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	UNESPA (Spanish Association of Insurers and Reinsurers)	Association of financial institutions	Spain			I disagree	It is necessary to clarify that business associations, when exercising their constitutional functions, shall not be regarded as engaging in lobbying activities. Therefore, in the interest of legal certainty, we would suggest incorporating the following final sentence at the end of the definition of lobbying activities, specifically in the 'Glossary' section: "Activities carried out with the objective of influencing the formulation or implementation of policy or legislation, or the decision-making processes of governments, governmental institutions, regulators, European Union institutions, bodies, offices and agencies or standard setters. Such activities include (non-exhaustive list): i. organising or participating in meetings, conferences, events; ii. contributing to/participating in public consultations, hearings or other similar initiatives; iii. organising communication campaigns, platforms, networks, grassroots initiatives; iv. preparing/commissioning policy and position papers, opinion polls, surveys, open letters, research work as per the activities covered by transparency register rules. Activities carried out by, among others, business associations in the exercise of their constitutional functions shall not be considered lobbying activities."	G1	G1-5 - Metrics related to political influence and lobbying activities	17.
Excels	UNESPA (Spanish Association of Insurers and Reinsurers)	Association of financial institutions	Spain			I disagree	It is also recommended that the Spanish translation of 'lobbying activities', currently rendered as 'grupos de presión', be changed to 'grupos de interés', in accordance with recent national regulatory developments	G1	G1-5 - Metrics related to political influence and lobbying activities	17.
Excels	Reclaim Finance	NGO	France			I disagree	Paragraph 17 states that: "The undertaking shall briefly disclose, for lobbying activities, the main topics covered by these activities and its main positions on these, including explanations on how this interacts with its material impacts, risks and opportunities identified in its materiality assessment (See [Draft] Amended ESRS 2 IRO-2)." While this is fully relevant, it is stricking to see that no direct link is made between the lobbying activities and the climate transition plan in E1-1. Disclosures on assumptions regarding the transition plans are also required, and yet entities would not provide information on how this is reflected in their own advocacy and lobbying activities. For consistency, we therefore recommend the Efrag to require entities to report on how their lobbying activities are compatible and contribute to the achievement of their climate transition plan (in G1-5 or in E1-1).	G1	G1-5 - Metrics related to political influence and lobbying activities	17.
Excels	Reclaim Finance	NGO	France			I partially agree and partially disagree	The monetary amounts devoted to political activities beyond "political contributions" (for example through spending on a public policy department, hiring private lobbyists, organizing events..) should also be disclosed.	G1	G1-5 - Metrics related to political influence and lobbying activities	16.
Excels	Reclaim Finance	NGO	France			I disagree	The current wording do not cover the lobbying activities carried out through representative organizations. Yet we know that the bulk of lobbying activities go through these bodies and can have large consequences on policies. We would therefore recommend the mandatory disclosure of elements on how the activities of these organization is coherent with the ones of the entity and its own targets and plans.	G1	G1-5 - Metrics related to political influence and lobbying activities	17.
Excels	Ascendia EOOD	Consultant (including software vendor)	Bulgaria				ACTUAL: The objective of sustainability reporting prepared in accordance with the ESRS is to present fairly (see Chapter 2) the undertaking's material impacts on people and environment, as well as the material sustainability risks and opportunities (collectively referred to as 'impacts, risks and opportunities') in relation to environmental, social and governance topics. Reporting under these two perspectives constitutes the double materiality principle. An ESRS sustainability statement covers governance, strategy, policies, actions, targets and metrics for topics related to material impacts, risks and opportunities. PROPOSED: The objective of sustainability reporting prepared in accordance with the ESRS is to assist informative decision making by external and internal stakeholders of the reporting entity through establishing structural approach to fairly disclose information related to undertakings impacts, risks and opportunities on people and environment. An ESRS sustainability statement covers governance, strategy, policies, actions, targets and metrics for topics related to material impacts, risks and opportunities.	ESRS1		3
Excels	Ascendia EOOD	Consultant (including software vendor)	Bulgaria				ACTUAL: The undertaking shall update the conclusions of the materiality assessments conducted in the previous reporting periods to take into account changed circumstances and/or assumptions. Because of changes in its individual circumstances or in the external environment, some types of information included in its ESRS sustainability statement for prior periods might no longer be material; conversely, some types of information not previously disclosed might become material. PROPOSED: The undertaking shall review its DMA on annual basis and adjust it if needed by considering significant/critical changes in the internal and external environment. Following this regular monitoring the information presented in a Sustainability statement from previous period may be no longer material and/or new material information may be disclosed.	ESRS1		29
Excels	Ascendia EOOD	Consultant (including software vendor)	Bulgaria				ACTUAL: The impact materiality assessment corresponds to the identification of information that relates to the undertaking's material actual or potential, positive or negative impacts on people or the environment over the short, medium or long term. Impacts include those connected with its own operations, products, or services, including through business relationships in its upstream and downstream value chain. Business relationships are not limited to direct contractual relationships. PROPOSED: The impact materiality assessment includes established processes for identification, analyses, assessment and monitoring of undertakings social and environmental impacts covering its own operations and its value chain. Undertaking`s risk management system shall be able to identify and assess such impacts as they may be linked to significant operational, strategic, compliance and financial risks and/or opportunities. For the purpose of sustainability reporting the impacts are grouped in potential/actual negative and potential/actual positive.	ESRS1		30
Excels	Ascendia EOOD	Consultant (including software vendor)	Bulgaria				ACTUAL: ..... If the undertaking has taken remediation actions during the reporting period to address actual negative impacts, these actions shall not be considered when assessing the materiality of the impact. Where the impact is deemed material based on this assessment, the undertaking shall disclose the remediation actions undertaken and their expected or actual outcomes. PROPOSED: Actions taken during the reporting year to remediate material impact shall be reported, including their expected or actual outcomes.	ESRS1		34

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Ascendia EOOD	Consultant (including software vendor)	Bulgaria				ACTUAL: For actual negative impacts, materiality shall be based on the severity of the impact. For potential negative impacts, it shall be based on a combination of the severity and likelihood of the impact. Severity shall be based on the following factors: the scale, scope and irremediable character of the impact. In the case of a potential negative human rights impact, the severity of the impact takes precedence over its likelihood. PROPOSED: The assessment of impacts considers several factors as follows: a) for actual negative impact – scale and irremediable character of the impact (severity); b) for potential negative impact – severity and likelihood; c) for actual positive impact – scale; d) for potential positive impact – scale and likelihood.	ESRS1		31
Excels	Ascendia EOOD	Consultant (including software vendor)	Bulgaria				ACTUAL: The following are two examples of impacts that are connected with the undertaking: ..... PROPOSED: The following are two examples of impacts that relate to the undertakings value chain:	ESRS1		AR 6
Excels	Ascendia EOOD	Consultant (including software vendor)	Bulgaria				ACTUAL: The severity is assessed based on a combination of its factors, i.e. scale, scope and irremediable character. The undertaking shall also take into account the practical considerations mentioned in AR 18(b): (a)scale: how serious the negative impact is or how beneficial the positive impact is for people or the environment; (b) scope: how widespread the negative or positive impacts are. In the case of environmental impacts, the scope may be understood as the extent of environmental damage or a geographical perimeter. In the case of impacts on people, the scope may be understood as the number of people adversely affected; and c) irremediable character: whether and to what extent the negative impacts could be remediated, i.e. restoring the environment or affected people to their prior state. The severity is assessed based on a combination of its factors, i.e. scale and irremediable character. The undertaking shall also take into account the practical considerations mentioned in AR 18(b): (a) scale: Answers one or more of the following questions: how serious the negative impact is; how beneficial the positive impact is for people or the environment; how widespread the negative or positive impacts are. In the case of environmental impacts, the scale may be understood as the extent of environmental damage or a geographical perimeter. In the case of impacts on people, the scope may be understood as the number of people adversely affected; and (b) irremediable character: Answers the following questions: whether and to what extent the negative impacts could be remediated, i.e. restoring the environment or affected people to their prior state.	ESRS1		AR 7
Excels	Ascendia EOOD	Consultant (including software vendor)	Bulgaria				ACTUAL: (53) In such situations, the undertaking (Chapter 9.2 applies): (a) discloses under the other topic the negative material impacts or material risks together with the actions that cause them, with a cross-reference to the related topic; and (b) provides a description of how the material negative impacts or material risks are addressed under the topic to which they relate. PROPOSED: Not clear. This should be subject to undertaking`s own preferences under which topic to present the relevant information as long as there is a proper references.	ESRS1		44
Excels	Ascendia EOOD	Consultant (including software vendor)	Bulgaria				ACTUAL: The information reported about policies, actions, and targets shall include upstream and/or downstream value chain information only when (and to the extent that) those policies, actions and targets address material impacts, risks and opportunities in the value chain. With reference to metrics, in many cases, in particular for environmental topics for which proxies are available, the undertaking may be able to comply with the reporting requirements by using an estimate without collecting data from the actors in its upstream and downstream value chain, especially from SMEs, such as, for instance, when calculating its greenhouse gas ('GHG') Scope 3 emissions (see Chapters 7.2, 7.3 and 7.4). PROPOSED: The reported Policies, actions and targets shall include upstream and/or downstream value chain information only when (and to the extent that) the value chain is within their scope.	ESRS1		67
Excels	Ascendia EOOD	Consultant (including software vendor)	Bulgaria				General comments: Actual negative impacts table 1)the title of column 1 to be "Material impacts" 2)the question "How to assess" from column 2 and 3 to be deleted as the information provided do not answer the question	ESRS1		APPENDIX C
Excels	Ascendia EOOD	Consultant (including software vendor)	Bulgaria				Potential impacts table: 1)the title of column 1 to be changed to " Material potential impacts where:" 2)the question "How to assess" from column 2 and 3 to be deleted as the information provided do not answer the question 3)C1,R1 to add at the end: in the reporting year; 4)Please clarify the text in C1,R2 and R4 as currently it is not clear what is the difference between those two cases; 5)In my opinion the material potential impacts should be reported in all casas no matter whether it is remediated or not, otherwise the readers of the report will be not able to follow up the status of the impacts reported during the years. In addition, in most of the cases companies have significant inherent risks (such as potential incidents/accidents) that may lead to material impacts (such as dead, other serious injuries, environmental contamination and etc.). Usually such risks have a permanent character and cannot disappear for the next reporting periods. The undertakings should be able to report what kind of internal controls (policies, procedures, instructions and other actions) are in place in order to manage those significant inherent risks and respectively their potential impacts.	ESRS1		APPENDIX C
Excels	Ascendia EOOD	Consultant (including software vendor)	Bulgaria				ACTUAL: The undertaking shall state that the general requirements of ESRS 1 have been applied for the preparation of its sustainability statement with an indication either (i) that none of the provisions listed in ESRS 2 paragraph 5 apply, or (ii) of which of the provisions listed in ESRS 2 paragraph 5 have been applied, leading to the disclosure of information required in the relevant paragraphs of ESRS 1: PROPOSED: .... In ESRS 2 paragraph 4	ESRS2		5
Excels	Ascendia EOOD	Consultant (including software vendor)	Bulgaria				ACTUAL: When reporting on policies, actions and targets, the undertaking shall report relevant information, avoiding information that is boilerplate, and therefore not relevant for users for example when policies and actions have been implemented to comply with law and regulation, or when the necessary information is already provided in accordance with [Draft] Amended ESRS 2 SBM-1. PROPOSED: ..... have been implemented to comply solely with low and regulations....." Pls. take into account that companies have many HSE policies and actions relevant to this reporting but in the mean time required by low.	ESRS2		AR 28

Source	Company	Type of responder	Country	Question No	Question Text	Selected answer	Comment/Suggestion	Standard	Related Chapter/DR	Paragraphs
Excels	Ascendia EOOD	Consultant (including software vendor)	Bulgaria				PROPOSED: Do not agree that the information is not important compared to other DR. The existence of integrated RM system is crucial for stakeholders to understand whether IRO`s are managed in a systematic, smart and regular basis or on ad hoc/accidental manner. Also, this provides additional information regarding the maturity of the management to govern in efficient and effective way by focusing on significant risks, impacts and opportunities.	ESRS2		26 (e) (f)
Excels	Ascendia EOOD	Consultant (including software vendor)	Bulgaria				RELATED TO GDR-T: Still not clear whether the DR are aiming to present targets related to the strategic sustainability goals of the company or to its material risks, impacts and opportunities. The DRs are mixing both type of targets.	ESRS2		GDR-T
Excels	The Financial Executives Association (FEA)	Business association (other than association of financial institution)	Netherlands				Typo: It states "...uses cobalt in its products, which is minded by using children labour...". I think it would either be "by using children" or "using child labour"	ESRS1	3.3.1 Impact materiality assessment	AR 6 for para 30.
Excels	The Financial Executives Association (FEA)	Business association (other than association of financial institution)	Netherlands				Typo: Type in sentence, it states "dt'	ESRS1	7.8 Classified and sensitive information, and information on intellectual property, know-how or results of innovation	101
Excels	The Financial Executives Association (FEA)	Business association (other than association of financial institution)	Netherlands				Typo: Typo under a, where it should be "percent" instead of "per cent"	ESRS2	SBM-1 - Strategy, business model and value chain	AR 10
Excels	The Financial Executives Association (FEA)	Business association (other than association of financial institution)	Netherlands				Typo: APPLICATION REQUIRMENTS instead of APPLICATION REQUIREMENTS	G1	Objectives	3
Excels	The Financial Executives Association (FEA)	Business association (other than association of financial institution)	Netherlands				Typo: and inESRS S1-S4.. -> misses space and includes two '.'	ESRS2	IRO-1 - Description of the process to identify and assess material impacts, risks and opportunities and material information to be reported	AR 21
Excels	The Financial Executives Association (FEA)	Business association (other than association of financial institution)	Netherlands				Typo: Can remove a in this sentence: a free, prior and informed consent	E4	E4-4 - Targets related to biodiversity and ecosystems	AR 5